

Privacy Policy

ELI5: The “ELI5” / “Explain it like I’m five” is our attempt to make these boring but important topics more accessible to you. The info in the ELI5 headers is not legally part of the document, but an honest and brief summary for your convenience. Your full read of this document is still needed.

1. GENERAL

ELI5: Your privacy is extremely important to us. This document sets out how we protect your privacy. We provide you with a sustainability service where you can leverage your own data to become a more informed and sustainable consumer. Your data deserves to be working for you, and not to be sold like a commodity to unidentified third parties.

The main purpose of Gokind using your personal data is to allow us to provide you with our sustainability service, and letting you reap the rewards of the service. We will give you automatic insights into what your brands are doing and not doing. You link your bank/card solution in the Service since this will result in the best and most automatic way for us to guide and nudge you into sustainable solutions. To be clear, the link you provide does not in any way allow us to manage transactions on your accounts and cards. You remain in full control.

If you have any questions check out our FAQ and our Terms of Service, any if you still feel confused then you are more than welcomed to contact us at gdpr@gokind.co and our data protection officer at dpo@gokind.co.

1.1

This privacy policy (the “**Privacy Policy**”) is made by Gokind AB (“**Gokind**”, “**we**”, “**us**”), corporate registration number 559226-0128, registered in Stockholm, Sweden. Your privacy is at the core of our services. We provide you with a sustainability service where you can leverage your own data to become a more informed and sustainable consumer. Your data deserves to be working for you, and not to be sold like a commodity to unidentified third parties. The main purpose of Gokind using your personal data is to allow us to provide our service obligation towards you, letting you reap the rewards of our service, and also optimizing your experience of our service. The purpose for each of our data processing activities is clearly defined in this Privacy Policy. This Privacy Policy also refers to our Terms of Service (the “**TOS**”), which can be viewed in our Application and on our website.

1.2

You can reach us by e-mail at gdpr@gokind.co and we are the data controller for the processing of your personal data. We trust that this Privacy Policy answers your questions about our collection, use, protection and disclosure of your personal data. If you have additional questions, please contact us on the address or e-mail address provided above. If you specifically want to reach our appointed data protection officer (our DPO), then you can mail the DPO directly: dpo@gokind.co. We are here to help you and improve so do not hesitate to fire away questions or suggestions to us.

1.3

Based on your transaction data and the information that you provide in connection with registration for and use of the service we will continually provide you with our service, which includes us using our best efforts to provide you with access and insights into the sustainability, equality and transparency work of brands, products and services (including the lack thereof) that are relevant to you and nudge you into discovering brands, products and services, and rewards, campaigns and other benefits relating to such, that we and our community of users consider to be forthcoming in terms of sustainability, equality and/or transparency. This includes us showcasing brands, products and services, and rewards, campaigns and other benefits, from providers that we believe, based on our sustainability, equality and transparency model and the data you provide to us, to be better or on par with your current consumption choices. The above service is defined in this Privacy Policy as the “**Service**”. A more elaborative description of the Service and its features are set out in the TOS.

1.4

Please note that you must be aged 13 years or older to use the Service. Please do not use the Service or provide us with any personal information if you are under 13 years of age.

1.5

The Service is provided for consumer users (“**users**”). The Service is provided through our web application (“**Web App**”) we provide or by downloading any of our mobile applications (the “**Mobile App**”; available on e.g. iOS and Android) to your mobile device (the Web App and the Mobile Apps jointly referred to as the “**Application**”).

1.6

This Privacy Policy explains which data we collect about you and how it is processed and shared and which measures we have taken to keep your data secure. It also describes what rights you have regarding your personal data.

1.7

When you use or register as a user, or otherwise interact with us, you acknowledge that you understand that we collect, retain and use your personal data in accordance with this Privacy Policy.

1.8

This Privacy Policy applies to the personal data we collect about you in connection with your use of our Service and the Application. The Privacy Policy does not apply to your personal data collected independently by any of our partners and Gokind disclaims any responsibility for the data processing conducted by such partners.

2. AMENDMENTS

ELI5: You will always find an up-to-date version of the Privacy Policy in our Application. We may change these terms, but then we will inform you.

2.1

We may amend this Privacy Policy from time to time. If we do so, the amended Privacy Policy will enter into force when we publish it within the Application and on our Website.

2.2

If any amendment makes the Privacy Policy less protective of your personal data, such amendment will not apply to data we collected about you before the amendment was made. The amendment will, however, apply to such data if you provide your consent to the Service and/or to the new version of the Privacy Policy, or if you provide new information or restate the same information after the entry into force of the amendment.

3. COLLECTION

ELI5: So what data do we process? When you register and set up your transaction link (the link with your bank/card), then this allows us to match your transactions with our sustainability data.

The transaction data contains the vendor, transaction text, amount and date. We will not access or provide you with any aggregated/consolidated account information service. So we will not know how much cash or credit you have on your account or card.

The service we provide you with uses credits, rewards, campaigns and information on sustainable products and services. This will mean that there will be data relating to how you use these , which we need to process to have our service functioning.

3.1

What information we collect.

We collect the personal data which has been provided by you or collected in the Service. For users, the personal data we process consists of the following:

3.1.1 Registration.

When you register as a user we collect and store your user information, including your full name, personal identification number, email-address and region data (jointly "**Registration Data**"). The Registration Data you provide will be verified for security reasons when you authenticate yourself towards your banking provider. The verification process will include Registration Data being cross checked with the relevant population register, and any changes of your Registration Data based on the check with the population register will be visible to you in the Application.

3.1.2 Payment account linking.

When you link your accounts and/or card solutions, such as debit card, credit card, checking account and/or investment account to the Service (the "**Transaction Link**") we ask you to provide your bank/card provider, account, card or payment account details and the other information as necessary for such Transaction Link(s) (jointly "**Linking Data**").

3.1.3 Transactions.

When using the Service, we automatically collect from the Transaction Link relevant transaction data needed for us to perform the Service. On the basis of your acceptance of the TOS (which is a prerequisite to use the Service), including your acceptance to create and uphold the Transaction Link, the financial institution(s) where you have the account(s) and/or the card issuer(s) of your card(s) (jointly the "**Transaction Issuers**") will disclose to Gokind information about the purchases and payments that you make using your linked payment methods, such as purchase amount, transaction text, merchant information and date (jointly "**Transaction Data**"). The Transaction Data will not cover data older than six months from your initial registration as

User. The historical data may be part of the Service, where you get retroactive credits, and also can gradually see how the Service has affected your sustainable consumption.

We will not access or provide you with any aggregated/consolidated account information service. So we will not know how much cash or credit you have on your account or card or how this has varied over time. We are not able to do this since that would constitute so called account information services requiring separate permits. The Service integrates with the open banking provider Tink, and when you use the Service you have separately accepted Tink's terms and conditions and privacy processing. We have intentionally limited our access and presentation of your data that you make available via the Transaction Link, not to provide you with account information services, like traditional banking apps do. We are here to provide you with a sustainability service.

3.1.3 Use of rewards, offers and orders for products and services.

We collect data from you when you use rewards, campaigns and product and service offerings from time to time available in the Application. For example, this includes data on whether you have redeemed a reward or used an offer, as well as how these interactions affect your credits in the Application (the TOS describes in detail the credit schema of the Application); (jointly "**Credit and Offer Data**").

3.1.4 Uploaded information and data created by you.

We collect data from you when you enter or upload data through forms and other communication submissions in our Service, such as preferences, interests, settings and whether or not you wish to receive marketing from us and any messages to our support team (jointly "**User Content and Preference Data**"). The User Content and Preference Data also includes the suggestions, tips and contributions you as User provide via the Applications contribution features, e.g. your suggestions on brands and sustainability aspects that we should cover in the Service.

3.1.5 Collection of general, statistical and security data.

We use device identifiers and similar technologies to recognize you across the Service and when using different devices. We use logins, cookies, device information and internet protocol addresses to identify you and log your use (e.g. from what device you have entered your pin code to access an instance of our Application). If you set your mobile device or your web browser not to accept cookies, or similar such as permission to use local storage, the Service will not function as intended. (jointly "**Admin Data**").

3.1.6 Other information.

We may also collect other technical information related to your use of the Service, such as browser information, any website from which you have been referred; pages you visit in the Service, and your IP-address; and location information ("**Usage Data**").

3.2

How we collect your information.

We collect your personal data directly from you in connection with your visit or registration on the Service, or when you use our Service by for example earning credits and redeeming rewards, or contacting us by mail, e-mail, chat, forms in Application or via telephone.

We collect your data through the Application, from the Transaction Link(s) you have established with our Application. This information will be transferred automatically to Gokind after you have approved the TOS and this Privacy Policy, and have successfully authenticated yourself towards the Transaction Issuer(s) (e.g. your bank or card provider).

We may combine information that you have provided to us with information from other sources, such as information which confirms your card/payment account details or your Registration Data. We do this in order to ascertain the correctness of the information we are collecting, and to be able to provide a better Service.

4. PROCESSING PURPOSE

ELI5: This is important. We are not here to overuse data, we are here to provide you with a sustainability service that appeals to and creates a positive impact for as many citizens as possible. Simplicity and ease of use is therefore key. Your data will not be used in any way that is in conflict with the purpose for which it was collected.

The core of our operations is to deliver to you one of the best and most easy to use sustainability services. Based on your transaction data and the information that you provide in connection with registration for and use of the service we will continually provide you with our service, which includes us using our best efforts to provide you with access and insights into the sustainability, equality and transparency work (including the lack thereof) of brands, products and services that are relevant to you and nudge you into discovering brands, products and services, and rewards, campaigns and other benefits relating to such, that we and our community of users consider to be forthcoming in terms of sustainability, equality and/or transparency.

This includes us showcasing brands, products and services, and rewards, campaigns and other benefits, from providers that we believe, based on our sustainability, equality and transparency model and methodology, and the data you provide to us, to be better or on par with your current consumption choices.

Processing relating to analyzing your purchases and processing your transactions are necessary for us to fulfill our contract obligations to deliver the service to you under our terms of service. Without e.g. the transaction link with your bank/card provider, the service would be impossible to achieve.

We love examples. If you buy from provider A and based on our sustainability mapping as part of our service, it is deemed that provider B would provide a relevant or more sustainable solution to you, then insights about the existence of provider B and its rewards, offers and other information on provider B's products and services may be published to you in the Application based on your previous purchase(s) with provider A. This personalized communication and nudging are at the core of our contract obligations to deliver the Service to you.

In case we do marketing communication to you that is not part of our service and which is directed to you based on your purchases visible via the transaction link then we always need your explicit consent! For example if we make available to you a product reward or campaign of a merchant that is not tied to us delivering the service to you - to promote sustainability - but

instead constitute personalized marketing on other grounds, then we need your consent. We call this type of communication “tailored tips” / “personalized non-service marketing”. If you accept this you can always later and at any time withdraw this acceptance. Believe us we do not want to send you junk where we cannot see a positive sustainability impact, so this type of communication should be very limited if you consent. After all Gokind is all about creating positive impact, not to push stupid spam or ads.

Your personal data will not be used in any manner that is incompatible with the purpose for which it was collected. Please note that certain data can be used even without your consent, for example if we need the data to provide our Service. We process your personal data for the purposes set out in this section 4 below.

4.1 Provide our Service.

As stated above, the core of our operations is to deliver to you one of the best and most easy to use sustainability services. Based on your Transaction Data and the information that you provide in connection with registration for and use of the service we will continually provide you with our Service, which includes us using our best efforts to provide you with access and insights into the sustainability, equality and transparency work of brands, products and services (including the lack thereof) that are relevant to you and nudge you into discovering brands, products and services, and rewards, campaigns and other benefits relating to such, that we and our community of users consider to be forthcoming in terms of sustainability, equality and/or transparency. This includes us showcasing brands, products and services, and rewards, campaigns and other benefits, from providers that we believe, based on our sustainability, equality and transparency model and methodology and the data you provide to us, to be better or on par with your current consumption choices. As stated above, the above service is defined in this Privacy Policy as the “**Service**”.

We use and process your personal data (including the Transaction Data) in order for us to fulfill our commitment to you to deliver this Service and the features therein (see also the TOS on our service commitment), e.g. to analyze your Transaction Data and our sustainability data, and thereby provide you with customized rewards and offers to deliver our Service to you. This includes showcasing sustainable/impact rewards and offers based on your purchase history and profile.

We love examples. If you buy from provider A and based on our sustainability mapping as part of our Service, it is deemed that provider B would provide a relevant or more sustainable solution to you, then insights about the existence of provider B and its rewards, offers and other information on provider B’s products and services may be published to you in the Application based on your previous purchase(s) with provider A. This personalized communication and nudging are at the core of our contract obligations to deliver the Service to you.

Processing relating to analyzing your purchases and processing your transactions are necessary for us to fulfill our contract obligations to deliver the Service to you under the TOS. Other processing activities set out above are necessary for the performance of our contracts with you or based on our legitimate interest in providing the Service.

The processing of Registration Data, Linking Data, Transaction Data and Credit and Offer Data, are all processed since such processing is necessary for us to fulfill our contract obligations to deliver the Service to you under the TOS. For example, if we did not have access to Transaction Data, then the Service (and its automatic features), where you automatically get sustainability guidance, could not be delivered. If we did not have access to Registration Data and Credit and Offer Data, then we could not check your identity, use of rewards and compliance with the TOS, which would result in us not being able to offer the Service. The Service is structured to provide you as simple and smooth access to the Service as possible.

We could in theory have structured another service where you, the user, would be required to do a lot of manual work to gain access to the sustainability guidance and benefits of our Service, but without any Transaction Link (i.e. without any bank integration). However, we know that simplicity is one of the key success factors and without a highly automatic solution, such as the Service, our chances to provide a powerful service to a broad spectrum of consumers would drastically be reduced. This is why we have formed the Service using bank integration.

As part of providing our Service, we create anonymized and aggregated statistics about the buying behavior of all of our user collective and subsegments of the user base. The statistics we create are anonymized and thinned so that they no longer represent personal data. We provide these statistics for internal use and use with our sustainability partners (scientific and commercial) to enhance understanding of consumers' buying behavior, use and acceptance of sustainable products and services. We want to be able to answer questions like: how can we nudge consumers to travel more with public transit, to buy more vegetarian food instead of meat or to factor in gender equality of the service providers that they choose? We use such aggregated statistics as part of the data we provide to partners about the performance of sustainable rewards or campaigns in the Application and how such affect buying behavior and interaction within the Application.

4.2 Improve our Service.

We will process your personal data to produce statistics on how you use our Service. When we use your personal data to improve our Service, we use it in an aggregated form (i.e. study the overall user patterns by reviewing de-identified data) to the extent possible. We use your information to be able to make the Service more user friendly, e.g. by fixing bugs, amending the interface in order for you to easily reach the information that you seek or highlighting popular functions. This processing is based on our legitimate interest to continuously improve the Service.

4.3 Prevent abuse or misuse.

Your personal data can also be used to prevent abuse of our Service or to prevent or investigate crimes. Abuse refers to, among other things, fraud, attempt of unauthorized login to user accounts and other measures which are in violation of our TOS or law. This processing is based on our legitimate interest to avoid abuse of the Service.

4.4 Direct marketing and marketing of the Service.

Separate from the Service (and its personalized sustainability communication to you, which is core to deliver the Service; see above), we use your personal data to communicate with you, to send newsletters, personalized rewards, campaigns, offers and relevant information about our

Service and merchants. These communications can be sent to you in the Service (via the Application), by SMS or e-mail. This processing is based on your prior consent or based on our legitimate interest to communicate with you regarding your use of the Service. You may at any time unsubscribe from direct marketing messages.

In case we are to provide you with marketing communication that does not pertain to our performance of the Service (see above) to you and which is directed to you based on your purchases visible via the Transaction Link (e.g. we make available to you a product reward or campaign of a merchant that is not tied to us delivering the Service to you - to promote sustainability - but instead constitute personalized marketing on other grounds), then such communication will only be made in case you have actively consented (through opt-in) to such type of communication (below and in our service “tailored tips” / “personalized non-service marketing”). A user that has opted-in to personalized non-service marketing can always later and at any time revoke his/her consent.

4.5 Aggregating data to non-personal data.

We regularly aggregate and de-identify your personal data ad hoc and after certain retention periods. The anonymization is made in such a way that a holder or recipient of such data does not receive information of your identity and thus cannot identify you individually. We may in connection with this use your personal data to aggregate and anonymize data for further use, such as in marketing or improving the Service. Only de-identified and anonymized data is used for such purpose – no personal information can be found in such aggregated data. We may share anonymized data, for example with our sustainability partners. This processing of non-personal data is based on our legitimate interest in improving and marketing the Service.

5. HOW WE HANDLE YOUR DATA

ELI5: We would never sell your data. Period. Your personal data will be handled by the Gokind group and your transaction provider (bank / card provider). When you access the Service, our open banking provider's terms and conditions also apply (we use the well renowned company Tink). We have subcontractors, such as a state-of-the art cloud computing provider that provides us with the safe IT-infrastructure of the Application and encrypted data storage. If we are forced by law to disclose data (e.g. in criminal proceedings) we will have to comply but will always use our best efforts to minimize disclosure in order to protect your privacy.

We do not sell or assign any of your personal data to any third parties. However, at times the personal data that we collect may be shared with other companies in the Gokind group to provide the Service, for the processing on our behalf or for the centralization of data. Gokind may also provide your user information to the Transaction Issuer that you have linked to the Service (via the Transaction Link(s)). If Gokind shares your personal data in such ways, we will ascertain that your information is still processed only in accordance with this Privacy Policy. To establish the Transaction Link(s), you would need to consent to the terms and conditions/privacy policy of the technical open banking provider used. The Application uses the well renowned open banking provider Tink.

Gokind does not share your personal information with any third party, except as described below.

5.1 Service providers.

Gokind may use third parties to manage one of more aspects of our business operations, including the processing or handling of personal information. We may share personal information with such third parties to perform services on our behalf such as processing payments, sending marketing communications, conducting research surveys, verifying and validating information that you have provided to us, and providing customer support services.

5.2 Sale or transfer of business or assets.

Personal information may be transferred or disclosed to a purchaser or prospective purchaser in the event of a sale, assignment, or other transfer of all or a portion of our business or assets. Should such a transfer occur, we will use reasonable efforts to ensure that the transferee uses your information in a manner that is consistent with this Privacy Policy.

5.3 Legal purposes.

Gokind may disclose your information if we are required to do so by law or to comply with legal requests (e.g. disclosure queries, court decisions, legal actions or the like) or when it is necessary to detect, prevent and address fraud and other criminal activity, to protect ourselves, you and other users, including as part of an inquiry if we in good faith believe that such action is required by applicable law. The above may include answering legal requests from non-EU/EEA jurisdictions, where we in good faith believe that the response is required by the law of the relevant jurisdiction, affects users in this jurisdiction and is in accordance with internationally recognized standards.

When we use service providers within the scope of our business in accordance with 5.1 above, we will enter into a data processing agreement with the service provider and take other appropriate measures to ensure that your personal data is processed in accordance with this Privacy Policy. Processing in accordance with 5.1-5.3 above is necessary for the performance of our contracts with you or based on our legitimate interest in providing the Service or based on our requirements under law.

Anonymized and aggregated data do not constitute personal data. Resulting statistics and conclusions for such statistics may be made available and utilized by us as title holder of such data.

6. DATA PROTECTION

ELI5: We store your data within the EU/EES. We use state-of-the art authentication methods, encryption, data aggregation and thinning to limit privacy risks.

The files containing your personal information will be stored within the EU/EES and on state-of-the art cloud computing infrastructure that will only be accessible to our employees and those of our agents and service providers who require it in the course of their duties. We maintain appropriate safeguards and high security standards to protect your personal information against unauthorized access, disclosure, or misuse. For example, electronic records are stored in secure, limited-access servers and electronic data is stored behind secured encryption access. We use technological tools like firewalls and multi-factor authentication, and we ensure our employees are trained on the importance of maintaining the security and confidentiality of the personal information we process.

All communications between your device and Gokind are encrypted. This enables client and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery. We offer industry-standard practices and security measures to safeguard and secure the personal data we collect. We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect Gokind accounts and systems from unauthorized access.

7. STORAGE PERIOD

ELI5: We store your data not longer than necessary. We have to comply with laws and store your data to operate and deliver the service to you. We routinely remove data, and in case of inactivity of you for more than 12 months, then your records will be deleted. Aggregated statistical data may be formed based on transactions and activity in the Application, and this does not identify you and is not personal data. You can always delete your account. Then use the delete account solution in the settings of the application. Just removing the Application will not result in us removing your account/data.

We generally retain your personal data as long as it is necessary for the purposes it was collected for or as otherwise required or authorized by applicable law, such as GDPR.

We will save your personal data as long as you are a registered user with Gokind. However, we routinely aggregate and de-identify your Transaction Data. E.g. in case of inactivity of you for more than 12 months (no use of the Application, including maintaining a Transaction Link), then your records will be deleted.

You may at any time request that we delete your account for the Service. If you do so, your user information will be permanently expunged from our servers, to the extent Gokind does not need to retain data for further periods (e.g. as set out in 7.1 below), and further access to your account will not be possible. To request deletion of your account, use the delete my account option in the Application. Merely deleting the Application from your device does not constitute a request to delete your account or unsubscribe to the Service.

Upon your un-subscription to the Service or any other termination of your access to the Service in accordance with the TOS, Gokind will, to the extent Gokind does not need to retain data for further periods (e.g. as set out in 7.1 below), erase your personal data from its systems and only anonymize and aggregated data that does not constitute personal data may remain by us as title holders of such.

7.1 Un-subscription.

After your un-subscription to the Service or any other termination of your access to the Service in accordance with the TOS, Gokind will only retain your personal data to the extent necessary for Gokind's fulfilment of our legal requirements or as otherwise necessary or required. For example, Gokind stores your Registration Data and your product or service orders for the fulfilment of our accounting obligations under law. In general data stored for legal process must be retained for five years, and limited data for legal and mandatory bookkeeping purposes for ten years.

8. YOUR RIGHTS

ELI5: You have a lot of great rights and benefits under this Privacy Policy and under GDPR. Let's highlight some of them. You can remove and correct information relating to your data. You have the right to access the data we have on you and request that it should be erased. You can also in some cases transfer your data to other providers (so called data portability). If you wish to exercise any of those rights, please contact us at dpo@gokind.co. We want to learn from any mistakes or unclarities we have so we would be super happy if you reach out to us and then we would push ourselves to resolve such things ASAP. You of course have the right to raise issues directly with the relevant data protection authority (in Sweden: the Swedish Authority for Privacy Protection (IMY)).

As a User, you always have the possibility to remove or correct the information we have about you. You can do this on your profile in our Application. Please note, however, that we may continue to process your personal data to the extent necessary for the performance of our contracts with you or if there is any other legal basis than consent for processing the data.

You have a right to access your own personal data, to see which personal data we hold about you and to receive a copy of the data upon your request. This right is not absolute, there might be instances where applicable laws or regulations would require us to withhold some of the information relating to you. In such cases we will inform you, to the extent possible, of why some information had to be withheld.

You have a right to have your data rectified, e.g. if some of the data relating to you is wrong, and we encourage you to help us keep your personal information up to date and accurate.

You have a right to request erasure of your data. The right to deletion of data is not absolute. It might for example apply to information that are wrong, outdated or no longer needed for the purpose it was collected for.

You may also have a right to have the processing of your data restricted, objecting to processing and profiling and to have your data transferred to another data controller (data portability). Those rights are limited and will be evaluated on a case-by-case basis.

If you wish to exercise any of those rights, please contact us at dpo@gokind.co.

If you think we process your data in a way that is not compatible with relevant data protection legislation you are of course free to contact the Data Protection Authority, but we strongly urge you to voice your concerns with the contact named above first, to see if we can rectify the situation. Remember, our mission is to allow you to leverage the power of your own data to put pressure on companies to become more sustainable and transparent. Your data deserves to be working for you, and not to be sold like a commodity to unidentified third parties.

9. TRANSFER OF PERSONAL DATA

ELI5: We store your data within the EU/EES. If we would use group companies or partners that would process data outside of this jurisdiction, then we would need to take prior measures to really secure that this processing comes with appropriate protective measures.

Gokind stores and processes your personal data within the EU/EEA. If other companies within the Gokind group or our partners conduct business outside the EU/EEA, we will ensure that

appropriate protective measures are taken prior to the data transfer to such business (for example by using the EU Commission's standard contractual clauses).

This Privacy Policy enters into effect on the 10th of March 2021 (v.2) and is valid until further notice. The latest version of the Privacy Policy is always viewable within the Application and on our website.