PRIVACY NOTICE

STORYTEL PULSE

1 ABOUT THIS NOTICE

1.1 Welcome to Storytel Pulse! This Privacy Notice (the "**Notice**") explains how Storytel ("**Storytel**", "us" or "we") process your personal data in relation to our platform Storytel Pulse (the "**Services**") as further described in our terms and conditions (collectively the "**Agreement**").

1.2 The purpose of this Notice is to inform you about the processing of your personal data and to assure you that your personal data is handled with care and transparency. You should always be able to feel safe when providing personal data to Storytel and we are continuously working on assuring that necessary technical and organisational security measures are in place. If you still have questions after reading this Notice, you are welcome to contact us by using the contact information in section 13 below.

2 CONTROLLER

Storytel Sweden AB (company reg. no. 556696-2865), is the responsible Controller for the overall processing of your personal data in the context of the Services and the different stages thereof.

3 CATEGORIES OF PERSONAL DATA THAT STORYTEL COLLECTS

3.1 Storytel processes the categories of personal data described below. Which data Storytel processes about you to some extent depends on which parts of Services you choose to use. The tables in this section 3 contain descriptions of the different categories of personal data that we may process about you, throughout the different steps of your user journey. In section 4, you can also find more information about our purposes and legal bases for our different processing activities.

3.2 **Using Storytel's Services:** When you create an account at Storytel Pulse, we may collect the following categories of personal data, depending on the Service that you are using and the market you are in.

- **Author Data**: If you **create an account** at Storytel Pulse, we will process the personal data that you have provided, such as:

    - Full name
    - Contact details (for example, email address or telephone number)
    - Nationality
    - IP-address
    - Technical information (such as time logs connected to the creation of the account)
    - Date of birth and gender

    When you use our Services, and in addition to the data described under **Author Data** above, we may collect the following categories of personal data, depending on how and which Service that you are using.

- **Usage data**:
    - Your book catalogue
    - Content that you choose to provide while using our Services (as described in the Storytel Pulse Terms and Conditions), as well as as communication with author support, or communications sent through our social media channels
    - Personal data necessary to provide additional features in our Services that you may choose to use
    - Data related to your navigation on the website and technical data such as online identifiers, advertising ID, device and platform versions, IP address, language settings, URL details, and browser type
    - Geographic location data derived from other data points or the country of the website you have used to sign up
    - Your preferences time spent using our Services browsing behaviour and other data related to your use of our Services

    You may personalise your account even more and/or use some of our optional social features offered within the website from time to time. For these features (collectively the "**Social Features**") we will process the personal data that you choose to provide us, for instance:
    - Full name
    - Profile picture

Please note that your name will always be visible to other users in the Services.

In addition to the processing of Author Data and Usage Data, depending on how you choose to interact with us and use our service we may process the following categories of personal data either provided by you directly or collected by us as a result of an action on your side:

- **Author support data**: If you contact our author support we will collect and save data in the chat history and email correspondence between you and our author support team. This data will include your personal data depending on what you choose to share with us and the context of the author support errand.
- **Third Party Data**: If you choose to **link your account** to a social media account or accounts of other third party services when you log in, we will process personal data for which you give the relevant third party permission to share with Storytel. If you want to know more about this, please turn to the specific service provider.

- **Cookies and tracking data**: Cookies and tracking data may be used to e.g. facilitate your access and remember your settings. More information on Storytel's use of cookies can be found in our cookie declaration. Click here for a direct link to our cookie declaration.

4 PURPOSES, CATEGORIES AND LEGAL BASES

4.1 In the table below, you'll find a description of our purposes for processing personal data, along with information on how these purposes relate to different categories of personal data and the legal basis we rely on for processing.For more information on the respective categories, please see the definitions of categories of data above under section 3.

4.2 Please also find a short description of the different legal bases below:

- **Legitimate interest:** This legal basis applies where Storytel has an interest in processing your personal data for a certain purpose where we consider our interest to outweigh your interest, taking into account the impact and risk that the processing may have on your rights.
- **Contractual obligation:** This legal basis applies when Storytel needs to process your personal data to comply with a contract that we have, or are preparing to, enter into with you or any company that you represent.
- **Legal obligations:** This legal basis applies where Storytel needs to process your personal data to comply with a legal requirement/regulation that applies to us.
- **Consent:** This legal basis applies to specific types of processing activities where your active approval is necessary and where Storytel will request that you provide such approval for Storytel’s use of your personal data for such purposes.

The table below clarifies how we process different categories of personal data for different purposes. The table should be read from left to right, showing which purposes each category of data is processed for and which legal basis applies to each purpose.

Please note that the same category of personal data may be processed for multiple purposes under different legal bases. This is because individual data points within a category may serve different purposes. For example, your email address (part of "Author Data") may be processed both to fulfill our contract with you (sending service emails) and based on our legitimate interest (sending communications, subject to your right to object). Therefore, you may see the same data category listed with different legal bases in the table depending on the specific purpose.

Purpose for processing	**Categories of personal data**	**Legal basis for processing**	**When the purpose of processing the data stops**	**Who do we share with**
Provision of our personalised Services:				
● Provide a personalised feed based on your language, preferences. ● Provide Social Features, as requested by you, including a more personalised profile, reviews on content and other users reviews. ● Remember your settings.	Author Data	Contractual obligation Legitimate interest	When the agreement between us ends.	Suppliers listed under section 8.
	Usage Data	Contractual obligation Legitimate interest	When the agreement between us ends.	Suppliers listed under section 8.
	Cookies and tracking data	Legitimate interest (necessary cookies) Consent (other cookies)	When the agreement between us ends or you withdraw your consent.	Suppliers of cookie and tracking services.
Anonymized personal data:				
● We anonymize personal data and process it to improve our Services and analyse user	Author Data	Legitimate interest Consent	Whilst we have an interest in service development.	Storytel Group companies.
	Usage Data			

behavior for product development purposes.		Legitimate interest Consent		
	Cookies and tracking data	Legitimate interest (necessary cookies) Consent (other cookies)		
Development, maintaining and improvement of our Services:				
● Assess the quality and success of our Services based on your use of the Service and for instance comments, interactions and other messages, in order to improve the Services. ● Develop new and improved features, technologies and services based on analysis of your use of the Services. ● Business planning and forecast development.	Author Data	Legitimate interest	When the agreement between us ends.	With companies within the Storytel Group.
	Usage Data			
	Cookies and tracking data	Legitimate interest (necessary cookies) Consent (other cookies)	When the agreement between us ends or you withdraw your consent.	With companies within the Storytel Group Suppliers of cookie and tracking services.
To inform you of our Services:				
● Through different communication channels, such as email.	Author Data	Legal obligation (in some instances we are required by law to inform you)	For the duration of the communication.	Suppliers of external communication and marketing services.

	Usage Data	Legitimate interest (to inform you about updates and content in the service). Contractual obligation.		
To communicate about our Services:				
We may use information about your use of the Services or other service-related information to provide relevant communications. If an active consent is required, we will ask for your consent.	Author Data Usage Data	Legitimate interest Consent (for non-necessary cookies).	We will cease this processing if you notify us that you no longer want to have an active account or when you notify us that you want to withdraw your consent, or that you are no longer interested in this processing.	Suppliers of external communication and marketing services.
	Cookies and tracking data	Legitimate interest (necessary cookies) Consent (other cookies)	When the agreement between us ends or you withdraw your consent.	With companies within the Storytel Group and Suppliers of cookie and tracking services.
To analyse and improve our communications:				
● If possible, we anonymize such personal data before processing it for this purpose.	Author Data Usage Data	Legitimate interest	When the agreement between us ends. We retain anonymized data, for as long as we have an interest in	With companies within the Storytel Group.

			improving our communication efforts.	
Connect with third party product or service:				
● If you choose to connect the Service to a third party services (e.g. Facebook and Google), we will share with, and receive data from, that third party service provider provided that you have given your permission to the integration.	Third Party Data Author Data Usage Data	Contractual obligation Legitimate interest	When the agreement between us ends.	With social media suppliers and other third parties.
	Cookies and tracking data	Legitimate interest (necessary cookies)	When the agreement between us ends.	Suppliers of cookie and tracking services.
		Consent (other cookies)	When the agreement between us ends or you withdraw your consent.	Suppliers of cookie and tracking services.
To provide author support:				
● Communicate with you, including saving written conversations to document each errand. ● Offer support for our Services and handle requests from you. ● Ensure that you can use our Services.	Author Data	Legitimate interest (e.g. to preserve our legal rights, answer your questions and to improve our Services as a result of questions and feedback)	When the agreement between us ends, however, we may save data for the period of the statutory limitation.	With companies within the Storytel Group and Suppliers of legal or other advisory services.

• Improve our Services as a result of questions and/or feedback that you communicate to us. <u>Please note:</u> If you choose to contact us through third-party social media platforms, they will be the controller of their own processing.	Usage Data Third Party Data	Legal obligations (e.g. to handle your data subject requests) Contractual obligation		
Comply with legal obligations and requests from Public Authorities				
• Accounting/financial reporting and retain this information in compliance with applicable law. • Conduct requests for information if required. • Report breaches of mandatory law and other compliance matters.	All categories of personal data listed in section 3.	Legal obligations	For as long as it is required under the legal obligation or request from the competent authority.	With Suppliers of financial services, accounting firms, Public Authorities and companies within the Storytel Group.
Fraud detection				
To prevent and detect fraud and unlawful use of our Services and to secure our Services and platform. May include evaluation and categorisation of how you use our service and profiling and automated decision making in order to respond to any fraudulent behaviour.	Since we look for many types of fraudulent use of our service we process all categories of personal data listed in section 3.	Legitimate interest Legal obligations	When the agreement between us ends or after any action taken to address such fraud. We will retain the data in accordance with any applicable statutory limitation connected to	With companies within the Storytel Group generally and in specific instances Public Authorities and advisors to Storytel if necessary to protect Storytel or file e.g. a claim.

			the fraud prevention action on our side.	
Dispute resolution and protecting our interests				
● To handle user disputes or complaints about our Services; ● To protect Storytel against legal claims and safeguard our rights; ● To address audits, questions and requests from public authorities as part of a hearing or initiated process.	All data listed under section 3 but mainly: ● Author Data ● Usage Data ● Third Party Data ● User support data	Legitimate interest (e.g. to preserve our legal rights, answer your questions and to improve our Services as a result of questions and feedback). For special category personal data we apply the derogation allowing such processing necessary to establish, exercise or defend legal rights.	When the dispute has been resolved or alternatively when we no longer have a legitimate interest in processing the personal data.	With companies within the Storytel Group generally and in specific instances Public Authorities and third party advisors to Storytel if necessary to protect Storytel or file e.g. a claim

5 HOW LONG DO WE PROCESS YOUR PERSONAL DATA?

5.1 Storytel will process your personal data for as long as we have a purpose and legal ground, for example as long as we have a contractual obligation, legitimate interest, your consent, or legal obligations to process your data, depending on which of these legal bases are applicable.

5.2 We process your personal data for as long as you have an account and for twenty-four (24) months after you have terminated the Agreement with us, to provide you with the personalised Storytel Service.

5.3 When you contact Storytel to receive support or for other purposes, we will retain your personal data for twenty-four (24) months after dealing with your last support ticket (e.g. problems and requests).

5.4 The personal data retained in our administration is retained for seven (7) years for tax and customs administration purposes unless we are legally obliged to retain the data for another period of time.

5.5 Storytel may retain data for longer than the time periods specified in this section, if legally prescribed or if it is necessary to preserve and defend Storytel's legal interests, for example, during judicial proceedings.

5.6 If we use consent as a legal basis, we will process your data until you retract your consent or until the data is no longer necessary for the purpose it was collected, in accordance with our retention periods specified below.

6 WHERE IS YOUR PERSONAL DATA STORED?

As a general rule, we process your personal data within the EU/EEA. However, your personal data may also be processed in the country where a Storytel group company has a local establishment, where our suppliers that are mentioned in section 8 or their sub-suppliers are located. For transfers outside the EU/EEA, please see more under sections 8 and 9.

7 DATA SECURITY AND INTEGRITY

The security, integrity and confidentiality of your personal data is of vital importance to us. We have implemented appropriate technical, administrative and physical security measures to safeguard your personal data against unauthorised access, use, alteration and disclosure. We regularly review our security procedures to assess whether we must implement additional measures or improve existing procedures. In the case where you have created a password for the use of our Services, we ask you to keep it safe and not to share it with anyone. You should be aware that no transmission of information over the internet can be safeguarded fully.

8 SHARING OF YOUR PERSONAL DATA

8.1 We will only share your personal data in accordance with the below:

- **Suppliers**: Some of Storytel's suppliers are authorized to handle personal data on behalf of Storytel as personal data processors. These suppliers include software and data storage providers, as well as consultants, advisors, as well as IT system management, author service, security, or business analysis. The primary purpose of this arrangement is to allow Storytel to access functions that we cannot produce internally but are essential for delivering our services. We ensure that such processing is necessary and generally base it on our legitimate interest, unless otherwise specified in section 4.

- **Storytel Group**: We may share your personal data with our Storytel group companies in order to provide you with the Services provided by our group not present in your country, to carry out our daily operations, or for the purpose of improving our Services. Your local Storytel group company will process your personal data in accordance with local requirements.

- **Public Authorities**: Personal data may also be shared to comply with statutory obligations or requirements or requests from authorities, to safeguard our legal interests, or to detect or prevent fraud and to secure our Services. The sharing takes place in situations when we are legally required to do so, upon your request, for administrative purposes or to prevent fraud or crime.

8.2 Storytel may share your personal data if we initiate discussions with a prospective buyer of our company or parts of our company, or if such negotiations result in a sale of the company or parts thereof. We will during this process continue to protect your data and notify you if your data will be transferred to a buyer. The purpose is to initiate and facilitate the transaction.

9 TRANSFERS OF PERSONAL DATA

9.1 As a multinational company, we may process your personal data within the EU/EEA or outside of these areas depending on which of the Services that you use, where our Storytel group companies are located or where our service providers are located. If we transfer your data to another country, such transfers are made to the previously described categories of recipients in section 8, and for the purposes as set out in this Notice.

9.2 We will ensure a high level of personal data protection upon a transfer in accordance with applicable law (including the GDPR) by applying protective measures. Such measures include e.g.:

- Transferring to countries outside the EU/EEA, which the EU Commission has confirmed to have acquired an adequate level of protection according to GDPR art 45;
- Transferring using the Standard Contractual Clause originated from the European Commission according to GDPR art 46.2 (c) and adhere to applicable data protection regulations;
- Apply necessary technical and organisational measures to protect the data upon a transfer.
- In applicable cases rely on applicable EU-US data sharing frameworks for the purpose of adequately protecting data transferred to the US.

10 LINKS TO EXTERNAL WEBSITES/SERVICES

Information provided by Storytel may contain links to websites or services operated or owned by parties other than Storytel. Storytel is not responsible for the processing of personal data (i.e. not the responsible Controller) on these websites. We recommend that you read the information regarding the processing of personal data on the relevant websites carefully.

11 CHANGES TO THE PRIVACY NOTICE

This Notice may be revised from time to time and we may also add new features or services that will be included in the Notice. If Storytel makes significant changes to the Notice, we will inform you about it via the email you provided in your registration or via a notification in the Services, depending on what is appropriate. The latest version of the Notice is published in the Services. If your acceptance is needed, Storytel will make sure to collect it. Please read this Notice regularly to stay updated on the content.

12 YOUR RIGHTS BASED ON EU/EEA LEGISLATION AND YOUR DATA PROTECTION CONTROLS

12.1 *Your rights*

Processing of personal data under the General Data Protection Regulation is associated with rights for you to be informed about and affect the way we process your data. The individual rights are described below and may be subject to limitations in applicable law.

- **Right of access:** you have the right to be informed of and to access the personal data we process about you.
- **Right to rectification:** you have the right to request to amend or update your personal data in the event it is inaccurate or incomplete.
- **Right to erasure:** you have the right to request that we delete your personal data. This right may be subject to restrictions, for example if you have an ongoing case with author support, or if we have a legal obligation to retain your data, for instance based on applicable bookkeeping regulations.
- **Right to restrict:** you have the right to request that we restrict the processing of all or parts of your personal data.
- **Right to object:** you have the right to object to us processing your personal data, for instance when such processing is based on legitimate interest, depending on the circumstances.

- **Right to data portability:** you have the right to request a copy of the personal data that you have provided us, in an electronically readable format and to forward that data.
- **Right to lodge a complaint:** you have the right to submit a complaint to the competent supervisory authority, the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten – IMY) or any other competent supervisory authority in the country of residence, if you believe that we have unlawfully processed your personal data.
- **Automatic decision making with legal effect:** you have a right to not be subject to an automatic decision with either legal or similar consequences for you. Storytel does not make these types of automatic decision making in our Service.

Please find link to the supervising authorities description of your rights here.

12.2 *Data Protection Controls*

If the processing is based on your consent, you can always retract your consent by sending us an email to the contact information below or by using the specific feature we have informed you about when collecting your consent.

Apart from this, you have the opportunity to opt out of receiving our newsletters in a link provided to you in each newsletter or similar message. You can manage your cookie preferences by using the cookie banner on our website.

Information about additional data protection control features can be found in our FAQ section in the Service.

13 WANT TO KNOW MORE?

13.1 Please visit our FAQ section in the Service for more information about how we process personal data and the data protection controls we have in place. Our FAQ will direct you to our author support, where you can find additional information and support. You can also find our cookie declaration in our cookie banner, where you can read more about how we use cookies and why.

13.2 If you have any questions on how Storytel processes your personal data, or if you want to exercise your rights, please contact us by using the contact information below. Add "To DPO" in the subject line of the email if you instead want to reach our appointed DPO.

- Email address: privacy@storytel.com
- Adress: Storytel Sweden AB, Att. Support, Box 24167, 104 51 Stockholm

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