

SBD – Risk Maturity Privacy Policy

Website Privacy Policy

Effective Date: October 1, 2018

Svangren Business Development SBD is a part of the private company own by Henrik Svangren in person. In the following SBD means one of these “SBD”, “we”, “us”, or “our”, recognizes the importance of privacy. In this Privacy Policy, we describe how we collect, use, and disclose information that we obtain about visitors to our website www.riskmaturity.ch www.svangren.ch or www.svangren.dk (the “Site”) and users of SBD Service(s). All capitalized terms not defined in this Privacy Policy have the same meaning as the capitalized terms set forth in our Terms of Service.

By using any of our Services, you agree that your information, including personal information, will be collected, used, and disclosed as described in this Privacy Policy. Your use of our Services, and any dispute over privacy, is subject to this Privacy Policy and our Terms of Service, including its applicable limitations on damages and the resolution of disputes. Our Terms of Service is incorporated by reference into this Privacy Policy.

If you have any questions about this privacy policy or our practices, please contact us. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our Swiss main office Artherstrasse 126, CH-6405 Immensee, +41 41 390 0847 or support@svangren.ch

EU-U.S. and Swiss Privacy Shield to follow

Information We Collect

We collect information about you directly from you, from third parties, and automatically through your use of our Services:

- **Information We Collect Directly from You.** We may collect information about you directly from you. For example, if you create an user with us, we will collect your name, phone number, email address, and password. If you pay for our Services directly to us, we will collect your payment card information. We will also collect any other information that you provide to us through our Services.
- **Information We Collect from Third Parties.** We may collect information about you from third parties. For example, if you log into our Services through Google, we will collect your Google email address and potentially other information from Google.
- **Information We Collect Automatically.** We automatically collect information about you through your use of our Services, including, without limitation, IP address, location, geolocation, browser type, domain name, the website that led you to our Services, the website to which you go after leaving our Services, the dates and times you access our Services, device ID, and activities within our Services (e.g., links you click, searches you run, etc.). Please see our Cookies section below for more information. We may combine information we collect automatically with information we collect directly from or from third parties.

User-Generated Content

You may post or upload materials to our Services, such as comments, notes, or photos (collectively, “User Content”). If you post User Content on our Services and choose to share this with other parties, the User Content, as well as other information may be available to these other parties, and we cannot prevent such information from being used in a manner that may violate this Privacy Policy, our Terms of Service, the law, or your personal privacy.

How We Use Information

We use the information that we collect, including personal information and User Content, for the following purposes:

- **Providing and Improving Our Services.** To provide and maintain our Services; to improve our Services; to develop new features, products, or services; to perform technical operations, such as updating software; and for other customer service and support purposes.
- **Research and Analytics.** To analyse how individuals, interact with our Services; to monitor and analyse usage and activity trends; and for other research, analytical, and statistical purposes.
- **Marketing and communications.** To communicate with you about your account and use of our Services; to send you product or service updates; to respond to your inquiries; to provide you with news and newsletters, special offers, promotions, behavioural advertising and other information we think may interest them; and for other informational, marketing, or promotional purposes. Our communications with you may include communications via email, via the Service, via mobile application alerts, via telephone or text/SMS. Please see our section regarding your choice for more information about how to change your communications preferences.
- **Protecting Rights and Interests.** To protect the safety, rights, property, or security of SBD, the Services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity which SBD, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Privacy Policy or our Terms of Service.
- **Legal Compliance.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request from law enforcement or a governmental authority.

How We Disclose Information

We disclose the information that we collect, including personal information and User Content, as follows:

- **Affiliates.** We may disclose information to current or future affiliates or subsidiaries for research, marketing, and other purposes consistent with this Privacy Policy.
- **Service Providers.** We may disclose information to our vendors, service providers, agents, or others who perform functions on our behalf.
- **SBD Partners.** We may disclose your information with the creator(s) of application(s) that you download in the SBD Application Store or Google play or Apple store.
- **Other Unaffiliated Third Parties.** We may disclose information to other unaffiliated third parties, including for those third parties' own marketing purposes.
- **Business Transfers.** We may disclose information to another entity in connection with, including during negotiations of, an acquisition or merger, sale or transfer of a business unit or assets, bankruptcy proceeding, or as part of any other similar business transfer.
- **Protecting Rights and Interests.** We may disclose information to protect the safety, rights, property, or security of SBD, the Services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity which SBD, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Privacy Policy or our Terms of Service.
- **Legal Compliance.** We may disclose information to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; in response to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request from law enforcement or a government official.
- **Aggregate and De-Identified Information.** We may disclose, rent or sell, aggregate, anonymous, or de-identified information for marketing, advertising, research, compliance, or other purposes.

In addition to the above, we will disclose your information to third parties as described to you at the time of collection or as consented to you before disclosure. For example, you may use our Services to share information that you collect with your SBD applications, with third parties (e.g., PDFs that you share with the SBD or information that you share with another SBD user or account). Once this data is shared with these third parties, the data becomes their property and SBD does not assume the risk or liability of what data you have shared now or in the past.

Cookies and Other Tracking Mechanisms

We and our service providers use cookies and other tracking mechanisms to track information about how you use our Services. We or our service providers may combine this information with other information, including personal information, we collect about you.

Cookies. Cookies are alphanumeric identifiers that we transfer to a computer's hard drive through a web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Services, while others are used to enable a faster log-in process or to allow us to track your activities while using our Services. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers provides information about how to prevent a computer from accepting new cookies, how to have the browser notify upon receiving a new cookie, or how to disable cookies altogether. If you disable cookies, you may be able to browse certain areas of the Services, but some features may not function (e.g., you may not be able to stay logged into their accounts).

Clear GIFs, pixel tags and other technologies.

Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on a computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (also referred to as web beacons, web bugs or pixel tags), in connection with our Services to, among other things, track user activities, help us manage content, and compile statistics about usage of our Services. We and our service providers also use clear GIFs in HTML emails to you, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Third-Party Services

We use third-party analytics companies, such as Google Analytics, to evaluate use of our Services. We also use third-party companies to enhance our Services, such as providing messaging and communication services. These entities may use cookies and other tracking technologies, such as cookies, web beacons, or LSOs, to perform their services. They use these tools to help understand use of, and to improve, our Services, performance, and user experiences.

Do Not Track Disclosure

Our Services do not respond to Do Not Track signals. You may, however, disable certain tracking as discussed in the section above (e.g., by disabling cookies).

Third-Party Collection

Our Services may contain links to third-party websites and applications or integrate with services provided by third parties. Any access to and use of such linked websites, applications, or third-party services is not governed by this Privacy Policy but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third parties, and we encourage you to read their privacy policies.

Security

We have taken steps to help protect the personal information we collect. However, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your device and account

by, among other things, choosing a robust password that nobody else knows or can easily guess and keeping your log-in and password private.

Your Choices

Correcting or Deleting Personal Information. You may correct or request deletion of your personal information by logging into your account and updating your information. Please note that we may retain certain information about you as required by law or as permitted by law for legitimate business purposes (e.g., in accordance with our record retention policies or to enforce our Terms of Service).

Opting out of Email Communications. We may send periodic promotional or informational emails to you. You may opt out of such communications by following the opt-out instructions contained in the email or contacting us at the information below. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt out of receiving marketing emails from us, we may still send you non-promotional emails (e.g., about your account with us).

Children

Our Services are not targeted to children under thirteen (13) years of age and we do not knowingly collect personal information from children under 13. If we discover that a child under 13 has provided us with personal information, we will promptly delete such personal information from our systems.

Transfers of Your Personal Information

Any personal information you provide to SBD through our Services may be transferred to or accessed by the parties listed in [How We Disclose Your Information](#) above for the purposes described in [How We Use Your Information](#) above, to the United States or other countries that may not guarantee the same level of protection of personal information as the one in which you reside.

Contact Us

If you have questions about the privacy aspects of our Services or for further information about our data privacy policies and practices, please contact us at:

SBD – Svangren, Henrik
Artherstrasse 126
CH-6405 Immensee
Phone: +41 41 390 0847
Email: support@svangren.ch

Changes to this Privacy Policy

This Privacy Policy is current as of the Effective Date set forth above. We may change this Privacy Policy from time to time, so please be sure to check back periodically. We will post any changes, including any material changes, to this Privacy Policy on our Site.