#### **EVERDRONE PRIVACY POLICY**

We at Everdrone AB, with org. nr. 559095-4169 ("**Everdrone**", "we", "our" och "us") is responsible for the processing of your personal data. We care about your privacy and want you to feel safe when we process your personal data. We often process personal data related to our drones and services as a processor, acting on behalf of our clients and following their instructions, as they are responsible for the processing. For more information about their processing, please contact them directly.

In this privacy policy we want to inform about how we process personal data when we develop our drones and services, as well as inform you who interact with us in different situations about how we process your personal data.

Should you have any questions regarding our processing of your personal data, or if you wish to exercise any of <u>your rights</u> under data protection legislation, please <u>contact us</u>.

# In short: Why do we do process your personal data?

Here you can read a summary of how we process your personal data. Below you can find <u>detailed information</u> on how and why we process your personal data, the legal basis for processing, the storage period for which we keep your personal data and how we share your personal data in different situations.

#### How we process your personal data

We process your personal data in the following situations:

- If you can be identified in our drone data;
- If you visit our facilities;
- If you visit our website;
- If you interact with us without having a business relationship with us or visit our social media;
- If you subscribe to our newsletter;
- If you represent our current or potential customer;
- If you represent our current or potential supplier or partner; and
- If you or your company have any questions or queries, and to comply with legal obligations.

Depending on the relationship we have with you, we process your personal data for all or only some of the above stated purposes. A detailed description of our processing of your personal data is provided in the charts below.

In some situations, we <u>share your personal data</u> with other companies and organizations, for example our IT partners, authorities and providers of services for analysing our website.

We mainly process your personal data within the EU/EEA. In rare instances, such as when we use services to help us send newsletters, we will transfer your personal data outside of the EU/EEA to those suppliers of newsletter services that are located there. Such transfer only takes place when we can ensure an appropriate level of protection of your personal data.

If you want to know more about the additional safeguards we have implemented to protect your personal data, please feel free to <u>contact us</u>.

## Your rights

In short you have the following rights:

- ✓ Right to lodge a complaint with a supervisory authority
- ✓ Right to withdraw your consent
- ✓ Right of access
- ✓ Right to object
- ✓ Right to rectification
- ✓ Right to erasure ("the right to be forgotten")
- ✓ Right of restriction of processing
- ✓ Right to data portability

If you have any questions about these rights, or wish to exercise any of your rights, you are more than welcome to contact us.

#### Who can gain access to your personal data

In the charts below we describe how we share your personal data in relation to the specific purposes of processing. In relation to our IT-partners we share your personal data for more than one purpose. These will process your personal data on our behalf and on our instructions to ensure sound and secure IT operations. We only share your personal data with our IT partners if it's necessary for them to fulfil their obligations towards us according to our contract with them.

If you have any questions regarding how we share your personal data or want to know more about who we share your personal data with, please feel free to contact us.

# Below you can read more about:

By clicking on the links below you can read more about how we process your personal data.

Who c	an gain access to your personal data	2
Who is	s responsible and how to contact us	4
rom v	where do we collect your personal data?	4
The pe	ersonal data you need to provide to us	4
	iled description of how we process your personal data	
	u can be identified in our drone data	
	o further develop our drones and their functioning	
If yo	u visit our facilities	<del>(</del>
To	maintain security for our property and employees	<del>(</del>
If yo	u visit our website	7
If yo	u interact with us without having a business relationship with us or visit our social media	8
If yo	u subscribe to our newsletter	<u>c</u>
If yo	u represent our current or potential customer	10
To	enter into an agreement with your company and administrate our relationship	10
If yo	u represent our current or potential supplier or partner	10
To	enter into an agreement with your company and administrate our relationship	10
If yo	u or your company have any questions or queries and to comply with legal obligations	11
To	comply with marketing legislation	11
To	comply with bookkeeping and accounting legislation	11
	cing of interests assessments when processing personal data based on the legal basimate interests"	
Conse	nt to the processing	12
What a	are your rights when we process your personal data?	12
-	Right to complain – Article 77 of the GDPR	
-	Right to withdraw your consent – Article 7.3 of the GDPR	
-	Right of access – Article 15 of the GDPR	13
-	Right to object – Article 21 of the GDPR	13
-	Right to rectification of processing – Article 16 of the GDPR	13
-	Right to erasure ("the right to be forgotten") – Article 17 of the GDPR	13
-	Right to restriction of processing – Article 18 of the GDPR	13
-	Right to data portability – Article 20 of the GDPR	13

When we refer to "your company" in this privacy policy, we refer to your employer or the organisation that you represent. We will only process data about you in your business role, which, for example means that we will only send marketing to your company and not to you in your capacity as a private individual.

#### Who is responsible and how to contact us

Everdrone AB, with org. nr. 559095-4169 is responsible for the processing of your personal data.

If you have any questions regarding our processing of your personal data or if you wish to exercise any of your rights, we are available at:

• E-mail address: info@everdrone.com

• Mailing address: Datavägen 37B, 436 32 Askim, Sweden

# From where do we collect your personal data?

We collect your personal data directly from you, for example when you contact us. We may also collect your personal data from your company, if they state you as their representative. We will also collect your personal data from other sources in the following situations:

- If you represent a potential customer, supplier or partner (i.e. a business lead), we may collect your personal data from the internet or a third-party service.
- If you use our website, we will use Google services to collect information on your browsing of our website to analyse your use of our website.

# The personal data you need to provide to us

In general, you are not required to provide your personal data to us. You find a description of when you are needed to provide your personal data in the charts below when the so-called legal basis is stated to be a "Legal obligation". If you don't provide such personal data to us, we at Everdrone will not be able to administrate our relationship with your company or fulfil the agreements with your company.

## A detailed description of how we process your personal data

The below charts describe in detail why we process your personal data, what personal data we process, when you need to provide the personal data to us and the legal basis for our processing. The legal basis is the basis for processing your personal data according to the GDPR. You will also find information about how long we process your personal data.

You can also click on the links below if you want to read about how we process your personal data depending on the situation in which you encounter us:

- If you can be identified in our drone data;
- If you visit our facilities;
- If you visit our website;
- If you interact with us without having a business relationship with us or visit our social media;
- If you subscribe to our newsletter;

- If you represent our current or potential customer;
- If you represent our current or potential supplier or partner; and
- If you or your company have any questions or queries and to comply with legal obligations.

Don't hesitate to <u>contact us</u> if you have any questions regarding our processing of your personal data.

## If you can be identified in our drone data

We want to improve our products and services by analysing data generated by our drones. On occasions this data might contain personal data, such as when a person standing adjacent to our drone when it is taking off is accidentally captured in video data, or if a person for any other reason can be identified through our data gathered from our drone flights.

To protect your privacy, the data will always be pseudonymised and any images stored by us will be very low-resolution. We will never intentionally try to identify you through this data. Such data may however be considered to be personal data since it could help identifying a person.

What processing we perform	What personal data we process	Our legal basis for the processing
<ul> <li>Gather and compare data from our drone flights to be able to improve our service and control how our drones operate</li> </ul>	Information we collect when we conduct a drone flight, e.g., flight time, the drone's position, the camera's point of interest, low-resolution images for navigation, and stereo vision data	Legitimate interest (Article 6.1 (f) GDPR  The personal data will be processed based on our <u>legitimate interest</u> to develop our drones and our service.
<u> </u>	ntains personal data, e.g. image date on the control of the contro	captured at low altitude during takeoff or the purpose of the processing.
Recipients: We will share your pers	onal data with our IT-partners.	

# If you visit our facilities

We have camera surveillance in and around facilities controlled by Everdrone. If you were to enter our facilities, you will be filmed and the data from our cameras will be stored.

What processing we perform	What personal data we process	Our legal basis for the processing	
<ul> <li>Gather footage from our security camera, in order to keep our property and employees safe</li> </ul>	Data consisting of your picture and video material of you in our camera surveillance footage	Legitimate interest (Article 6.1 (f) GDPR)  The personal data will be processed based on our <u>legitimate interest</u> to protect our employees and our facilities from any unauthorized person trying to enter areas controlled by Everdrone.	
Storage period: We only data derived from camera surveillance at areas controlled by Everdrone for 3 days.			

employees. When required by law, we may need to disclose your data to public authorities and other organisations. We may also need to disclose your data if it is necessary to exercise, establish or monitor our legal claims.

Transfer outside EU/EEA: We will not transfer your personal data for this specific purpose.

#### If you visit our website

We analyse how our website is used. We gather personal data from you and your device. We collect personal data by using cookies. This means that your personal data is processed when you visit our website. To protect your privacy, we have taken measures to avoid identifying you when you visit our website. For instance, we only store an encrypted version of your IP address to reduce the risk of being able to identify you.

When you visit our website, we will gather your personal data from your device and from the companies we cooperate with (see below).

What processing we perform	What personal data we process	Our legal basis for the processing
<ul> <li>Analyse how you use our website to improve our website and services. To do this, we use our own analytic service and the analytic service from Google Analytics</li> <li>The analytic service means that we place a random ID on your device to distinguish your device from other visitors and to acknowledge patterns in how our website is used. We will, however, not know who you are</li> <li>The personal data we gather will be used, e.g. to optimise functions and to adapt the websites to suit our visitors</li> </ul>	<ul> <li>An encrypted version of your IP address, which we at Everdrone can't connect to you as an individual</li> <li>Information about your device/browser (which area in the country you use our website from and which screen resolution you have)</li> <li>Information about your activities on the website</li> </ul>	Consent (Article 6.1 (a) GDPR)  We will only process your personal data for this purpose if you consent.  You can prevent Google Analytics from using your personal data by downloading and installing this browsel add-on.  You have the right to withdraw your consent at any time by contacting us. Your withdrawal of consent shall not affect the lawfulness of the processing before the withdrawal.

**Storage period:** We will store your personal data, which is pseudonymised, for as long as needed for the purpose of the processing, but never longer than 26 months after your visit on our website.

Google will continue to store your personal data for their own purposes and <u>Google</u> will inform you separately about such storing.

**Recipients:** If you consent, we will share your personal data with Google which provides the service to analyse the website.

We will also share your personal data with our IT partners.

**Transfer outside EU/EEA:** Your personal data will be transferred to the United States when you use our website and have consented to us using analytic services from Google. Your personal data will be transferred outside the EU/EEA based on an adequacy decision regarding the United States recognised by the European Commission. This

means that the European Commission has assessed that a particular country has an adequate level of protection for your personal data under Article 45 GDPR. This decision between the EU and the USA is called the <u>EU-US Data</u> <u>Privacy Framework</u>. You can find Google's certification <u>here</u>, by e.g. searching for the company.

If you want more detailed information about transfer of personal data outside of EU/EEA you can contact us.

# If you interact with us without having a business relationship with us or visit our social media

If you are in contact with us without having a business relationship with us, for example by sending us an e-mail or a message on our social media account, we will process your personal data as we describe in the charts below. We process the personal data you provide us and information from your social media account (if you use such an account to communicate).

When contacting us through a social media platform, we suggest you also familiarise yourself with the privacy information of that platform.

To communicate with you				
What processing we perform	What personal data we process	Our legal basis for the processing		
<ul> <li>Communicate, e.g. via e-mail</li> <li>Communicate via social media, e.g. if you comment on our site or our wall</li> <li>Answer your questions and give you the best service</li> </ul>	<ul> <li>Information you provide to us, e.g. name and contact information</li> <li>If you visit our social media accounts (e.g. our Facebook, LinkedIn and X) we also process:</li> <li>Information from your profile on the social media in question (username and any picture you have chosen for your account)</li> <li>Other information regarding the matter for which you contact us</li> </ul>	Legitimate interest (Article 6.1 (f) GDPR)  The personal data will be processed based on our <u>legitimate interest</u> in communicating with you who have contacted us.		

**Storage period:** We will delete your personal data regularly and as described below:

- Communication with us via our website, social media or in e-mails will be stored for as long as it is considered necessary for the purpose of the processing.
- Your comments and communication with us on social media can be deleted by you at any time. We will remove posts or comments which are in breach of the rules of the platform or in conflict with legislation as soon as possible.

**Recipients:** When you interact with us on our social media account, the social media platform that you use will process personal data about you as a user. These social media platforms will continue to process your personal data as independent controllers. Information about how long they store your personal data can be found in their respective privacy information. The social medias we use are <u>Facebook</u>, <u>LinkedIn</u> and <u>X</u>. You can read more about their respective processing of your personal data by clicking on the links.

We will also share your personal data with our IT-partners.

**Transfer outside EU/EEA:** We will not transfer your personal data for this specific purpose. However, the suppliers of the social media platform that you use will be able to access and process your personal data as independent

controllers from outside the EU/EEA. You can read more about this in their respective privacy information by clicking on the links above.

When we use services from Meta, X (previously Twitter), and LinkedIn, we and our suppliers rely on an adequacy decision regarding the United States recognised by the European Commission for transferring personal data outside of the EU/EEA. This means that the European Commission has assessed that a particular country has an adequate level of protection for your personal data under Article 45 GDPR. This decision between the EU and the USA is called the <u>EU-US Data Privacy Framework</u>. These companies are certified under the EU-US Data Privacy Framework. You can find their respective certifications <u>here</u>, by e.g. searching for the company.

If you want more detailed information about transfer of personal data outside of EU/EEA you can contact us.

## If you subscribe to our newsletter

The chart below describes how we process your personal data if you subscribe to our newsletters. We gather your personal data directly from you and provide some personal data ourselves by analysing how you use our newsletters.

To send newsletters			
What processing we perform	What personal data we process	Our legal basis for the processing	
<ul> <li>Send information about news, marketing, offers and invitations ("newsletters") to you who have chosen to subscribe to our newsletters</li> <li>Improve and develop our newsletters by analysing how you open them and what you click on in the newsletters</li> </ul>	<ul> <li>Information about how you open our newsletters and what you click on</li> <li>IP-address</li> <li>E-mail address</li> </ul>	Consent (Article 6.1 (a) GDPR)  The personal data will be processed based on your consent.  You have the right to withdraw your consent at any time by contacting us. Your withdrawal of consent shall not affect the lawfulness of the processing before its withdrawal.	

**Storage period:** You can choose to unsubscribe or object to receiving newsletters and marketing at any time. If you object to receiving marketing from us, we keep track of this in our "unsubscribe-list" to avoid sending you any further marketing material.

**Recipients:** We share your personal data with <u>Mailchimp</u> which helps us send newsletters. Mailchimp process your personal data on our behalf and on our instructions, help us administrate our marketing and, therefore, will have access to your personal data.

We will also share your personal data with our IT partners.

**Transfer outside EU/EEA:** Your personal data will be transferred to the United States when you consent to receiving newsletters from us. The reason is that Mailchimp are based in the United States. Your personal data will be transferred outside the EU/EEA based on an adequacy decision regarding the United States recognised by the European Commission. This means that the European Commission has assessed that a particular country has an adequate level of protection for your personal data under Article 45 GDPR. This decision between the EU and the USA is called the <u>EU-US Data Privacy Framework</u>. Mailchimp are certified according to the EU-US Data Privacy Framework. You can find Mailchimp's certification <u>here</u>, by e.g. searching for the company.

If you want more detailed information about transfer of personal data outside of EU/EEA you can contact us.

#### If you represent our current or potential customer

What processing we perform	What personal data we process	Our legal basis for the processing
<ul> <li>Negotiate and enter into an agreement with your company</li> <li>Administrate our relationship with your company (e.g. communicate with our customer)</li> </ul>	Information you provide to us, e.g. name, organisational belonging, position in your company, telephone number and e-mail address	Legitimate interest (Article 6.1 (f) GDPR  The personal data will be processed based on our legitimate interest to negotiate and enter into an agreement with your company and to administrate the agreement.

**Storage period:** Your personal data will be removed if we conclude that we will not enter into an agreement with your company.

If your company becomes our customer, we will store your personal data for this purpose as long as your company is our customer, however for a shorter period if we receive information that you no longer represent the company.

**Recipients:** We will share your personal data with our IT-partners, such as ClickUp who process your personal data on our behalf and on our instructions for CRM-purposes.

**Transfer outside EU/EEA:** Your personal data will be transferred to the United States based on Standard Contractual Clauses (Article 46.2 c GDPR) module two for the transfer of personal data outside of the EU/EEA. You can find the Standard Contractual Clauses here.

If you want more detailed information about transfer of personal data outside of EU/EEA you can contact us.

#### If you represent our current or potential supplier or partner

What processing we perform	What personal data we process	Our legal basis for the processing
<ul> <li>Negotiate and enter into an agreement with your company</li> <li>Administrate our relationship with your company (e.g. communicate with our supplier or partner)</li> </ul>	Name, organisational belonging, position in your company, telephone number and e-mail address	Legitimate interest (Article 6.1 (f) GDPR The personal data will be processed based on our legitimate interest to negotiate and enter into an agreement with your company and to administrate the agreement.

**Storage period:** Your personal data will be removed if we conclude that we will not enter into an agreement with your company.

If your company becomes our supplier or partner, we will store your personal data for this purpose as long as the company you represent is our supplier or partner, however for a shorter period if we receive information that you no longer represent the company.

**Recipients:** We will share your personal data with our IT-partners, such as ClickUp who process your personal data on our behalf and on our instructions for CRM-purposes.

**Transfer outside EU/EEA:** Your personal data will be transferred to the United States based on Standard Contractual Clauses (Article 46.2 c GDPR) module two for the transfer of personal data outside of the EU/EEA. You can find the Standard Contractual Clauses <a href="here">here</a>.

If you want more detailed information about transfer of personal data outside of EU/EEA you can contact us.

# If you or your company have any questions or queries and to comply with legal obligations

To handle any questions, complaints or claims			
What processing we perform	What personal data we process	Our legal basis for the processing	
<ul> <li>Handle any questions, complaints or claims</li> <li>To defend ourselves against claims and complaints</li> <li>To initiate any claims</li> </ul>	Name, organisational belonging, position at your company, telephone number, e-mail address and information concerning your company's complaint or claim	Legitimate interest (Article 6.1 (f) GDPR)  The personal data is processed based on our <u>legitimate interest</u> to handle a question, complaint and/or legal dispute in which you are the representative of a customer, supplier or partner	

**Storage period:** We will store your personal data from the time the matter was initiated and for the duration of the potential dispute.

**Recipients:** We will share your personal data with our IT-partners.

**Transfer outside EU/EEA:** We will not transfer your personal data for this specific purpose.

To comply with marketing legislation		
What processing we perform	What personal data we process	Our legal basis for the processing
If you have stated that you do not wish to receive marketing from us, we will store such information in an "unsubscribe- list" to make sure we do not send any marketing to you	Name     E-mail address	Legal obligation (Article 6.1 (c) GDPR)  The processing is necessary to comply with legal obligations which we are subject to, i.e. marketing law which require us to not send marketing material to individuals who have objected to receiving such marketing.  We cannot make sure you will not receive marketing from us without processing your personal data for this purpose and you are therefore required to provide your personal data to us.  You need to provide the personal data to us. Otherwise, we cannot ensure that you will not receive any more marketing from us.

**Storage period:** You will be listed in our "unsubscribe-list" until further notice.

**Recipients:** We will share your personal data with our IT-partners.

**Transfer outside EU/EEA:** We will not transfer your personal data for this specific purpose.

# To comply with bookkeeping and accounting legislation

What processing we perform	What personal data we process	Our legal basis for the processing
Store information in bookkeeping and accounting	Name, history regarding payments made and other information that constitutes accounting records	Legal obligation (Article 6.1 (c) GDPR)  The processing is necessary to comply with legal obligations to which we are subject, i.e. bookkeeping and accounting legislation.  You need to provide the personal data to us. Otherwise, we cannot comply with our legal obligations.

**Storage period:** We will store any document constituting bookkeeping material and personal data included therein for seven to eight years according to bookkeeping and accounting legislation. The regulation means that we store bookkeeping material until and including the seventh year after the end of the calendar year for the fiscal year to which the personal data relates.

**Recipients:** In order to store information that we according to bookkeeping and accounting law are required to store, we may use a company that help us archive such information.

**Transfer outside EU/EEA:** We will not transfer your personal data for this specific purpose.

# Balancing of interests assessments when processing personal data based on the legal basis "legitimate interests"

As we state above, for some purposes, we process your personal data based on our "legitimate interest". By carrying out a balancing of interests assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data.

If you want more information in relation to our balancing of interests assessments, please do not hesitate to <u>contact us</u>.

#### Consent to the processing

For some purposes, we process your personal data based on your consent. More information about these situations is stated above. You can <u>withdraw your consent</u> at any time. If you withdraw your consent, we will stop our processing of your personal data for that purpose. Your withdrawal does not affect the legality of the processing based on consent, prior to the withdrawal.

# What are your rights when we process your personal data?

In accordance with the GDPR, you have certain rights that you can exercise to affect how we process your personal data—see below for more information.

If you have any questions regarding your rights or want to exercise any of your rights, please contact us by using the contact details <u>above</u>. You can also find more detailed information about your rights and when they apply at <u>The Swedish Authority for Privacy Protection (IMY)</u>.

#### Right to complain – <u>Article 77 of the GDPR</u>

You have the right to *lodge a complaint* with the competent supervisory authority if you consider that the processing of your personal data violates the GDPR. In Sweden, the competent supervisory authority is <u>The Swedish Authority for Privacy Protection</u> (IMY).

# Right to withdraw your consent – <u>Article 7.3 of the GDPR</u>

You have the right to *withdraw your consent* at any time by <u>contacting us</u>. You can always withdraw the consent you give on the website directly on the website.

#### Right of access – <u>Article 15 of the GDPR</u>

You have the right to *obtain confirmation* as to whether we are processing your personal data or not. You can make a request by <u>contacting us</u>. If we are processing your personal data, you also have the right to *obtain a copy of the personal data* processed by us as well as *information about our processing*, such as the purposes of the processing and for how long your personal data is stored.

## - Right to object - Article 21 of the GDPR

You have the right to at any time *object* to our processing of your personal data for direct marketing purposes (including profiling) and to processing of your personal data that is based on a <u>legitimate interest</u>.

## Right to rectification of processing – <u>Article 16 of the GDPR</u>

You have the right to have *inaccurate personal data concerning you rectified* without undue delay. You also have the right to have *incomplete personal data completed*.

#### Right to erasure ("the right to be forgotten") – Article 17 of the GDPR

Under certain conditions, you have the right to *have your personal data erased by us* without undue delay. For example, if you withdraw your consent and there is no other legal basis for the processing or if the personal data is no longer necessary for the purposes for which they were collected or processed.

# - Right to restriction of processing - Article 18 of the GDPR

Under certain conditions, you have the right to request that we *restrict our processing* of your personal data. For example, if you contest the accuracy of the personal data, or if the processing is unlawful and you oppose the erasure of the personal data and instead request the restriction on the use of the personal data.

## Right to data portability – <u>Article 20 of the GDPR</u>

If we process your personal data based on your consent or to fulfil a contract, you have the right to *receive personal data concerning you*. This right applies to personal data that you have provided to us in a structured, commonly used and machine-readable format. You also have the right to *transmit those personal data* to another controller, where technically feasible.

This privacy policy was latest updated by Everdrone AB on 2025-10-23.