

# CAREIUM PRIVACY NOTICE

## Introduction

Careium Sweden AB, together with all companies within the Careium Group including those operating in Norway, the Netherlands, Germany, France, and the United Kingdom (collectively referred to as "Careium" "We", "Us" or "Our" in this Privacy Notice) respects the privacy of the service member (collectively referred to as "You", "Your", "Service Member" and "Customer" in this Privacy Notice) using Our website and Our products and services. We are committed to protecting Your Personal Data (as described in further detail below).

This Privacy Notice will tell You about to how We look after Your Personal Data when You visit Our website (regardless of where You visit it from) or use Our products and services and tell You about Your privacy rights and how the law protects You. We are committed to ensure the privacy of those who use our products and services or are visiting Our Website and to ensure that our processing is in accordance with General Data Protection Regulation ("GDPR") and other applicable data protection laws.

You can download a PDF version of the policy here. Please also see the Glossary below, which provides further details on the meanings of some of the words and terms used in this Privacy Notice.

## 1. Important information and who We are

### Purpose of this Privacy Notice

This Privacy Notice aims to give You information on how Careium collects and processes Your Personal Data through Your use of this website and Our products and services, including any data You may provide through this website when You:

- use Our website;
- provide Your contact details as a potential customer (or an employee of a potential customer);
- place an order to use (and when You use) Our applications, products or services (either directly or as an employee of a customer);
- use Our products and services via a third party (who will provide You with their own privacy notice);
- contact Us to make a complaint; or
- contact Us directly for another purpose.

Our website is not intended for children, and We do not knowingly collect data relating to children.

It is important that You read this Privacy Notice together with any other privacy, data protection or fair processing information that We may provide on specific occasions when We are collecting or processing Personal Data about You (including when We provide You with Our products and services) so that You are fully aware of how and why We are using it. This Privacy Notice supplements other notices and privacy policies and is not intended to override them.

### Controller

Careium is the controller and responsible for Your Personal Data, where You have a direct relationship with Us. Where You have accessed Our products or services via a third party (such as a care home provider or local authority) You should confirm with the privacy policy of such third parties if they have provided Your personal data to Us as a processor for them, or to Us as a controller. Where We act as a controller this Privacy Notice will apply, but if We act as a processor then the third parties' privacy notice will apply. If You have any questions about this Privacy Notice, including any requests to exercise Your legal rights (as referred to below), please contact Us using the details set out below.

## Contact details

If You have any questions about this Privacy Notice or Our privacy practices, please contact our DPO in the following ways:

**Full name of legal entity:** Careium Sweden AB

Email address: [gdpr@careium.com](mailto:gdpr@careium.com)

Postal address: Jörgen Kocksgatan 1B, 211 20 Malmö

Telephone number: +46 (0)10-482 90 00

You have the right to make a complaint at any time to the Integritetsskyddsmyndigheten ("IMY"), the Swedish supervisory authority for data protection issues if You are concerned in relation to how We collect or process Your Personal Data. We would, however, appreciate the chance to deal with Your concerns before You approach IMY so please contact Us in the first instance.

### Contact details to IMY:

Email address: [imy@imy.se](mailto:imy@imy.se)

Postal address: Box 8114, 104 20 Stockholm

Telephone number: +46 (0)8 657 61 00

## Changes to the Privacy Notice and Your duty to inform Us of changes

We keep Our Privacy Notice under regular review.

It is important that the Personal Data We hold about You is accurate and current. Please keep Us informed if Your Personal Data changes during Your relationship with Us.

## Third-party links

This website may include links to third-party websites, plug-ins, applications and social media platforms. Clicking on those links or enabling those connections may allow third parties to collect or share data about You. We do not control these third-party websites, plug-ins, applications or social media platforms and are not responsible for their privacy statements. When You leave Our website, We encourage You to read the Privacy Notice of every website You visit.

Our products and services may be provided in conjunction with or via third parties such as a care home or local authority provider. The third party will confirm how they pass data to Us. Where You have accessed services via a third party We will provide information to them that they require to deliver their services to You.

## 2. The data We collect about You

Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about You which We have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier and title. This may include details of Your employment if acting as an employee. If you use Our services Identity Data also includes social security number.
- **Contact Data** includes billing address email address and telephone numbers.
- **Financial Data** includes payment methods, bank details and direct debit mandates.
- **Transaction Data** includes details about payments from You and other details of products and services You have purchased from Us, including recordings of telephone calls.

- **Technical Data** includes internet protocol (IP) address, Your login data, browser type and version, time zone and location setting, browser plug-in types and versions, operating system and platform and other technology on the devices You use to access this website and Our services.
- **Profile Data** includes Your username and password, purchases or orders made by You, Your interests, preferences, feedback and survey responses. If you use Our Services, Profile Data may also include information that you share with Us when signing up including information about disabilities, diseases and other health data, which is sensitive personal data.
- **Usage Data** includes information about how You use Our website, products and services. If you use Our Services, Usage Data also include alarms that You send to Us, content that you may share during alarm calls (voice recording) and our documentation during a visit triggered by an alarm which may include sensitive personal data.
- **Marketing and Communications Data** includes Your preferences in receiving marketing from Us and Your communication preferences.
- **Location Data**: includes Your current location disclosed by Our wearable technology products.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from Your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal Your identity. For example, We may aggregate Your Usage Data to calculate the percentage of users accessing a specific website feature. However, if We combine or connect Aggregated Data with Your Personal Data so that it can directly or indirectly identify You, We treat the combined data as Personal Data which will be used in accordance with this Privacy Notice.

We may collect **Special Categories of Personal Data** about You (this type of data includes details about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about Your health, and genetic and biometric data). If You use Our Services We will in most cases collect personal data about Your health. We do this so We can provide Our services to You. We do this with Your consent and You have the right to withdraw Your consent at any time by using the contact details in this Privacy Notice.

We do not collect any information about criminal convictions and offences.

### **If You fail to provide Personal Data**

Where We need to collect Personal Data by law, or under the terms of a contract We have with You, and You fail to provide that data when requested, We may not be able to perform the contract We have or are trying to enter into with You (for example, to provide You with Our products or services). In this case, We may have to cancel a product or service You have with Us but We will notify You if this is the case at the time.

### **3. How is Your Personal Data collected?**

We use different methods to collect data from and about You including through:

- **Direct interactions.** You may give Us Your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data You provide when You:
  - enquire about, or place an order for, Our products or services;
  - create an account on Our website;
  - subscribe to Our services or publications;
  - request marketing to be sent to You; or
  - give Us feedback or contact Us.
- **From family members.** We may need to collect details of a Service Member's next of kin to provide information on their family member or for the purposes of Our services. This would be Identity and Contract Data.

- **From other employees.** If Your employer is dealing with Us they may provide Your details to Us in order that We can deliver Our services and products, or for You to engage with Us.
- **Automated technologies or interactions.** As You interact with Our website, We will automatically collect Technical Data about Your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about You if You visit other websites employing Our cookies. Please see section “Cookies” below for further details.
- **Location Data.** Some of Our products include Wearable technology which will allow Us to determine Your current location. These location-enabled Services require Your personal data for the feature to work. If You choose to use these products You will need to Wear them and by doing so, You agree to Your data being used for this purpose. You are not bound to wear any of these products but if You do not, then the location enabled service will not be available.

#### 4. How We use Your Personal Data

We will only use Your Personal Data when the law allows Us to. Most commonly, We will use Your Personal Data in the following circumstances, where:

- We need to perform the contract We are about to enter into or have entered into with You.
- It is necessary for Our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override those interests.
- We need to comply with a legal obligation.
- We have Your consent, including to process medical details or provide marketing information.

Please see the Glossary and Lawful Basis sections of this Privacy Notice below, to find out more about the types of lawful basis that We will rely on to process Your Personal Data.

#### Purposes for which We will use Your Personal Data

We have set out below, in a table format, a description of all the ways We plan to use Your Personal Data, and which of the legal bases We rely on to do so. We have also identified what Our legitimate interests are where appropriate.

Please note that We may process Your Personal Data for more than one lawful ground depending on the specific purpose for which We are using Your Personal Data. Please contact Us if You need details about the specific legal ground. We are relying on to process Your Personal Data where more than one ground has been set out in the table below.

| Purpose/Activity  | Type of data  | Lawful basis for processing including basis of legitimate interest   |
|---|---|--|
| To deal with enquiries from You about Our products or services  | (a) Identity<br>(b) Contact   | (a) Necessary for Our legitimate interests (to support You or the contract with Your employer)   |
| To register You as a new Customer   | (a) Identity<br>(b) Contact   | (a) Performance of a contract with You<br>(b) Necessary for Our legitimate interests (to support the contract with Your employer)                        |
| To process and deliver Your order including:<br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to Us | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Communications | (a) Performance of a contract with You<br>(b) Necessary for our legitimate interests (to recover debts due to Us/ perform a contract with Your employer) |

|  |  |   |
|--|--|---|
| To manage Our relationship with You which will include:<br>(a) Notifying You about changes to our terms or Privacy Notice<br>(b) Asking You to leave a review or take a survey   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Communications   | (a) Performance of a contract with You<br>(b) Necessary to comply with a legal obligation<br>(c) Necessary for our legitimate interests (to keep our records updated and to study how Customers use Our products/services/perform a contract with Your employer)                          |
| To manage the services We provide to a Customer including, making contact with family members and third party service providers (such as care home and local authorities)  | (a) Identity<br>(b) Contact<br>(c) Location<br>(d) Profile<br>(e) Usage                                      | (a) Necessary for our legitimate interests (to support the contract with Your employer)<br>(b) Performance of a contract with You<br>(c) In those situations We process Special Categories of Personal Data, we also rely on Your consent.  |
| For training purposes, to prevent and detect crime (including fraud) and to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity<br>(b) Contact<br>(c) Technical   | (a) Necessary for Our legitimate interests (for running Our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to You and measure or understand the effectiveness of the advertising We serve to You   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Communications<br>(f) Technical               | Necessary for Our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)   |
| To use data analytics to improve Our website, products/services, marketing, customer relationships and experiences   | (a) Technical<br>(b) Usage   | Necessary for Our legitimate interests (to define types of Customers for Our products and services, to keep Our website updated and relevant, to develop Our business and to inform Our marketing strategy)   |
| For assessment and analysis and to make suggestions and recommendations to You about products or services that may be of interest to You, and to invite You to attend Our events   | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile<br>(f) Marketing and Communications | Necessary for Our legitimate interests (to develop Our products/services and grow Our business)   |

## Marketing

We may use Your Identity, Contact, Technical, Usage and Profile Data to form a view on what We think You may want or need, or what may be of interest to You. This is how We decide which products, services and offers may be relevant for You (We call this marketing).

You will receive marketing communications from Us if You have requested information from Us or purchased products or services from Us and You have not opted out of receiving that marketing.

### **Opting out**

You can ask Us to stop sending You marketing messages at any time by contacting Us using the details provided above.

Where You opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product or service purchase or order, product or service experience or other transactions.

### **Cookies**

Our website uses cookies to distinguish You from other users of Our website. This helps Us to provide You with a good experience when You browse Our website, allows Us to improve Our website and enables for Us to provide You with relevant Marketing. We use consent to use cookies that is not strictly necessary to collect Your personal data and You can change Your consent preferences to the use of cookies on this website. You will find more information in our Cookie Policy.

### **Change of purpose**

We will only use Your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If You wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Us.

If We need to use Your Personal Data for an unrelated purpose, We will notify You and We will explain the legal basis which allows Us to do so.

Please note that We may process Your Personal Data without Your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of Your Personal Data**

We may share Your Personal Data with the parties set out below for the purposes set out in the table above:

- Third Parties, as set out in the Glossary below.
- Third parties to whom We may choose to sell, transfer or merge parts of Our business or Our assets. Alternatively, We may seek to acquire other businesses or merge with them. If a change happens to Our business, then the new owners may use Your Personal Data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of Your Personal Data and to treat it in accordance with the law. We do not allow Our third-party service providers to use Your Personal Data for their own purposes and only permit them to process Your Personal Data for specified purposes and in accordance with Our instructions.

We may share Your Personal Data with third parties who have agreements with You for whom We act as a Data Processor. Where We act on this basis it is the third party who is the Data Controller and will confirm the basis of any Personal Data use.

## **6. International transfers**

We do not intend to process personal data outside the European Union (**EU**) or the European Economic Area (**EEA**). However, transfers of personal data to the United States may occur in connection with, for example, support matters. In such cases, the data is transferred to recipients that are certified under the EU–U.S. Data Privacy Framework.

If the transfer of personal data to other countries outside the EU/EEA becomes necessary, or under conditions other than those described above, we will ensure that such transfers comply with applicable data protection regulations. This

means that the third country must either be subject to an adequacy decision by the European Commission or that standard contractual clauses have been entered into with the receiving party.

## **7. Data security**

We have put in place appropriate security measures to prevent Your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to Your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Your Personal Data on Our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and We will notify You and any applicable regulator of a breach where We are legally required to do so.

## **8. Data retention**

### **How long will You use my Personal Data for?**

We will only retain Your Personal Data for as long as reasonably necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain Your Personal Data for a longer period in the event of a complaint or if We reasonably believe there is a prospect of litigation in respect to Our relationship with You.

To determine the appropriate retention period for Personal Data, We consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of Your Personal Data, the purposes for which We process Your Personal Data and whether We can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances You can ask Us to delete Your Personal Data: see the Your Legal Rights section below for further information.

In some circumstances We will anonymise Your Personal Data (so that it can no longer be associated with You) for research or statistical purposes, in which case We may use this information indefinitely without further notice to You.

## **9. Your legal rights**

Under certain circumstances, You have rights under GDPR in relation to Your Personal Data. We need to process Your Personal Data in order to administrate Your request. Please note that we will only be able to handle Your request if We are the Controller for the relevant processing. If You have received or ordered Your Careium product or services through a municipality or another company, please contact that other organisation since they will act as data controller or be able to provide more information.

You have the right to:

**Request access** to Your Personal Data (commonly known as a "data subject access request"). This enables You to receive a copy of the Personal Data We hold about You and to check that We are lawfully processing it.

**Request correction** of the Personal Data that We hold about You. This enables You to have any incomplete or inaccurate data We hold about You corrected, though We may need to verify the accuracy of the new data You provide to Us.

**Request erasure** of Your Personal Data. This enables You to ask Us to delete or remove Personal Data where there is no good reason for Us continuing to process it. You also have the right to ask Us to delete or remove Your Personal Data where You have successfully exercised Your right to object to processing (see below), where We may have processed Your information unlawfully or where We are required to erase Your Personal Data to comply with local law. Note, however, that We may not always be able to comply with Your request of erasure for specific legal reasons which will be notified to You, if applicable, at the time of Your request.

**Object to processing** of Your Personal Data where We are relying on a legitimate interest (or those of a third party) and there is something about Your particular situation which makes You want to object to processing on this ground as You

feel it impacts on Your fundamental rights and freedoms. You also have the right to object where We are processing Your Personal Data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process Your information which override Your rights and freedoms.

**Request restriction of processing** of Your Personal Data. This enables You to ask Us to suspend the processing of Your Personal Data in the following scenarios:

- If You want Us to establish the data's accuracy.
- Where Our use of the data is unlawful but You do not want Us to erase it.
- Where You need Us to hold the data, even if We no longer require it as You need it to establish, exercise or defend legal claims.
- You have objected to Our use of Your Personal Data but We need to verify whether We have overriding legitimate grounds to use it.

**Request the transfer** of Your Personal Data to You or to a third party. We will provide to You, or a third party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which You initially provided consent for Us to use, or where We used the information to perform a contract with You.

**Withdraw consent at any time** where We are relying on consent to process Your Personal Data. However, this will not affect the lawfulness of any processing carried out before You withdraw Your consent. If You withdraw Your consent, We may not be able to provide certain products or services to You. We will advise You if this is the case at the time You withdraw Your consent.

### **How to exercise Your rights**

If You wish to request access, please use form 1.

If You wish to request correction, erasure, objection, restriction or data portability, please use form 2.

If You want to withdraw Your consent, please contact Us using the details set out above or, if it concerns cookies, by changing Your settings in the Cookie Banner.

Please note that if You have received or ordered Your Careium product or services through a municipality or another company, please contact that other organisation since they will act as data controller or be able to provide more information.

### **No fee usually required**

You will not have to pay a fee to access Your Personal Data (or to exercise any of the other rights). However, We may charge a reasonable fee if Your request is clearly unfounded, repetitive or excessive. Alternatively, We could refuse to comply with Your request in these circumstances.

### **What We may need from You**

We may need to request specific information from You to help Us confirm Your identity and ensure Your right to access Your Personal Data (or to exercise any of Your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact You to ask You for further information in relation to Your request to speed up Our response.

If We approve Your request we will send the relevant information electronically by a secure transfer service or to Your postal address if required by You.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take Us longer than a month if Your request is particularly complex or You have made a number of requests. In this case, We will notify You and keep You updated.

## **10. Glossary**



## LAWFUL BASIS

**Legitimate Interest** means the interest of Our business in conducting and managing Our business to enable Us to give You the best service/product and the best and most secure experience. We make sure We consider and balance any potential impact on You (both positive and negative) and Your rights before We process Your Personal Data for Our legitimate interests. We do not use Your Personal Data for activities where Our interests are overridden by the impact on You (unless We have Your consent or are otherwise required or permitted to by law). You can obtain further information about how We assess Our legitimate interests against any potential impact on You in respect of specific activities by contacting Us.

**Performance of Contract** means processing Your Personal Data where it is necessary for the performance of a contract to which You are a party or to take steps at Your request before entering into such a contract.

**Comply with a legal obligation** means processing Your Personal Data where it is necessary for compliance with a legal obligation that We are subject to.

## THIRD PARTIES

### Third Parties

- Service providers acting as processors based in the EU and EEA who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in EU and EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the EU/EEA who require reporting of processing activities in certain circumstances.
- Service providers acting for You in the provision of related services, such as emergency services, Your care home or a local authority obtaining services to assist You.
- Third party equipment providers whose equipment You have access to via Your arrangement with Us.
- Those individuals You agree We can share data about You with, this will include location data to allow them to locate You or be advised in the event of Your suffering a fall.

Last Updated: May 30 2025.