

CODESCENE PRIVACY POLICY

Updated: May 8th 2024

CodeScene AB ("CodeScene") is a Swedish company (Registration number 559028-3270), with its principal office at Hyllie Boulevard 34, SE-215 32 Malmö, Sweden. This Privacy Policy describes our privacy practices, and informs you of our policies regarding the collection, use and disclosure of the personal data we receive from you when you interact with us, via our websites (the "Site") or otherwise. CodeScene is considered to be the data controller regarding the processing activities described in this Privacy Policy. We may update this Privacy Policy at our discretion, in line with legislative or industry developments. For details of our privacy principles related to AI-based features (marketed as CodeScene 'ACE') please see <https://codescene.com/product/ace/principles>.

1. Core Principles

- 1.1. We respect that we have a duty of care to the people within our data
- 1.2. Data can be a liability and should therefore only be collected and processed when necessary
- 1.3. We will never sell, rent or otherwise distribute or make public your personal information

2. Relevant Legislation

- 2.1. Along with our business and internal systems, the Site is designed to comply with the following national and international legislation with regards to data protection and user privacy:
 - 2.1.1. Swedish Dataskyddslagen (SFS 2018:218)
 - 2.1.2. Swedish Dataskyddsförordningen (SFS 2018:219)
 - 2.1.3. EU Data Protection Directive 1995 (DPD)
 - 2.1.4. EU General Data Protection Regulation 2018 (GDPR)
- 2.2. The Site's compliance with the above legislation, all of which is stringent in nature, means that they are also likely to be compliant with the data protection and user privacy legislation of many other countries and territories.
- 2.3. The Site may contain links to other websites and services. We encourage you to read the privacy policies of any such websites you visit and/or services you use.

3. Purposes of Processing

- 3.1. We may process your personal data for the following purposes:
 - 3.1.1. To be able to provide analysis and insights to our users about their software development organizations. For example, how knowledge is distributed across their teams, how their teams interact with each other, and which developers are focused on which areas;
 - 3.1.2. To enforce our policies and Terms & Conditions, including to protect our rights, property, and safety and also the rights, property and safety of third parties if necessary;
 - 3.1.3. To send you information about products and services of ours that we think you might like, as well as those of our partner companies;
 - 3.1.4. To fulfil legal requirements.

4. Legal Grounds

- 4.1. The legal grounds for our processing of your personal data are:
 - 4.1.1. The processing described in 3.1.1 and 3.1.2 is necessary for the performance of a contract to which you are a party and/or in order to take steps at your request prior to entering into a contract.
 - 4.1.2. The processing described in 3.1.3 and 3.1.4 is necessary for the purposes of the legitimate interests pursued by us or by a third party to carry out marketing activities and comply with applicable laws, as long as such interests are not overridden by your interests or fundamental rights and freedoms regarding the protection of personal data

5. Collection & Processing of Personal Data

- 5.1. We may process the following personal data when you use the Site or otherwise interact with us:
 - 5.1.1. Basic identifiers: Name, Email address.
 - 5.1.2. Technical identifiers: Internet Protocol (IP) address, unique ID, operating system, location, type of web browser, the pages you viewed, git service provider ID, tags, cookies, information in cookies and referral links (the link that sent you to a particular web page).
- 5.2. We need to process the personal data mentioned above in order to provide you with our services. As a result, if you do not provide us with such data, we will be unable to provide you with our services.

6. Storage & Deletion of Data

- 6.1. We store your data in a secure operating environment that is not accessible to the public. Your personal data is stored as long as you are an active user of the Site or otherwise interact with us.
- 6.2. As part of our commitment to information security we maintain an ISO 27001 certification, under which our security processes are regularly audited.



6.3. Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. Please note that we may retain some information in order to fulfil our obligations under applicable Swedish laws.

7. Disclosure of Personal Data

7.1. We may share and disclose your personal data with the following recipients:

7.1.1. Technical Infrastructure

7.1.1.1. Amazon Web Services ('AWS'): cloud service provider used for data storage and compute

7.1.2. Payment, Invoicing & Subscription management

7.1.2.1. Stripe: payment processing platform used for handling all online purchases

7.1.2.2. Chargebee: subscription management system used for license administration

7.1.2.3. Odoo: accounting system used for generating offline invoices

7.1.3. Marketing, Sales & Support

7.1.3.1. HubSpot: CRM and CMS provider used for sales, support and marketing

7.1.3.2. Freshdesk: ticketing management service used for support

7.1.3.3. UserPilot: In-app service used to dynamically provide relevant content & features

7.1.4. Product Analytics

7.1.4.1. Amplitude: Analytics platform used to better understand overall trends

7.1.4.2. HotJar: Analytics service used to better understand user interaction

8. Transfer of Data

8.1. In some cases, transfer of your personal data to the US will occur, based on the location of recipients' data centres. In order to safeguard your personal data in any such 'third country' transfers, we will apply the Standard Contractual Clauses (SCC) issued by the European Commission, unless the recipient is certified under the Data Privacy Framework Program (DPF).

8.2. Further information about the DPF and the SCC can be found here:

8.2.1. DPF: <https://www.dataprivacyframework.gov/>

8.2.2. SCC: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

9. Cookies

9.1. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit the Site, we may collect information from you automatically through cookies or similar technologies.

9.2. Cookies are used for a wide variety of purposes such as to keep you logged in, to remember your preferences and settings, to analyse how the Site is used by you, and to serve advertising to you.

9.3. Cookies may be served to you by the website you are visiting (a "first-party cookie") or by another organisation providing services to that website, such as an analytics company (a "third-party cookie"). They will either be stored for the duration of your visit (a "session cookie") or they will remain on your device for a fixed period, which could be months or even years, to remember you across multiple browsing sessions (a "persistent cookie").

9.4. If you do not want Cookies to be placed on your device, you can adjust the settings of your internet browser to restrict some or all Cookies, and to alert you when a Cookie is placed on your device. For further information about how to do so, please refer to your browser's 'help' section or equivalent. Please note that if you use your browser settings to block all Cookies (including strictly necessary Cookies) you may not be able to access or use all or parts of the Site, and/or use all features and functionality.

10. Your Rights

10.1. You have an absolute right to object to the processing of your personal data for direct marketing. Furthermore, you have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

10.2. If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers

10.3. If you have any complaints regarding our processing of your personal data, you may file a complaint with the competent data protection authority, Integritetsskyddsmyndigheten, at <https://www.imy.se/en/>

10.4. If you would like to make a request regarding any of your rights or to discuss how we process your personal data, please contact us at privacy@codescene.com