

PRIVACY NOTICE – RETRIEVER SERVICES

Last updated: 10 January 2024

1. ABOUT THIS DOCUMENT

Retriever (“**Retriever**”, “**we**”, “**us**”, or “**our**”), is offering services (“**Retriever Services**”) that enables our customers to monitor and analyse editorial and non-editorial media such as press articles, online media, TV, radio, Youtube, podcasts and social medias. To be able to offer Retriever Services to our customers we collect, index and store data, including personal data, in our databases (“**Retriever Databases**”), which are used as sources of information when we are providing, inter alia, the following Retriever Services to our customers:

- Retriever Monitor

Retriever Monitor is a media monitoring and analysis platform that provides coverage of Nordic and international media sources, including press articles, online media (both editorial and other webpages) TV, radio, Youtube and podcasts (the “**Media**”). To deliver Retriever Monitor, Retriever collects, indexes and stores the Media in Retriever’s database (“**Monitor Database**”). Our customers access the Monitor Database via a web interface which allows our customers to search for Media in the Monitor Database and may for example save and comment on specific Media. In this manner, Customers may build their own archive of Media in our platform.

- Retriever Research

Retriever Research is a research database and a news archive which is used by, for example, journalist, researchers, authors, students and companies. The database includes the same Media as the Monitor Database (the “**Media Archive**”).

- Retriever Listen

Retriever Listen is a social media listening and analytics platform which includes information that Retriever collects from social media platforms (including, but not limited to, Facebook; Instagram; Reddit; X (Twitter); and selected blogs and forum) (“**SoMe-Data**”). This data is also stored

in Retriever's "**Social Media Archive**". In the Social Media Archive customers are able to search for SoMe-Data and view their search hits via a web interface. For example, a Customer may use Retriever Listen to follow how their brand is mentioned in SoMe-Data on social media platforms and compare it to information about other brands.

This information (the "**Notice**") informs you on how Retriever is processing your personal data when acting as a controller within the meaning of the EU General Data Protection Regulation 2016/679 ("**GDPR**") when processing personal data in the Retriever Databases. Please refer to the column "Who is the controller of the personal data" in section 2. Please note that the Notice does not provide information about how our customers process personal data when they are using the Retriever Services, and that when processing personal data from the Retriever Databases each customer is a controller of the personal data and responsible for its own processing of the personal data, such processing to be governed by the customer's privacy notice.

If you have any questions about our personal data processing, you can always get in touch with us using the contact details set out in section 7 below.

2. **FOR WHOM IS THIS NOTICE RELEVANT?**

This Notice is addressed to all data subjects whose personal data is included in Retriever's Databases. The data subjects can be categorized as:

- (i) **Social Media Data Subjects.** – This category includes but is not limited to 1) social media users who have created or interacted with content on social media platforms and 2) individuals that have been mentioned (or in any other way are included) in **SoMe-Data**. Please note that Retriever only collects SoMe-Data from open accounts, with the exception for when the customer has connected their own social media accounts and thereby given Retriever the ability to collect more than just open data.
- (ii) **Authors of Media and data subjects who are portrayed, included in or mentioned in Media.** – This category includes you who have written, published or otherwise made available media we collect from Media. We collect Media from both editorial sources and non-editorial sources. For editorial media an author will most likely be a journalist. For non-editorial Media an author will in many cases be politicians, opinion leaders, academics, but may also be other type of data subjects who have written, posted or published Media. This category also includes you who are included in Media, for example by being portrayed or mentioned in an article or photography.

Retriever does not have contact details to the above-mentioned data subjects and have assessed that collecting and processing additional personal data for the sole purpose of informing data subjects would run counter to the principle of data minimisation in the GDPR. In this sense, it would be disproportionate to collect contact details for the sole purpose of informing the data subjects directly. Retriever is therefore relying on the exemption of providing information in article 14.5 of the GDPR, and will instead of actively providing information to each of the data subjects, take appropriate

safeguards to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available. This is done by publishing this Notice on Retriever's website.

2.1 Information to users of Retriever Services (our customer's employees)

If you have been authorized to use Retriever Services, usually by your employer (our customer), we will process your personal data to, for example, set up a user account and verify your authorized access to Retriever Services. When Retriever is providing Retriever Services to our customers, we are processing your personal data on behalf of our customer, i.e., as a processor to our customers. This means that in relation to the provision of Retriever Services, it is our customer who is the controller of your personal data and ultimately responsible for the processing.

Please seek our customer's (your employer or other organisation who has assigned you with access to use Retriever Services) privacy notice for information about how your personal data is being processed when you are using Retriever Services.

3. HOW WE PROCESS YOUR PERSONAL DATA

3.1 For Social Media Data Subjects

In the table below you can find information about which personal data we collect about Social Media Data Subjects, our purposes of the processing, a description of who the controller of the personal data is and information of how we collect the data.

<i>Categories of personal data</i>	<i>Retriever's purpose(s) of the processing</i>	<i>Who is the controller of the personal data?</i>	<i>How is the personal data collected?</i>
The personal data included in SoMe-Data depends on the information that has been made publicly available. In general, SoMe-Data includes the following types of personal data: – Images; – Videos, – Account information from the relevant social media platform (username, profile picture and other account information which has been made public when	Personal data included in SoMe-Data is processed for purpose of creating and enriching the Social Media Archive , which is used as a repository of information when we offer and provide Retriever Services (mainly Retriever Listen) to our customers.	Retriever is independently deciding the purposes and means of the personal data processing when creating and enriching the Social Media Archive. Within the meaning of GDPR Retriever is, therefore, the controller of the personal data included in SoMe-Data when it is processed for Retriever's own purposes of creating and enriching the Social Media Archive.	SoMe-Data is collected from social media platforms both by 1) importing open SoMe-data and by 2) collecting SoMe-Data through the social media platforms' dedicated APIs.

posting SoMe-Data at the relevant social media); – Mentions and reference to data subjects in posts, etc. Please note that we will not ask for sensitive personal data, such as information about your health, political opinion, sexual orientation or religious beliefs, but since the personal data we process consists of the SoMe-Data that has been made public it cannot be excluded that also sensitive personal data may be collected if such data has been made public via social media platforms.		When Retriever is providing Retriever Listen to our customers, the customers will get access to the Social Media Archive via our digital platform. Our customers are controllers when they are using Retriever Listen and other Retriever Services via our platform, and for example make searches in the Social Media Archive for their own purposes.	
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3.2 For Authors of Media and data subjects who are portrayed, included in or mentioned in Media.

In the table below you can find information about which personal data we collect about Authors of Media and data subjects who are portrayed, included in or mentioned in Media, our purposes of the processing, a description of who the controller of the personal data is and information of how we collect the data.

<i>Categories of personal data</i>	<i>Retriever's purpose(s) of the processing</i>	<i>Who is the controller of the personal data?</i>	<i>How is the personal data collected?</i>
The personal data included in Media depends on the information that have been made publicly available. In general, Media includes the following types of personal data: - Images; - Videos;	Personal data included in Media is processed for purpose of creating and enriching the “Monitor Database” and the “Media Archive”, which are used to offer and provide, inter alia, the services Retriever	Retriever is independently deciding the purposes and means of the personal data processing when creating and enriching the Monitor Database and the Media Archive. Within the meaning of GDPR Retriever is, therefore, the controller	For editorial Media we have partnership agreements with Media Sources who provides Editorial Media to us. Media content and content behind paywalls are acquired based on agreements with the owners. Publicly

- Name and contact details (if made available) of the author of Media; - Mentions and reference to data subjects in articles, etc. Please note that we will not ask for sensitive personal data, such as information about your health, political opinion, sex life or religious belief, but since the personal data we process consists of the Media that has been made public, it cannot be excluded that also sensitive personal data may be collected if such data as been made public.	Monitor and Retriever Research to our customers.	of the personal data included in Media when it is processed for Retriever's own purposes of creating and enriching the Social Media Archive. When Retriever is providing Retriever Monitor or Retriever Research to our customers, our customers will get access to our databases via our digital platform. Our customers are independent controllers when they are using our services via our platform, and for example make searches in our databases for their own purposes.	available web data is indexed either by crawling or through open APIs.
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3.3 Which our legal basis for the processing of your personal data?

3.3.1 Social Media Archive and Monitor Database

We process the personal data included in the Social Media Archive and Monitor Database to be able to offer and provide Retriever Services (mainly Retriever Listen and Retriever Monitor) to our customers. Our processing of personal data is therefore based on our and our customers' legitimate interest (*Article 6.1 (f)*) in offering and taking part of Retriever Services, to be able to monitor, analyse and follow mentions and/or specific topics in Media and SoMe-Data.

We consider that our legitimate interests can be achieved in accordance with applicable law, that there is no less intrusive way to achieve the same purposes, and that those legitimate interests are not outweighed by your interests. We have also taken appropriate protective measures to limit the effects of the processing on your privacy interest.

To the extent sensitive personal data is included in the Media or SoMe-Data we collect, our processing is based on [Article 5.2 (e) of the GDPR, as it relates to personal data which have been manifestly made public by the data subject].

3.3.2 *Media Archive*

As particularly set forth in recital 153 of the GDPR, the processing of personal data in news archives and press libraries, such as the Media Archive, is a processing of personal data for journalistic purposes. Our processing of personal data included in the Media Archive is therefor so-called "**journalistic exception**" outlined in Article 85 of the GDPR and the Swedish Act containing supplementary provisions to the EU General Data Protection Regulation (SFS 2018:218), chapter 1, section 7.

This means that the processing of personal data included in the Media Archive is exempt from many of the provisions of the GDPR to be able to reconcile the right to protection of personal data with the right to freedom of expression and information. This means that the rights described in section 0 will not be applicable when your personal data is included in the Media Archive.

Please contact us by using the contact details set forth in section 8, if you have any questions about our personal data processing based on the journalistic exception.

3.4 **For how long do we process your personal data?**

3.4.1 An important purpose with the Retriever Services is the archiving of Media and SoMe-data to be able to maintain such information and provide long-term access to it to our current and future customers. This means that personal data included in SoMe-Data and Media will be processed by Retriever for as long as Retriever assess the Media or the SoMe-data to be relevant to achieve such archiving purposes. How do we share your personal data and with whom?

The personal data included SoMe-Data and Media is disclosed to the following categories of recipients:

- **Our Customers and Subcontractors.** We may share personal data included in SoMe-Data and Media to our Customers and Subcontractors when providing Retriever Services to our Customers.
- **Our service providers:**

- For the Social Media Archive we use Amazon Web Services EMEA SARL ("**AWS**") for storage and hosting of SoMe-Data. SoMe-Data is stored inside the EU/EEA.
- For the Media Archive and the Monitor Database we use Rejlers/Embriq for storage of Media. Media is stored inside the EU/EEA.
- **Courts and similar judicial entities and/or authorities**, if we are required to do so by law.

4. YOUR RIGHTS

According to the GDPR, you have various data protection rights which you can exercise, including the right to be informed in accordance with this Notice. We've outlined these rights below to help you understand them better. If you have any comments or complaints regarding our processing of your personal data, please contact us directly by contacting our Data Protection officer ("**DPO**") at the contact details set forth in section 7.

Once we receive a request from you, we will respond as soon as possible, and in any case, within the deadline stipulated in applicable legislation. Please note that before taking any action, we may ask you to verify your identity.

Note also that if your data has been submitted to us in our role as a processor (See the column "Who is the Controller of the Personal Data" in section 2) and you wish to exercise any rights you may have under applicable data protection laws, please inquire with the respective customer directly. Furthermore, the rights described in this section is not applicable when your personal data is included in the Media Archive and processed for a journalistic purpose.

WHAT DOES IT MEAN	HOW YOU CAN EXERCISE YOUR RIGHT
Right to access	
You have the right to access and receive a copy of your personal data that we process, as well as other supplementary information at any given time.	Such requests should be made to dpo@retriever.se . If possible, please specify the type of information you would like to access to ensure that our disclosure meets your expectations.
Right to rectification	
You can challenge the accuracy of your personal data at any given time. Depending on the purpose of the processing you can request the completeness of your personal data. If your personal data is indeed inaccurate, you are entitled to have the inaccurate data removed, corrected, or completed, as appropriate.	We encourage you to notify us of any inaccuracies regarding your personal data as soon as they occur, including changes to your contact details. A request to exercise this right is made in writing to dpo@retriever.se

Right to rectification	
In certain cases, you are entitled to have your personal data erased (also known as the “right to be forgotten”), such as in cases where the personal data is no longer needed for the purpose for which it was collected, or if we no longer have a legal basis to continue processing it.	A request to exercise this right is made in writing to dpo@retriever.se
Right to objection	
You have the right to object to the processing of your personal data at any time. This means that we will stop or be prevented from processing further your personal data. You have the absolute right to object to receiving further marketing material or communications from us.	A request to exercise this right is made in writing to dpo@retriever.se If possible, please specify to which purpose of processing you wish to object to ensure that our actions meet your expectations.
Right to restriction	
By exercising this right, you limit the way we will process your personal data for a certain period of time. This right is an alternative to requesting the erasure, in case you don’t want the deletion of your personal data.	A request to exercise this right is made in writing to dpo@retriever.se
Right to withdraw your consent	
You have the right to withdraw your consent to any processing for which you have previously given consent at any given time.	A request to exercise this right is made in writing to dpo@retriever.se

You also have the right to contact and lodge a complaint to the competent data protection authority.

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Norway Datatilsynet P.O. Box 458 Sentrum 0150 Oslo Tel. +47 22 39 69 00 Email: postkasse@datatilsynet.no Website: https://www.datatilsynet.no	Denmark Datatilsynet Carl Jacobsens Vej 35 2500 Valby Tel. +45 33 1932 00 Email: dt@datatilsynet.dk Website: http://www.datatilsynet.dk/

5. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM

In addition to what has been described above, we may also access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

6. CHANGES TO THIS NOTICE

If we make changes to this Notice, we will notify you on our Website. You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice.

7. OUR DATA PROTECTION OFFICER

Retriever has appointed a Data Protection officer (“**DPO**”) tasked to monitoring and to ensuring Retriever’s compliance with the GDPR.

The data protection officer can be reached at dpo@retriever.se

8. CONTACT INFORMATION

Our contact information is:

Sweden Name: Retriever Sverige AB Address: Blasieholmsgatan 4A, 111 48 Stockholm Phone number: +46 8 546 121 00 Email address: support@retriever.se	Finland Name: Retriever Suomi Oy Address: Kalevankatu 20, 00100 Helsinki Phone number: +358 207 705730 Email address: info@retriever.fi
Norway Name: Retriever Norge AS Address: Langkaia 1, 0150 Oslo, NO Phone number: +47 22 91 03 50 Email address: post@retriever.no	Denmark Name: Retriever Danmark A/S Address: Store Kongensgade 81, 1264 København Phone number: +45 36 99 05 86 Email address: infodanmark@retriever.dk