

PRIVACY POLICY

Who is responsible for the processing of your personal data?

[New Bubbleroom Sweden AB, with organization number [556699-9214 (“Bubbleroom”, “we” are responsible for the processing of your personal data.

Your privacy is important to us. Through this policy, we wish to inform you of how your personal data will be processed when you shop with us, when you visit us online and identify yourself, when you create and use an account, and when you receive newsletters, SMS mailings, letters through the post, information, or any other form of marketing from us.

If you have any questions regarding the processing of your personal data, or if you wish to contact us in order to exercise your rights, you are welcome to contact us at Bubbleroom – we are available on email address customerservice@bubbleroom.com. Our postal address is New Bubbleroom Sweden Risängsgatan 4 504 68 Borås Sweden, and if you wish to phone us, our telephone number is +46 8-411 17 17

How do we process your information?

In brief, we process your personal data in order to:

- administer your purchases when you shop with us;
- administer your account if you have chosen to sign up for an account, e.g. so that you can use the functions provided to you via the creation of your account;
- send you marketing via emails, SMS mailings and post;
- send you relevant offers based on your purchase history and the goods that you have shown interest in, e.g. by clicking on them in our newsletter or SMS mailings, or by placing the items in your customer basket ;
- follow current laws and legislation; and
- offer functionality on the homepage, so that it is as user-friendly as possible.

Bubbleroom places great emphasis on being as clear as possible about how we process your personal data. Do you wish to know about why we process your personal data in more detail? You can read about this at the end of this policy. Here we will provide you with more detailed information about why we process your personal data, which data we process, and for how long we process your personal data. You can also read about the legal basis in which we process your data in a legal manner, in accordance with the EU’s General Data Protection Regulation (GDPR)

How do we protect your personal data?

We, and our business partners, have adopted several organizational and technical safety measures in order to protect your personal data. We actively work towards complying with the EU’s General Data Protection Regulation (GDPR) We have several IT systems and functions that help us to protect your personal data from illegal and unauthorized processing. Moreover, we have internal procedures that ensure that only the necessary people have access to your data.

Must you submit your personal data to us, and what happens if you do not submit it?

We require certain personal data from you in order for us to provide you with certain services, and in order to enter into agreements with Bubbleroom. If you do not submit the personal data necessary for us to fulfil our agreement with you, we may not be able to deliver your goods, etc.

If you do not submit the information give us your consent that is required for processing your data, we shall not be able to process your personal data. Your consent is required if you wish to continue receiving newsletters, SMS mailings and post containing information and offers, etc. for a period that extends beyond the period in which we would otherwise send you information (see below).

Who will have access to your personal data?

As a starting point, your personal data will only be processed by Bubbleroom. However, your personal data can be shared outside of Bubbleroom if e.g. it is necessary to fulfil our agreement with you, as well as to obtain assistance with elements that are not a part of our core business, and so be able to offer you good prices on our products.

Here is a more detailed list of how we may have to share your personal data:

- We share your personal data with our external customer service in order to maintain good customer service;
- In order to sell you the goods that you wish to purchase, we share your personal data with the supplier who provides the payment alternative that you have selected. Depending on the payment alternative you have chosen, the details and the manner in which they are processed by the supplier may vary.
- We will share your personal data with our transport supplier in order to deliver the goods you have purchased, and in order to return the goods if you experience buyer's remorse, wish to complain about your purchase, or if you wish to exchange your goods. This is done in order to ensure that the transporter can conduct the delivery, as well as send you information when your product is available for pick-up;
- We share your social security number with a supplier, who helps us to ensure that your contact information is correct;
- We share your purchase history with the supplier that we use to analyze how best we can improve our services and offers for our customers;
- If you do not pay for your goods within the agreed-upon time, we will share your personal data with one of the suppliers that we use to gather payment;
- We share your personal data with the printing and shipping companies that we use in order to send you marketing information.

Bubbleroom will also share your personal data with the selected external IT suppliers that we use; however, this will only be done to the extent necessary for the suppliers to fulfil their commitments to us.

If you wish to receive more information about exactly which companies or authorities we share your personal data with, you are welcome to contact us.

Will we transfer your personal data outside of the EU/EES?

As a rule, Bubbleroom processes your personal data within the EU/EES; however, in certain cases, we may use suppliers outside of the EU/EES. The transfer of personal data outside of the EU/EES is only conducted if we have support for the transfer, in accordance with the conditions outlined in the EU's General Data Protection Regulation (GDPR).

We share certain personal data with American personal data assistants, who process personal data on our behalf by providing us with IT services. These companies are Privacy Shield certified. According to a decision by the European Commission, personal data may be transferred to recipients in the USA, on condition that the recipient is Privacy Shield certified. Privacy Shield is an agreement between the EU and the USA that has the purpose of protecting Europeans basic rights and guaranteeing the legal security for companies that transfer personal data to the USA. American companies that wish to become Privacy Shield certified may apply to the USA's department of commerce, which ensures that the company's privacy policy complies with the high security standard required by Privacy Shield.

Which rights do you have in order to affect how we process your personal data?

According to the EU's General Data Protection Regulation (GDPR), you have certain rights regarding the processing of your personal data. Below is a description of your rights, as well as what these rights entail. To exercise your rights, you are welcome to contact us. Please see the contact information above.

Revoking your consent

If we process your personal data with the support of your submitted consent, you have the right to revoke, in whole or in part, your consent for the processing of your personal data at any time. Revoking of your consent applies from the day that it has been revoked.

Right to access

You have the right to receive confirmation of the personal data that concerns you, as well as to receive access to information regarding how your personal data is being processed, e.g. the purposes of the processing and to which categories of the personal data the processing applies. You also have the right to receive a copy of your personal data that is being processed.

Right to correction

[If you have an account with us, you can log in at any time and change your personal information.] You also have the right to have incorrect personal data amended without delay, by providing information that supplements the incomplete personal data.

Right to deletion (the right to be forgotten)

You have the right to demand the deletion of your personal data if:

- the personal data is no longer necessary for the purposes they were gathered or processed for;
- if you revoke your consent on which the processing is based, and there is no further legal basis for the processing;
- if you object to the processing, on condition that we have no legitimate reasons to continue the processing that override your legitimate reasons for not continuing;

- when your personal data has been processed in an illegal manner; or
- if the personal data must be deleted in order to fulfil a legal obligation to which we are subject.

Bubbleroom will delete your personal data upon your request, on the condition that we do not have an obligation to save your personal data in accordance with the EU's General Data Protection Regulation (GDPR), or any other legislation.

Right to limited processing

You have the right to demand that the processing of your personal data is limited if:

- you contest the correctness of the information (however, only within the period we require to check this);
- the processing is illegal and you wish us to limit the information rather than delete them;
- you need the personal data in order to make valid or defend legal claims, and we no longer require the personal data; or
- you object to the processing if we have not conducted a balance of interests.

Right to object to processing

You have the right to object, at any time, to the processing of your personal data based on a balance of interests – including profiling (read more about when this happens in the tables below.) However, this does not apply if we can present compelling legitimate reasons for the processing that override your interests, rights and freedoms, or if it is for the purpose of determining, exercising or defending legal claims.

You also have the right to object to your personal data being processed for marketing purposes, which includes profiling to the extent that this is connected to such direct marketing. If you object to marketing and/or profiling, your personal data will no longer be processed for such purposes.

Right to lodge a complaint

You have the right to lodge a complaint to an authorized regulatory authority (without this affecting any other administrative review procedure or judicial remedy). Such a complaint is preferably lodged with the authority of the member state within the EU/EES in which you reside, in which you work, or in which a violation of current laws and rules for data protection is alleged to have occurred. The authorized regulatory authority in Sweden is the Swedish Data Protection Authority, which can be reached via www.datainspektionen.se.

Right to data portability

You have the right to obtain the personal data that pertains to you, and that you have submitted to us in a structured, commonly used and machine readable format, and you have the right to transfer this data to another personal data controller (data portability) when:

- the processing is based on your consent or on an agreement; and
- the processing occurs automatically.

You have the right to the transfer of your personal data directly from us to another personal data controller when this is technically possible.

A detailed description of how we process your personal data

Here we will provide you with more detailed information about why we process your personal data, which data we process, and for how long we process your personal data. Please note that the column below only states how long we process the data for the purpose that is stated in the same row. The same information may be stored for a longer period for another purpose.

In the third column, you can also read about the *legal basis* we have to process your data in a legal manner, in accordance with the EU's General Data Protection Regulation (GDPR)

When you begin a purchase with us without completing the purchase			
For which purposes do we process your personal data?	Which personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?
<p>In order to save your products in the basket if you have abandoned it, and in order to gain access to it on the same device if you visit us online again.</p> <p>For you to have access to products that you have added to the basket on another device, if you visit us online again but from another device.</p> <p>We also send information about your shopping cart via email, read more below</p>	<p>A hash (text ID) of the email address you provided when you began the purchase, information regarding the products you added to the basket, and which links you clicked on in our newsletters.</p> <p>If you are logged in to your account with us, the information is connected to your account.</p>	<p>Our legal basis for the processing is our legitimate interest in making it as simple and smooth as possible for you to purchase the product(s) you have shown an interest in by adding them to the basket.</p>	<p>The information is processed from the time that you add the product(s) to your basket, until the time when you make a purchase with us; however, no longer than three days after you have added the product(s) to the basket.</p>

When you shop with us			
For which purposes do we process your personal data?	Which personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?
<p>In order for us to know whom we have entered into an agreement with, to</p>	<p>Name, postal address, email address and customer number.</p>	<p>The processing is necessary in order to fulfil our agreement with you.</p>	<p>The information is processed until the purchase is complete and the products</p>

deliver the goods to you, for us to confirm your purchase via email, and in general to administer your purchase, in accordance with the current consumer legislation.			have been delivered to you.
To enter the information required to perform your purchase for you, when you choose for us to do so.	Social security number.	The processing is conducted with the support of your consent	The information is processed from the time that you choose that the information should be entered for you, until the time that they have been gathered and entered.
To enter the information required to perform your purchase for you.	Email and address.	The processing is conducted with support from our legitimate interest to facilitate you; someone who has been our customer for the last 36 months.	Your data is processed with this purpose for 36 months from your time of purchase.
In order to administer your payment if you choose to pay directly using a card.	Card information, e.g. your card number.	The processing is necessary in order to fulfil our agreement with you.	The information is processed until the payment has been completed and is not saved by us, but rather by the supplier who assists us with card payments.
In order for you to purchase goods via an invoice, in installments or other payment methods that entail us providing you with credit, and in order for us or our payment service suppliers to conduct a credit test	Name, postal address, telephone number, email, social security number and balance of the liability (if applicable), as well as information that we, or our business partners, gather from credit bureaus,	Processing is necessary in order for you to select to receive credit, and thereby fulfil our credit/installment purchase agreement with you, and the importance of a secure identification of you, as the person liable for payment, and to	The information is processed until the payment has been completed. Information that is necessary to conduct the credit check, as well as the result of the credit check, is processed from the time that you choose

<p>in conjunction with this, with the purpose of assessing your payment ability.</p>	<p>i.e. information regarding your financial situation.</p>	<p>receive payment via invoice and thereby be able to fulfil our agreement with you. The processing of your social security number is motivated with regard to ensuring secure identification of you, as the person liable for paying for the purchase.</p>	<p>to pay via credit, and it is deleted as soon as your payment ability has been checked.</p>
<p>In order for us (and/or the shipping company we use) to send you your goods, as well as notify you of whether the delivery has been shipped or delivered, and for you to be able to follow your shipment during transport.</p>	<p>Name, postal address, email address, cell phone number (if you have selected SMS notifications), order number and tracking number.</p>	<p>The processing is necessary in order to fulfil our agreement with you.</p>	<p>The information is processed until we have sent your goods, or until the goods have been delivered/picked up at your collection point (depending on shipping method).</p>
<p>In order for you to be allowed to regret your purchase, or exchange the goods you have purchased, and in order for us to comply with mandatory consumer legislation, e.g. to remunerate you, using the same payment method as during the purchase, when you exercise your right to buyer's remorse.</p>	<p>Name, postal address, telephone number, email address and information about the purchase, e.g. the order confirmation and payment method. When you exercise your right to buyer's remorse or to exchange a product, the information that you submitted when exercising this right to buyer's remorse or exchange will also be saved.</p>	<p>The processing is necessary in order to fulfil our agreement with you, and for us to comply with consumer legislation.</p>	<p>The information is processed from the time that you make your purchase and for two months following your purchase, with the purpose of ensuring that we always comply with consumer legislation regarding e.g. the right to buyer's remorse. If you exercise your right to buyer's remorse or to exchange a purchase, we will process your data until we have made a decision regarding</p>

			the remorse/exchange, as well as until we have completed any exchange or remuneration.
In order to manage any claims against us, e.g. in the case of complaints.	Name, postal address, telephone number, email address, information regarding your purchase, as well as information from our communication with you in connection with your claim (e.g. the time of purchase and why you wish to complain).	The processing is necessary in order for us to act in accordance with consumer legislation, and it is conducted with the support of our legitimate interest in defending ourselves in the case of any legal claims which, in our assessment.	The information is processed from the time that you submit your claim, and will continue to be processed for the duration of the claim. If we deny a claim, we always save the information about the claim for one year, in the event that you should choose to have your claim reviewed by the Swedish National Board for Consumer Complaints.
In order to collect non-payment.	Contact information, your order confirmation, and your social security number.	The processing is necessary in order to fulfil the agreement.	The data is saved until you have completed your payment.
In order to comply with accounting laws.	History regarding payments made, transactions, etc. that constitute accounting material.	The processing is necessary in order to comply with mandatory laws, i.e. the Swedish Book-Keeping Act.	The information is processed for seven years, in accordance with the Swedish Book-Keeping Act.
In order to manage your case when you are in contact with our customer service via email or telephone.	Email address, telephone number, as well as the information you submit to us about e.g. your purchase.	Our legal basis for the processing is our legitimate interest in helping you with your case.	The information is processed from the time that you are in contact with our customer service, until we have helped you with your case.
In order to be able to troubleshoot our system in case of	Name, postal address, telephone number, email	Our legal basis for processing is our legitimate interest in	The information is processed from making a purchase

suspected fraud or when something has been wrong with your payment or order.	address, IP address and selected payment method. In any case you leave your social security number to us, we also process that information.	troubleshooting in our system to assist you if something is wrong with your order or payment, or if we suspect a fraud with us.	and up to three years ahead.
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When you have chosen to have an account with Bubbleroom online			
For which purposes do we process your personal data?	Which personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?
For those who have chosen to have an account with us, we will process your data with the purpose of activating, administrating and maintaining your account, as well as informing you when we update the terms and conditions and our privacy policy.	Name, username, password, postal address, telephone number, email address.	The processing is necessary in order to fulfil our agreement with you, if you have chosen to have an account (i.e. you have consented to having an account), and to comply with current consumer and data protection laws.	The information is processed from the time that you choose to create your account, until you change the information or choose to delete your account. If your account has been inactive for 24 months, we will stop processing your data for this purpose. By inactivity, we mean that you have not made any purchase connected to your account, or shown interest in your account in any other way, e.g. logging in to your account. If you contact us and ask to keep the account, we will keep it (until a further 24 months of inactivity).

<p>To enter the information required to perform your purchase for you, so you avoid entering this information every time you purchase products from us online.</p>	<p>Name, username, postal address, telephone number, email address, as well as information about your payment history and payment method.</p>	<p>The processing is necessary in order to fulfil our agreement with you regarding accounts.</p>	<p>The information is processed for the duration that you retain your account.</p>
<p>In order for you to view your active and previous orders.</p>	<p>Order history, e.g. what you have ordered.</p>	<p>The processing is necessary in order to administer your account in accordance with the terms and conditions, and thereby to fulfil our agreement with you.</p>	<p>The information is processed from the time that you order your goods and for the following 36 months. Thereafter, the purchase history is anonymized.</p>
<p>To save your social security number, if you have chosen to leave this and allow it to enter automatically when you wish to pay for your purchase via an invoice.</p>	<p>Social security number.</p>	<p>The processing is necessary in order to administer your account in accordance with the terms and conditions, and thereby to fulfil our agreement with you. The processing of your social security number is motivated with regards to ensuring secure identification of you, as the</p>	<p>The information is processed for the duration that you retain your account.</p>

		person liable for payment.	
To create, show, share and delete wish lists that you have chosen to make.	Name and any personal data that you enter in the free text field.	The processing is necessary in order to administer your account in accordance with the terms and conditions, and thereby to fulfil our agreement with you.	The information is processed for the duration that you retain the list.

In order to communicate with you and provide you with information and offers that have been adapted for you			
For which purposes do we process your personal data?	Which personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?
To send newsletters, SMS mailings, post with information and offers to you, as someone who has made a purchase.	Email, telephone and/or address (depending on whether you have declined marketing via any channel).	Our legal basis for the processing is our legitimate interest in sending marketing information to you, as someone who has conducted a purchase with us, unless you have declined marketing.	We will continue to send you postal information for 36 months after you have made a purchase with us. We will continue to send you newsletters and SMS mailings for 18 months after you have made a purchase with us.
To send newsletters via emails and SMS mailings with information and offers to those who	Email address and cell phone number.	Consent that you have provided us with.	The information is processed for 36 months from the time in which you signed up for a

have signed up for our newsletters.			newsletter or SMS mailing.
In order to adapt the content in our marketing mail that you have signed up for, you will receive offers and information regarding products that you have been assessed as being interested in.	Contact information (e.g. email address and postal address), purchase history, behavior on our website, and the links that you click on in our newsletters.	Our legal basis for the processing is our legitimate interest in providing you with personalized information and personalized offers.	The data is processed from the time that you make a purchase or create an account, and for a further 18 months.
To send you information about your shopping cart via email if you leave our site without complete the purchase.	Information you provided to us in connection with sales such as name, e-mail address and information about which items you added to your shopping cart on our website.	Our legal basis for the processing is our legitimate interest in sending relevant marketing information to you in connection with sales. You have the right to object to the market attendance when collecting the data and at each mailing.	The data will be processed from the time you give us your email address and 24 hours forward.
To send market research surveys to those who have conducted a purchase with us.	Name and email address.	Our legal basis for the processing is our legitimate interest in sending you market research surveys.	The information is dealt with throughout the process required to send you market research surveys. This is continued for a maximum of 36 months after you have made a purchase.
In order to provide adapted marketing across various digital channels, e.g. Facebook, Instagram and YouTube, as well as to reach new customers.	Email address and certain information about you and your online behavior that is collected via the digital channels.	Our legal basis for the processing is our legitimate interest in sending you marketing information.	The information is processed throughout the duration of the marketing in the digital channels, and a maximum of 36 months after you

			have a made a purchase.
In order to ensure that the information we have about you is correct during our communication with you, we coordinate your contact information against an updated database.	Contact information, e.g. name, postal address and email address.	Our legal basis for the processing is our legitimate interest in ensuring that e.g. our mailings are sent to the correct recipient, and to maintain good directory assistance.	The processing is conducted for the duration of time in which you have an account with us or receive marketing from us. This is usually 36 months after you have made a purchase, or longer if you have chosen to keep your account, or longer if you have consented to receive communication from us.

Despite the above, we will never continue to process your personal data if you choose to decline the processing, if you de-register for communication, choose to revoke your consent, or in any other way choose to limit the processing.

For us to develop and become even better through analyses			
For which purposes do we process your personal data?	Which personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?
To analyze the manner in which we can improve our services and offers for our customers.	Purchase history, name and social security number.	Our legal basis for the processing is our legitimate interest in improving our service for you and other customers.	The information is processed from the time of your purchase until they have been shared with the supplier who is performing the service on our behalf, and for a maximum of 36 months after your purchase.

How have we conducted the balance of interests when the legal basis is our legitimate interest?

For certain purposes, Bubbleroom will process your personal data with our legitimate interest as a legal basis for this processing. We do this with support from a balance of interest, through which we have assessed that our legitimate interest to perform the processing overrides your interest and your basic rights to not have your personal data processed.