

Privacy policy

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1. Processing of personal data

Karnov Group as data controller

Karnov Group is the data controller of the personal data collected and processed when you use our services. This is because it is necessary for Karnov Group to collect data in order to provide these services to you as a user of our services.

Services covered by this policy

This policy applies to the use of all products covered by the Karnov online universe, including the Online Library.

You can read more in the license terms for Karnov Group's online products.

Purpose and basis for processing

Processing of your personal data is carried out to fulfil the User Agreement and for the legitimate interests of Karnov Group.

If you consent to participate in surveys, receive marketing or other communication, Karnov Group will process your data in accordance with Article 6(1)(a) of the General Data Protection Regulation (consent).

In addition, Karnov Group processes the personal data provided by you or your employer to Karnov Group for the purpose of fulfilling the agreement on the use of Karnov Group's products, cf. Article 6(1)(b) of the General Data Protection Regulation.

In the same way, information about authors and similar contributors' personal data is processed, for example when publishing a book or the like, cf. Article 6, subsection of the Data Protection Regulation. 1, letter b.

Karnov Group also processes the data generated by your use of our services on the basis of legitimate interests, cf. Article 6(1)(f) of the General Data Protection Regulation. The information is used to provide our service, for marketing, to improve our IT security, for communication and for the development of our products.

2. What data is processed?

Information you provide to us

How we use your personal data depends on which services you use and how you use those services. We use the data we have about you to provide, support, customise and make available our services in a way that is relevant and useful to you.



- We use your registration data to verify your identity and allow access Page 2 of 6 to our services
- We may communicate with you via email, for example about the availability of our services, security or other service communications. For example, emails on how to use the services, updates and reminders. You can always change your communication preferences. Please note that you cannot opt-out of service notifications from us, including notifications on security and legal issues.
- We use data and content about users for invitations and communications that promote our services. We will only send you marketing information if you have consented to this, and you can withdraw your consent at any time.
- We use data to conduct research to further develop our services to provide you and others with a better, more intuitive and personalised experience and increase engagement for our services.
- We conduct surveys through our services. You are not obliged to answer surveys and you have the possibility to decide on the information you give us. You can opt-out of survey invitations.
- We use the data (which may include your communications with us) necessary to investigate, answer and respond to complaints and problems with the service (e.g. errors).
- We use your information to produce aggregated datasets, where it is no longer possible to identify you. For example, we may use your data to generate statistics about our users, their profession or industry, the number of ad impressions delivered or clicked on, or the demographic breakdown of visitors to a website.
- We use your data (including your communications with us) if we believe it is necessary for security reasons or to investigate potential fraud or other violations of our License Terms, this Privacy Policy and/or attempts to harm our members or visitors.

Information from your employer

Your employer may provide us with information to enable you as a user to use Karnov Group's platform. We may receive information about your work area, title, contact details and the IP address from which you are expected to access the service.

Use of services

We log usage data when you visit or otherwise use our services, including our websites, app and platform technology, for example when you view or click on a document or perform a search. We use logins, cookies, device information and internet protocol addresses ("IP addresses") to identify you and log your usage.



Cookies and other similar technologies

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We collect data using cookies and similar technologies.

You can read more about how Karnov Group uses cookies and similar technologies below

You can also control the use of cookies through your browser settings and other tools.

Your device

We receive data from your devices and networks.

When you visit or leave our services (including our plugins, cookies or similar technology on other people's websites), we receive the address of both the website you came from and the one you go to. We also receive information about your IP address, proxy server, operating system, browser and add-ons, device ID and capabilities, and/or ISP.

Newsletters

Karnov Group has a newsletter to which you can choose to subscribe – and you can always unsubscribe later. The purpose of the newsletter is to send new information from the company, which may include new content on the website and advertising of our services. The newsletter is sent by email.

We will only send you newsletters if you have given your active consent.

We process your personal data for as long as you are subscribed to the newsletter. If you unsubscribe from the newsletter, we will stop sending it to you.

By unsubscribing from the newsletter, we will also delete your contact details, unless you continue to receive other products from us, including as a subscriber to our online platform. In such cases, we will still need to keep your contact details, but you will of course no longer receive the unsubscribed newsletter.

Other information

Our services are dynamic, and we often launch new features that may require the collection of new data. If we collect new personal data or use your personal data for other purposes, we will notify you and we will amend this privacy policy as relevant.



3. Your rights as a data subject

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As a data subject, you have a selection of rights that you can exercise by contacting us at the email address specified in section 6 or by sending us a letter.

Your rights include the right to request access to the personal data we process about you and the right to receive a copy of it.

In some cases, you have the right to object to our processing of your personal data, to request the rectification or erasure of your personal data that you believe is inaccurate, outdated, etc., or to request the restriction or erasure of the processing of your personal data.

As a data subject, you also have the right to data portability if specific conditions in data protection legislation are met. If technically feasible, you also have the right to have your personal data transmitted to another data controller.

In certain cases, a request to exercise your rights may be restricted in accordance with applicable rules, including consideration for critical private interests if these are deemed to override your interests as a data subject.

If you have previously given Karnov Group your consent to the processing of your personal data, you have the right to withdraw your consent at any time. The withdrawal of your consent does not change the lawfulness of the processing carried out until the withdrawal. If you withdraw your consent, the processing of your personal data will cease and your personal data will be deleted, unless there is a legitimate or legal basis to keep it.

You can read more about your rights in the Danish <u>Data Protection Agency's quide on rights of data subjects</u>.

4. Storage of data

Data storage

We store your personal data for up to 8 years after the end of the cooperation, depending on the type of data and whether there is specific legislation requiring the storage of personal data.

As Karnov Group is listed on the Swedish Stock Exchange, there are in certain cases special requirements for storage, e.g. of financial information.

As a general rule, user information is deleted as soon as an account is removed, unless there are special circumstances justifying a longer



retention period, see below.

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Termination of online access

We will retain some of your data even if you terminate your online access, providing it is necessary for compliance with our legal obligations (including requests from official authorities), compliance with laws and regulations, resolving disputes, maintaining security, preventing fraud and abuse, or enforcing our user agreement.

Specific information for authors and experts

We retain and process some of your personal data in relation to previously published works or other literary works. The aim is to provide an overview of the author history and to present the author history to new authors and customers, thus maintaining a complete author history.

5. Transfer of data to third countries

Karnov Group uses suppliers and subcontractors for the processing and storage of personal data in order to provide our online universe. Among these suppliers and subcontractors are companies that are either located in third countries or are connected to such companies by corporate law.

Karnov Group strives to ensure that all processing of personal data takes place within the EU/EEA. If this is not possible, the necessary organisational and technical measures will be taken to ensure adequate protection of the personal data. An example of such a type of measure could be anonymization.

6. Disclosure of personal data

Karnov Group does not, as a general rule, disclose personal data to third parties, unless it is done as part of performing a task on behalf of Karnov Group, including disclosure to other affiliated companies. This disclosure takes place on the basis of Article 6(1)(f) of the General Data Protection Regulation (legitimate interest). In cases where it is necessary, an appropriate data processing agreement will always be concluded.

Especially for authors and similar partners: Karnov Group shares your personal data with relevant actors in the distribution chain, including retailers, for example in connection with book publishing etc.



7. Amendment Page 6 of 6

If necessary, we may amend this privacy policy. The privacy policy in force at any time can be found here.

If you do not want to accept the amendments, you can terminate your access to the service pursuant to your subscription agreement. Your continued use of our services after we have published means that you accept the updated privacy policy.

8. Contact

Questions

If you have any questions about our processing of your personal data, please feel free to contact our Privacy Officer at privacy@karnov_group.com.

Complaints

At any time, you may submit a question or complaint about Karnov Group's processing of personal data to the Danish Data Protection Agency.

This privacy policy was last updated in November 2023.

Changelog			
Version	Change category New/update/ wording/ other	Description of main changes	Effective from
Version 1.01	New	First version of the privacy policy	November 2023