

# LUP Technologies AB

## Privacy policy

Date of Last Revision: 2024-03-01

LUP Technologies AB ("us", "we", or "our") operates the [lupnumber.com](https://lupnumber.com) website, including all subdomains (the "Site"). This page informs you of our policies regarding the collection, use, and disclosure of Personal Information we receive from users of the Site, or through corresponding applications on mobile and desktop devices and any related services.

LUP Technologies AB acts as both a Data Controller and a Data Processor under the General Data Protection Regulation (GDPR). We determine the purposes and means of processing certain data (as a Data Controller) while also processing data on behalf of our customers (as a Data Processor).

### Information Collection

We collect Personal Information when you interact with our Site, use our check-in terminals, or access our services. Personally identifiable information may include, but is not limited to:

- Driver and Visitor Information: Name, phone number, license plate, company affiliation
- Account Information: Email, username, authentication credentials.
- Log Data and Device Information: IP address, browser details, timestamps, usage data, and interactions with the Site.
- Transaction Data: Transportation details and trip information

We process Personal Data based on the following legal grounds under GDPR:

- Performance of a Contract (Art. 6(1)(b)): To fulfill our contractual obligations when you use our services.
- Legitimate Interests (Art. 6(1)(f)): To improve security, analyze usage, and enhance user experience.
- Legal Obligation (Art. 6(1)(c)): To comply with regulatory and legal requirements.
- Consent (Art. 6(1)(a)): When required, such as for marketing emails and texts.

## Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as, but is not limited to, your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages, links clicked, non-sensitive text entered, and mouse movements and other statistics.

All Log Data is encrypted over the wire, and any sensitive data entered is obfuscated on our databases with policy in place that prohibits employees from reviewing such sensitive data.

In addition, we may use [third party services](#) to collect this information.

## Communications and Use of data

We may use your Personal Information and Log Data to:

- Process transactions between you, your company, our customers and us.
- Send e-mails about our Site or respond to inquiries.
- Provide support for the Site.
- Enhance or improve the user experience of the Site.
- Monitor data to ensure that it complies with your contractual obligations to us.

- Perform any other function that we believe in good faith is necessary to protect the security or proper functioning of the Site.
- With your prior consent, we may post your personal testimonials along with those of other satisfied customers on the Site in addition to other endorsements.

The information we collect from a Customer is disclosed only in accordance with our [Terms of Service](#) and this Privacy Policy. We will never sell your log data to third parties. However, in the course of business we may cooperate with third-parties in common marketing efforts. We may also hire third party individuals and organizations to help us make the Site better. [These third parties](#) include our web host provider, other SaaS providers, such as an email hosting service, payment processors or outside contractors we hire to perform maintenance or assist us in securing our Site. We may also hire third parties to operate, maintain, repair, or otherwise improve or preserve the Site or its underlying files or systems.

## **Release of Your Information for Legal Purposes**

We may access or release Personal Information about you when required to do so in order to comply with any applicable laws, regulations, subpoena or enforceable governmental or public authority request, including, to meet national security or law enforcement requirements. We may also access or release Personal Information when we have a good faith belief that such access or release is reasonably necessary to (i) enforce applicable terms of service, including investigation of potential violations, (ii) detect, prevent, or otherwise address fraud, security or technical issues, (iii) respond to user support requests, or (iv) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

## **Right to Access, Edit, and Remove Your Information**

You have a right to access personal information we hold about you. Whenever you use our Site, we strive to make sure that the Personal Information is correct. If that information is wrong, we give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your Personal Information, we may ask you to verify your identity before making any changes. We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems). Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. Because we protect information from accidental or malicious destruction, even after information is deleted from the Site, it may not be immediately deleted from our servers.

To request removal of your Personal Information from our Site, Services, blog or social media, contact us at [support@lupnumber.com](mailto:support@lupnumber.com). In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

## **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

Change your cookie preferences by clicking on our website.

## Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information and Log Data, we cannot guarantee its absolute security.

We implement strict security measures to protect your data, including:

- End-to-end encryption (TLS for data transmission).
- Access controls & authentication (only authorized personnel can access data).
- Regular security audits to prevent unauthorized access.

To report security vulnerabilities, please contact us ASAP at [support@lupnumber.com](mailto:support@lupnumber.com)

## Governing Law

These Terms shall be governed and construed in accordance with the law of Sweden, without regard to its conflict of law provisions.

Our failure to enforce any right or provision of these Terms will not be considered a waiver of those rights.

If any provision of these Terms is held to be invalid or unenforceable by a court, the remaining provisions of these Terms will remain in effect.

## Changes To This Privacy Policy

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on our Site.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Site after we post any modifications to the Privacy Policy will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Site.

If you have any questions about this Privacy Policy, please contact us at [support@lupnumber.com](mailto:support@lupnumber.com)