

PRIVACY NOTICE

Last changed: 2025-05-26

Skippo AB, organization number 559386-0942 ("Skippo"), is a digital service provider that provides services and products simplifying boatlife.

When we provide our products and services, we process your personal data. We are committed to protecting your privacy and want you to always feel secure and informed about how we handle your personal data when you are using our products and services, e.g. website(s) and application(s).

In this Privacy Notice, you can find more information about the personal data we process about you, why we do it, and what rights you have.

1 WHO IS THE DATA CONTROLLER AND CONTACT INFORMATION

Skippo is the data controller for the processing of your personal data described in this Privacy Notice and is responsible for ensuring that all processing is carried out in accordance with applicable data protection legislation.

If you have any questions regarding the processing of your personal data or wish to exercise any of your rights, please contact us using the contact information provided below.

Skippo AB

Postal address: Riddargatan 17B, 114 57 Stockholm

Phone number: 0200-45 65 22

E-mail: dataprotectionoffice@skippo.io.

2 WHO DO WE PROCESS PERSONAL DATA ABOUT AND WHAT PERSONAL DATA DO WE PROCESS?

Who we process personal data about

- *Visitors*: Individuals who visit our website(s)
- *Users*: Individuals who are engaging with functionality in our app(s) or website(s) by creating an account.
- *Customers*: Individual users who have purchased one or more services, e.g. navigation subscription or premium content.

3 PROCESSING OF PERSONAL DATA THAT WE PARTICULARLY WISH TO BRING TO YOUR ATTENTION

Profiling

We use profiling to provide our services in the best possible way, including tailored features, recommendations and marketing that we believe are the most relevant to you and to avoid sending you unwanted information. To do so, we will combine certain types of data to predict your personal preferences and categorize you into a profile of individuals with similar preferences and behaviors. Anyone who is categorized in the same type of profile will receive the same type of information or marketing. For this purpose, we process information about your electronic equipment, such as device information, operating system, browser version, IP address, unique identifiers, real time geographic location of your device, information on how you as a user use our products and services as well as your provided profile information such as boat type and home harbour. We will also use your profile to better understand you and your needs, provide better customer support, and to know what interactions you have had with us. The use of your profile will not include any automated decision-making.

The legal basis for these processing activities is your consent. For more information on which personal data we process to build your customer profile, see section 4. You can withdraw your consent to our profiling at any time by [contacting us](#).

Sensitive personal data and children's personal data

We never collect or process personal data that may be considered sensitive, such as information about your health. Our services are not intended for the use by persons under the age of 13 and Skippo does not intentionally collect personal data about anyone under this age limit. If you as a caregiver find out that your child has provided personal data to us, please [contact us](#).

4 WHY DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT BASIS ARE WE ALLOWED TO DO SO?

To provide our services

We process your personal data to enable you to use our services and products, such as when you create an account, purchase a subscription from us, or contact our customer support. Please see the table below for more information.

In certain of our processing activities, we collect data from your device, such as your location data or IP address. The table below specifies the situations in which this applies. For more information on how we use tracking techniques such as cookies, please also refer to our [Cookie policy](#).

Purpose of the processing	Categories of personal data	Legal basis	Retention period
User account In order for you to create a user account with us to engage with our product and services.	Your name, country, email address, profile picture, boat information and home harbour.	Performance of contract, GDPR article 6.1 (b).	Four years from your last activity.
Paid services To provide you with an upgraded experience through paid services, e.g. subscriptions.	Your name, email address and postal address for payments made through our website(s).	Performance of contract, GDPR article 6.1 (b).	Four years from your last activity.
Navigation services To enable you to use our navigation app, including Anchor Guard to monitor if and how your boat moves when anchored.	Your devices' precise location data.	Performance of contract, GDPR article 6.1 (b).	Data is used only in real time, without being stored.
Tracing plotter To enable you to store and use your previous tracks with your boat and see statistics of your usage.	Name, email address, your devices' precise location and time used.	Consent, GDPR article 6.1 (a).	Four years from your last activity. You may withdraw your consent at any time .by deleting tracks in the app.
Sharing of user location on map To share your real-time location and basic information about you and your boat with other Skippo users within our app and website, in order to provide the feature and give you the opportunity to contribute to a safer	Your first name and the initial of your last name, real-time location data, and basic information about your boat, including type of boat, boat brand, boat model, speed, course, length and width.	Consent, GDPR article 6.1 (a).	Your location data is stored 24 hours from the time it was collected. You may withdraw your consent at any time by disabling this feature in the app under map settings.

<p>and more enjoyable experience.</p> <p>Users may only see other users' location if they have consented to the sharing of their location and are on or within 50 meters from water.</p>			
<p>User Generated Content</p> <p>To provide an improved and interactive user experience through sharing of boat related information such as photos and videos.</p>	<p>User generated content such as photos, images, videos, where individuals may occur and other content or information that you generate, transmit, or otherwise make available on our website(s) or app(s), as well as associated metadata.</p> <p>Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.</p>	<p><i>User generated content:</i> Legitimate interest, GDPR, article 6.1 (f), where our legitimate interest is to provide a more engaging and enhanced user experience through increased sharing of, for example, boat images and videos.</p> <p><i>Metadata:</i> Consent, GDPR article 6.1 (a).</p>	<p>Four years from your last activity.</p>
<p>Reviews</p> <p>To enable users to leave reviews in order to share their experiences.</p>	<p>Name, user generated content such as uploaded reviews on boat models, visited locations in the form of comments, images, videos, and other information that you</p>	<p>Legitimate interest, GDPR, article 6.1 (f), where our legitimate interest is to provide a more engaging and enhanced user</p>	<p>Four years from your last activity.</p>

	make available in the app/website.	experience through sharing of insights.	
Customer support To enable us to respond to your questions, complaints, and other types of requests regarding our services and products.	Your name, email, your country, operating system and information provided by you regarding your specific inquiry, including, but not limited to, any images, screenshots or other attachments.	Legitimate interest, GDPR article 6.1 (f), where our legitimate interest is to handle questions and requests regarding our products and services.	Four years from your last contact with customer support.

Marketing

We process your personal data to be able to provide you with information about our business and services. Please see the table below for more information.

Purpose of the processing	Categories of personal data	Legal basis	Retention period
Personalized and relevant advertising To provide personalized advertising from us and our partners based on your customer profile This personal data processing includes elements of profiling, please visit Section 3.1 for more information.	Information about your electronic equipment, such as device information, operating system, browser version, IP address, unique identifiers, information on how you as a user use our products and services. In case where you use the tracing plotter (see above) the information also includes geolocation and time at location for the created tracks.	Consent (GDPR, article 6.1 (a)).	Four years from your latest activity. You may withdraw your consent at any time by clearing the cookies for our web-sites from your browser. In case of creation of tracks by the use of tracing plotter, you may delete these through the web or app.
Direct marketing Send direct marketing to you such as offers via email, text	Your name, country, email address, approximate geographic location and information provided by you such as boat information and home harbour.	Consent (GDPR, article 6.1 (a)).	Four years from your latest activity. You have the option to withdraw your consent to marketing each

messages, or push notifications.			time we send you marketing materials. You can also withdraw your consent at any time by contacting us.
Social Media To display relevant marketing about Skippo on social media platforms, and receive aggregate information regarding the use of our social media pages.	Email address and other personal data you provide or make available through our social media pages.	Legitimate interest (GDPR article 6.1 (f)).	Four years from your latest activity.

Development of our business and security

We process your personal data to develop our business and enhance our services and products by analyzing how you use our services and products and to collect statistics based on your usage. We also process your personal data to prevent abuse and illegal activities when using our services. Please see the table below for more information.

Purpose of the processing	Categories of personal data	Legal basis	Retention period
Improvement of our products and services To improve our products and services, ensure that our products and services function correctly, compile statistics and make our products and services more user-friendly.	Information about your electronic equipment, such as device information, operating system, browser version, IP address, unique identifiers, geographic location of your device, information provided by you and information on how you as a user use our products and services.	Legitimate interest (GDPR, article 6.1 (f)), where our legitimate interest is to develop our business and services.	Four years from time of collection.

Security in the provision of our products and services To prevent, limit and investigate various forms of abuse of, and illegal activities directed against our products and services.	Information on your activity and electronic equipment.	Legitimate interest (GDPR, article 6.1 (f)) where our legitimate interest is to minimize abuse and illegal use of our products and services.	Four years from time of collection.
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Legal claims, supervision, acquisition, legal requirements and exercise of rights

We process your personal data in the event of a supervision, when you exercise your rights, to comply with laws and when we protect our interests in the event of a dispute. Please see the table below for more information.

Purpose of the processing	Categories of personal data	Legal basis	Retention period
Disputes Protect our interests in the event of a dispute.	The categories of individuals and personal data necessary in relation to the dispute issue and involved parties.	<p>Legal obligation (GDPR, article 6.1 (c)), Consumer Sales Act (2022:260), Act (2005:59) on Distance Contracts, Act (2015:671) on Alternative Dispute Resolution in Consumer Relations.</p> <p>Legitimate interest (GDPR article 6.1 (f)), when we are not legally obligated to resolve a dispute through alternative dispute resolution, where our legitimate interest is to protect our interests in case of a dispute.</p>	The personal data are retained for the duration of the dispute and for ten years thereafter.

		<i>Contact us if you would like to learn more about how we have balanced your interests against ours.</i>	
Supervision Address claims and provide requested information to the relevant supervisory authority in the event of a supervision.	The categories of individuals and personal data requested during a supervision.	Legal obligation (GDPR, article 6.1 (c), GDPR, article 31).	The data are retained for the duration of the supervision and for up to 4 years thereafter.
Mergers & acquisitions To transfer your personal data in the event of a merger or corporate acquisition.	The categories of individuals and personal data involved in the merger or acquisition.	Legitimate interest (GDPR article 6.1 (f)), where our legitimate interest is to carry out a merger or corporate acquisition.	Not applicable.
Your rights Accommodate your request to exercise any of your rights.	Identification information such as your name, email address or postal address.	Legal obligation (GDPR article 6.1 (c) and GDPR, chapter III).	The data will be retained for four years after we have processed your request.
Regulatory reporting To ensure we fulfill our requirements relating to payments, bookkeeping and taxes, as well as documenting and reporting financial status.	The personal data related to payment transactions.	Legal obligation (GDPR article 6.1 (c), Accounting Act (1999:1078)).	Up to and including the seventh year following the end of the calendar year in which the financial year concluded.

5 HOW DO WE OBTAIN YOUR PERSONAL DATA?

We primarily collect data directly from you, for instance, when you register an account, use our products or services or when you communicate with us. We may also collect personal data about you from other sources, known as third parties, such as payment providers, e.g. Klarna and Stripe, or social media platforms such as Facebook or Instagram.

6 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In order to provide our services and products, as well as to comply with laws and regulations, we sometimes need to share your personal data with others who assist us in various aspects of our operations and help us deliver our services and products. These parties are described in more detail below.

Suppliers

In order for us to fulfill our commitments to you, we share your personal data with our suppliers, such as:

- *IT suppliers:* Companies that manage essential operation, technical support, and maintenance of our IT solutions.
- *Analytics and statistics providers:* Companies that provide us with reports and other statistics on how users utilize our services, website(s) and app(s), in order us to improve our services to you.
- *CRM suppliers:* Companies that provide services enabling us to communicate with customers, such as sending out campaigns, emails, and notifications in our app(s).
- *Payment providers:* Companies that assist us in processing payments for our services, such as when you purchase a subscription from us.
- *Marketing suppliers:* Companies that assist us in marketing services to you.
- *Social media platforms:* Companies that provide social media platforms to help us display marketing to relevant users.

When sharing your personal data with our suppliers, we enter into Data Processing Agreements when required and ensure they comply with our instructions put in place appropriate technical and organizational measures to protect your personal data.

Public authorities

Skippo may also share your personal data with public authorities.

- *Law enforcement agencies:* The Swedish police, Swedish prosecution authority or Swedish economic crime authority in case you are the subject of a registered investigation case. As a rule, Skippo refuses such requests.
- *Data privacy agency:* The Swedish Authority for Privacy Protection (Integritetskyddsmyndigheten) in case of case where your data is included in the authority's investigation of Skippo's handling of personal data, or in response to a Skippo user filing a

complaint against Skippo with the Swedish authority for privacy protection or their counterpart in the user's country of residence.

- *The National Board for Consumer Disputes*: in case where your data is required to protect yours or the interests of Skippo in case of a consumer dispute.
- *The Courts*: in cases where a court orders Skippo to divulge your personal data as part of a legal process that involves Skippo.

7 WHEN OUR PROCESSING OF PERSONAL DATA OCCURS OUTSIDE THE EU/EEA

We always aim to process your personal data within the EU/EEA, but in certain situations, we may need to transfer your personal data to partners or service providers located outside the EU/EEA (so-called "third countries").

Regardless of where your personal data is processed, we take all reasonable contractual, technical, and organizational measures to ensure that the level of protection for the personal data is equivalent to that within the EU/EEA. If the recipient is not located in a country deemed by the EU Commission to have an adequate level of protection, we ensure that your personal data is protected by entering into the [EU Commission's standard contractual clauses](#) with our partners and service providers processing personal data in third countries. We also implement additional technical and organizational security measures when needed, such as encryption and pseudonymization.

8 EXTERNAL LINKS

Skippo's websites and mobile apps may contain links to external websites or services that are not controlled by Skippo. If you click on a link to an external website, we recommend that you read the information on the processing of personal data and the use of cookies that applies to the external website.

9 YOUR RIGHTS

We are responsible for ensuring that your personal data is processed in a lawful, transparent, and open manner in relation to you, and that your information is accurate and up to date. You have certain rights regarding our processing of your personal data. If you wish to exercise any of your rights, you can contact us using the contact details in section 1 above.

We will respond to you as soon as possible and no later than within one month from the date we receive your request. If we are unable to respond to your inquiry or need more time, we will explain why.

Right of access

You have the right to know whether we process personal data about you or not. If we do, you also have the right to receive information about what personal data we process and how we process it. You also have the right to receive a copy of the personal data we process about you.

If you are interested in specific information, we ask you to specify this in your request. For example, you can specify if you are interested in a certain type of information (such as what contact and identity information we process about you), or if you want information about data from a specific time period.

Right to rectification

If any of the personal data we process about you is inaccurate, you have the right to have them corrected. You also have the right to supplement incomplete personal data with additional information needed to ensure the accuracy of the data. Once we have corrected your personal data, or supplemented them with new information, we will inform those to whom we have disclosed your data about the updated information, provided that it is not impossible or too burdensome. If requested, we will also inform you about those to whom we have disclosed your data. If you request rectification, you also have the right to request that we restrict our processing of your data while we investigate the issue.

Right to be forgotten

You have the right in certain cases to request that we delete the personal data we have registered about you. You have the right to have your data erased if:

- The data is no longer needed for the purposes for which it was collected or otherwise processed.
- We process your data based on your consent and you withdraw your consent.
- If the processing is for direct marketing and you object to the data being processed for such purposes.
- You object to the processing of the data based on our legitimate interest, and we cannot demonstrate that our reasons for processing outweigh your interests.
- The personal data is processed unlawfully.
- We have a legal obligation to delete the personal data.

If we delete your data after you have requested it, we will also inform those to whom we have disclosed the data about the deletion, provided that it is not impossible or too

burdensome. If you ask us, we will also inform you about those to whom we have disclosed your data.

Right to restriction

Restriction means that the data is marked so that it may only be processed for certain limited purposes in the future. The right to restriction applies:

- When you believe that the data is inaccurate, and you have requested rectification. In such cases, you may also request that the processing be restricted while we investigate whether the data is correct or not.
- If the processing is unlawful and you do not want the data to be deleted.
- When we no longer need to process the data for the purposes for which it was collected, but you need it to establish, exercise, or defend legal claims.
- If you have objected to processing based on our legitimate interest. In such cases, you may request that we restrict the processing while we investigate whether our interest in processing your data outweighs your interests.

Even if you have requested that we restrict the processing, we have the right to use the data for storage purposes, if we have obtained your consent for the processing, to establish, exercise, or defend legal claims, or to protect someone's rights. We may also process the data for reasons related to an important public interest. When the restriction ends, we will inform you about it.

If we restrict the processing of your data, we will also inform those to whom we have disclosed the data, provided that it is not impossible or too burdensome. If you ask us, we will also inform you about those to whom we have disclosed your data.

Right to withdraw consent

You have the right to withdraw consent for a specific processing activity at any time. Withdrawal of consent does not affect the lawfulness of our processing before the consent was withdrawn, but it may mean that we can no longer provide a particular service/product to you.

When we rely on consent as the legal basis, we have provided information in this Privacy Notice on how you can withdraw your consent in the respective table above.

Right to object

You have the right to object to our processing of your personal data based on our legitimate interest. If you object to the processing, we will, based on your specific situation, evaluate whether our interests in processing the data outweigh your interests in

not having the data processed for that purpose. If we cannot demonstrate compelling legitimate grounds for the processing that override your interests, we will cease the processing activity that you object to - provided that we are not required to process the data to establish, exercise, or defend legal claims. If you object to the processing, you also have the right to request restriction while we investigate the issue.

You always have the right to object to the processing of your personal data for direct marketing. We are then no longer permitted to process your personal data for direct marketing.

Right to data portability

Data portability means that you have the right to receive the data we have collected about you, from you, in a structured, commonly used, and machine-readable format, and that you have the right to transmit this data to another data controller.

The right to data portability applies only to:

- Data collected from you, about you,
- If the processing is based on your consent or to fulfill a contract with you, and
- The processing is automated.

Right to lodge a complaint

If you are dissatisfied with how we handle your personal data, please contact us so that we can try to resolve your issue together.

You also have the right to lodge a complaint with the supervisory authority. The Swedish Authority for Privacy Protection (IMY) is the Swedish supervisory authority responsible for our use of your personal data. You also have the right to lodge a complaint with the supervisory authority in the country where you reside or work, or in the country where you believe a violation of the regulations has occurred.

10 CHANGES TO THE PRIVACY POLICY

This Privacy Notice is subject to change. We therefore recommend that you visit this page regularly to read the latest version of the Privacy Notice. In the event of significant changes, we will clearly inform you of this in an appropriate manner. The date of the latest version is displayed at the top of the Privacy Notice.