

Privacy Policy

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Table of Contents

1. Introduction
2. Data Controller
3. Processing of your personal data
4. Your rights
5. To whom may we transfer your personal data?
6. Transfer of personal data to third countries
7. How do we protect your personal data?
8. Changes
9. If you have any questions

1. Introduction

We value your privacy, and this policy is intended to inform you about how Proplab AB (“**Proplab**”, “**we**”, “**us**”) processes your personal data in a lawful, appropriate and secure manner, and what rights you have when we process your personal data. We provide AI-based services that help property companies, estate agents and other stakeholders to create visual marketing materials for homes and commercial premises, for example through digital furnishing, styling and visualisation of how a space can be used. This policy applies to the processing of personal data when you register as a user. The policy also applies when you or your employer wishes to purchase our services, when you or the company or organisation you represent provides us with your services and/or products, when you visit our website, when you apply for a job with us, or are otherwise in contact with us.

If you have any questions or wish to exercise any of your rights, please feel free to contact us using the contact details in section **Fel! Hittar inte referenskölla.** below.

In addition to this Privacy Policy, our Terms and Conditions, which are available [here](#), apply when purchasing our services.

2. Data Controller

Proplab AB, company registration number 559488–5567, with its address at Redaregatan 48, 252 36 Helsingborg, is the data controller for the processing carried out in accordance with this policy.

3. Processing of your personal data

In the table below, you can read more about how we process your personal data based on the purposes we have identified. We describe the purpose of the processing, in other words, why we process your personal data. For each purpose, we also specify which categories of

personal data we may process to achieve the purpose, the legal basis or bases on which we process the data, and how long we process the data.

Purposes	Categories of personal data	Legal basis	Deletion period
To be able to provide the services you, as a customer, request when we enter into an agreement with the company or organisation you represent.	Contact details, such as name, email address and delivery address. Details of the employer, workplace and job title. Billing details. Purchase details. Login details for our service.	To fulfil agreements with you or the company/organisation you represent.	For the duration of our service provision and for the following 12 months.
To provide the services you, as a user, request.	Contact details, such as name, email address and delivery address. Login details for our service. Information about your use of our service. Information about your device, such as your IP address, when you visit our website.	Performance of the contract with you regarding the use of our service.	For the duration of our provision of the service and for the following 12 months.
To manage our contractual relationship with you or the company/organisation you represent regarding services and/or products you provide to us.	Contact details, such as name, email address and postal address. Billing details. Details of our purchase.	Fulfilment of contracts with you or the company/organisation you represent.	For the duration of our active business relationship with you and for 12 months following our last purchase.
To comply with legal requirements, such as applicable	Billing details.	Legal obligation.	Seven years.

bookkeeping legislation.			
To safeguard and protect Proplab's legal interests.	<p>Contact details, such as name and email address.</p> <p>Correspondence between us.</p> <p>Details of the agreement between us.</p> <p>Information contained in application documents, such as personal identification number, photograph, job title, current and previous places of employment, CV, health information (if you have included such details in your application), certificates, grades, references and similar.</p>	<p>For such processing of your personal data, we rely on the legal basis of balancing of interests, where our legitimate interest is to safeguard and protect our rights in connection with any potential dispute.</p> <p>Health data and other special categories of personal data will be processed by us as employers when, and to the extent, permitted by local laws.</p>	Until any dispute has been resolved.
To market our service and business through, for example, mailings, our website, special offers and social media.	<p>Contact details, such as name, email address and delivery address.</p> <p>Information about your use of our service.</p> <p>Information about your device, such as your IP address, when you visit our website.</p> <p>Any social media usernames.</p>	For such processing of your personal data, we rely on the legal basis of legitimate interest, where our legitimate interest is to be able to market our service and our business.	12 months after your last activity on our service.
To provide customer service, respond to feedback and similar communications.	<p>Contact details, such as name, email address and delivery address.</p> <p>Information about your use of our service.</p>	Fulfilment of agreements with you or the company/organisation you represent.	Two years from the date you contacted us regarding customer

			service or with feedback.
To enable general customer and supplier care (quality assurance, statistics, market, customer and supplier analysis, as well as business, method and product development).	Contact details, such as name, email address and delivery address. Information about your use of our service.	Processing is carried out on the basis of our legitimate interest in developing our business.	Five years from the date of completion of the assignment or from the date the information was collected.
To enable you, as a visitor to our website, to use the website as intended.	Information about your device, such as your IP address, which is collected via necessary cookies when you visit our website.	The processing is carried out on the basis of our legitimate interest in providing a functional website to those who choose to visit it.	Depends on the type of cookie. Read more about the cookies we use in our Cookie Policy here .
To administer and carry out an effective recruitment process, and to hire new staff once the recruitment process has been completed.	Information contained in application documents, such as personal identification number, photograph, job title, current and previous places of employment, CV, health information (if you have included such details in your application), certificates, grades, references and similar.	The processing is carried out on the legal basis of a balancing of interests, where Proplab's legitimate interest is to be able to assess your qualifications and personal characteristics in connection with recruitment decisions. Health data and other special categories of personal data will be processed by us as employers when, and to the extent,	Until the recruitment process is completed and the position is filled, and for two years thereafter. If you consent to this, we may retain your application documents for future recruitment.

		permitted by local laws.	
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We only process personal data that is necessary to achieve the purposes stated above and only for the time necessary to achieve those purposes. Exactly which personal data we process about you depends on how you, as a customer or supplier to us, have come into contact with us and which of our services we provide to you or the company you represent, or which of your services and/or products you or the company you represent provides to us.

To enable us to fulfil the legal obligations arising from applicable law or to safeguard our legal interests, we may retain personal data for a longer period than that specified above. However, personal data is never retained for longer than is necessary or required by law for the respective purpose.

In addition to the personal data you provide to us yourself, or which we collect from you, we may also collect personal data from third parties. These third parties vary from time to time but include, amongst others, suppliers of address data from public registers.

When you are asked to provide personal data, you may choose not to do so. If you choose not to provide certain personal data, it may result in us being unable to fulfil our obligations to you or the company/organisation you represent.

In certain limited scenarios, Proplab may process personal data uploaded by customers strictly on their behalf. In such cases, Proplab acts as a data processor, and such processing is governed by a separate Data Processing Agreement.

4. Your rights

You have the right to receive information about the processing of your personal data that we carry out. Below is a summary of the rights you can exercise by contacting us.

Right of access

You have the right to request, free of charge, information about how we process your personal data. You also have the right to receive a copy of the personal data we process about you. We kindly ask that such requests be submitted to us in writing, specifying the information you wish to access, and must include your name and be signed by you. We will respond to your enquiry as soon as we can. If we are unable to fulfil your request for access to the data referred to in your enquiry, we will provide a reason for this. A copy of your personal data will be sent to your registered address, unless otherwise agreed with you in writing.

Right to rectification

Proplab has the primary responsibility for ensuring that the personal data we process is accurate. If you inform us that the personal data you have provided is no longer accurate, we will correct, block or delete such personal data as soon as possible.

Right to erasure

You have the right to request that we, without undue delay, erase your personal data. Personal data shall be erased in the following cases:

- (i) if the personal data is no longer necessary for the purpose for which it was collected;
- (ii) if you have withdrawn your consent and the processing is based solely on consent as the legal basis;
- (iii) if the processing is for direct marketing purposes and you object to your personal data being processed for this purpose;
- (iv) if you object to the processing of personal data that takes place following a balancing of interests and your interests outweigh ours;
- (v) if your personal data has not been processed in accordance with applicable data protection rules; or
- (vi) if erasure is required to comply with a legal obligation.

There may be obligations that prevent us from immediately erasing all of your personal data. These obligations arise from applicable legislation in areas such as accounting. If certain personal data cannot be deleted due to legal requirements, we will inform you of this and ensure that the personal data can only be used for the purpose of fulfilling such legal obligations and not for any other purposes.

Right to restriction

You have the right to request that Proplab temporarily restrict the processing of your personal data. Such a restriction may be requested in the following cases:

- (i) if you believe that the personal data we hold about you is incorrect and you have requested rectification in this regard;
- (ii) when the processing of your personal data is not in accordance with applicable data protection rules, but you do not wish your personal data to be erased, but rather restricted; and
- (iii) when we no longer need your personal data for the purposes of our processing, but we need it to establish, exercise or defend a legal claim.

If you have objected to the processing of your personal data, the use of that data may be restricted whilst an investigation is ongoing. Where your personal data is restricted, we will only store your personal data and will seek your consent before any further processing.

Right to data portability

You have the right, where we process your personal data with your consent or to fulfil a contractual obligation with you, to request that we provide you with all the personal data we process concerning you and which is processed by automated means, in a machine-readable format. This could, for example, be an Excel file or a CSV file. Where technically possible, you also have the right to request that we transfer your personal data to another data controller.

Right to object

You have the right to object to our processing of your personal data if the processing is based on our legitimate interest. In such cases, we will ask you to specify which processing you are objecting to. If you object to any processing, we will only continue to process your personal data if we have legitimate interests in the processing and these outweigh your interests. We will also always inform you of this.

Right to withdraw consent

If you have given your consent to the processing of your personal data, you decide for yourself if and when you wish to withdraw your consent to the processing of personal data to which you have voluntarily consented. You can do this by contacting us.

Right to submit a complaint

If you have a complaint about Proplab's processing of personal data, you can contact us using the contact details provided in section **Fel! Hittar inte referenskölla.** below. You can also contact the responsible authority in your country to raise your complaint, such as the Swedish Authority for Privacy Protection, if you are a resident in Sweden, the Norwegian Data Protection Authority, if you are a resident in Norway, or the Danish Data Protection Agency, if you are a resident in Denmark.

The contact details are as follows:

Sweden

Website: <https://www.imy.se/en/>

Telephone: 08 657 61 00

Email: imy@imy.se

Postal address: Box 8114, 104 20 Stockholm

Norway

Website: <https://www.datatilsynet.no/>

Telephone: 22 39 69 00

Email: postkasse@datatilsynet.no

Postal address: Postboks 458 Sentrum, 0105 Oslo

Denmark

Website: <https://www.datatilsynet.dk/english>

Telephone: 33 19 32 00

Email: dt@datatilsynet.dk

Postal address: Carl Jacobsens Vej 35, 2500 Valby

5. To whom may we transfer your personal data?

Only those individuals at Proplab who need access to your personal data in order to carry out their duties will have access to it.

To provide certain services, we engage selected third parties. Your personal data is shared with such selected third parties for the same purposes and on the same legal grounds as those for which the personal data was collected and on which it is based. Proplab

implements technical and organisational security measures to ensure that your personal data is handled securely. We have listed the categories of recipients with whom your personal data may be shared below:

Suppliers and subcontractors: Proplab uses third-party suppliers to manage parts of its operations, such as companies providing technical support, IT system operation and marketing services. We may share personal data with these suppliers in connection with their provision of services on our behalf. When we use such suppliers, we enter into a data processing agreement with them and take other appropriate measures to ensure that your personal data is processed in a manner consistent with this policy.

Banks and other business partners: Proplab shares your personal data with other independent data controllers, such as banks and other business partners. These recipients manage and are independently responsible for the processing of your personal data.

Social media: Proplab uses social media. When using social media, your personal data is collected and processed by these companies. Please refer to each company's privacy policy for further information.

Authorities: We will also disclose your personal data to authorities, such as the relevant tax authorities, if required by law, an official decision or a court order, or if we reasonably believe that disclosure is necessary to protect our rights.

When sharing your personal data, Proplab takes technical and organisational measures to ensure that your personal data is handled in a secure and safe manner. Our selected third parties will only process your personal data in the manner and for the purposes set out in this policy.

Proplab will not sell your personal data to third parties unless we have first obtained your consent. We may transfer your personal data to a purchaser/investor or potential purchaser/investor in connection with a restructuring, sale or other transfer of all or part of Proplab's shares, assets or our business in general. In the event of such a transfer, we will take steps to ensure that the recipient processes your personal data in a manner consistent with this policy.

6. Transfer of personal data to third countries

Proplab's AI-based services for creating visual marketing materials are not intended to process personal data in the material uploaded to the service. Users are requested not to upload material containing personal data. However, Proplab is unable to control the content that users upload. If personal data were nevertheless to appear in the material processed by the AI tool, it would be transferred to a country outside the EU/EEA. Proplab may also transfer your personal data to a country outside the EU/EEA if any of our suppliers or partners are located there. In such countries, data protection legislation may not provide the same level of protection as under the GDPR. Proplab protects your personal data by either basing the transfer on a decision by the European Commission regarding an adequate level of protection or by implementing appropriate security measures, such as incorporating the European Commission's standard contractual clauses in combination with technical and

organisational safeguards, to ensure that your personal data remains protected. You can read more about which countries are considered to have an adequate level of protection on the European Commission's website [here](#). Further information on standard contractual clauses can be found [here](#).

We carry out a risk assessment before any transfer takes place and we implement technical and organisational safeguards to ensure an appropriate level of protection. We transfer as little personal data as possible and, where possible, anonymise the data before transfer. For further information on the safeguards we implement in individual cases, please contact us.

The following recipients outside the EU/EEA may be relevant:

Suppliers and subcontractors: We may share your personal data with suppliers and subcontractors outside the EU/EEA. These may include, for example, IT service providers. Here we list our suppliers and subcontractors outside the EU/EEA.

Google Workspace: By using the service, your personal data will be processed by Google Ireland Limited. When Google receives your personal data, it may be transferred to, amongst other places, the USA. You can read more about Google's processing of personal data [here](#).

Social media: When you visit, appear on or otherwise use Proplab's social media channels, your personal data is also collected and processed by the company that owns the respective social media platform. When these companies receive your personal data via Proplab's channels, the data may be transferred to, amongst other places, the USA. Here we list the social media platforms on which Proplab has channels.

Facebook and Instagram: By using the service, your personal data is processed by Meta Platforms Ireland Ltd. You can read more about the processing of personal data [here](#). To find out more about the service's transfers to third countries and the standard contractual clauses, please click [here](#).

LinkedIn: By using the service, your personal data is processed by Microsoft Corporation. You can read more about Microsoft's processing [here](#) and about their transfers to third countries [here](#).

7. How do we protect your personal data?

To protect your privacy, detect, prevent and limit the risk of attacks, etc., Proplab implements a range of technical and organisational information security measures. We also take measures to protect your personal data against unauthorised access, misuse, disclosure, alteration and destruction. We ensure that access to your personal data is only granted to staff who need it to perform their duties and that they observe confidentiality.

8. Changes

We reserve the right to amend this policy when we deem it necessary. Such amendments are primarily required in the event of any changes in the law, or in response to guidance or recommendations from supervisory authorities or other bodies issuing opinions regarding applicable data protection regulations. Furthermore, this policy will be updated as necessary due to changes in our operations. If we make significant changes to how we process your personal data, you will be informed of this before the changes take effect.

9. If you have any questions

If you have any questions regarding this policy or the processing of your personal data, wish to make a request in accordance with this policy, or wish to report a breach of this policy, etc., please feel free to contact us via email at: info@proplab.ai.