# PRIVACY POLICY (2026:2)

*Last updated: 2026-11-17*

## 1. Introduction

Protecting your privacy and personal data is important to us. This Privacy Policy explains how Oizora AB (reg. no. 559577-1170) ("Oizora", "we", "us" or "our") processes personal data when we act as a data controller, for example when you visit our website, use our services as a customer representative, participate as a respondent, or communicate with us.

Where Oizora processes personal data **on behalf of a customer** (for example when providing our HR and audio services), such processing is governed by the applicable **Data Processing Agreement (DPA)** between Oizora and the customer.

This Privacy Policy is intended to provide transparent information in accordance with the General Data Protection Regulation ("GDPR").

If you have any questions, please contact us at hello@oizora.com

## 2. Who does this Privacy Policy apply to?

This Privacy Policy applies to individuals whose personal data we process as a controller, including:

- representatives and users of our customers
- respondents participating in interviews, surveys or audio recordings
- job applicants and candidates using voice-based applications
- website visitors
- subscribers to newsletters or marketing communications
- individuals contacting us or participating in events

## 3. Personal data we process

Depending on your interaction with Oizora, we may process the following categories of personal data:

- contact details (name, email address, company, role)
- account and user information
- voice recordings and audio responses
- transcripts and generated summaries
- content metadata (timestamps, themes, tags, sentiment indicators)
- communication data (emails, support messages)
- technical data (IP address, device and usage data)
- recruitment-related information (where applicable)

We do not intentionally collect sensitive personal data unless required for a specific purpose and legal basis.

## 4. Purposes of processing

We process personal data for the following purposes:

- providing, operating and improving our services
- enabling interviews, surveys, voice applications and audio-based insights
- administering customer relationships and user accounts
- communicating with users and respondents
- recruitment and employer branding activities
- marketing and business development
- compliance with legal obligations
- security, fraud prevention and system integrity

## 5. Legal bases for processing

We process personal data based on the following legal bases:

- performance of a contract
- legitimate interests, such as providing and improving our services, security, and business operations
- consent, where required (for example for certain interviews or marketing communications)
- compliance with legal obligations

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

## 6. Respondents and interviews

If you participate as a respondent (for example in an interview, exit interview, voice application or survey), your responses may be recorded, transcribed and analysed to produce insights for the relevant customer.

Oizora processes such data either as:

- data controller, where Oizora determines the purpose (e.g. platform operations), or
- data processor, where processing is carried out on behalf of a customer under a DPA.

You will be informed of the applicable role and purpose in connection with the interview.

## 7. Use of AI and automated processing

Oizora uses artificial intelligence technologies to support transcription, analysis and content generation. Such processing is used solely to provide the service and does not involve automated decision-making producing legal or similarly significant effects within the meaning of Article 22 GDPR.

Customer and respondent data is **not used to train general AI models.**

## 8. Sharing of personal data

We may share personal data with trusted service providers (sub-processors) who support our operations, such as hosting, analytics, communication and payment services.

Personal data may also be disclosed:

- where required by law
- to authorities upon lawful request
- in connection with corporate transactions

All processors are subject to appropriate contractual and security safeguards.

## 9. International data transfers

Some service providers may process data outside the EU/EEA. Where this occurs, Oizora ensures that appropriate safeguards are in place in accordance with GDPR, such as Standard Contractual Clauses.

## 10. Data retention

Personal data is retained only for as long as necessary to fulfil the purposes described in this Privacy Policy or to comply with legal requirements.

Specific retention periods may apply depending on the service and customer configuration. Data is deleted or anonymised once it is no longer needed.

## 11. Your rights

As a data subject, you have the right to:

- access your personal data
- request rectification of inaccurate data
- request erasure of your data
- object to or restrict processing
- withdraw consent
- request data portability
- lodge a complaint with the Swedish Authority for Privacy Protection (IMY)

Requests may be sent to hello@oizora.com.

## 12. Cookies, website analytics and third-party links

### Cookies

We use strictly necessary cookies to operate the Service, for example to keep you signed in. We use analytics cookies only with your consent. Read more in our Cookie Policy at oizora.com/cookies.

### Website analytics (Google Analytics)

On our public website we use Google Analytics 4 to understand how visitors use the site, for example which pages are visited and how many people request a demo. We use this to improve our website and our communication.

Google Analytics is used only if you accept it in our cookie banner. It is never used inside the Oizora platform or on interview, registration or other respondent pages.

- **Data collected:** a randomly generated visitor ID stored in a cookie, the pages you visit and when, the referring website, approximate location (country/region), and general device and browser information. Google Analytics 4 does not log or store IP addresses.
- **What we don't do:** we do not use Google Analytics to identify you, and we do not combine it with other data we hold about you. Advertising features, ad personalisation and Google signals are switched off.
- **Legal basis:** your consent (Article 6(1)(a) GDPR). You can withdraw it at any time by clicking "Cookie settings" in the website footer. If you withdraw your consent, Google Analytics stops and its cookies are deleted from your browser.
- **Recipient:** Google Ireland Limited, which processes the data on our behalf. Data may be transferred to Google LLC in the United States. Google LLC is certified under the EU–U.S. Data Privacy Framework, and the transfer is also covered by the EU Standard Contractual Clauses.
- **Retention:** analytics data is deleted automatically after 2 months. The cookies themselves last up to 2 years unless you delete them or withdraw your consent.

### Third-party links

Our website and services may contain links to third-party websites and services. We are not responsible for the privacy practices of such third parties and encourage you to review their privacy policies separately.

## 13. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website. Material changes will be communicated where required.