

Humly Privacy Notice

How Humly processes personal data as a controller

Version of 9 October 2026, revision 2. Replaces the previous Humly Privacy Policy.

This notice explains how Humly processes personal data and why and how the data is used — for example about website visitors, customer and partner contacts, people who contact our support, and job applicants.

This notice does not cover personal data Humly processes on its customers' behalf, such as bookings and visitor registrations. That processing is governed by the Humly DPA and the relevant controller's privacy notice. A customer may itself act as processor for a group company.

1. Who is responsible

Humly Solutions AB, company registration number 559233-6480, Sveavägen 124, 113 50 Stockholm, Sweden (**Humly, we**) is the controller for the processing described here.

Contact for privacy questions and to exercise your rights: security@humly.com.

2. What we process, why, and on what legal basis

Purpose	Personal data	Legal basis	How long we keep it
Customer and partner relationships: agreements, orders, licences, invoicing, account administration	Name, title, employer, business email and telephone number, and contact roles registered in Humly Control Panel; order and invoice details	Legitimate interest in managing the relationship with your organisation (Article 6(1)(f)); contract performance where you personally are party to the contract (Article 6(1)(b)); accounting obligations (Article 6(1)(c))	During the relationship and up to 24 months after; accounting records through the end of the seventh year following the calendar year in which the financial year ended
Partner sales reporting	Names and contact details of end-customer contacts included in partners' sales reports	Legitimate interest in managing our channel and warranty obligations (Article 6(1)(f))	24 months after the end of the relationship
Support	Name, contact details, content of support requests and communications	Legitimate interest in providing support (Article 6(1)(f)); contract performance where you personally are party to the contract (Article 6(1)(b))	During the relationship and up to 36 months after it ends
Product notices and security	Contact details of administrative and technical contacts	Legitimate interest in informing customers of maintenance, changes and security matters (Article 6(1)(f))	During the relationship and up to 24 months after it ends, subject to any longer period necessary for a specific legally required security notification

Purpose	Personal data	Legal basis	How long we keep it
Marketing, newsletters and events	Name, email address, employer, interests and interactions with our emails and website	Consent where required by electronic-marketing law; otherwise legitimate interest in relevant business marketing where permitted (Articles 6(1)(a) and (f)). Each marketing message provides a way to opt out	Until you unsubscribe or withdraw consent, or after 36 months without interaction
Website and cookies	IP address, device and browser information, pages visited, cookie identifiers	Legitimate interest for necessary website processing; non-essential analytics and marketing cookies require consent before use (Articles 6(1)(f) and (a))	As described in our cookie settings
Security research and vulnerability reports	Name or handle, contact details and report content	Legitimate interest in product security (Article 6(1)(f)); legal obligation for records and reporting actually required by the CRA or other applicable law (Article 6(1)(c))	Identifiable reports for 5 years. Necessary compliance evidence may be kept for up to 10 years, or a longer legally required period; reporter identity and unnecessary personal details are removed when no longer needed
Recruitment	Application, CV, contact details, interview notes	Legitimate interest in recruiting, or consent to keep your application for future roles (Article 6(1)(a) and (f))	12 months after the recruitment ends, or 24 months with consent
Legal claims and compliance	Data relevant to the matter	Legitimate interest and legal obligations (Article 6(1)(c) and (f))	As long as necessary for the matter

We receive business-contact details from you, your organisation and relevant Humly partners, including partner sales reports. We also collect the interactions and technical information described above when you use our website or communicate with us. We provide this notice when collecting data directly and, for indirectly received data, within the applicable GDPR period, normally no later than one month or our first communication if earlier.

We identify information required for a transaction, support request or legal obligation when collecting it. Without necessary contact, order or support details, we may be unable to handle that request or transaction. Marketing consent and optional cookie choices are voluntary. Cookie settings describe the individual cookies and allow choices to be changed.

3. Who receives the data

We share personal data with service providers that process it on our behalf under data processing agreements, including providers of customer relationship management and marketing automation, email and office software, support desk, accounting and hosting. We share data with Humly partners where needed to serve your organisation, and with authorities where the law requires it. We do not sell personal data.

4. Transfers outside the EU/EEA

Some providers, including HubSpot, are located outside the EEA or may access data from abroad. We rely on an applicable adequacy decision, including the EU-U.S. Data Privacy Framework for a certified recipient and covered processing, or the appropriate European Commission standard contractual clauses with any necessary supplementary measures. You may request information about, or a copy of, the applicable safeguards at security@humly.com, with appropriate redaction to protect confidential information.

5. Your rights

Subject to the conditions in GDPR, you may request access, correction, erasure or restriction, and object to processing based on legitimate interests. Data portability applies to qualifying automated processing based on consent or a contract with you. You may object to direct marketing at any time, after which we stop that marketing processing. You may withdraw consent without affecting processing already lawfully carried out. Contact security@humly.com.

You also have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten, www.imy.se) or the supervisory authority where you live or work.

6. Changes

We update this notice when our processing changes. The date of the current version is shown at the top.