

ZealiD AB		Document name ZealiD B2B Outreach Privacy Policy		
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Date	Revision	Comment	Contributor
2025-06-12	01	First draft	Philip Hallenborg
2025-06-17	02	Updates to emails	Philip Hallenborg

ZealiD B2B Outreach Privacy Policy

Effective Date: 2025-06-13

ZealiD AB ("ZealiD", "we", "our", or "us") is a Qualified Trust Service Provider regulated under eIDAS and committed to the highest standards of personal data protection. This Privacy Policy explains how ZealiD processes professional contact data for outbound B2B marketing purposes, in accordance with the General Data Protection Regulation (GDPR).

1. Who We Are

ZealiD AB is a Swedish limited company (Reg. No. 556972-4288) headquartered at Norrlandsgatan 10, 111 43 Stockholm, Sweden. We provide digital identity, qualified electronic signature, and secure authentication services to regulated institutions and professionals across Europe.

For privacy-related questions, please contact:

Email: support@zealid.com

Phone: +46 768 374 200

2. Purpose of Processing

We process professional contact data to identify and contact individuals whose roles suggest they may benefit from ZealiD's trust services. This processing is carried out for:

- Direct B2B marketing

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- Customizing messages for relevancy
- Initiating relationships with potential enterprise clients

We never use this data for profiling with legal effects or for automated decision-making.

3. Categories of Personal Data

We process the following business-related personal data:

- Full name
- Work email address
- Job title
- Company name and size
- LinkedIn or other public professional profiles
- Interaction signals (e.g., content engagement, technologies used)

We do **not** process sensitive personal data or consumer-oriented information.

4. Source of Data

We obtain contact information from:

- Publicly available sources (e.g., company websites, professional social networks)
- Third-party platforms such as Amplemarket, which aggregate professional data from public and reputable sources

You were not contacted based on any private or sensitive data.

5. Legal Basis for Processing

The lawful basis for processing is **legitimate interests** under Article 6(1)(f) of the GDPR. Our interest lies in promoting ZealiD's services to relevant professionals in regulated

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industries. We believe this processing does not override your privacy rights due to the professional context, data minimization, and available opt-out mechanisms.

See our summary Legitimate Interests Assessment (LIA) below.

6. Your Rights

You have the right to:

- Access your data
- Rectify inaccurate data
- Erase your data ("right to be forgotten")
- Restrict or object to processing (including direct marketing)
- Lodge a complaint with your data protection authority

To exercise your rights, email us at support@zealid.com.

7. Opt-Out and Transparency

If you have received a message from us, it is because we believe our services may be relevant to your role. You can opt out at any time using the link provided in our email or by replying directly.

8. Data Retention

We retain contact data for up to 12 months unless you opt out or request deletion earlier. After this, your data will be either deleted or permanently anonymized.

9. International Transfers

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Some of our outreach tools (e.g., Amplemarket) may store data in the US. These transfers are covered by Standard Contractual Clauses (SCCs) to ensure adequate protection, and we conduct Transfer Impact Assessments (TIAs) for high-risk processing.

10. Security Measures

ZealiD and our service providers apply industry-standard security controls, including:

- Encryption at rest and in transit
- Access controls and monitoring
- Vendor due diligence and audits

11. Legitimate Interests Assessment (Summary)

- **Purpose:** To inform professionals in regulated sectors about trust services that may be beneficial to their work.
- **Necessity:** There is no less intrusive method to inform relevant prospects of our solutions. Only publicly available business contact data is used.
- **Balance Test:** Individuals are contacted at their professional addresses, have a clear opt-out, and are not subjected to frequent or intrusive messages. Relevance, transparency, and control are prioritized.

12. Transfer Impact Assessment (TIA) Summary

We have assessed the risk of international transfers of personal data to the United States where our third-party vendor Amplemarket is hosted. While the US does not currently benefit from an adequacy decision, the following mitigating measures are in place:

- Standard Contractual Clauses (SCCs) are included in our Data Processing Agreement with Amplemarket.
- The data transferred is limited to professional contact data (non-sensitive).

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- The vendor performs annual SOC 2 Type II audits and regular penetration testing.
 - Data is encrypted in transit and at rest.
 - Individuals retain full rights under GDPR and are offered clear opt-out mechanisms.
- We assess that the risk to data subjects is low due to the nature of the data, security controls, and enforceable contractual safeguards.

13. Changes to this Policy

We may update this policy to reflect changes in our practices or legal obligations. The latest version will always be available at <https://zealid.com/privacy-outreach>

ZealiD AB

www.zealid.com

support@zealid.com

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