

PRIVACY POLICY

This privacy policy describes how nok9 AB, reg.no 556765-1129 (“NOK9”) processes your personal data as regards its business including NOK9-websites (i.e. any website ending with nok9.com) and the services provided to you through these websites. The terms “we”, “our” and “us” in this policy refers to NOK9.

We safeguard your privacy and will at all times ensure that your personal data is processed in a lawful manner, which inter alia means that:

- We treat personal data in a correct and open manner.
- We collect personal data for the legitimate purposes set forth in this policy, and do not treat the personal data in any way incompatible with these purposes.
- The personal data we process is adequate, relevant and necessary for the purposes for which they are collected and used.
- The personal data we process is accurate and updated if necessary.

Please see below for more information on how we process your personal data.

1 WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

NOK9 is data controller for your personal data and is responsible for ensuring that the processing is conducted in accordance with applicable data protection regulations.

2 WHOM DO WE PROCESS PERSONAL DATA ABOUT?

We process personal data regarding the following categories of persons:

- *Customers and partners*, i.e. private persons who represent or are employed at our existing or future customers/partners.
- *Visitors*, i.e. private persons who visit and use our websites.
- *Marketing recipients*; i.e. private persons who have registered to receive our newsletter or join our customer club, or who we collect information about through our social media.

3 WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

We may process both information that you submit to us and which we collect from you.

3.1 **If you are a customer/partner**

We may process the following personal data, regarding you as representative/employee of a customer, or partner:

- Contact information, such as name, title, address, email address and phone number,
- Personal identity number,
- IP-number, user name and other information about your use of our websites,
- Payment data and information that is revealed after a credit report, and
- Other personal data submitted through the services on the websites, such as data that has not been specifically requested, submitted within a test report.

3.2 **If you are a visitor**

We may process the following personal data about you as a visitor:

- IP-number, user name and other information about your use of our websites.

3.3 **If you are a marketing recipient**

We may process the following personal data about you as a marketing recipient:

- Contact information, such as name, title address, email address and
- IP-number, user name and other information about your use of our websites.

4 **WHY AND ON WHAT LEGAL BASIS ARE WE PROCESSING YOUR DATA?**

4.1 If you are a representative for/employee of an organization that is a customer or other partner, the legal basis for our processing of personal data is a balance of interest, i.e. the processing is necessary for a purpose that concerns our legitimate interests in maintaining and fulfilling our contractual commitments. If you do not provide the above-mentioned personal data, we may not be able to fulfil our commitments to the organisation of which you are a representative/employee.

4.2 We collect and process personal data belonging to you as a visitor, marketing recipient, representative/employee of customer or partner in order to assure the quality of our business, to contact you and/or to offer and promote our products or services to you. We may also send relevant offers to you in the form of, among other, newsletters, promotional offers through email etc. The legal basis is that such processing is necessary for our legitimate interest in being able to develop our business and meet your needs as well as promote products and services that we believe you may be interested in. Our interest of

processing personal data for these purposes go beyond your potential interest of protecting your personal integrity, in light of the potential benefits that the marketing brings to you. However, you are entitled to object to the processing of your personal data for the purpose of direct marketing at any time.

- 4.3 Some personal data may be processed due to NOK9 being required to fulfil certain legal obligations, such as personal data processed as a result of our accounting obligation or other obligations stated in law.

5 FOR HOW LONG IS YOUR PERSONAL DATA BEING STORED?

- 5.1 NOK9 does not save personal data longer than necessary in relation to the purpose for which the data is being processed. Therefore, we perform screenings of the personal data on a regular basis and remove data which is no longer necessary to process.

- 5.2 We save data about you as a representative/employee for a customer or partner or supplier for as long as there is an active agreement and two years thereafter. After the contractual relationship has ended, we save personal data for as long as a legal claim related to the agreement is or may be enforced. However, we may need to store personal data even after this time period, e.g. in order to manage warranties, insurance or deadlines for complaints, comply with legal requirements, handle other legal requirements that may be directed against NOK9 and which do not derive from any agreement or to promote products or services and send offers that we believe you might be interested in.

- 5.3 We save data about you as a marketing recipient until you object to the processing of your personal data. If you object to the processing, we will delete your personal data as soon as possible.

- 5.4 We save data about you as a visitor up until you object to the processing of your personal data or for up to 24 months after your last visit to the website. If you object to the processing, we will delete your personal data as soon as possible.

6 WHO HAS ACCESS TO YOUR PERSONAL DATA?

Your personal data may be submitted to and processed by third parties. These may include group companies, service providers such as payment providers on our web shop, legal advisors, accountants, business consultants, authorities etc. Examples of situations when your personal data may be transferred to third parties are when such action is required due to law, disputes, authority requests or decisions or after a request by you, alternatively when so is required in order to fulfil NOK9's legitimate interest. NOK9 remains personal data controller for the personal data provided to the third parties, while the third parties, depending on the circumstances, become independent personal data controllers, personal data controllers joint with NOK9 or personal data processor to NOK9.

7 HOW AND WHERE DO WE STORE YOUR PERSONAL DATA?

- 7.1 NOK9 takes appropriate technical and organizational measures to prevent unauthorized or unlawful processing and access, loss, destruction or damage to personal data, thereby ensuring an appropriate level of security.
- 7.2 NOK9 may process personal data within as well as outside of the EU/EEA. We will and must take necessary actions in order to ensure that the transfer of personal data is conducted lawfully and that the personal data will continue to be protected by the recipients outside of the EU/EEA.

8 COOKIES

- 8.1 Cookies are small text files that are saved in your device when visiting a website. These cookies help us improve your user experience on our website and help us find out which pages you are interested in. Some of these cookies are necessary for functionality, while others are used to optimize and enhance your experience.
- 8.2 We use cookies to collect data and for example compile the number of visitors, which links visitors click on, demographics and interest in order to optimize our website and provide you with a better experience while on the website.
- 8.3 We also use third party cookies which conduct cross-domain tracking in order for us to provide marketing to you on other websites or media channels.
- 8.4 You may block cookies and still have access to most of our content on the website. If you choose to block cookies, however, it may impair the website's functionality. To block cookies, you must change the security settings in your browser.

9 PROFILING

NOK9 may process your personal data through profiling, such as analysis of how you use our websites, which services and offers you have been interested in, details of your purchases etc. to provide you with offers that we think may interest you. You may at any time object to the processing of your personal data through profiling. However, if such treatment is necessary for the conclusion or performance of an agreement with you or if such treatment is permitted under applicable law, we may still continue with the processing.

10 WHAT RIGHTS DO YOU HAVE AS A DATA SUBJECT?

- 10.1 **The right to access** – You have the right to turn to us and request access to the personal data we process related to you. You also have the right to request information about, among other things, the purpose of the processing and the recipients of the data. NOK9 will provide you with a copy regarding the processed personal data, free of charge. If you request further copies, we may charge an administration fee.

- 10.2 **The right to rectification and limitation** – You have the right to, without undue delay, have your personal data rectified or, under certain circumstances, limited. If you believe that NOK9 is processing personal data regarding you which is inaccurate or incomplete, you may request to have the data rectified or completed.
- 10.3 **The right to deletion** – You also have the right to have your personal data deleted, e.g. if the data is no longer necessary for the purpose of the processing or if the processing is based on a consent which has been withdrawn. However, there may still be legal requirements or contractual relations preventing us from deleting your personal data.
- 10.4 **The right to objection** – You have the right, at any moment, to object to the processing of your personal data if the legal basis of processing is based on a balance of interests. You also have the right, at any moment, to object to the processing of your personal data if the data is processed for the purpose of direct marketing.
- 10.5 **The right to file a complaint** – If you are dissatisfied with how we process your personal data, please contact us by using our contact information stated below in section 12. You also have the right to file a complaint regarding our personal data processing to:

Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm
imy@imy.se

11 **ALTERATIONS OF THE POLICY**

NOK9 reserves the right to alter and update the policy. If the policy is materially altered or if current data is to be processed in a different manner than what is stated in the policy, NOK9 will inform about this appropriately.

12 **CONTACT NOK9**

For questions about the policy or requests regarding personal data, please contact NOK9 by using our contact information below.

Contact information

Email address: info@nok9.com

Address: nok9 AB, Citadellsvägen 19, S-211 18 Malmö, Sweden