

## Gunnebo Industries' Customer and Supplier Privacy Policy

In this Gunnebo Industries' Privacy Policy for Customers and Suppliers ("**Policy**"), references to "Gunnebo Industries", "we", "us" and "our" will mean the member within the Gunnebo Industries group of companies (for contact details please read "**Questions and queries**" below) that has formally engaged with you or your employer as a supplier or partner, or that you are a customer of (collectively referred to as "you/r" unless the context provides for a different interpretation).

Gunnebo Industrier AB and its subsidiaries will be referred to collectively as the "Group".

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### Why do we inform you?

We know that you care how information about you is processed. This Policy outlines in detail how we collect, process, use and transfer (collectively "**process**") your personal data. In light of the volume of information in this Policy, please use the content section above to identify the areas you are most interested in.

Personal data is information that relates to an individual who can be identified from that information, whether or not in conjunction with any other information. Common examples of personal data processed by Gunnebo Industries in its day to day business include name, address, telephone number and other contact details and video surveillance data and images ("CCTV").

### Who is the data controller?

The data controller is Gunnebo Industries, meaning that we determine how and the reason why your personal data is processed. For contact details, please read "**Questions and queries**" below.

Where we have appointed a data protection officer (DPO), you may contact the DPO via the contact details provided in "**Questions and queries**" below.

### Processing of your personal data

#### *How and why do we process your personal data?*

The personal data we collect from you or via our systems help us manage the contractual relationship with you or your employer, e.g. for payment of invoices for deliveries or work that has been performed, for our contact with you and your employer but also to comply with our legal obligations or to conduct our business. The personal data we collect, the legal basis for our processing and the purpose of the processing are detailed below. Please note that personal data in the below table may be processed by different companies within the Group. Sometimes, these activities are carried out by third parties, including other members of the Group (see "**Does Gunnebo Industries share personal data with others?**" below).

| Personal data  | Basis of processing   | Purpose of processing   |
|--|---|---|
| Data to administer supplier and customer registers or relationships (including name of contact | It is necessary for the performance of, or to take steps for entering into, our contract with | This is required to enable us to administer the contractual relationship with you or your |

|   |   |  |
|---|---|--|
| persons, customer and (external) ID number, contact details such as phone number, fax, email and company address, title, department and function) | you or your employer or necessary for our legitimate interest to develop our business and to communicate with our contacts. | employer to, for example communicate with you, manage accounting and invoicing. The data can also be used for business development, marketing and statistics, based on our legitimate interest to develop our business and to communicate with our contacts. |
| Credit check (on companies and businesses, not on you as a representative for the company or business)  | It is necessary for our legitimate interest to ensure that a customer is creditworthy.                                      | A credit check is conducted on companies, sole proprietorship, and is used to decide whether to accept a cooperation or contractual relationship.  |
| Information about product interests, campaigns and browsing history   | It is necessary for our legitimate interest to adapt offers and communications based on your interests.                     | We use the information to adapt campaigns and possible offers.   |
| Sound recordings (from phones)  | It is necessary for our legitimate interest to verify that customer contracts are correct.                                  | We use the sound recording to verify the accuracy of customer contracts.   |
| Communication Data, for example e-mail  | It is necessary in order for us to communicate within our cooperation or assignment.  | This is required in order for us to fulfill our obligations under the contract between us and you, or your employer, or it is necessary for our legitimate interest to communicate with you within our cooperation or assignment.                            |

### ***Where does Gunnebo Industries obtain my personal data from?***

Most of the personal data we process is obtained from you or your employer when we enter into an agreement with you or your employer, when we perform or receive an assignment, or when we otherwise communicate as part of a cooperation or potential cooperation. We may also obtain data during the time of the work or assignment. For other data types of personal data, we may obtain it as a result of you being on our premises or using our systems (for example, CCTV footage).

In some circumstances, we may request your explicit consent to process (specific types of) personal data. In these circumstances, you are able to withdraw your consent at any time by following the instructions provided when you gave consent or via the contact details below (see "**Questions and queries**").

### **Does Gunnebo Industries share personal data with others?**

#### ***Our Group Companies***

Personal data will only be shared across the Group in certain circumstances and where it is lawful to do so. It may be necessary to share your personal data with other members of the Group, which includes a potential holding company and its subsidiaries for the purposes of our business management. Your personal data may in particular be shared with the parent company Gunnebo Industries AB which to a great extent is responsible for IT-services within the Group.

Access rights between members of the Group are limited and granted only on a need to know basis, depending on job functions and roles.

#### ***Service Providers***

We use third party service providers who provide services including IT services, audit and security services. In providing the services, your personal data will, where applicable, be processed by the service provider on our behalf.

We will control any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your personal data. We will have written contracts with them which provide warranties regarding the security of your personal data as well as warranties that they comply with our data security standards and international transfer restrictions.

## **Disclosure to third parties**

In certain circumstances, we share and/or are obliged to share your personal data with third parties outside the Group, for the purposes described above and in accordance with the data protection laws.

These third parties include:

- administrative authorities (tax, debt collection or social security authorities)
- financial institutions
- insurance providers
- police, public prosecutors
- external advisors

## **Does Gunnebo Industries transfer personal data to countries outside the EEA?**

We may also transfer your personal data we process to a country outside the European Economic Area ("EEA"), for example, when one of our service providers use staff or equipment based outside the EEA. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights. We have, among other things, established an adequate level of data protection through EU Standard Contractual Clauses based on the EU commission's model clauses or through binding corporate rules within the Group. If you would like to see a copy of any relevant provisions, please contact your Data Protection Officer (see "**Questions and queries**" below).

## **How is my personal data secured?**

Gunnebo Industries operate state of the art IT security systems to protect the confidentiality, integrity and availability of your personal data. We have in particular taken appropriate security measures against unlawful or unauthorized processing of personal data, and against the accidental loss of, or damage to, personal data. Access is only granted on a need-to-know basis to those people whose roles require that they process your personal data.

## **How long does Gunnebo Industries store my personal data?**

We will store your personal data for as long as we need it to fulfil the purposes for which it was collected (see above) and in order to comply with legal and regulatory requirements. This may mean that some information is held for longer than other information. If you would like further information about our data retention practices, please refer to our Data Retention Policy.

## **What are my rights under applicable data protection laws?**

You have various rights which you can enforce, including the right to be informed in accordance with this Policy.

For questions and queries please contact us according to "**Questions and queries**" below.

The below table provides a summary of the rights that the law entitles you to. The table also includes information on possible conditions and limitations on how the right can be exercised and how you execute your right.

| <b>Your right</b>         | <b>What does it mean?</b>  | <b>How do I execute this right?</b>   | <b>Conditions to exercise?</b>  |
|---------------------------|--|---|---|
| Right of access           | You have the right to access the personal data that we have on you. To exercise this right the conditions in this table must be fulfilled.                         | Requests for such information should be made in writing to <a href="mailto:privacy@gunneboindustries.com">privacy@gunneboindustries.com</a> . If possible, you should specify the type of information you would like to see to ensure that our disclosure meet your expectations. | We must be able to verify your identity. Your request may not affect the rights and freedoms of others, e.g. privacy and confidentiality rights of other staff. |
| Right of data portability | You may be entitled to receive the data which you have provided to us and which is processed by us by automated means, in a commonly-used machine readable format. | Requests should be made in writing to <a href="mailto:privacy@gunneboindustries.com">privacy@gunneboindustries.com</a> . If possible, you should specify the type of information you would like to receive to ensure that our disclosure meet your                                | The GDPR does not establish a general right to data portability but if the processing is based on your consent or on our contract with you and when the         |

|   |  |   |  |
|---|--|---|--|
|   | This right can be exercised subject to certain conditions, see column four.  | expectations.   | processing is carried out by automated means (e.g. not paper records) you can exercise this right. The right includes only personal data that you have provided to us. Hence, the right does not apply to personal data generated by us.   |
| Rights in relation to inaccurate personal or incomplete data              | You may challenge the accuracy or completeness of personal data which we process about you. If it is found that personal data is inaccurate, you are entitled to have the inaccurate data removed, corrected or completed, as appropriate.   | We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.<br><br>Please always check first whether self-help tools are available.<br><br>If no such tools are available, requests should be made in writing to <a href="mailto:privacy@gunneboindustries.com">privacy@gunneboindustries.com</a> . | This right only applies to your own personal data. When exercising this right, please be as specific as possible.  |
| Right to object to or restrict our data processing of your personal data. | You have the right to object to or ask us to restrict the processing of your personal data. This right can be exercised subject to certain conditions, see column four.  | Requests should be made in writing to <a href="mailto:privacy@gunneboindustries.com">privacy@gunneboindustries.com</a> .  | This right applies only if the processing of your personal data is explicitly based on our so-called legitimate interests (see " <b>How and why do we process your personal data?</b> " above). Objections or request for restrictions must be based on grounds relating to your particular situation. This means that your request for the objection or restriction cannot be generic or too general. |
| Right to have personal data erased  | You may be entitled to have your personal data erased (also known as the "right to be forgotten"), e.g. where you think that the information we are processing is inaccurate, or the processing is unlawful. This right can be exercised subject to certain conditions, see column four. | Requests should be made in writing to <a href="mailto:privacy@gunneboindustries.com">privacy@gunneboindustries.com</a> .  | There are various lawful reasons why we may not be in a position to erase your personal data. This may apply (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, (iii) where we have to comply with legal archiving obligations, or (iv) where the personal data is necessary for the performance of our contract with you.                     |
| Right to withdrawal   | You have the right to withdraw your consent to any processing for which you have previously given consent to.  | Requests should be made in writing to <a href="mailto:privacy@gunneboindustries.com">privacy@gunneboindustries.com</a> .  | If you withdraw your consent it will only take effect for the future.  |

## **Questions and queries**

If you would like further information about your data protection rights, including rights about access to data and correction of inaccurate data, please contact your contact person with us or send an email to [privacy@gunneboindustries.com](mailto:privacy@gunneboindustries.com).

## **Changes to this Policy**

We may decide to change this Policy. If the change is indicative of a fundamental change to the nature of the processing (e.g. enlargement of the categories of recipients or introduction of transfers to a third country) or a change which may not be fundamental in terms of the processing operation but which may be relevant to and impact upon you, then the updated Information will be provided to you well in advance of the change actually taking effect. We send them to you via e-mail or publish them on our website so that you will be aware of the changes. When notifying you of such changes, we will also explain what the likely impact of those changes on you will be, if any.