

Ebeco Privacy Policy

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1 INTRODUCTION

At Ebeco, we safeguard your personal privacy. We want you to feel confident that we handle your personal data correctly. This privacy policy describes how we collect, process and use your personal data. It also describes your rights and how you can exercise them.

Data protection laws and regulations aim to protect individuals' privacy and personal integrity. In order to conduct its operations, Ebeco AB processes personal data relating to employees, customers, suppliers, business contacts and other individuals with whom the organisation has a relationship or may need to contact.

To protect the privacy of these individuals, the company will continuously work to ensure that personal data is processed in a lawful and correct manner. We all share responsibility for complying with this policy. This ongoing effort is also carried out to protect the company's reputation and minimise the risk of fines or other legal sanctions.

2 PURPOSE

The purpose of our privacy policy is to ensure that Ebeco processes personal data in accordance with the EU General Data Protection Regulation (GDPR). The policy covers all processing where personal data is handled and includes both structured and unstructured data. We aim to demonstrate transparently how we collect and process personal information. We also show how we protect employees, customers, suppliers, business contacts and others.

3 GDPR

The EU General Data Protection Regulation describes how organisations such as Ebeco AB must act when collecting, handling and storing personal information. The group works actively to comply with this regulation and other applicable laws and regulations related to the processing of personal data, and continuously follows developments in this area.

All processing of personal data must comply with the fundamental principles set out in the Regulation. These principles are as follows:

- a. Lawfulness, fairness and transparency
Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. The requirement of lawfulness means, among other things, that there must be a legal basis for processing.
- b. Purpose limitation
Personal data shall be collected for specified, explicit and legitimate

purposes only. This means that the controller must define the purposes before collecting personal data. The data must not subsequently be processed in a manner incompatible with those purposes. The purposes must be documented and the data subject must be informed both at the time of collection and upon request. If the data is later processed for other purposes compatible with the original ones, the data subject must also be informed.

c. Data minimisation

Personal data shall be adequate, relevant and not excessive in relation to the purposes for which it is processed. In other words, it is not permitted to collect data for undefined future needs. Collected data must not be processed if, for example, it is outdated and no longer relevant.

d. Accuracy

Personal data shall be accurate and kept up to date. All reasonable steps must be taken to ensure that inaccurate data is erased or rectified without delay.

e. Storage limitation

Personal data must not be kept in a form that permits identification of the data subject for longer than necessary.

When personal data is no longer required, it should be erased or anonymised. Time limits and routines for deletion or anonymisation should be established to ensure compliance.

f. Integrity and confidentiality

Personal data must be protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Appropriate technical and organisational measures must therefore be implemented.

4 OUR RESPONSIBILITY

This policy applies to everyone within the group who processes personal data, as well as external partners who process personal data on behalf of the group.

Everyone working for or with Ebeco AB shares responsibility for ensuring that collected and stored personal data is handled appropriately. Each function must ensure that processing complies with the principles of this policy.

However, the following responsibilities apply:

The Board of Directors has ultimate responsibility for ensuring that the group meets its legal obligations. The Board delegates responsibility for compliance to executive management.

Executive management is responsible for keeping the Board informed about how the company complies with requirements. Management also has the following responsibilities:

- Continuously evaluating and reviewing processes involving personal data to ensure compliance with this policy.
- Providing training and guidance to employees handling personal data.
- Ensuring individuals can exercise their right to erasure and access, within a reasonable time.
- Ensuring third-party processors comply with this policy.
- Ensuring systems meet acceptable security standards and legal requirements.
- Evaluating third-party services used for processing or storing personal data.
- Reporting personal data breaches to the supervisory authority within 72 hours and informing affected individuals within a reasonable time.

5 LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Ebeco AB processes personal data based on one of the following legal grounds:

- Consent
- Contract
- Legitimate interest
- Legal obligation

6 PERSONAL DATA WE PROCESS

Ebeco AB may process the following personal data relating to **employees**:

- Name
- Address
- Phone number
- Email address
- Personal identity number
- Photo

In addition, personal data that you have chosen to provide is processed, for example in connection with employment or other situations.

Ebeco AB may process the following data relating to **customers, suppliers and others**:

- Name

- Address
- Phone number
- Email address
- Photo
- Username
- Password
- IP address

Additional data may be processed if you provide it, for example via email, warranty registration or use of the Garantera service.

When using the Ebeco Connect app, device ID (MAC address) and network name are also processed.

Ebeco AB does not store personal data longer than legally permitted or necessary, or until manually deleted.

7 HANDLING OF PERSONAL DATA

The following applies to handling within the company:

- Only individuals whose work requires it should have access to personal data.
- Personal data must not be shared informally. Access must be requested via a manager if necessary.
- Management provides training to ensure understanding of responsibilities.
- Employees must take precautions when handling personal data:
 - Personal data must not be disclosed to unauthorised persons.
 - Stored data must be regularly reviewed and updated. Data that is no longer needed must be deleted.
 - Uncertainty must be escalated to management immediately.

8 SECURITY

Personal data must be protected against unauthorised access, accidental deletion or similar risks. The following must be ensured:

- Data must be protected by strong passwords that are regularly updated and never shared.
- Data must be stored on secure designated systems protected by appropriate security software and firewalls.
- Data should be backed up regularly and backups tested.

9 YOUR RIGHTS

Ebeco AB strives for transparency and wants you to understand the rights you have regarding the personal data we process. These rights mean that data subjects shall be informed about when and how their personal data is processed and have control over their own data.

- **Right to information**
If you would like a deeper insight into which personal data we process about you, you may request access to the data.
- **Right to rectification**
You may request that inaccurate personal data is corrected.
- **Right to erasure**
You may request that your personal data is deleted. Please note that we may have the right to deny your request if there are legal obligations preventing us from deleting personal data. Such legal obligations may arise from accounting and tax legislation.
- **Right to restriction of processing**
You have the right to request that the processing of your personal data is restricted. Restriction means that the data is marked so that it may only be processed for certain limited purposes in the future.
- **Data portability**
If you have provided your personal data to us, you may in certain cases have the right to receive and use your personal data elsewhere. A prerequisite for this is that the transfer is technically feasible and can take place in an automated manner.
- **Right to object**
You always have the right to object to the processing of your personal data. This primarily applies in cases where we rely on legitimate interest as the legal basis. In order to continue processing your personal data after such an objection, Ebeco AB must be able to demonstrate compelling legitimate grounds that override your interests, rights or freedoms.

10 CONTACT

Responsible for this policy: Ebeco AB, reg. no. 556198-1316, Lärjeågatan 11, 415 02 Gothenburg, Sweden.

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