

**PRIVACY POLICY**  
**Contact persons at customer companies**

Emcomp International AB  
Version 1.a, updated 2018-05-08

**1 INTRODUCTION**

This privacy policy is intended to provide to you, as a contact person at a customer company or potential customer company of Emcomp International AB ("**Company**") information regarding how the Company handles your personal data. The privacy policy also describes your rights *vis-à-vis* us and how you can enforce your rights. Those customer companies with which the Company has a contractual relationship or is about to enter into a contractual relationship are referred to below as "**Customers**". Those companies which the Company contacts without having an existing or imminent customer relationship are referred to as "**Potential Customers**".

**2 WHO IS THE CONTROLLER OF PERSONAL DATA?**

The Company is the controller of personal data for the processing of personal data collected regarding the contact persons at Customers and Potential Customers.

Set forth below is the Company's contact information.

Emcomp International AB, 556556-0165

Hemvägen 12, 732 71 Fellingsbro

+46(0)581-62 15 50

Should you have any questions about the Company's processing of your personal data, please contact us at [info@emcomp.se](mailto:info@emcomp.se).

**3 TYPES OF PERSONAL DATA PROCESSED**

**3.1 Customers**

The Company processes the following personal data about customers' contact persons:

- (a) Name
- (b) Telephone number
- (c) Email address

If the Customer is your own sole proprietorship, we may also collect the following data:

- (a) The registration number of the sole proprietorship (which is also your personal ID number)
- (b) Credit information regarding your sole proprietorship

The processing of the above-stated personal data is necessary in order for the Company to be able to perform the agreement which the Company has with the Customer. If this data cannot be processed, the agreement with the Customer cannot be performed. The data is collected from you personally and/or the Customer you represent.

The Company also saves its Customers' purchasing history, i.e. data regarding products purchased, quantity, date and price.

### **3.2 Potential Customers**

The Company processes data regarding names, contact information, and company position for contact persons at Potential Customers. The data is collected from contacts with potential customers, for example by email, phone calls, fair visits and similar.

## **4 PURPOSES, LEGAL GROUNDS AND TIME OF STORAGE**

### **4.1 Customers**

#### *4.1.1 Customer administration*

Names and contact information are processed by the Company in order for the Company to be able to carry out the purchase, supply the product to the Customer, and otherwise administer the Customer's orders and provide service to the Customer after the purchase, as well as to otherwise exercise its rights and perform its obligations under the agreement with the Customer. In the event the Customer is not a sole proprietorship, the processing is carried out based upon a weighing of interests as legal grounds where the Company's legitimate interest is to be able to perform the agreement with the Customer and provide the Customer good service. If the Customer is a sole proprietorship, the legal grounds for the processing are that it is necessary for the Company to be able to perform the agreement with the Customer.

The registration number/personal ID number of sole proprietorships are processed in conjunction with invoiced purchases. The processing is carried out based upon a weighing of interests as the legal grounds where the Company's legitimate interest is to be able to establish the identity of the Customer.

A credit check regarding a sole proprietorship may be processed in order for the Company to be able to ensure the Customer's creditworthiness. The processing is based on a weighing of interests where the Company's legitimate interest is to assess the possibility to obtain payment.

The above-stated data is saved as long as necessary for the purposes stated above.

#### *4.1.2 Returns, warranty claims and product liability*

The Company saves data regarding the Customer's purchasing history and any correspondence and documentation regarding the products the Customer has purchased. Such documentation may contain the contact person's name and other information regarding the contact person. The Company saves such documentation as long as and to the extent necessary in order for the Company to be able to provide the Customer with qualified service after the purchase, and to handle any complaints, claims under warranties, and claims under the Products Liability Act. The information is saved for these purposes based upon a weighing of interests.

#### *4.1.3 Direct marketing*

The Company may also process your email address for direct marketing purposes. The marketing consists of the Company emailing newsletters and offers regarding products/services which we believe are relevant to you in your profession.

Newsletters and offers may be sent by email to sole proprietorships for up to 12 months after the Customer's most recent purchase. Newsletters and offers may be sent by email to contact persons at Customer Companies which are not sole proprietorships for up to five years after the Customer's most recent purchase.

Newsletters and marketing materials are only sent where you have not declined such marketing and you may deregister at any time from our newsletters and marketing materials. In order to deregister, please contact the Company at [info@emcomp.se](mailto:info@emcomp.se) or use the link for deregistration set forth in each newsletter/email.

The marketing is carried out based upon a weighing of interests as the legal grounds where the Company's legitimate interest is to market its products.

#### 4.1.4 *Miscellaneous*

In addition to the provisions set forth above, the Company may process your personal data where necessary in order to perform a legal obligation which requires processing or in order for the Company to be able to establish, enforce, or defend against legal claims.

## 4.2 **Potential Customers**

The Company uses data regarding contact persons for marketing purposes based upon a weighing of interests. The marketing consists of emails of newsletters and offers which we consider to be relevant to you in the exercise of your profession. Newsletters and marketing emails are only sent where you have not declined such marketing and you may deregister from our newsletters and marketing emails at any time. In order to deregister, please send an email to the Company at [info@emcomp.se](mailto:info@emcomp.se) or use the link for deregistration set forth in each newsletter/email.

Your data is saved as long as the Company requires the data for the marketing campaigns for which the data was collected, provided that you have not previously declined such marketing. The marketing takes place based upon a weighing of interests as the legal grounds where the Company's legitimate interest is to market its products.

## 5 **WHO MIGHT WE SHARE YOUR DATA WITH?**

The Company may transfer your personal data to website administrator, supplier of CRM-system and similar. These recipients are only entitled to process your personal data on behalf of the Company while performing a service for the Company, for example delivering a product ordered by the Customer. The Company takes all reasonable legal, technical and organizational measures in order to ensure that your data is handled securely and with an adequate level of protection when transferring to, or sharing with, such selected third parties.

The Company may also release your personal data to public authorities, for example the Tax Agency, where we are obligated to do so by law. In the event all or part of the Company's operations are sold, the Company may transfer your personal data to a potential purchaser of the business.

## 6 **TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EU/EEA?**

Your personal data will be processed primarily within the EU/EEA, but may be transferred to [STATE COUNTRIES OUTSIDE OF THE EU/EEA]. The Company has taken appropriate protective measures in order to protect your personal data through the recipient of the personal data having signed an agreement containing certain standard contract clauses which have been approved by the EU Commission. A copy of these standard clauses may be obtained upon request to [info@emcomp.se](mailto:info@emcomp.se).

## 7 YOUR RIGHTS

You have certain legal rights which you can enforce against the Company. Set forth below is a summary of these rights. For complete information regarding your rights, please see the General Data Protection Regulation, sections 3–5.

- (a) **Right to access to/extracts from registers.** You are entitled to be informed as to whether the Company is processing personal data about you. If it is, you are entitled to information regarding, among other things, which personal data is being processed, the purposes of the processing, which external recipients have access to your personal data, and how long we save your personal data.
- (b) **Right to data portability (only sole proprietorships).** If you are a customer through a sole proprietorship, you have a right to a copy of the personal data which you have provided to the Company, in a structured, commonly used, and machine-readable format. You also have the right to require that the Company transfer this personal data to another controller of personal data. The right to data portability applies to personal data which is processed in an automated manner and which is based on your consent or on an agreement to which you are a party.
- (c) **Correction of erroneous data.** You have a right to require that the Company correct erroneous or incomplete information about you.
- (d) **Deletion of certain data.** You have a right to require the Company to delete your personal data under certain circumstances, for example where the personal data is no longer necessary for the purpose for which we collected it.
- (e) **Right to object to the Company's processing of personal data.** You have the right, under certain circumstances, to object to the Company's processing of your personal data.
- (f) **Right to object to direct marketing.** You have the right at any time to object to the Company processing your personal data for direct marketing purposes. If you object to such processing, the Company must discontinue all direct marketing to you without unnecessary delay.
- (g) **Right to restrict the processing of your personal data.** You have the right to require the Company to restrict its processing of your personal data in certain circumstances. For example, if you have denied that your personal data is correct, you can request a restriction on the processing during a period of time which allows the Company to verify whether the personal data is correct.
- (h) **Complaints.** If you have any complaints regarding the Company's processing of your personal data, you are entitled to file such complaints with the Privacy Protection Authority.

If you would like to submit a request for a extract from the register, data portability, correction, deletion, objection or restriction, please contact the Company at [info@emcomp.se](mailto:info@emcomp.se).

## 8 CHANGES IN THE PRIVACY POLICY

The Company reserves the right to make changes to this privacy policy. Where such changes are made, notice will be provided [info@emcomp.se](mailto:info@emcomp.se).