

Ström & Gulliksson

Personal Data Policy

General

This information relates to the processing of personal data that Ström & Gulliksson AB ('Ström & Gulliksson' or 'we') obtains in conjunction with the performance of our assignments for customers, from you/your organisation in capacity as business partner, from your visits to our website www.sg.se or from a third party.

We care about your personal privacy and this Policy regulates how we collect, use and protect data about you and how you can exercise your rights. Please contact us if you have any questions or comments regarding this Personal Data Policy.

With reference to law, we refer below to the General Data Protection Regulation, GDPR (Swe. Dataskyddsförordningen) and other applicable Swedish data protection legislation.

1. Personal data

The personal data that we process about you normally comes from you yourself or from someone within your organisation in conjunction with entering into an assignment agreement or the like. You are not obliged to provide us with personal data, but without it we cannot undertake an assignment in the event that personal data is necessary to enable us to be able to carry out the necessary disqualification (conflict of interest) or we cannot otherwise perform our agreed commitments.

We may also use data about you that you have left on our website or that we have obtained from other sources provided by a third party, e.g. marketing and sales activities companies.

The personal data about you that may be affected is:

Personal data and contact details (name, address, email address, telephone number and – when this is clearly justified considering the purpose of the processing, the importance of secure identification or for necessary disqualification – also personal identity (ID) number).

Technical data about your unit or Internet connection (for example, IP address, cookies, electronic images and similar track and trace technologies on websites and in email communication, your geographic location and login details). Read our cookie information on our website www.sg.se for further information about how we use cookies.

2. Purpose and legal basis

It is a precondition for our processing of your personal data to be lawful that there is a legal basis for this, i.e. that it is necessary to perform a contract with you or a legal obligation to which we are subject, or that the processing is done following a balance of interests or that you have given your consent to specific processing. The following are examples of the purposes for which we process your personal data and the legal basis on which this is done.

One of our primary purposes for collecting personal data is to perform and administer our assignments, more precisely in order to perform obligatory disqualification checks, check identity and ownership structure, keep ourselves informed about the circumstances in a specific matter, protect the interests of you or your organisation, for reporting and invoicing purposes and also, as regards personal data from our business partners, to administer and perform contractual obligations.

Legal basis: The performance of a contract or legal obligation, or if you are a representative, employee or otherwise represent an organisation that has entered into contract with us – legitimate interest. Ström & Gulliksson's legitimate interest in the above-mentioned processing of personal data is to be able to perform contractual or legal obligations.

We may also use the personal data to adapt our services and service offering, business and method development, market analysis, statistics and risk management.

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Legal basis: Legitimate interest.

We may use data about you to provide news information and marketing related to our services, both general and client-specific, and inform you about new relevant legislation, our activities or services. We may thus use the data about you for direct marketing, unless you/your organisation have instructed us not to do this. To the extent that you do not have an active customer relationship with us and are a consumer, however, we will only use your data for electronic direct marketing if you have consented to this.

Legal basis: Legitimate interest or consent where expressly stated.

You have an opportunity at any time to object to us using your personal data for marketing purposes by contacting us in the manner described in Clause 9 below, or directly in our electronic mailing.

Ström & Gulliksson's legitimate interest in the above-mentioned processing of personal data is to be able to offer you/your organisation better services (by developing, analysing our activities and communicating with our contacts) and also to provide you with personally adapted offers and other relevant information.

3. Data security

All personal data that Ström & Gulliksson processes is processed in accordance with the legislation concerning the processing of personal data applicable at any given time. The personal data is stored in operating environments that use security measures to prevent unauthorised access. Reasonable standards for the protection of personal data are complied with. The measures are taken with a view to preventing unpermitted or unlawful processing of the data about you and unintentional loss or destruction of, or damage to, this data.

If a personal data breach is detected, this will, in the manner prescribed by law, be notified to the Swedish Data Protection Authority and also to you when and in the manner prescribed by law.

4. Disclosure of personal data

Ström & Gulliksson will not disclose personal data to external parties unless:

- (i) This has been specially agreed between you and Ström & Gulliksson.
- (ii) It is necessary to exercise your rights.
- (iii) It is necessary for Ström & Gulliksson to be able to perform a statutory obligation, comply with decisions from public authorities or courts.
- (iv) Ström & Gulliksson engaged an external service provider, as processor, to perform our services on our behalf. In this case, service providers engaged will be bound to only use personal data on Ström & Gulliksson's behalf and also to protect it and process it confidentially in a corresponding way to Ström & Gulliksson.

The personal data may, pursuant to the above, be transferred to countries outside the EU to the extent that this is permitted by law.

Where and in a manner provided by law you are entitled to get a list of any processors that process your personal data on behalf of Ström & Gulliksson.

5. Your rights

You are entitled to request information about Ström & Gulliksson's processing of the personal data relating to you and have access to the data in accordance with what is prescribed by law. Such a request must be in writing and be personally signed. We will respond to your request as soon as possible and within one month. In the event that we cannot fulfil your request, we will notify you of this, stating the reasons why.

Ström & Gulliksson will, at your request or on our own volition, rectify personal data about you that is incorrect and, when necessary, supplement the same and also restrict the processing of your data. If you consider that the data about you is incorrect or incomplete, you are entitled to ask for it to be rectified in the manner prescribed by law. We will correct

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or update the data about you as quickly as reasonably possible. You are also entitled, in the manner prescribed by law, to have the data about you erased or request that we restrict the processing of your personal data and also withdraw any consent. You are also entitled, in the manner prescribed by law, to have the personal data you provided to us transferred (ported).

Please note that it may be required that we retain necessary personal data in conjunction with erasure, withdrawal of consent or porting to be able to fulfil our obligations by law or contract. It may also be permitted for us according to law to retain certain personal data to satisfy our business needs.

You are entitled to object to such processing of your personal data that we do pursuant to a balance of interests. We must then, after you have specified the processing to which you are objecting, demonstrate that there are overriding interests. You are also entitled to object at any time to the processing of your personal data carried out for direct marketing.

6. Storage period

The personal data is kept in accordance with the obligation imposed on Ström & Gulliksson for a period of ten years from the date of completion of a matter, or a longer period if called for by the nature of the matter. Data that is processed for the purpose of developing, analysing and marketing Ström & Gulliksson's business is never kept for longer periods than may be deemed necessary considering the purpose in accordance with Clause 2 above and in accordance with prevailing provisions and laws. Your personal data is thinned out or rendered anonymous when it is no longer relevant for the purposes for which it has been collected or is no longer required according to law or contract.

7. Amendment of the Personal Data Policy

This Personal Data Policy may be updated by us. If there are significant amendments to this Personal Data Policy, we will notify you by putting a clear message on our website or in some other appropriate way. We invite you to read through this Personal Data Policy to keep yourself informed about how we process your personal data.

8. Complaints

Please notify us as soon as possible if you consider that the processing of your personal data has been dealt with incorrectly. You also have the option to make a complaint to the Swedish Data Protection Authority about our personal data processing.

You may be entitled to damages if you consider that you have suffered a loss because our processing of your personal data has taken place in violation of the law. You can then request damages from us or institute proceedings at a court.

9. Contact details:

Ström & Gulliksson AB, corporate identity (ID) number 556102-2702, is the controller for the processing of your personal data as described above, unless otherwise expressly stated in conjunction with the collection of your data. Please contact us in accordance with the following if you have any questions about the policy or our processing of personal data.

Address: Ström & Gulliksson AB, Box 4188, SE-203 13 Malmö, Sweden
Telephone: +46 (0)40-754 45
E-mail: mail@sg.se