Enequi privacy policy

1. Our handling of personal data

Enequi protects your personal integrity, and we want you to feel safe and confident in sharing your personal data with us. For us at Enequi it is important to be open with how we process your personal data which is why we want to be clear in how we do so.

This privacy policy will give you information on how we process your personal data when you are visiting our home page, when you use our mobile application, when you purchase our products or services or in any other way when you are interacting with us. This information is produced to comply with laws and regulations stipulating how companies are allowed to process personal data, the data protection regulation. Some examples of this are the European Union (EU) General Data Protection Regulation (2016/679, GDPR) and the Swedish Data Protection Regulation (2018:218 with supplementary provisions to the EU Data Protection Regulation).

The storage period for personal data is described in sections 3 and 6, and only applies if no other regulation or legislation is applicable and takes precedence like, as an example, the archiving of accounting data.

Enequi continuously works with privacy and integrity to stay updated regarding current data protection legislation and because of this the Privacy Policy might be revised. You will find the latest version in our <u>home page</u>.

You are always welcome to contact us if you have any questions or points of view.

2. Who is responsible for your personal data?

Enequi AB, Kung Hans väg 3, 192 68 Sollentuna, with organisation number 559142-7538 (" Enequi"," we" or" us") is the personal data controller for the personal data collected and processed by Enequi.

Enequi has assigned a Data Protection Officer who is responsible in helping Enequi to comply with current Data Protection Regulations. This Data Protection Officer can be contacted by sending an e-mail to info@enequi.com or by phone +46 10 122 17 00.

If you are sharing personal data with one of our collaboration partners (for example via a web link to one of our partners published in our website) the collaboration partner will be responsible for your personal data and its processing.

3. What personal data is collected by Enequi and for what purposes are these used?

We collect your personal data when you purchase our products, when you use our services or when you contact our Customer Service.

When you share personal data with us at Enequi, we use these for the purposes and per the legal basis as described below:

A. For you as an Enequi customer

When you are an Enequi customer we collect your personal data for the purpose of processing and administrating your order and responding to any possible questions you might have as well as sending you surveys, and marketing deemed suitable. The personal data collected and processed for this is:

- Surname and given name,
- Address.
- E-mail address,
- Telephone number,
- Social security number (in some unique cases)
- Property registration name and number (in some unique cases)

The legal basis for the processing of the personal data is to fulfil our contract with you by processing your order and administrating your purchase. Regarding questions and issues, and/or marketing related to your purchase, the legal basis for the processing is our legitimate interest in marketing our products and to inform about relevant news and updates. In connection to your purchase, and at every marketing occasion, you will have the possibility to reject such marketing in accordance with the Swedish Marketing Regulation (2008:486).

If you have not declined marketing by e-mail, your personal data will be kept if you have not unregistered yourself and will then be deleted latest after 1 month. We might, however, keep your personal data for a period of 5 years after purchase to promote our customer relation and to fulfil our guaranteed commitments.

B. When you are having a business account at Enequi

When your business account is created, we collect your personal data for the purpose of administrating your account and the benefits connected to the business account. We might also perform marketing by e-mail that we deem to be suitable. The personal data we collect are:

- Surname and given name,
- E-mail address,
- Telephone number,
- Social security number (when this is used as the company organisation number)

The legal basis for the processing of the personal data is our legitimate interest in fulfilling our commitments to you as a business customer, and to be able to send you marketing material that we deem suitable.

The personal data is kept and processed for as long as your business account exist and will be cleared latest within 1 year after closing such account.

C. When you contact our Customer Service

You can contact us by using our web-based form, by phone or by e-mail. When doing so we collect your personal data for the purpose of being able to assist you with any possible quotation requests, general questions and issues, and in surveys regarding our customer support. The personal data we might collect are:

- Surname and given name,
- Hometown,
- Telephone number,
- E-mail address,
- Company name, and
- Personal data that you might include in your communication with us.

The legal basis for the processing of the personal data is our legitimate interest in assisting you regarding any kind of issues or with any questions or complaints that you might have.

D. When you wish to receive our newsletter

When you contact us, you will, in some cases, have the possibility to approve our sending of marketing material and newsletters to you, the purpose is for us to be able to provide you with newsletters or offers. The personal data we might collect are:

- E-mail address,
- Telephone number, and
- Home address.

The legal basis for the processing of the personal data is our legitimate interest in providing you with marketing materials. If you are a private person who has not purchased anything from us, we will then only send you marketing materials and newsletters after receiving your explicit consent, and you have the right to withdraw such consent at any time. You can do so by following the instructions for deregistration from our e-mails or SMS, or by contacting us. Even when you have withdrawn your consent, we might still contact you, regarding other processing, such as sending you a quotation upon request.

If you have given your consent in receiving marketing material and newsletters, we will keep your personal data for as long as it is deemed necessary for the processing unless you request to deregister. In such a case we will delete your data within 1 month from such a request.

E. When participating in our contests or in our events

We might have contests or other events where we need for you to register to be able to participate. The purpose of processing your personal data when registering is for us to be able to administrate and run such contests and events. The personal data we then collect is:

- Surname and given name,
- E-mail address, and
- Telephone number.

The legal basis for our processing of personal data is our legitimate interest in administrating, running and follow up of our contests and events by confirming registrations, by answering questions, and to be able to notify a winner of a contest.

The personal data is being kept for as long as deemed necessary for the purpose. When the contest or event has ended and potential winners have been notified, your personal data will be cleared within 1 month of the closure or ending of such a contest or event.

F. When using our mobile application

To be able to use the functions in our products mobile application you first need to register an account in the application. The purpose of this data processing is to be able to administrate your account and to prevent unauthorized persons to access our services and for us to understand how you, as a customer, experience and use our products, to be able to improve and develop new products and services. The personal data we collect are:

- Surname and given name,
- E-mail address,
- Country,
- Location by means of GPS co-ordinator.

The legal basis for the personal data processing is our legitimate interest in performing updates to give you the possibility to use our mobile applications or in understanding how you, as a customer, experience our products and use such feedback to improve existing, and develop new, products and services.

The personal data is being kept for as long as deemed necessary for the processing and the function unless you request to deregister. In such a case we will delete your personal data within 1 month after receiving such a request.

G. When visiting our website

We use cookies on our website. For further information regarding this we refer to our <u>Cookie</u> Policy.

H. When applying for a job

You can always send us a spontaneous job application and we will then process your personal data for the purpose of administrating your application. The personal data we will process are the ones you have decided to share with us, and this can be:

- Surname and given name,
- E-mail address,
- Telephone number, and
- Any other data which you have chosen to share with us and might be found in a CV or a cover letter.

We might collect data from a third party, which you have made available to us. This can, as an example, be a reference or information at LinkedIn. The legal basis for this is our legitimate interest to process job applications that we receive. The personal data is being kept by us as long as deemed necessary for the purpose. If we decide not to hire you, we might ask for your permission in keeping your data for future recruitment purposes. In such a case we need your given consent to do so. If not, the personal data will be deleted after completed processing and administration within 1 month of completing the recruitment process. If we choose to continue with your application, we will keep the data when required in the recruitment process.

4. How Enequi use your personal data of registered customers

When you place an order or purchase a product or service from Enequi, we will use your purchase and order history (for example how you are performing searches on our website or what links you choose to click) to get an insight into and be able to understand what products and services is of your interest, and if there are other products and services that we think could be of your interest. Based upon this Enequi will be able to provide you with information regarding updates in our product and services portfolio, but also about existing solutions that you are not aware of. We will also be able to send you special offers based upon your interests and preferences and other similar news and updates. This is special information given to you as an existing customer apart from the regular public offerings.

This is only performed when you have given your consent to our third-party cookies and have chosen to receive our marketing materials and newsletters. If you do not want us to use your order history to send you offers or to give you membership benefits you will always have the right to deregister. If you do not want us to use your order history at all (when developing and improving our products and services or improving functionality) you will always have the right to request for your data to be removed.

5. When we might share your data and where the processing takes place

Enequi will only share your personal data when it is required by law or when it is legally allowed. We might, in some cases, use a personal data processor which will help us with marketing or handling of contracts and orders. Companies that help us with such tasks can be transport and logistic companies, banks, credit card companies or suppliers within the marketing area. In such cases we have signed an agreement with the personal data processor who will ensure that there are security measures implemented to protect your personal data. When we share your personal data the purpose of processing such is then the same as when we initially collected your data.

Enequi will minimize the transfer of personal data to countries outside of EU/ESS and in cases when this could happen (such as for systemized support and maintenance) it is done in accordance with specifically high demands and agreements.

We also share your personal data with certain parties that are personal data controllers themselves, which means they are then controlling how the information is processed and handled. Examples of such parties are government, companies that offer independent payment solutions and companies in public transport of goods.

6. Storage and storage period of personal data

At Enequi the processing of personal customer data will enable us in giving you the best possible service. We will keep your data, if deemed necessary, to fulfil the purposes for which these were initially collected. The data might also be kept for the period required by law, especially the Swedish Accounting Act (1999:10798). At Enequi we use processes and routines which will ensure that we do not keep unnecessary personal data and we will minimize the storage period as far as possible.

To get more information regarding specific storage periods, please read under each processing type described in section 3.

7. How we secure personal data

At Enequi we secure for your data to be processed in accordance with specific security measures to enable us in protecting your data from unauthorized and illegal access. We only process the information that is required and only by the persons that need this, to be able to give our customers the best possible service.

8. Your rights

You always have rights when your personal data is processed by a personal data controller. At Enequi we want to be open and transparent in how we are processing your data. Down below you can find more details about your rights.

<u>Right to access</u>: If you want to find out what personal information we keep and process, you can request for an extract of your data from our register. When such a request is received, we might ask for additional information just to ensure that the information we share is given to the correct person. A request for a data extract from our register should be given in writing and signed by you.

<u>Right to rectification</u>: You always have the right to ask for your data to be rectified or for information to be added in cases of incorrect or incomplete personal information.

<u>Right to erasure:</u> You have the right to be" forgotten", which means that you can always requests for us to erase all your personal data that we have kept. This right can be used if the personal data no longer is required for the purpose of initial collection or if you withdraw your consent regarding processing where we have used your consent as the legal basis. In some cases, Enequi cannot meet your request of erasure. In such cases it means that the data is still required to fulfil legal requirements.

The right to restrict processing: You might have the right to require us to restrict the access in processing your personal information, for example if you object to the correctness of the information and if we need to investigate if that is the case.

<u>The right to data portability</u>: When your personal data is processed based upon consent or being used to fulfil contracts, you have the right to request for us to share your data in a structured, commonly used way and in a machine-readable format, which makes it possible to transfer the data to another personal data controller.

<u>The right to object</u>: You will always have the right to object to our processing of your personal information when this is collected based upon legitimate interest. We will then stop processing your data unless we can demonstrate compelling legitimate reasons which outweighs your interests.

The right not to be subject to a decision based solely on automated processing: Your personal information cannot be used in direct marketing or profiling if you object to such use. You also have the right, at any time, to withdraw your given consent and decline any kind of marketing.

9. Complaints and government control

If you think that we have processed and handled your personal data incorrectly you can always contact us at Enequi. The Swedish privacy protection authority (Integritetsskyddsmyndigheten, IMY) is responsible to supervise in questions and issues

regarding data protection legislation and if you think there are incorrect processing or handling of your personal data you can issue a complaint at the website of the privacy protection authority (IMY) <u>website</u>.

10. Contact us.

Our ambition is to always give you clear and correct information in how we process and handle your personal data. At Enequi the customers personal integrity is of the outmost importance. We continuously work with improvements for you to feel confident in sharing your personal data with us. If you have questions regarding the processing of your personal data, or if you want to raise your rights, you are welcome to contact our customer support.