

# Data Privacy Policy

ALEIDO GROUP AB



# 1. Introduction and Purpose

Welcome to Aleido's Data Privacy Policy (the "Policy").

Aleido respects your privacy and is committed to protecting your personal data. This Policy aims to give you information on how Aleido collects and processes your personal data when you are an external contact of Aleido, meaning when you act as a customer or customer representative, supplier, interested party, or prospect customer Aleido. This Policy also applies when you visit us at this website (regardless of where you visit it from), including any data you may provide through this website when you sign up to our newsletter, follow us in our other digital channels including social media or otherwise when you communicate with us by e-mail or in other electronic format or if you use any of our external web-based services. This Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the applicable data protection legislation protects you.

It is important that you read this Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other notices and is not intended to override them.

## 2. CONTROLLER

Aleido is made up of different legal entities. This privacy notice is issued on behalf of the Aleido group so when we mention "Aleido", "we", "us" or "our" in this Policy, we are referring to the relevant company in the Aleido group responsible for processing your data. In addition, subsidiaries of Aleido Group AB can also be data controllers (including as "joint controllers) and process personal data as described in this Policy. Your relationship with Aleido will determine which of our group companies have access to and processes your personal data, and which of our group companies are the data controller(s) responsible for the personal data.

Aleido Group AB is the controller and responsible for the Aleido website. However, each company of Aleido group with their own website processes personal data received on their own website as a data controller. Further, each company of Aleido group processes personal data of website visitors as a separate data controller when co-operation with the said visitor is needed.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact us at [dataprotection@aleido.com](mailto:dataprotection@aleido.com) or on the contact details set out below.

Contact details

Aleido Group AB is a Swedish company with registration number 556606-0363, having its registered address at Lindholmsallén 2, SE-417 80 Gothenburg, Sweden.

The data privacy manager can be contacted at [dataprotection@aleido.com](mailto:dataprotection@aleido.com).

You have the right to make a complaint at any time to the relevant supervisory authority for data protection. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority so please contact us in the first instance and we will do our very best to solve the issue.

### 3. ACCURACY OF YOUR DATA

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 4. THIRD-PARTY LINKS

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 5. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data and Transaction Data includes only financial data and transaction data about the company that you represent, since Aleido mainly delivers its services Business to Business. Accordingly, no personal data will be processed. Occasionally we may work with sole traders or partnerships where personal data, such as bank account data, in this category may be provided.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data includes your username and password if applicable, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you are registered as an active customer to us in your capacity as representative for a company buying services or products from Aleido we sometimes need to store information about you that concerns your status and availability at the company, for instance if you are on parental leave or sick leave and who we should contact in the meantime. This data will only be processed if it is strictly necessary and provided that you have clearly made the information public.

## 6. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with information, goods or services). In this case, we may have to cancel your communication with us but we will notify you if this is the case at the time.

## 7. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, e-mail, in person on market or student fairs or otherwise. This includes personal data you provide when you:

- ask to be contacted by one of our sales representatives;
- create an account on our website or provide your contact details to us;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enquire about our services;
- when we contact you directly about our services;
- downloading a pdf from our website;
- registering to our contact lists when meeting us at market or student fairs;

- enter a competition, promotion or survey; or
- give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google Analytics based outside the EU/EEA or UK;
    - (b) advertising networks such as LinkedIn, Facebook, Monster, Broadbean etc. based inside and outside the EU/EEA or UK;
    - (c) search information providers such as Google, Bing, HubSpot, XING etc. based inside and outside the EU/EEA or UK; and
    - (d) Identity and Contact Data from publicly available sources.

## 8. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To communicate with you as a prospect customer or supplier and to register you as a new customer or supplier	(a) Identity (b) Contact	Legitimate interests and performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Send you invitations to upcoming events	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Financial Data and Transaction Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To manage our relation with you if you are a shareholder which will include: (a) Send you relevant information regarding reports and annual meetings (b) Control and maintain the public shareholders register	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods, services, positions, events and other news at Aleido that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop and promote our products/services, business operations and positions and grow our business)

Regarding the legitimate interests mentioned, Aleido has evaluated that the risk for the individual is less significant than the advantage for Aleido when processing this data, e.g. because no sensitive data is processed based on this purpose and because the processed data as well as the access rights are limited to the amount and type strictly necessary.

#### Promotional offers from us

If it is permitted under the law, we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you or your company may want or need, or what may be of interest to you or your company. This is how we decide which services, products, news, events and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

#### Third-party marketing

We will not share your personal data with any company outside the Aleido group for marketing purposes.

#### Opting out

You can ask us at any time to stop sending you marketing messages by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Please see our cookie policy for further details about the cookies we use.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your consent, in compliance with the above rules, where this is required or permitted by law.

## 9. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Other companies in the Aleido group acting as joint controllers or processors and who are based in Sweden, Germany, United Kingdom ("UK"), Hungary and China .
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities based in each country where Aleido operates who require reporting of processing activities in certain circumstances.
- Third parties referred to in section 4 above.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## 10. INTERNATIONAL TRANSFERS

Since Aleido operates internationally and has customers and projects in many different countries, we share your personal data within the Aleido group where needed for our business purposes. This will involve transferring your data outside the EU, EEA and UK. Some of our external third parties are based, or use sub-processors, outside the EU/EEA or UK so their processing of your personal data will involve a transfer of data outside those jurisdictions.

Whenever we transfer your personal data out of the EU, EEA and UK we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- All Aleido legal entities have by agreement and policies adopted the same procedures and level of protection and security measures in order to safeguard your data.
- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the UK Secretary of State for the Home Department. For further details, see the European Commission: Adequacy of the protection of personal data in non-EU countries and the UK Secretary of State for the Home Department: Adequacy regulations; or
- Where we use certain service providers, we may use specific contracts approved by the UK Information Commissioner's Office or the European Commission, which give personal data the same protection it has in the UK or Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries and the UK International Data Transfer Agreement and Addendum to the 2021 EU Standard Contract Clauses; or

Please contact us at [dataprotection@aleido.com](mailto:dataprotection@aleido.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EU/EEA and/or UK.

## 11. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 12. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see "*Request erasure*" below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### 13. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure or restriction of processing of your personal data. This enables you to ask us to delete, remove or restrict personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request the transfer of your personal data to you or to a third party. We will fully provide your right to data portability. In particular, you also have the right to receive personally identifiable information you provide to us in a structured, commonly used and machine- readable format.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services or communications to you. We will advise you if this is the case at the time you withdraw your consent.

Request explanation of this Privacy Policy, if you have any questions about how we collect and use your personal data.

In addition, when applicable data protection law(s) require, as a close relative of a deceased person you will also have some of the data protection rights. If we hold and process data of a deceased person, you have the right to request the access, correction and deletion of the deceased person's data, however we need to verify your identity and the relationship between you and the deceased person.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Amendments

If this Policy becomes obsolete or incomplete due to new services or new applications on our website, we are always entitled to make changes to the privacy policy. We will inform you about all changes of this Policy on our homepage.