

ECOLEAN PRIVACY POLICY

HELSINGBORG 2018-05-18

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1 Introduction

Your privacy and digital security is of importance to us at Ecolean Aktiebolag, company reg. no. 556351-0212 ("**Ecolean**"). It is our desire that you will always feel safe and secure when you submit personal data to Ecolean. Ecolean is the data controller for the processing of personal data that occurs.

This Privacy Policy (the "**Privacy Policy**") has three purposes:

- 1 To **explain how we use** the information that you share with us so that we can offer you our products and services,
- 2 To ensure that **you understand what personal data we collect** with your permission and what we do – respectively do not do – with that information, and
- 3 To **keep hold us responsible** for the protection of your rights and your privacy under the policy.

Personal data is all the information which directly or indirectly can identify a living natural person, e.g. name, address, telephone number and IP addresses.

All personal data that we collect concerning you will have a connection to the sales of our products and services, and we will not use the information for any other purposes.

Ecolean will always comply with the applicable legislation concerning how your personal data may be processed, including the General Data Protection Regulation (GDPR), the Swedish Data Protection Act and other applicable laws.

2 Which personal data do we collect about you, and why?

There are two main categories of information that we collect personal data for:

1. information that we must have in order to be able to contact you when you have subscribed to our newsletter or sent a question to us through our interest form, and
2. information that we can use to contact you for other purposes, e.g. in order to invite you to events, execute customer surveys or other marketing measures in case you choose to share such information with us.

Click here for a complete compilation on what personal data that is being processed, why and for how long; [Compilation](#).

2.1 Interest form and newsletter

When you sign up to our newsletter, Ecolean collects a number items of personal data. We need this information to be able to send the requested information to you. Click here for a complete compilation on what personal data that is being processed, why, and how long it will be retained. [Compilation](#)

2.2 E-mail and support matters

In some cases, it might occur that you contact our employees or our customer support, e.g. via e-mail or a telephone call. In such an instance, we save your e-mail address and the contact details you may provide to us in connection with such contact in order to deal with your question.

Click here for a complete compilation on what personal data that is being processed, why and for how long; [Compilation](#).

3 When do we collect personal data?

We collect personal data when:

- You subscribe to our newsletter on our website,
- You register your interest through the interest form on our website,
- You contact our customer support or employees either by telephone or e-mail for assistance or if you have questions, and
- You submit your contact details to us at fairs or events.

4 How do we use the personal data?

We use your personal data to:

- Send newsletters to you about Ecolean and our products which might be of interest to you,
- Invite you to events,
- Send your contact details to a relevant salesperson so that this individual will be able to contact you regarding your general request as formulated in the interest form,
- Register you in our registers of interests in order for our sales personnel to be able to contact you,
- Send market surveys to you in order to improve our service, and
- Do marketing analysis.

5 Specifically for you as customer or supplier to Ecolean

Ecolean manages personal data in relation to their customers' and suppliers' employees in accordance with existing legislation and the GDPR.

5.1 When do we collect personal data?

We collect personal data when:

- Your company becomes a customer or a supplier to Ecolean and you are registered as a contact person under the customer or the supplier, or if
- You contact our customer support or employees either by telephone or e-mail for assistance or if you have questions.

5.2 How do we use the personal data?

We use your personal data to:

- Communicate with you regarding the contract between your company and Ecolean,
- Send out and pay invoices if you are registered as reference person,
- Invite you to events, and
- Send market surveys to you in order to improve our service.

6 Specifically for you as a sole proprietor

When registered as a sole proprietor your personal identity number is utilised as the legal registration number. Based on your consent, Ecolean will process your personal identity number e.g. when sending or receiving invoices to/from you or register you in our customer/supplier register.

Click here for a complete compilation on what personal data that is being processed, why and for how long; [Compilation](#).

7 How do we share the information with other companies?

In case you are a customer or supplier, your personal data will be shared with other companies within the Ecolean corporate group so that Ecolean's employees with knowledge regarding your specific geographical market and who are best suited to assist you in your matter can make contact with you.

Ecolean uses a number of database and programme suppliers to manage the communication with you as seamless as possible. We always enter into a contract with these external parties who are governed by a duty of confidentiality and are obligated to fulfil the requirements that are imposed in existing legislation concerning how the transfer of the personal data may be executed and how your personal data is allowed to be processed. In that way, the safety and the confidentiality of your personal data is guaranteed.

8 Transfer to other countries

Ecolean transfers your personal data to a country outside the EU or the EEA. Such transfer will always be executed in a safe and legal way. Ecolean will not transfer your personal data to an external party outside the EU or the EEA without first having entered into a contract, ensured that the country is approved by the European Commission or that the external party is certified under the Privacy Shield-principles (if transfer to the United States). If you would like to know more about the requirements on transfers of personal data to a country outside the EU or the EEA, please read more [here](#).

9 Your rights

It is our obligation to only process personal data which are correct, relevant and necessary with regards to the purposes of the processing, and you are entitled to control that this is the case. Ecolean has the responsibility to ensure that your personal data is processed in accordance with applicable legislation.

Ecolean will, on your request or on its own initiative, correct, de-identify, delete or supplement data which is detected to be inaccurate, incomplete or misleading.

You as an individual have a number of rights under existing legislation. You have the right to:

1 *Gain access to your personal data.*

- We will, on your request and as quickly as possible but no later than within 30 days from when we received your message on gaining access to the data, provide information regarding what personal data we are processing regarding you.
- You are also entitled to obtain a copy of the personal data which is being processed.
- You are entitled to obtain once per calendar year, by a written and signed application, without cost an extraction from registers about which personal data

that are registered about you, the purposes of the processing and to which recipients the data has been submitted or shall be submitted. You also have a right to in the extraction from registers gain information about where the data have been collected if the personal data have not been collected from you, the existence of automated decision-making (including profiling) and the predicted period for which the details will be stored, or the criteria used to determine that period.

2 *Demand rectification of your personal data.*

- We will, on your request, as quickly as possible and no later than within 30 days from when we received your message on rectification rectify the inaccurate or incomplete information that we are processing about you.

3 *Demand erasure of your personal data.*

- We will, on your request as quickly as possible and no later than within 30 days from when we received your message on erasure delete your personal data if they are no longer necessary for the purpose for which they were collected.
- There may exist reasons causing us to be unable to immediately delete your personal data. We will in that case cease with the processing which is being done for other purposes and inform you about the legal basis and the relevant purpose for continued processing.

4 *Demand a restriction of processing.*

- You have a right to mark your personal data in order for it to only be processed for certain limited purposes. You can *inter alia* demand a restriction when you consider that your personal data is inaccurate, and you have demanded rectification according to above. Whilst the time when the personal data's correctness is investigated, the processing of it will be limited.
- Ecolean will inform you if the investigation results in that the processing shall be limited. We will make sure that necessary rectifications or erasure of personal data and restriction of processing of personal data also is made by the companies to which Ecolean have provided your personal data (please see section 5 above).

5 *Demand data portability.*

- You have a right, under certain circumstances, to receive and transfer your personal data in a structured, commonly-used and machine-readable format to another data controller. Contact us if you wish to know more!

6 *Object to processing of personal data which is being done with the support of a balancing test.*

- You can object to the processing if it is based on a balancing test. If you object to such processing, we will only continue to process your personal data if there are eligible reasons to the processing which outweighs your interest. We will inform you of the reasons if that is the case.

7 *Demand that we cease to process your personal data for direct marketing.*

- You always have a right to object against direct marketing by sending an e-mail to info@ecolean.se. When we have received your objection, we will cease to process the personal data for such marketing purpose.

8 *File a complaint with the Swedish Data Protection Authority concerning our processing of your personal data and compliance with the law./*

- You are entitled to file a complaint concerning the processing that we perform on your personal data to the Swedish Data Protection Authority, if you think that we are in breach of the Privacy Policy, are not in compliance with rules concerning your rights, or in any other way are acting contrary to existing law.
- Note that the Swedish Data Protection Authority changes name to the Privacy Protection Authority, Sw. “*Integritetsskyddsmyndigheten*” from 25 May 2018.

If you wish to assert any of your rights above, please feel free to contact us. Our contact details can be found in section 13.

10 Security

You should always feel secure when you submit personal data to us. Therefore, Ecolean has introduced the necessary security measures to protect your personal data against unjustified access, change and erasure.

It is important to us that the information on our customers is processed in a secure manner. Even if we observe necessary precautions for data protection, no security measures are completely secure, and therefore we can not guarantee to one hundred percent the security of your personal data.

If we should lose the control of your personal data which is sensitive in relation to privacy, e.g. personal identity number, we will inform you immediately and no later than within 72 hours from when we detected the incident.

11 Changes in the Privacy Policy

At times, we may make changes in the Privacy Policy. We will send you a notification if we make major changes in the Privacy Policy, based on what is appropriate with regards to the circumstances, e.g. by sending a message by e-mail or a SMS message to you, or via a pop-up window with information before you obtain access to Ecolean’s website. In certain cases, we will inform you in advance, and your continued use of the website after the changes will constitute your acceptance of the changes. Therefore, we kindly advise you to ensure that you read all such messages carefully.

If you do not want that we continue to process your personal data in our registers in accordance with the new version of the Privacy Policy, you can notify us, and we will delete your personal data within 30 days from your message. Note that we cannot delete your details if there are legal reasons for continued processing. If that is the case, we will notify you of the reasons for continued processing.

12 Information about cookies, other technology and third party’s collection of data

This section describes the use of cookies and other technology on Ecolean’s website.

12.1 What are cookies and other technology?

A cookie is a small text file which is stored on your computer, mobile or other device when you visit a website. The cookie helps website publishers to recognize your device the next time you visit their website. Other similar technology exists, such as pixel tags (transparent graphical pictures placed on a website or in an e-mail, which indicates that a page or an email has been shown), *i.e.* web bugs (similar to pixel tags) and web storage, which is used in software on computers or mobile devices.

12.2 How do we use cookies and other technology?

We use both session cookies (which expire when you close your web browser) and persistent cookies (which remain on the device during a certain period of time or until you delete them). We use the following types of cookies for the purposes described in this chart:

Type of cookie	Purpose
Necessary operative	These cookies are necessary in order for us to provide the website in the best possible way.
Performance/Analysis	We use these cookies in order to analyse how the website is reached, used, or performs. We use this information to maintain, operate and continuously improve the website. We can also get information from our newsletters through e-mail, including if you have opened or forwarded a newsletter or clicked on any of its content. This information tells us how effective our newsletters are and helps us to ensure that we deliver information which you find interesting.
Functional	These cookies let us operate some functions on the website in accordance with the choices you make. These cookies make sure that when you continue to use or return to the website, we can offer you our services as you have demanded them to be provided, e.g. by remembering your name and e-mail which you have previously submitted.
Third party	We can allow our business partners to use cookies on or outside the website for the same purposes as mentioned above, including to collect information about your activities over time and between different websites. We can also hire service operators in the purpose to on our behalf use cookies for the purposes mentioned above.
Ecolean advertisements	We work with web publishers, advertisement networks and service operators to deliver Ecolean advertisements on other websites and services. Cookies can be used to provide you advertisements which may be relevant for you and your interests on other websites and services, and to regulate the advertisements which you receive and measure their efficiency.

12.3 Manage your cookie settings and other settings

Many web browsers allow you to manage your settings. You can set up your web browser to reject cookies or delete certain cookies. With the help of your web browsers settings you can eventually manage other technology in the same way as you manage cookies.

Please observe that if you choose to block cookies it may cause the website to be impaired or prevent some parts of it to function.

There is no generally approved standard on how you are to shall address Do Not Track-signals, and we do not respond to such signals. Users may visit Youronlinechoices.com for information on rejecting that their information is used for online behavioural advertising by member companies in European Interactive Digital Advertising Alliance (EDAA).

Another available tool is Network Advertising Initiatives (NAI) Opt-Out Tool on networkadvertising.org/choices. The tool makes it possible for you to reject the use of information about your online activities for online behavioural advertising from NAI's member companies.

On your mobile device, you can also have a "Limit Tracking" setting (on iOS-devices) or a setting to "Opt Out of Interest-Based Ads" (on Android) which makes it possible for you to limit the use of information about your use of apps in the purpose to show advertisements targeted at your interests.

We work with advertisement partners in order to deliver Ecolean's advertisements. One of the services that we use to track activity related to Ecolean, e.g. by placing cookies, is Google Analytics from Google (Google, Inc., with its headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States). We may use suppliers, among them Google, who uses first-party cookies (such as the Google Analytics cookie) and third-party cookies (like the DoubleClick cookie) together in order to inform, optimise and deliver advertisements based on your earlier visits on our website, including Google Analytics for Display Advertising. Google provides tools to manage the collection and use of certain data which takes place through Google Analytics on [Tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout) and through Google Analytics for Display Advertising or the Google Display Network by using Google's advertisement settings on google.com/ads/preferences/.

12.4 More information

For more information on the use of cookies and how you can block them, visit Allaboutcookies.org or Youronlinechoices.eu. If you have any questions or comments regarding our use of cookies, please contact us via info@ecolean.se.

13 Contact details

Thank you for having read our Privacy Policy. If you have any questions, you are most welcome to contact us!

Data Controller

Ecolean Aktiebolag

Postal address

Box 812

SE-258 01 Helsingborg

Sweden

Visiting Address

Kielergatan 48

258 01 Helsingborg

Telephone

+46 (0)10 459 40 00

E-mail

info@ecolean.se

COMPILATION – GENERAL

Purpose	Categories of personal data	Legal basis	Retention period
In order to be able to send you newsletters	E-mail	Consent	Until you unsubscribe
To be able to contact and communicate with you at your shown interest and on questions submitted through the general interest form	Name Position / Title Company Country E-mail Telephone number Message	Consent	During the case management, and thereafter if you are registered as a customer or supplier to Ecolean
To be able to contact and communicate with you after an expression of interest at a trade fair or event	Name Position / Title Company Country E-mail Telephone number (Business card information)	Balancing test	As long as the personal data is of relevance and you have not refused our processing
To be able to facilitate customer support and manage your registered issues or questions	E-mail Name Other personal data which you might provide with such contact	Balancing test	During the management of the case

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To be able to facilitate your questions and correspondence through e-mail to Ecolean's employees	E-mail Name Other personal data which you might provide at such contact	Balancing test	During the management of the case
To invite you to events	Name Company E-mail Allergies (in some cases)	Consent Legal obligation	Up until the event, and thereafter by the financial department up to seven years pursuant to a legal obligation (the Swedish Accounting Act)
To conduct market analysis	IP-address Country	Consent	As long as the personal data is of relevance, legal consent has been given, and you have not refused the processing
To conduct market surveys	E-mail	Consent	As long as the personal data is of relevance, legal consent has been given and you have not refused the processing
At usage of the website in order to be able to follow how the website is used by interested persons	IP-address Cookies	Consent	As long as the personal data is of relevance and legal consent has been given

COMPILATION – CUSTOMERS

Purpose	Categories of personal data	Legal basis	Retention period
To register you as the customer's contact person	Name Position Company	Balancing test	As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid

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	E-mail Telephone number Country Language		
To communicate with you regarding the agreement	Name E-mail Telephone number Country Language	Fulfilment of the agreement Balancing test	As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid Your personal data will be stored as long as needed if it is needed as proof during the guarantee period of the agreement, or as long as a claim can be filed under the agreement
To be able to facilitate customer support and manage your registered issues or questions	Name Company E-mail Telephone number Country Language	Fulfilment of the agreement Balancing test	As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid Your details may be saved in case it may be required as proof during the guarantee period for the agreement
To execute and send invoices on which you are reference person	Name Company E-mail Telephone number	Fulfilment of the agreement Balancing test Legal obligation	As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid Your details may be saved in the event it may be needed as proof during the guarantee period for the agreement, or as long as a claim can be filed under the agreement

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			Further, your personal data may be stored up to seven years due to a legal obligation (the Swedish Accounting Act)
To send invites to events	Name Position Company E-mail	Balancing test Legal obligation	Up until the event, and thereafter by the financial department up to seven years due to a legal obligation (the Swedish Accounting Act)
To conduct market surveys, e.g. examine the customer satisfaction	E-mail	Balancing test	As long as the personal data is of relevance and you have not refused the processing
To be able to send invoices to sole proprietors	Personal identity number	Consent	During the time our customer relationship is ongoing and in accordance with applicable statute of limitations rules

COMPILATION – SUPPLIERS

Purpose	Categories of personal data	Legal basis	Retention period
To register you as the supplier's contact person	Name Position Company E-mail Telephone number Country Language	Balancing test	As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid

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<p>To communicate with you regarding the agreement</p>	<p>Name E-mail Telephone number Country Language</p>	<p>Fulfilment of the agreement Balancing test</p>	<p>As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid</p> <p>Your personal data will be stored as long as needed if it is needed as proof during the guarantee period of the agreement, or as long as a claim can be filed under the agreement</p>
<p>To be able to facilitate customer support and manage your registered issue and questions</p>	<p>Name Company E-mail Telephone number Country Language</p>	<p>Fulfilment of the agreement Balancing test</p>	<p>As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid</p> <p>Your details may be saved in case it is required as proof during the guarantee period for the agreement</p>
<p>To execute and send invoices on which you are reference person</p>	<p>Name Company E-mail Telephone number</p>	<p>Fulfilment of the agreement Balancing test Legal obligation</p>	<p>As long as you hold the specific position which is of relevance for the communication, or as long as the agreement is valid</p> <p>Your details may be saved in the event it is needed as proof during the guarantee period for the agreement, or as long as a claim can be filed under the agreement</p> <p>Further, your personal data may be stored up to seven years due to a legal obligation (the Swedish Accounting Act)</p>
<p>To send invites to events</p>	<p>Name Position Company</p>	<p>Balancing test Legal obligation</p>	<p>Until the event, thereafter by the financial department due to legal obligations regarding archiving (the Swedish Accounting Act)</p>

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	E-mail		
To conduct market surveys	E-mail	Balancing test	As long as the personal data is of relevance and you have not refused the processing
To be pay invoices to sole proprietors	Personal identity number	Consent	During the time our customer relation is ongoing and in accordance with applicable statute of limitations rules