

PRIVACY POLICY FOR SWEDISH MICROWAVE AB

1 SWEDISH MICROWAVE AB SAFEGUARDS YOUR PERSONAL INTEGRITY

- 1.1 Swedish Microwave AB, corp. reg. no. SE556461-7420, Dynamovägen 5, 591 61 MOTALA (the "**Company**") respects your privacy and is committed to maintaining a high level of security and integrity regarding your personal data. The Company is also committed to ensuring that processing is carried out in accordance with applicable data protection legislation.
- 1.2 This Privacy Policy describes how the Company processes personal data about you in your capacity as a(n)
 - (i) representative of a company that is a customer, supplier, or partner;
 - (ii) owner of a sole trader;
 - (iii) representative of a company that is a potential customer, supplier, or partner to the Company;
 - (iv) visitor of the Company's website;
 - (v) visitor of the Company's premises;
 - (vi) person seeking employment with the Company.
- 1.3 Depending on the nature of your relationship with the Company, only certain parts of this Privacy Policy may apply to you.
- 1.4 This policy also provides information about your rights in relation to the Company and how you can exercise them.
- 1.5 Do not hesitate to contact us should you have any questions regarding this Privacy Policy or your privacy. The Company's contact information is set out under the section "Contact Information".

2 PERSONAL DATA AND PROCESSING OF PERSONAL DATA – WHAT IS IT AND WHAT ARE ITS IMPLICATIONS FOR ME?

- 2.1 Personal data means any information that directly or indirectly relates to a natural, living person. Accordingly, personal data is information about you and your person, e.g. your name, your contact information, pictures of you, and your IP-address.
- 2.2 Processing means any operation which is performed on personal data, such as collection, storage, use, adaption, or disclosure.
- 2.3 Your personal data is stored as long as there is a need to preserve them in order to fulfil the purposes for which the data was collected in accordance with this Privacy Policy. Thereafter, your personal data will be deleted. For more information about how long the Company stores specific personal data, please refer to the Section "What personal data does the Company process, for which purposes, and on which legal bases?" below.

3 CONTROLLER AND PRIVACY OFFICER

- 3.1 The Company is the controller of your personal data and is therefore responsible for ensuring that your personal data is processed correctly and securely in accordance with applicable legislation.
- 3.2 The Company has appointed Dennis Danielsson as Privacy Officer (the "**Privacy Officer**"). The Privacy Officer is responsible for, among other things, monitoring and ensuring that the Company's

processing of personal data is carried out in accordance with applicable legislation. You can contact the Privacy Officer at +46 141 21 61 34 or dennis.danielsson@smw.se.

4 WHAT PERSONAL DATA DOES THE COMPANY PROCESS, FOR WHICH PURPOSES, AND ON WHICH LEGAL BASES?

4.1 Company representatives for e.g. customers, suppliers and partners

4.1.1 *Keeping in touch with Company representatives*

Purposes of processing

To be able to keep in touch with representatives of customers, suppliers, and partners (e.g. in connection with the provision of products or services by or to the Company), including to ensure payment.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position, and employer.

Information that is provided to the Company by email, via the Company's social media, or by other channels of communication.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest to keep in touch with representatives in order to (i) fulfil its obligations under the agreement with the customer or partner that the representative represents, or (ii) receive products or services pursuant to the agreement with the supplier that the representative represents (legitimate interest).

The processing is necessary for the Company's legitimate interest in (i) receiving payment for its provision of products and services, or (ii) making payments for its receipt of products and services, as applicable (legitimate interest).

The processing is necessary for the Company's legitimate interest in evaluating, developing, and improving its products, services, and marketing (legitimate interest).

How long is your personal data stored?

As long as the information is necessary in order for the Company to manage its business relationship with the company that the representative represents.

4.1.2 *Fulfilment of legal requirements*

Purposes of processing

To be able to fulfil legal requirements, e.g. accounting requirements.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for compliance with the Company's legal obligations.

How long is your personal data stored?

Seven years, counting from the end of the calendar year during which the financial year, to which the information pertained, was terminated.

4.1.3 *Carrying out surveys*

Purposes of processing

To be able to carry out surveys regarding the customer experience and the Company's products and services.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.

Information that is provided to the Company by email, via the Company's social media, or by other channels of communication.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in evaluating, developing, and improving its products, services, and marketing (legitimate interest).

How long is your personal data stored?

During the business relationship and two years following termination of the business relationship.

4.1.4 *Marketing*

Purposes of processing

To be able to market the Company's brand, products, and services (e.g. by sending newsletters and other marketing material, as well as invitations to Company events, etc.).

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.

Where applicable, information regarding dietary preferences, potential allergies and/or disabilities (e.g. in connection with corporate events or meetings).

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in marketing its products, services and brands to the customer, supplier, or partner that the representative represents (legitimate interest).

If and to the extent that processing in connection with Company events includes personal data concerning allergies, disabilities or similar data (health data), such processing is carried out on the basis of the representative's consent.

How long is your personal data stored?

During the business relationship and two years following termination of the business relationship, or until the data subject objects to marketing, whichever occurs earlier.

In respect of personal data concerning allergies, disabilities or similar data, one year, except for personal data processed on the basis of consent, which will be erased within one month from the event or meeting or when the consent is withdrawn, whichever occurs earlier.

4.1.5 Complaints and warranty matters

Purposes of processing

To be able to respond to and compensate customers, suppliers, and partners in connection with complaints and warranty matters.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.

Where applicable, information regarding phone calls with the Company's customer service.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in ensuring the quality of its products and services as well as to maintain its business relationships (legitimate interest).

How long is your personal data stored?

Two years after the expiration of the applicable warranty period.

In respect of information regarding phone calls with the Company's customer service, two years after the expiration of the applicable warranty period.

4.1.6 Customer service quality improvement

Purposes of processing

To be able to improve the quality of the Company's customer service.

Categories of personal data

Information that is provided to the Company by email, via the Company's social media, or by other channels of communication.

Where applicable, information regarding phone calls with the Company's customer service.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in ensuring the quality and efficiency of the Company's customer service (legitimate interest).

How long is your personal data stored?

One year from the date of contact with the Company's customer service.

4.1.7 *Legal claims*

Purposes of processing

The processing is carried out for the purpose of establishing, exercising and/or defending any legal claims.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position and employer.

Information that is provided to the Company by email, via the Company's social media, or by other channels of communication.

Where applicable, information regarding phone calls with the Company's customer service.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in establishing, exercising or defending legal claims that could arise in connection with the customer, supplier, or partner relationship (legitimate interest).

The processing is necessary for the establishment, exercise or defence of legal claims (Art. 9 GDPR).

How long is your personal data stored?

For the applicable statute of limitations.

4.2 **Owner of a sole trader**

4.2.1 *Secure identification*

Purposes of processing

The processing is carried out to enable secure identification of sole traders.

Categories of personal data

Personal identification number (the sole trader's registration number).

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in securely identifying sole traders in connection with the fulfilment of its obligations and/or exercise of its rights in relation to sole traders, regardless of such sole trader's role in relation to the Company, e.g. customer, supplier or partner (legitimate interest).

How long is your personal data stored?

As long as the information is necessary in order for the Company to manage its business relationship with the sole trader.

4.2.2 *Legal claims*

Purposes of processing

The processing is carried out for the purposes of establishing, exercising and/or defending any legal claims, for which processing – in the Company's view – is clearly justified with regard to the purpose of the processing.

Categories of personal data

Personal identification number (the sole trader's registration number).

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in establishing, exercising or defending legal claims (legitimate interest), for which processing – in the Company's view – is clearly justified with regard to the purpose of the processing.

How long is your personal data stored?

For the applicable statute of limitations.

4.3 **Potential customers, suppliers and partners and company representatives for potential customers, suppliers and partners**

4.3.1 *Marketing*

Purposes of processing

To be able to market the Company's brand, products, and services (e.g. by sending newsletters and other marketing material, as well as invitations to Company events, etc.).

Categories of personal data

Contact information, such as name, address, telephone number, email address, and, where applicable, title, position and employer.

Where applicable, information regarding dietary preferences, potential allergies and/or disabilities (e.g. in connection with corporate events or meetings).

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in marketing its products, services and brands to potential customers, suppliers, or partners that a company representative represents (legitimate interest).

If and to the extent that processing in connection with Company events includes personal data concerning allergies, disabilities or similar data (health data), such processing is carried out on the basis of the data subject's consent.

How long is your personal data stored?

One year, except for personal data processed on the basis of consent, which will be erased within one month from the event or meeting or when the consent is withdrawn, whichever occurs earlier.

4.3.2 *Legal claims*

Purposes of processing

The processing is carried out for the purpose of establishing, exercising and/or defending any legal claims.

Categories of personal data

Contact information, such as name, address, telephone number, email address, and, where applicable, title, position and employer.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in establishing, exercising or defending legal claims that could arise in connection with the relationship with the potential customer, supplier, or partner (legitimate interest).

The processing is necessary for the establishment, exercise or defense of legal claims (Art. 9 GDPR).

How long is your personal data stored?

For the applicable statute of limitations.

4.4 **Visitors of the Company's website**

4.4.1 *Website operation and development*

Purposes of processing

To be able to ensure the operation of the Company's websites and their application and to be able to develop the Company's websites and to better adapt the websites based on how they are used.

Categories of personal data

Technical data, such as IP address, MAC address, URL, unique device ID, network and device performance, browser, language and identification settings, geographic location, operating system, and other information from cookies or similar mechanisms (device information).

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in improving, streamlining, simplifying and developing its website and to increase the number of recurring visitors (legitimate interest).

How long is your personal data stored?

In accordance with the Company's cookie policy.

4.4.2 *Legal claims*

Purposes of processing

The processing is carried out for the purpose of establishing, exercising and/or defending any legal claims.

Categories of personal data

Technical data, such as IP address, MAC address, URL, unique device ID, network and device performance, browser, language and identification settings, geographic location, operating system, and other information from cookies or similar mechanisms (device information).

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in establishing, exercising or defending legal claims (legitimate interest).

The processing is necessary for the establishment, exercise or defense of legal claims (Art. 9 GDPR).

How long is your personal data stored?

For the applicable statute of limitations.

4.5 Visitors of the Company's premises

4.5.1 *Enhancing security*

Purposes of processing

To enhance security at the Company's premises, including protecting against unauthorized access, and protecting the Company's data, assets, and property.

Categories of personal data

Personal information and contact information, such as name, address, email address, telephone number, employer (if relevant) and who the visitor will visit.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in enhancing security at its premises, including protecting against unauthorized access, and in protecting its data, assets, and property (legitimate interest).

How long is your personal data stored?

Personal data shall be anonymized within 30 days following the visitor's visit and retained in anonymized form for an additional period of one year.

4.5.2 *Legal claims*

Purposes of processing

The processing is carried out for the purpose of establishing, exercising and/or defending any legal claims.

Categories of personal data

Personal information and contact information, such as name, address, email address, telephone number, employer (if relevant) and who the visitor will visit.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in establishing, exercising or defending legal claims that could arise in connection with the customer, supplier, or partner relationship (legitimate interest).

The processing is necessary for the establishment, exercise or defence of legal claims (Art. 9 GDPR).

How long is your personal data stored?

For the applicable statute of limitations.

4.6 Recruitment (job applicants at the Company)

4.6.1 *Evaluation of job applicants*

Purposes of processing

To be able to evaluate job applicants and ensure that the job applicant has the necessary qualifications.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position, and current employer.

Information provided in cover letter, resume, and any other documents that are submitted to the Company.

Where applicable, pictures.

Other information that the applicant provides to the Company in connection with the recruitment process.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the Company's legitimate interest in recruiting qualified employees (legitimate interest).

How long is your personal data stored?

One year.

4.6.2 *Legal claims*

Purposes of processing

The processing is carried out for the purpose of establishing, exercising and/or defending any legal claims.

Categories of personal data

Personal information and contact information, such as name, address, telephone number, email address, title, position, and current employer.

Information provided in cover letter, resume, and any other documents that are submitted to the Company.

Where applicable, pictures.

Other information that the applicant provides to the Company in connection with the recruitment process.

Processing activities

Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis

The processing is necessary for the purposes of the Company's legitimate interest in establishing, exercising or defending legal claims (legitimate interest).

The processing is necessary for the establishment, exercise or defense of legal claims (Art. 9 GDPR).

How long is your personal data stored?

For the applicable statute of limitations.

5 FROM WHICH SOURCES IS YOUR PERSONAL DATA COLLECTED?

With respect to customers, suppliers, and partners and company representatives for customers, suppliers, and partners and potential customers, suppliers, and partners and company representatives for potential customers, suppliers, and partners, your personal data is usually collected from the company or organisation that you represent, but also, in certain cases, directly from you, e.g. by email, our social media or other channels of communication or in connection with events or meetings. The Company may also receive personal data about you from other companies within the group that the Company is part of or from partners of the Company. The Company may also use external information services to supplement existing data, e.g. with your position and contact information.

With respect to visitors of the Company's website, visitors of the Company's premises, and job applicants, your personal data may be provided to the Company directly from you or from the staffing agency, recruitment company, or hiring company through which you apply for work. The Company may also receive personal data about you from other companies within the group that the Company is part of or from partners of the Company. The Company may also use external information services to supplement existing data.

6 WITH WHOM DOES THE COMPANY SHARE YOUR PERSONAL DATA?

The Company does not disclose personal data to third parties, except as set forth below. Your personal data will not be sold to third parties for marketing purposes.

The Company may disclose personal data when necessary to fulfil a legal obligation or to fulfil the Company's obligations to you, customers and/or partners.

Personal data may be transferred to other companies within the Company's group, suppliers (including suppliers of cloud solutions), partners, professional advisors, authorities, and potential buyers.

With respect to information that is provided via the Company's social media, personal data may be shared with the public.

7 TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

- 7.1 The company always strives to process your personal data within the EU/EEA. If your personal data is transferred to a country outside the EU/EEA, the Company will take the necessary measures to ensure that the transfer of the personal data is legal and that your personal data is processed securely and with an adequate level of protection that is comparable to the protection offered within the EU/EEA.

- 7.2 For example, data collected on the Company's website through Google Analytics and the LinkedIn may be transferred to Google and LinkedIn Corporation (Microsoft Corporation) in the United States. Your personal data is then protected through these entities' adherence to the EU-U.S. Data Privacy Framework. More information about the EU-U.S. Data Privacy Framework is available at <https://www.dataprivacyframework.gov/>.]

8 SOCIAL MEDIA

Regarding personal data that occurs and is processed on social media, such as Facebook, Instagram, Twitter, Youtube and LinkedIn, we refer users to the policy provided by the relevant service provider for information on how such service provider processes personal data. In the Company's view, the purpose of the processing is that relevant stakeholders, and their representatives, shall be able to interact and maintain contact with the Company via social media, in order to contribute to good relationships with customers and partners and to make the Company's customer service and products widely accessible through several different channels, and the processing is necessary to promote such legitimate interests of the Company (legitimate interest).

9 WHAT ARE YOUR RIGHTS?

You have the right to access your personal data and receive a copy of the data processed by the Company.

If your personal data is inaccurate or incomplete you also have the right to rectify or complete the personal data.

You have the right to request the deletion of your personal data. If the Company does not have a legal basis to continue processing your data, it will be deleted.

In certain circumstances, you have the right to request the restriction of the processing of your personal data. When processing is restricted, the Company may only process your personal data in limited ways, such as storage, unless specific conditions allow for other processing activities.

If your personal data is processed based on your consent or a contract with you, you have the right to receive your data in a machine-readable format and to request its transfer to another controller.

In certain circumstances, you have the right to object to the Company's processing of your personal data.

You have the right to file a complaint regarding the Company's processing of your personal data with the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*), Box 8114, SE-104 20 Stockholm.

10 SECURITY OF YOUR PERSONAL DATA

We want you to feel safe when sharing your personal data with us. To ensure this, the Company has implemented appropriate security measures to protect your data from unauthorized access, modification, or destruction. Your personal data will not be disclosed except as outlined in this Privacy Policy.

11 COOKIES

The Company uses cookie-like techniques in order to provide certain functions on the Company's website to improve the website and to deliver a better and more personal service. The Company uses cookies in accordance with the Company's Cookie Policy, available at <https://smw.se/legal/integrity-policy-and-cookies>.

12 IF YOU DO NOT SHARE YOUR PERSONAL DATA WITH THE COMPANY

If you do not share your personal data with the Company, the Company will not be able to fulfil its legal or contractual obligations towards you or towards the company that you represent.

13 CHANGES

The Company reserves the right to change this Privacy Policy at any time. In the event of changes to this Privacy Policy, the Company will publish the amended Privacy Policy on smw.se with information on when the changes will come into effect and may also notify customers and partners in an appropriate manner.

14 CONTACT INFORMATION

Do not hesitate to contact the Company if you have any questions about this Privacy Policy, the processing of your personal data or if you wish to exercise your rights under this Privacy Policy or applicable legislation.

SWEDISH MICROWAVE AB

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