

# We care about your privacy.

## Information for data subjects.

Do you wonder about security and privacy issues concerning your personal data? For us, it is important that you have confidence to allow us to process your personal data, and that you are aware that we do so in a legal and trustworthy manner. Tamro aims to ensure a high level of protection for your privacy. This information text explains how Tamro processes your personal data and why and what rights you have as a data subject.

### THE TYPES OF PERSONAL DATA WE COLLECT

We collect and register two types of data about you – customer data and traffic data.

**Customer data** comprises your basic contact details, such as your name, address, e-mail address and phone number. It may also include information about which of our services you use and how you use them, orders, user IDs, passwords and other information which you provide or which is communicated in our contact with you.

**Traffic data** comprises information which is linked to the services Tamro provides you and what happens when you use them (such as our digital services). This may encompass information to enable us to invoice for our services, as well as to log who used a service and when.

### WHY WE COLLECT AND REGISTER PERSONAL DATA

We collect and register certain information about you in order to manage our business relationship, to distribute relevant information and to offer and provide our services. Any processing of personal data must be supported by the General Data Protection Regulation, that is, there must be so-called legal grounds. This means that processing must be necessary to fulfil and manage a contractual relationship or to fulfil a legal obligation, or else the result of a balance of interests or you providing consent to such processing.

In the vast majority of cases, Tamro processes your personal data to fulfil and manage our contractual relationship. In some cases, we register customer data for ongoing or planned discussions on possible partnerships, where the legal ground is a balance of interests.

### HOW WE COLLECT PERSONAL DATA

We collect and register data which: (i) you provide personally when becoming a customer and when communicating with us, such as at meetings and conferences; (ii) is generated when you use any of our digital services, such as when you visit our website, call or send e-mail.

### HOW LONG WE KEEP PERSONAL DATA

The data are kept as long as our contractual relationship continues or as long as there is a legitimate reason to maintain our relationship based on possible partnerships, and for a limited period thereafter. Information which must be kept by law, such as accounting data, is kept for the time prescribed by law.

## TO WHOM WE DISCLOSE PERSONAL DATA

We may disclose your data to subcontractors and other companies within our group (PHOENIX Group) who process data on our behalf. The reason is that for some services we gather operations and support under a single unit within the group or at a particular subcontractor. However, these parties may not use your data for purposes other than those which we specify.

We are also obligated to disclose data when required by law and the exercise of official authority, such as to the tax authorities or the police.

## HOW WE PROTECT PERSONAL DATA

We work tirelessly to protect the privacy of our customers and our employees. Our security measures encompasses data, IT infrastructure, buildings and technical facilities. Great emphasis is placed on information security to prevent, deter and detect data breaches and data losses. Data access is restricted to those with a legitimate need, and all processing is logged and regularly followed up. Encryption is normally used for data transfers and we have a structured approach to virus protection and other external threats. We also train our staff, including the use of a mandatory e-learning module, to raise awareness of the importance of secure and appropriate personal data processing.

## YOUR RIGHTS

You have the right to know what personal data we have registered about you, why and how we process them. You have the following rights:

- Right to access (request a copy of your data which we process)
- Right to rectification (if you discover a mistake, we shall rectify or supplement our records)
- Right to erasure (data which is no longer required, when you withdraw consent or oppose processing and where your interest outweighs ours)
- Right to object (to processing based on a balance of interests)
- Right to restriction (when you believe that particular processing lacks legal grounds)
- Right to portability (when under certain conditions you wish to transfer your data to another actor)

## CONTACT DETAILS

Tamro AB, 556020-2169, P.O. Box 49, SE-401 20 Gothenburg, Sweden, is the data controller and as such is responsible for the processing of your personal data.

Pontus Moberg is the data protection officer at Tamro AB. Within Tamro's operations, the data protection officer is tasked with the following in this role:

- To inform and advise on the processing of personal data;
- To monitor compliance with the General Data Protection Regulation;
- To cooperate with and act as the contact point for the Swedish Data Protection Authority.

If you would like to contact Tamro's data protection officer, you can e-mail [pontus.moberg@tamro.com](mailto:pontus.moberg@tamro.com), call 031-767 75 00 or send a letter to Tamro AB, Attn: Data Protection Officer, P.O. Box 49, SE-401 20 Gothenburg, Sweden.