

## PRIVACY POLICY

Netgroup Engineering AB is committed to protecting and respecting your privacy. This privacy policy describes how Netgroup collects and uses personal data about employees and other representatives of our former, current and prospective suppliers, customers and other business partners. It also describes the choices available to you regarding our use of your personal data.

In case you are applying for a job position, please read our Job Applicant Privacy Policy.

Netgroup is the responsible entity (controller) for the processing of your personal data as described herein. Please do not hesitate to reach out to [gdpr@netgroup.se](mailto:gdpr@netgroup.se) if you have any questions or comments regarding your privacy.

### 1 PERSONAL INFORMATION THAT WE PROCESS

Netgroup may process the following categories of personal data about you:

- **Contact details**, such as name, email address, telephone number, postal address.
- **Individual data**, such as preferred language, photos, hobbies.
- **Organisational data**, such as company name, job position, place of work, country.
- **Correspondence data**, such as personal information provided by email, regular mail or other means. Please note that we receive any information you send to us.
- **Information on events you are taking part in**, such as information related to event registration, including allergies and other food preferences.

**Other data.** We may also collect and process any other relevant information you share with us about yourself. For example, we may collect and process information about your interactions with us, including details about contacts, email correspondence, phone calls or contact in person (such as the date, time and subject of the conversation).

**Sensitive data.** We will only collect and process sensitive personal data about you if there is a clear reason for doing so. Because email communications are not always secure, we encourage you to not include sensitive data in your emails to us.

### 2 HOW WE GATHER YOUR PERSONAL INFORMATION

**Information you give to us.** Most of the information Netgroup collects about you is received directly from you. You can always choose not to provide us certain information. However, some personal data is necessary in order for us to interact with our customers, suppliers or other partners for business purposes. Not providing such personal data might inhibit the managing and provision of services or products that you, or the company you represent, might expect from us.

**Information we collect about you.** Netgroup may also obtain personal data from your employer, or the company you represent. Personal data may also be collected and updated from

publicly available sources and based on information received from authorities, contact information service providers and other similar reliable sources. Data updating of this kind is performed manually or by automated means.

### 3 HOW YOUR INFORMATION WILL BE USED

Netgroup processes your personal data for the purposes and based on the legal bases listed below. Please note that the examples listed under each purpose are not exhaustive, and may differ depending on the nature of our business relationship.

- **To enter into and manage the business relationship.** Your personal data will mainly be used to manage and take care of the business relationship between Netgroup, you and the company you represent. For example, we need to process personal data to fulfil our contractual and other promises and obligations to you and the company you represent. This also includes taking steps necessary prior to entering into a contract with you, or the company you represent. The legal basis for this processing is to fulfil our contractual obligations and to pursue other legitimate interests, for example our interest to enter into and fulfil agreements and to manage daily operations according to lawful and fair business practices. This is normally also in the interest of the company you represent.
- **To promote and market our services.** Your name and email address may be used to communicate our services to you. For example, for the purpose of sending you our periodic newsletters, information about our services, promotional and advertising material, invitations to events. The legal basis for this processing is to pursue legitimate interest, for example our interest to market our services, to nurture our business relations and to keep you informed about our business. If you no longer wish to receive such communication, you can follow the unsubscribe instructions contained in the email received by us or contact us on [gdpr@netgroup.se](mailto:gdpr@netgroup.se).
- **To protect our legitimate business interests and legal rights.** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we may use information about you in connection with legal claims, compliance, regulatory and audit functions.
- **With your consent.** We may also use information about you where you have given us permission to do so for a specific purpose not listed above. For example, with your permission we may publish personal testimonials or featured customer stories to promote our services. You have the right to withdraw your consent at any time. However, please note that this will not affect any processing that has already taken place.

### 4 HOW WE SHARE YOUR INFORMATION

Netgroup aims to deliver great services and products that meets your needs and expectations. This means sharing information with trusted third parties.

- **Employees and consultants.** During the course of our business relationship, your personal data will inevitably be shared with our employees and consultants. However, we will restrict access to those of our employees and consultants who need it to perform their jobs.
- **Group Companies.** We may transfer information about you to other group companies for purposes connected with our relationship with you and the company you represent.
- **Suppliers and subcontractors.** Your personal data may be transferred to or shared with third parties, in the ordinary course of business and to the extent required by the business relationship between Netgroup, you and the company you represent. For example, we may engage suppliers, subcontractors or other third parties to help provide products and services to you, or the company you represent.

We may also engage service providers that supply services to us which require the processing of personal data. For example, marketing agencies, database service providers, hosting and backup service providers, email service providers and others.

Please note that our suppliers and subcontractors are not authorised to use or disclose your personal data except as necessary to perform services on our behalf, or to comply with legal requirements.

- **Legal obligations.** Sometimes legal obligations may require us to share information about you, for example if required by law or legal process, or due to law enforcement agencies following an appropriate request.
- **Business transfers.** We may share or transfer your personal data in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Other parties.** We may also share your personal information where you ask or permit us to, for example where we make a referral to another company. You may also be included in conversation together with other external parties, for example in emails.

## 5 WHERE WE PROCESS YOUR PERSONAL DATA

Netgroup always strives to process and store your data within the EU/EEA. However, your data may in certain situations be transferred to, and stored at, a destination outside of the EU/EEA territory.

Please note that privacy laws in countries outside of the EU/EEA may not be the same as, and in some cases may be less protective than, privacy laws in your country. Netgroup will however take all steps necessary to ensure that adequate safeguards (for example, EU standard Model Clauses and Privacy Shield) are in place to protect your personal information and to make sure it is treated securely. You can contact us for information about the applicable safeguards.

## **6 HOW LONG WE KEEP YOUR INFORMATION**

Netgroup keeps your personal data only as long as necessary to fulfil the purposes for which it was collected. How long this is depends on the type of information collected. We regularly review our need to keep data, taking into account applicable legislation.

Generally, we need to keep most of your personal data during our contractual or business relationship with you and the company you represent. Normally, we also need to keep your personal data for a period thereafter due to warranties or other claim periods related to a contract or order. Your data may also be stored for a longer period if required by applicable statutory retention periods, such as tax and accounting rules.

## **7 YOUR RIGHTS**

You have the right to request information about our processing of your personal data and request a copy of such personal data. You are also entitled to have incorrect data about you corrected and you may be entitled to have your personal data deleted, for example if the personal data is no longer necessary for the purpose it was collected. You also have right to object to processing based on legitimate interest and request that processing of your personal data should be limited. In certain situations, you also have the right to transfer your personal data to another controller.

## **8 UPDATING YOUR PERSONAL INFORMATION**

Netgroup is constantly trying to ensure that the information contained in our records is both accurate and current. If your personal information happens to change, please keep us informed of such changes.

## **9 CHANGES IN THIS PRIVACY POLICY**

Since our business and organisation may change over time, this privacy policy may need to be updated periodically to reflect such changes. You will be informed of any significant changes (for example by email), but we also recommend that you review this privacy policy from time to time to ensure you are aware of any amendments made.

## **10 HOW TO CONTACT US**

Netgroup is the responsible entity (controller) for the processing of your personal data as described above. Netgroup is subject to Swedish data protection legislation, including the General Data Protection Regulation (GDPR).

If you have any questions or comments on this privacy policy or about our use of your personal data, please contact us at [gdpr@netgroup.se](mailto:gdpr@netgroup.se) or you can contact us at +46 31-510400.

## **11 COMPLAINTS**

You have the right to lodge a complaint to the Swedish Supervisory Authority, if you believe that we have not complied with our obligations regarding your personal data.