

Hellberg Safety AB DATA PRIVACY POLICY (Reg.no.: 556214-4898)

INTRODUCTION AND PURPOSE

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

Hellberg Safety respects your privacy and is committed to protecting your personal data. This Policy aims to give you information on how Hellberg Safety collects and processes your personal data when you are an external contact of Hellberg Safety, meaning when you act as a customer or customer representative, supplier, interested party, prospect customer of Hellberg Safety. 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 law 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.

CONTROLLER

This privacy notice is issued on behalf of the Hellberg Safety so when we mention "Hellberg Safety", "we", "us" or "our" in this privacy notice, we are referring to Hellberg Safety responsible for processing your data. Hellberg Safety AB is the controller and responsible for this website.

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 dataprivacy@hellbergsafety.com or on the contact details set out below.

Contact details

Hellberg Safety AB is a Swedish company with registration number 556214-4898, having its registered address at Stakebergsvägen 2, 443 61 Stenkullen, Sweden.

The data privacy manager can be contacted at dataprivacy@hellbergsafety.com

You have the right to make a complaint at any time to the Data Inspection Board either in Sweden or in your local country. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance and we will do our very best to solve the issue.

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.

THIRD-PARTY LINKS

This website 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.

Social Media

Our websites integrate browser plug-ins from social networks. These social networks can be operated by third parties who have their place of business partly outside the EU or the EEA – an adequate level of data protection according to Article 44 GDPR may therefore not apply. The browser plug-ins and links are indicated in our internet offers by logos or other notices.

The plug-ins are deactivated by default on our homepage and therefore do not send any data. You can activate the plug-ins by clicking on the “Enable Consent / Social Media” button. Of course, the plug-ins can be deactivated again with a single click. If these plug-ins are enabled, your browser will establish a direct connection with the servers of the respective social network. This redirects the information that you have visited to our website to the social network. If you are logged in to the social network via your personal user account or log in while visiting our website, the visit to our website will then be assigned to your account. By interacting with browser plug-ins or links, e.g. by pressing a “Like” button, this information is transmitted to the respective social network and stored there. In this respect, the above statements regarding the collection and use of personal data apply.

For the purpose and scope of the data collection through social networks as well as the further processing and use of your data as well as your respective rights and options for the protection of your privacy, please refer to the respective data protection information of the operator.

Even if you are not logged in to the social networks, websites with active social plug-ins can send data to the networks. An active plug-in sets a cookie with an ID every time the website is being accessed. Since your browser sends this cookie unmasked every time you connect to a network server, the network could basically create a profile that shows the visited web pages of the user belonging to the ID. Furthermore, it would be possible to assign this identifier later – for example when later logging in to the social network – again to a person.

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 Hellberg Safety 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 may 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 Hellberg Safety 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.

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.

HOW IS YOUR PERSONAL DATA 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 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 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.
- **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:
 - analytics providers such as Google Analytics based outside the EU;
 - advertising networks such as LinkedIn, Facebook, Monster, etc. based inside and outside the EU;
 - search information providers such as Google, Bing, XING etc. based inside and outside the EU; and
 - Identity and Contact Data from publicly available sources.

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 (Article 6 para 1 lit. b) GDPR).
- 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 (Article 6 para 1 lit. f) GDPR).
- Where we need to comply with a legal or regulatory obligation (Article 6 para 1 lit. c) GDPR).

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 reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation

<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>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)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>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)</p>
<p>To make suggestions and recommendations to you about goods, services, positions, events and other news at Hellberg Safety that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop and promote our products/services, business operations and positions and grow our business)</p>

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 Hellberg Safety 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.

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 knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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 in paragraph 8 above.

- 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 Hellberg Safety operates who require reporting of processing activities in certain circumstances.
- Third parties referred to in paragraph 4 and 8.
- 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.

INTERNATIONAL TRANSFERS

We may share your personal data within the Hellberg Safety Group. This will involve transferring your data outside the European Economic Area (**EEA**). Some of our external third parties are based or use sub-processors outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure that a similar degree of protection is afforded to it and made in line with data protection laws. All Hellberg Safety legal entities have by agreement and policies adopted the same procedures and level of protection and security measures in order to safeguard your data. Unless there is another legitimate basis, our international transfers of personal data are based on the EU Commission's standard contractual clauses or where applicable US Privacy Shield or corresponding certification procedures ensuring the adequate level of protection.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized 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.

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 unauthorized 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 paragraph 13 "***Request erasure***" below for further information.

In some circumstances we may anonymize 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.

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 data portability according to Article 20 GDPR. 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.

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.

HELLBERG SAFETY'S COOKIE STATEMENT

Background and purpose

When you visit this website or any other website linked from this website, we use cookies, web beacons and similar technologies (jointly referred to as “cookies”) to improve your experience with us. We use cookies for statistical purposes and to tailor the website to your needs, interests and preferences. Cookies may also be used when you choose your display language or use other personalized features. The cookie contains no personal information; it only identifies the device you use with your web browser.

This cookie statement explains how we use cookies and your choices regarding their usage. Please also see our [Data Privacy Policy](#) with regards to the use of your personal data.

What are cookies?

Cookies are small text files consisting of letters and numbers. These are sent from Hellberg Safety or Hellberg Safety's partner's web servers and stored on your device as described below. We use several types of cookies:

- **Session cookies** are temporary cookie files that expire when you close your browser or app.
- **Persistent cookies** are cookie files that remain until you erase them or they expire.
- **First-party cookies** are cookies set by the site you are visiting.
- **Third-party cookies** are cookies set by a third-party site.

Web beacons are small transparent graphic images that may be in e-mails we send to you.

Similar technologies are technologies that store information in your browser or on your device in a manner similar to cookies and web beacons.

Your consent

By accessing and using this website and allowing cookies through your web browser settings, you consent to the use of cookies. If you do not want to accept our use of cookies, you need to disable the function for cookies in your web browser settings. If you do not permit cookies, this website may not function as intended.

Google Analytics

We use Google Analytics to identify the preferences of the visitors of our website and which areas of our website that are particularly popular. This allows us to tailor the content of our website to your needs, interests and preferences and to improve our offer and communication to you.

We also use retargeting technology. The technology uses cookies to store details of your interest in our products, services, events or available positions. When you visit our website, we read these cookies. The process is anonymized, i.e. you cannot be identified through our use of retargeting technology.

If you do not wish us to collect, store, and analyze statistical data related to your visit to the website, or if you do not want to receive information on our websites that are tailored to your needs, interests and preferences, you may object to the future use of your data at any time (opt-out). In order to object to the future use of your data you need to install an opt-out cookie in your browser.

The opt-out cookie will only indicate that you have opted out and it will only affect the browser where the opt-out cookie is installed. If you delete the cookie or use a different device, you need to opt-out again by installing a new opt-out cookie.

Therefore, we only use Google Analytics if you give your consent, especially according to Article 6 para 1 lit a) GDPR or if the processing or use is permitted according to Article 6 para 1 lit. b) to f) GDPR. Insofar, the use of Google Analytics can be based on to Article 6 para 1 lit. f) GDPR in case of legitimate interests. We are of the opinion that the processing of potential personal data for the purpose of protecting our legitimate interests is permitted to evaluate your use of the website in the manner described above.

If you do not accept cookies

If you do not want to accept cookies you need to change the cookie settings in your browser software. You can usually find these settings in the 'options' or 'preferences' menu of your browser.

If you want to delete cookies

You can delete cookies that have been saved on to your computer. How to do this depends on the type of browser you use.

Share functions

Our website includes buttons where you as a visitor to the website can share content with friends via social networks, such as LinkedIn, Twitter, Facebook and Google+. You can also choose to follow Hellberg Safety and receive marketing information from Hellberg Safety in these networks. These external websites can place cookies on your device when you are logged into their services. Please consult the respective websites for more information about their cookies and how you can handle them.

Hellberg Safety AB