

## **Privacy Policy**

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## Customers to ADDvise Group

#### Processing of personal data

You should feel comfortable and secure when ADDvise process your personal data. We take all reasonable measures to protect your personal information. We process personal data in accordance with the European General Data Protection Regulation (GDPR) and our guidelines and policies.

#### When and why ADDvise process personal data

ADDvise process the customer's name, telephone number and email address to fulfil the obligations arising from the agreement that ADDvise and the customer have.

#### For how long will ADDvise process your personal data?

ADDvise process and save personal data as long as the agreement is valid. Upon termination of the contract, the personal data will be saved for additional seven years due to the Swedish Accounts Act (bokföringslagen). ADDvise will also save the personal data for five years after the expiration of the agreement with the purpose of being able to inform customers about new products and services that might interest the customer.

#### Responsible for the personal data

ADDvise is responsible for the processing of your personal data. ADDvise is required to rectify any personal data that's incorrect, incomplete or misleading. If you believe that your personal data is incorrect, incomplete or misleading, please contactADDvise.

#### Transmission of personal data

ADDvise may disclose your personal data to third parties if it's necessary to administer a request or complete an order made by you.

In all of the above-mentioned situations, ADD vise is responsible for the personal data and the third parties are Data Processors. The Data Processors are required to follow ADD vise's instructions and they are not entitled to disclose your personal data to anyone else or to use your personal data for other purposes than those given by ADD vise. The Data Processors are also required to take certain technical and organizational measures to protect your personal data.

Personal data may also be disclosed if subject by law, regulation or authority decision.

#### Contact and requests

If you have any questions regarding the processing of your personal data, please contact our Privacy Officer by email: personuppgiftsansvarig@addvisegroup.se

As a customer or former customer of ADDvise you are entitled to request a registry extract of the personal data we process about you.

#### Security

### Potential customers to ADDvise Group

#### Processing of personal data

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#### When and why ADDvise process personal data

ADDvise process the potential customer's name, telephone number and email address either to fulfil an obligation at the request of the potential customer prior to an agreement or because there's a legitimate interest in processing the personal data.

#### For how long will ADDvise process your personal data?

ADDvise will process the personal data as long as the legitimate interest is deemed to exist. A legitimate interest is deemed to exist as long as a tender or similar intention to enter into an agreement is considered valid. However, the data will under no circumstance be processed for a longer period than three years.

#### Responsible for the personal data

ADDvise is responsible for the processing of your personal data. ADDvise is required to rectify any personal data that's incorrect, incomplete or misleading. If you believe that your personal data is incorrect, incomplete or misleading, please contactADDvise.

#### Transmission of personal data

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#### Security

### Suppliers to ADDvise Group

#### Processing of personal data

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#### When and why ADDvise process personal data

ADDvise process the supplier's name, telephone number and email address to fulfil the obligations arising from the agreement that ADDvise and the supplier have.

#### For how long will ADDvise process your personal data?

ADDvise process and save personal data as long as the agreement is valid. Upon termination of the contract, the personal data will be saved for additional seven years due to the Swedish Accounts Act (bokföringslagen). ADDvise will also save the personal data for five years after the expiration of the agreement with the purpose of potentially continuing to order goods or services. The personal data is processed because ADDvise consider there's a legitimate interest for the supplier to have its personal data processed for the above-mentioned purpose.

#### Responsible for the personal data

ADDvise is responsible for the processing of your personal data. ADDvise is required to rectify any personal data that's incorrect, incomplete or misleading. If you believe that your personal data is incorrect, incomplete or misleading, please contactADDvise.

#### Transmission of personal data

ADDvise may disclose your personal data to third parties if it's necessary to administer a request.

In all of the above-mentioned situations, ADDvise is responsible for the personal data and the third parties are Data Processors. The Data Processors are required to follow ADDvise's instructions and they are not entitled to disclose your personal data to anyone else or to use your personal data for other purposes than those given by ADDvise. The Data Processors are also required to take certain technical and organizational measures to protect your personal data.

Personal data may also be disclosed if subject by law, regulation or authority decision.

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#### Security

## Potential suppliers to ADDvise Group

#### Processing of personal data

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#### When and why ADDvise process personal data

ADDvise process the potential supplier's name, telephone number and email address because ADDvise consider there's a legitimate interest for the potential supplier that ADDvise process the personal data.

#### For how long will ADDvise process your personal data?

ADDvise will process the personal data as long as the legitimate interest is deemed to exist. However, the data will under no circumstance be processed for a longer period than three years.

#### Responsible for the personal data

ADDvise is responsible for the processing of your personal data. ADDvise is required to rectify any personal data that's incorrect, incomplete or misleading. If you believe that your personal data is incorrect, incomplete or misleading, please contact ADDvise.

#### Transmission of personal data

ADDvise may disclose your personal data to third parties if it's necessary to administer a request.

In all of the above-mentioned situations, ADDvise is responsible for the personal data and the third parties are Data Processors. The Data Processors are required to follow ADDvise's instructions and they are not entitled to disclose your personal data to anyone else or to use your personal data for other purposes than those given by ADDvise. The Data Processors are also required to take certain technical and organizational measures to protect your personal data.

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#### Security

## Employees within ADDvise

#### Processing of personal data

You should feel comfortable and secure when ADDvise process your personal data. We take all reasonable measures to protect your personal information. We process personal data in accordance with the European General Data Protection Regulation (GDPR) and our guidelines and policies.

#### When and why ADDvise process personal data

ADDvise process the employee's name, social security number (Swedish personnummer), telephone number and home address in order to comply with the Swedish labour laws and to fulfil the obligations arising from the agreement that ADDvise and the employee have.

#### For how long will ADDvise process your personal data?

ADDvise process and save personal data as long as the employment agreement is in effective. Upon termination of the contract, the personal data will be saved for additional seven years due to the Swedish Accounts Act (bokföringslagen).

#### Responsible for the personal data

ADDvise is responsible for the processing of your personal data. ADDvise is required to rectify any personal data that's incorrect, incomplete or misleading. If you believe that your personal data is incorrect, incomplete or misleading, please contactADDvise.

#### Transmission of personal data

ADDvise may disclose your personal data to third parties if it's necessary to administer a request.

In all of the above-mentioned situations, ADDvise is responsible for the personal data and the third parties are Data Processors. The Data Processors are required to follow ADDvise's instructions and they are not entitled to disclose your personal data to anyone else or to use your personal data for other purposes than those given by ADDvise. The Data Processors are also required to take certain technical and organizational measures to protect your personal data.

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#### Security

## Whistleblowing

#### Categories of personal data processed

We may process personal data in order to comply with our legal obligations under the Swedish Act (2021:890) on the Protection of Persons Who Report Misconduct (the "Whistleblower Act"). This means that we process personal data in the form of information that has emerged in a work-related context about various types of misconduct. Such misconduct may consist of an act or omission that, for example, is unlawful or that there is a public interest in its disclosure.

#### Purpose of the processing

The purpose of complying with our legal obligations under the Whistleblower Act mainly means that we process the personal data to the extent necessary for a so-called *follow-up case*. A follow-up case is a case that consists of:

- receiving a report through an internal or external reporting channel and have contact with the reporting person (for example, an employee);
- taking steps to assess the accuracy of the allegations made in the report;
- providing information on the investigated claims for further action, and
- providing feedback on the follow-up to the reporting person.

In addition, we may also process the personal data in order to fulfill a disclosure that is necessary for action to be taken in connection with what has emerged in a case, and for reports to be used as evidence in legal proceedings.

#### Who do we share the personal data with?

When we process your personal data for the purposes stated above, we essentially only share the personal data with persons who have been designated as authorized, or people who work at entities that have been designated as authorized to receive, follow up and provide feedback on reports in a follow-up case. In practice, this is mainly the General Counsel, ADDvise Group. Within the framework of any legal proceedings, we may also share the personal data with the person or persons identified in the report, authorized representatives and authorities. We will only share the personal data with the above-mentioned categories of recipients to the extent that this is necessary for them to be able to fulfill their tasks linked to the follow-up case, or when this is necessary for us to comply with our legal obligations under the Whistleblower Act.

#### How long do we store the personal data?

How long we store the personal data depends on both what kind of personal data is reported in a follow-up case and what measures we take in connection with a report in a follow-up case. Our starting point is that we anonymize or delete the personal data when it is no longer needed for the purposes stated above. That being said, we anonymize or delete personal data that is clearly not relevant to the handling of a follow-up case as soon as possible. Furthermore, we never process personal data in a follow-up case longer than two years after the case has been closed.