

# Privacy Policy

## 1. Introduction

With the following information, we would like to give you as a "data subject" an overview of the processing of your personal data by us and your rights under data protection laws. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services of our company via our website, it may be necessary to process personal data. If the processing of personal data is necessary and there is no legal basis for such processing, we will generally obtain your consent.

The processing of personal data, such as your name, address or e-mail address, is always carried out in accordance with the General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to "Phoenix Mecano AB ". By means of this privacy policy, we would like to inform you about the scope and purpose of the personal data we collect, use and process.

As the controller, we have implemented numerous technical and organisational measures to ensure that the personal data processed via this website is protected as completely as possible. Nevertheless, internet-based data transmissions can generally have security gaps, so that absolute protection cannot be guaranteed. For this reason, you are free to transmit personal data to us by alternative means, for example by telephone or post.

You can also take simple and easy-to-implement measures to protect yourself against unauthorised access to your data by third parties. We would therefore like to take this opportunity to give you some tips on how to handle your data securely:

- Protect your account (login, user or customer account) and your IT system (computer, laptop, tablet or mobile device) with secure passwords.
- Only you should have access to the passwords.
- Make sure that you only ever use your passwords for one account (login, user or customer account).

I Do not use one password for different websites, applications or online services.

I Especially when using publicly accessible IT systems or IT systems shared with other people, you should always log out after logging in to a website, application or online service.

Passwords should consist of at least 12 characters and be chosen in such a way that they cannot be easily guessed. Therefore, they should not contain common everyday words, your own name or the names of relatives, but should contain upper and lower case letters, numbers and special characters.

## **2. Person Responsible**

The controller within the meaning of the GDPR is

Phoenix Mecano AB

Kvarnvägen 14, 352 41 Växjö, Sverige

Telephone: +46 (0)470 71 79 50

E-mail: [info@phoenix-mecano.se](mailto:info@phoenix-mecano.se)

## **3. Data Protection Officer**

You can reach the data protection officer as follows

Anna Pedersen

Telephone: +46 (0)470 72 49 97

E-mail: [anna.pedersen@phoenix-mecano.se](mailto:anna.pedersen@phoenix-mecano.se)

You can contact our data protection officer directly at any time with any questions or suggestions regarding data protection.

## **4 Definitions**

The data protection declaration is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terminology used in advance.

We use the following terms, among others, in this privacy policy

### **1. Personal data**

Personal data is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **2 Data subject**

Data subject is any identified or identifiable natural person whose personal data is processed by the controller (our company).

### **3. Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as 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.

### **4 Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of limiting its future processing.

### **5. Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

### **6 Pseudonymisation**

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

### **7 Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### **8. Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular enquiry in accordance with Union or Member State law shall not be regarded as recipients.

### **9. Third Party**

A third party is a natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or processor, are authorised to process the personal data.

### **10 Consent**

Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## **5. Legal basis of the processing**

Art. 6 para. 1 lit. a) GDPR (in conjunction with. Chapter 6, Section 18 of the Swedish Electronic Communications Act (2003:389) and Directive 2002/58/EC (ePrivacy Directive)) serves our company as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the fulfilment of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of another service or consideration, the processing is based on Art. 6 para. 1 lit. b) GDPR. The same applies to such processing operations that are necessary for the performance of pre-contractual measures, for example in cases of enquiries about our products or services.

If our company is subject to a legal obligation which requires the processing of personal data, such as for the fulfilment of tax obligations, the processing is based on Art. 6 para. 1 lit. c) GDPR.

In rare cases, the processing of personal data may become necessary in order to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were injured in our company and their name, age, health insurance details or other vital information would have to be passed on to a doctor, hospital or other third party. The processing would then be based on Art. 6 para. 1 lit. d) GDPR.

Ultimately, processing operations could be based on Art. 6 para. 1 lit. f) GDPR. Processing operations that are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to safeguard a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not prevail. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47 Sentence 2 GDPR).

Our offer is generally aimed at adults. Persons under the age of 16 may not transmit any personal data to us without the consent of their parents or legal guardians. We do not request personal data from children and young people, do not collect it and do not pass it on to third parties.

## **6 Transmission of data to third parties**

Your personal data will not be transferred to third parties for purposes other than those listed below.

We only pass on your personal data to third parties if:

1. you have given us your express consent to do so in accordance with Art. 6 para. 1 lit. a) GDPR,
2. the disclosure pursuant to Art. 6 para. 1 lit. f) GDPR is authorised to protect our legitimate interests and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data,
3. in the event that there is a legal obligation for the disclosure pursuant to Art. 6 para. 1 lit. c) GDPR, and
4. this is legally permissible and necessary for the processing of contractual relationships with you in accordance with Art. 6 para. 1 lit. b) GDPR.

As part of the processing operations described in this privacy policy, personal data may be transferred to the USA. Companies in the USA only have an adequate level of data protection if they have certified themselves under the EU-US Data Privacy Framework and thus the adequacy decision of the EU Commission pursuant to Art. 45 GDPR applies. We have explicitly stated this for the service providers concerned in the privacy policy. In order to protect your data in all other cases, we have concluded data processing agreements based on the European Commission's standard contractual clauses. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a) GDPR. This may not apply in the case of data transfers to third countries for which the European Commission has issued an adequacy decision pursuant to Art. 45 GDPR.

## 7 Technology

### 7.1 SSL/TLS encryption

This site uses SSL or TLS encryption to **ensure** the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact requests that you send to us as the operator. You can recognise an encrypted connection by the fact that the address line of the browser contains "https://" instead of "http://" and by the lock symbol in your browser line.

We use this technology to protect your transmitted data.

### 7.2 Data collection when visiting the website

If you only use our website for information purposes, if you do not register or otherwise provide us with information or do not give your consent to processing that requires consent, we only collect the data that is technically necessary for the provision of the service. This is regularly data that your browser transmits to our server ("in so-called server log files"). Our

website collects a range of general data and information each time you or an automated system accesses a page. This general data and information is stored in the server log files. The following can be recorded:

1. browser types and versions used,
2. the operating system used by the accessing system
3. the website from which an accessing system reaches our website (so-called referrer)
4. the subpages that are accessed via an accessing system on our website
5. the date and time of access to the website
6. an abbreviated Internet Protocol address (anonymised IP address) and
7. the Internet service provider of the accessing system.

When using this general data and information, we do not draw any conclusions about your person. Rather, this information is required in order to

1. deliver the content of our website correctly
2. optimise the content of our website and the advertising for it,
3. ensure the long-term functionality of our IT systems and the technology of our website, and
4. to provide law enforcement authorities with the information necessary for prosecution in the event of a cyber attack.

This collected data and information is therefore analysed by us both statistically and with the aim of increasing data protection and data security in our company in order to ultimately ensure an optimal level of protection for the personal data processed by us. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

The legal basis for data processing is Art. 6 para. 1 lit. f) GDPR. Our legitimate interest follows from the data collection purposes listed above.

### **7.3 Cloudflare (content delivery network)**

Our website uses functions of CloudFlare. The provider is CloudFlare, Inc. 665 3rd St. #200, San Francisco, CA 94107, USA.

CloudFlare offers a globally distributed content delivery network with DNS. Technically, the transfer of information between your browser and our website is routed via the CloudFlare

network. CloudFlare is therefore able to analyse the data traffic between users and our websites in order to detect and ward off attacks on our services, for example. CloudFlare may also store cookies on your computer for optimisation and analysis purposes.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be restricted.

We have concluded a corresponding agreement with Cloudflare on the basis of the GDPR for order processing or in accordance with EU standard contractual clauses. Cloudflare collects statistical data about visits to this website. The access data includes: Name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider. Cloudflare uses the log data for statistical evaluations for the purpose of operation, security and optimisation of the website.

If you have consented to Cloudflare being used, the legal basis for the processing of personal data is Art. 6 para. 1 lit. a) GDPR. We also have a legitimate interest in using Cloudflare to optimise our online offering and make it more secure. The corresponding legal basis for this is Art. 6 para. 1 lit. f) GDPR. The personal data is stored for as long as it is required to fulfil the purpose of processing. The data is deleted as soon as it is no longer required to fulfil the purpose.

This US company is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may be transferred without further guarantees or additional measures.

You can find more information about CloudFlare at:  
<https://www.cloudflare.com/privacypolicy/>.

## **8. cookies**

### **8.1 General information on cookies**

Cookies are small files that your browser automatically creates and that are stored on your IT system (laptop, tablet, smartphone, etc.) when you visit our website.

Information is stored in the cookie that results from the connection with the specific end device used. However, this does not mean that we obtain direct knowledge of your identity.

The use of cookies serves to make the use of our website more pleasant for you. For example, we use session cookies to recognise that you have already visited individual pages of our website. These are automatically deleted after you leave our site.

In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your end device for a specified period of time. If you visit our site again to use our services, it is automatically recognised that you have already visited us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate our offer for you for the purpose of optimisation. These cookies enable us to automatically recognise that you have already visited our website when you visit it again. The cookies set in this way are automatically deleted after a defined period of time. The respective storage period of the cookies can be found in the settings of the consent tool used.

## **8.2 Legal basis for the use of cookies**

The data processed by the cookies, which are required for the proper functioning of the website, are therefore necessary to safeguard our legitimate interests and those of third parties in accordance with Art. 6 para. 1 lit. f) GDPR.

For all other cookies, you have given your consent to this via our opt-in cookie banner in accordance with Art. 6 para. 1 lit. a) GDPR.

## **8.3 Usercentrics (Consent Management Tool)**

We use the consent management tool "Usercentrics" from Usercentrics GmbH, Sendlinger Str. 7, 80331 Munich, Germany. This service enables us to obtain and manage the consent of website users for data processing.

Usercentrics collects data generated by end users who use our website. When an end user gives consent, Usercentrics automatically logs the following data:

- Browser information.
- Date and time of access.
- Device information.



- The URL of the page visited.
- Geographical location.
- Page path of the website.
- The consent status of the end user, which serves as proof of consent.

The consent status is also stored in the end-user's browser so that the website can automatically read and follow the end-user's consent in all subsequent page requests and future end-user sessions for up to 12 months. The consent data (consent and revocation of consent) is stored for three years. The retention period corresponds to the regular limitation period in accordance with Section 195 of the German Civil Code (BGB). The data will then be deleted immediately or forwarded to the person responsible on request in the form of a data export.

The functionality of the website is not guaranteed without the described processing. The user has no right to object as long as there is a legal obligation to obtain the user's consent to certain data processing operations (Art. 7 para. 1, 6 para. 1 sentence 1 lit. c) GDPR).

**Usercentrics** is the recipient of your personal data and acts as a processor for us.

Detailed information on the use of Usercentrics can be found at:  
<https://usercentrics.com/privacy-policy/>.

## 9 Contents of our website

### 9.1 Data processing when opening a customer account and for contract processing

In accordance with Art. 6 para. 1 lit. b) GDPR, personal data is collected and processed if you provide it to us for the fulfilment of a contract or when opening a customer account. Which data is collected can be seen from the respective input forms. It is possible to delete your customer account at any time, for example by sending a message to the above address of the controller. We store and use the data provided by you to fulfil the contract. After completion of the contract or deletion of your customer account, your data will be blocked, taking into account tax and commercial law retention periods, and deleted after these periods have expired, unless you have expressly consented to further use of your data or a legally permitted further use of data has been reserved by us, about which we will inform you accordingly below.

## **9.2 Making contact / contact form**

Personal data is collected when you contact us (e.g. via contact form or email). Which data is collected when using a contact form can be seen from the respective contact form. This data is stored and used exclusively for the purpose of responding to your enquiry or for contacting you and the associated technical administration. The legal basis for the processing of the data is our legitimate interest in responding to your request in accordance with Art. 6 para. 1 lit. f) GDPR. If your contact is aimed at the conclusion of a contract, the additional legal basis for the processing is Art. 6 para. 1 lit. b) GDPR. Your data will be deleted after final processing of your enquiry; this is the case if it can be inferred from the circumstances that the matter in question has been conclusively clarified and the deletion does not conflict with any statutory retention obligations.

## **9.3 Application management / job exchange**

We collect and process the personal data of applicants for the purpose of handling the application process. Processing may also be carried out electronically. This is particularly the case if an applicant submits the relevant application documents to us electronically, for example by e-mail or via a web form on the website. If we conclude an employment or service contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude a contract with the applicant, the application documents will be automatically deleted six months after notification of the rejection decision, provided that no other legitimate interests on our part prevent deletion. Another legitimate interest in this sense is, for example, a burden of proof in proceedings under the Swedish Discrimination Act (2008:567).

The legal basis for the processing of your personal data is Article 6(1)(b) and (f) GDPR and Article 88 GDPR in conjunction with the Swedish Data Protection Act (2018:218).

## **10. newsletter dispatch**

### **10.1 Sending newsletters to existing customers**

If you have provided us with your e-mail address when purchasing goods or services, we reserve the right to regularly send you offers for similar goods or services to those already purchased from our range by e-mail. In accordance with Section 7, third paragraph of the Swedish Marketing Act (2008:486), we do not need to obtain separate consent from you for this. In this respect, data processing is carried out solely on the basis of our legitimate interest in personalised direct advertising in accordance with Art. 6 para. 1 lit. f) GDPR. If you have initially objected to the use of your email address for this purpose, we will not send you any emails. You are entitled to object to the use of your email address for the aforementioned advertising purpose at any time with effect for the future by sending a message to the controller named at the beginning. You will only incur transmission costs for this in accordance with the basic rates. Upon receipt of your objection, the use of your e-mail address for advertising purposes will be discontinued immediately.

### **10.2 Advertising newsletter**

On our website, you are given the opportunity to subscribe to our company's newsletter. Which personal data is transmitted to us when you subscribe to the newsletter can be seen from the input mask used for this purpose.

We inform our customers and business partners about our offers at regular intervals by means of a newsletter. You can only receive our company's newsletter if

1. you have a valid e-mail address and
2. you have registered to receive the newsletter.

For legal reasons, a confirmation e-mail will be sent to the e-mail address you entered for the first time for the newsletter mailing using the double opt-in procedure. This confirmation email is used to check whether you, as the owner of the email address, have authorised the receipt of the newsletter.

When you register for the newsletter, we also store the IP address assigned by your Internet service provider (ISP) to the IT system you are using at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of your e-mail address at a later date and therefore serves our legal protection.

The personal data collected when registering for the newsletter is used exclusively to send our newsletter. Furthermore, subscribers to the newsletter may be informed by e-mail if this is necessary for the operation of the newsletter service or a registration in this regard, as could be the case in the event of changes to the newsletter offer or changes to the technical circumstances. The personal data collected as part of the newsletter service will not be passed on to third parties. You can cancel your subscription to our newsletter at any time. The consent to the storage of personal data that you have given us for the newsletter dispatch can be revoked at any time. There is a corresponding link in every newsletter for the purpose of revoking consent. It is also possible to unsubscribe from the newsletter at any time directly on our website or to inform us of this in another way.

The legal basis for data processing for the purpose of sending the newsletter is Art. 6 para. 1 lit. a) GDPR.

## **11. social media plugins**

### **11.1 LinkedIn plugin**

We have integrated components of the LinkedIn Corporation on this website. LinkedIn is an internet-based social network that enables users to connect with existing business contacts and make new business contacts.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible for data protection matters outside the USA.

Each time you access our website, which is equipped with a LinkedIn component (LinkedIn plugin), this component causes the browser you are using to download a corresponding representation of the LinkedIn component. Further information about the LinkedIn plug-ins can be found at <https://developer.linkedin.com/plugins> As part of this technical process, LinkedIn receives information about which specific subpage of our website you have visited.

If you are logged in to LinkedIn at the same time, LinkedIn recognises which specific subpage of our website you are visiting each time you access our website and for the entire duration of your visit to our website. This information is collected by the LinkedIn component and assigned to your LinkedIn account by LinkedIn. If you click on a LinkedIn button integrated on our website, LinkedIn assigns this information to your personal LinkedIn user account and stores this personal data.

LinkedIn always receives information via the LinkedIn component that you have visited our website if you are logged in to LinkedIn at the same time as accessing our website; this occurs regardless of whether you have clicked on the LinkedIn component or not. If you do not want this information to be transmitted to LinkedIn, you can prevent the transmission by logging out of your LinkedIn account before accessing our website.

As part of processing via LinkedIn, data may be transferred to the USA and Singapore. This US company is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that may also transfer personal data without further guarantees or additional measures. In addition, the security of the transfer is regularly ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, consent will be obtained from you in accordance with Art. 49 para. 1 lit. a) GDPR.

Personal data will only be processed using the social media buttons with your express consent in accordance with Art. 6 para. 1 lit. a) GDPR.

LinkedIn offers the option to unsubscribe from email messages, SMS messages and targeted ads and to manage ad settings at <https://www.linkedin.com/psettings/guest-controls>. LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame, which may set cookies. Such cookies can be rejected at <https://www.linkedin.com/legal/cookie-policy>. The applicable data protection

provisions of LinkedIn may be retrieved under <https://www.linkedin.com/legal/privacy-policy>  
LinkedIn's cookie policy is available at <https://www.linkedin.com/legal/cookie-policy>

## **11.2 Facebook plugin**

We use components of the social media network Facebook on our website. Facebook is operated by Meta Platforms Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. For users in the EU and EEA, the responsible entity is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Each time a page of our website containing a Facebook plugin is accessed, your browser downloads the relevant plugin components directly from Facebook. This process allows Facebook to receive information about which specific subpage of our website was visited, regardless of whether you interact with the plugin.

If you are logged into Facebook while visiting our website, Facebook can associate your visit with your Facebook account. If you interact with plugin elements (such as clicking a “Like” button), this information is transmitted to Facebook and stored there. If you do not want Facebook to associate data with your account, you must log out of Facebook before visiting our site.

Data may be transferred to servers in the USA. Meta Platforms Inc. is certified under the EU-U.S. Data Privacy Framework. In addition, we have entered into standard contractual clauses (SCCs) to ensure an appropriate level of data protection for any third-country transfers.

Processing occurs only with your explicit consent in accordance with Art. 6 para. 1 lit. a GDPR.

Further information on Facebook's data protection policies and privacy settings can be found at:

<https://www.facebook.com/about/privacy/>

<https://www.facebook.com/policies/cookies/>

## **11.3 Instagram plugin**

We use components of the social media platform Instagram on our website. Instagram is operated by Meta Platforms Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. For data processing in the EU and EEA, the responsible controller is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

When you access a page of our website that contains an Instagram component (such as an embedded image or button), your browser connects to Instagram's servers to load and

display the content. This process informs Instagram about the pages you have visited on our site.

If you are logged into your Instagram account, Instagram can associate your visit to our website with your user profile. If you do not wish this association to occur, please log out of Instagram before visiting our site.

Data may be transferred to the USA. Meta Platforms Inc. is certified under the EU-U.S. Data Privacy Framework. Standard contractual clauses are also in place to ensure adequate data protection.

Processing takes place exclusively on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR.

Further information on Instagram's data use and privacy policy can be found at:

<https://privacycenter.instagram.com/policy>

<https://help.instagram.com/1896641480634370>

## **12 Partner and affiliate programmes**

### **12.1 DoubleClick**

This website contains components of DoubleClick by Google. DoubleClick is a brand of Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland), under which special online marketing solutions are marketed to advertising agencies and publishers.

DoubleClick by Google transmits data to the DoubleClick server with every impression as well as with clicks or other activities. Each of these data transfers triggers a cookie request to your browser. If the browser accepts this request, DoubleClick places a cookie on your IT system. The purpose of the cookie is to optimise and display advertising. The cookie is used, among other things, to place and display user-relevant adverts and to create reports on advertising campaigns or to improve them. The cookie is also used to avoid multiple displays of the same adverts.

DoubleClick uses a cookie ID that is required for the technical process. The cookie ID is required, for example, to display an advert in a browser. DoubleClick can also use the cookie ID to record which adverts have already been displayed in a browser in order to avoid duplication. The cookie ID also enables DoubleClick to record conversions.

A DoubleClick cookie does not contain any personal data. However, a DoubleClick cookie may contain additional campaign IDs. A campaign ID is used to identify the campaigns with which you have already been in contact.

Each time you access one of the individual pages of this website, which is operated by us and on which a DoubleClick component has been integrated, the Internet browser on your IT system is prompted by the respective DoubleClick component to transmit data to Google for the purpose of online advertising and billing of commissions. As part of this technical process, Google obtains knowledge of data that Google also uses to create commission statements. Among other things, Google can track that you have clicked on certain links on our website.

These processing operations are only carried out with your express consent in accordance with Art. 6 para. 1 lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may be transferred without further guarantees or additional measures.

You can view the data protection provisions of DoubleClick by Google at:  
<https://www.google.com/intl/de/policies/>.

## **13. plugins and other services**

### **13.1 Google Analytics 4**

We use Google Analytics 4 (GA4), a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The parent company is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

GA4 enables us to analyse how visitors interact with our website. The system collects events such as page views, scrolls, clicks, and session durations. No IP addresses are stored. Instead, GA4 uses IP anonymisation and processes only truncated IPs for geolocation purposes before discarding them.

The following categories of data may be processed:

- device and browser information,
- interactions with the site (e.g. clicks, time spent),
- approximate location (based on anonymised IP),
- technical referrer and user language settings.

Google processes this data on our behalf pursuant to a data processing agreement under Art. 28 GDPR, including the application of EU standard contractual clauses for international transfers. Google LLC is also certified under the EU-U.S. Data Privacy Framework.

The legal basis for processing is your consent under Art. 6 para. 1 lit. a GDPR. You can revoke your consent at any time with effect for the future.

More information is available at:

<https://support.google.com/analytics/answer/12017362>

<https://policies.google.com/privacy>

## **13.2 Google Photos**

We use the Google Photos service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to store images that are embedded on our website.

Embedding is the integration of specific third-party content (text, video or image data) that is provided by another website (Google Photos) and then appears on our own website (our website). An embed code is used for embedding. If we have integrated an embed code, the external content from Google Photos is displayed immediately by default as soon as one of our web pages is visited.

Your IP address is transmitted to Google Photos via the technical implementation of the embed code, which enables the images from Google Photos to be displayed. Google Photos also records our website, the type of browser used, the browser language, the time and length of access. In addition, Google Photos may collect information about which of our subpages you have visited and which links you have clicked on, as well as other interactions you have carried out when visiting our site. This data may be stored and analysed by Google Photos.

These processing operations are only carried out with your express consent in accordance with Art. 6 para. 1 lit. a) GDPR.

This US company is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may also be transferred without further guarantees or additional measures.

You can view Google's privacy policy at: <https://www.google.com/policies/privacy/>.



### **13.3 Google Tag Manager**

We use the Google Tag Manager service on this website. The operating company of Google Tag Manager is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

This tool allows "website tags" (i.e. keywords that are integrated into HTML elements) to be implemented and managed via an interface. By using Google Tag Manager, we can automatically track which button, link or personalised image you have actively clicked on and can then record which content on our website is of particular interest to you.

The tool also triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. If you have opted out at domain or cookie level, this will remain in place for all tracking tags implemented with Google Tag Manager.

These processing operations are only carried out with your express consent in accordance with Art. 6 para. 1 lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may also be transferred without further guarantees or additional measures.

Further information on Google Tag Manager and Google's privacy policy can be found at: <https://www.google.com/intl/de/policies/privacy/>.

### **13.4 Google WebFonts**

Our website uses so-called web fonts for the standardised display of fonts. Google WebFonts are provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

These processing operations are only carried out with express consent in accordance with Art. 6 para. 1 lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may be transferred without further guarantees or additional measures.

Further information on Google WebFonts and Google's privacy policy can be found at:  
<https://developers.google.com/fonts/faq> ; <https://www.google.com/policies/privacy/>.

### **13.5 YouTube (videos)**

We have integrated YouTube components on this website. The operating company of YouTube is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

YouTube is an Internet video portal that enables video publishers to post video clips free of charge and other users to view, rate and comment on them free of charge. YouTube allows the publication of all types of videos, which is why complete film and television programmes as well as music videos, trailers or videos made by users themselves can be accessed via the Internet portal. Each time you access one of the individual pages of this website, which is operated by us and on which a YouTube component (YouTube video) has been integrated, the Internet browser on your IT system is automatically prompted by the respective YouTube component to download a representation of the corresponding YouTube component from YouTube. The services Google WebFonts, Google Video and Google Photo can also be downloaded from YouTube. Further information about YouTube can be found at <https://www.youtube.com/yt/about/de/>. As part of this technical process, YouTube and Google receive information about which specific subpage of our website you are visiting.

If you are logged in to YouTube at the same time, YouTube recognises which specific subpage of our website you are visiting when you access a subpage containing a YouTube video. This information is collected by YouTube and Google and assigned to your YouTube account.

YouTube and Google always receive information via the YouTube component that you have visited our website if you are logged in to YouTube at the same time as accessing our website; this happens regardless of whether you click on a YouTube video or not. If you do not want this information to be transmitted to YouTube and Google, you can prevent it from being transmitted by logging out of your YouTube account before accessing our website.

These processing operations are only carried out with your express consent in accordance with Art. 6 para. 1 lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may also be transferred without further guarantees or additional measures.

You can view YouTube's privacy policy at <https://www.google.de/intl/de/policies/privacy/>.

### **13.6 YouTube videos in extended data protection mode (YouTube NoCookies)**

Some subpages of our website contain links or shortcuts to YouTube content. In general, we are not responsible for the content of websites to which links are provided. However, if you follow a link to YouTube, we would like to point out that YouTube stores the data of its users (e.g. personal information, IP address) in accordance with its own data usage guidelines and uses it for business purposes.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA.

We also directly integrate videos stored on YouTube on some subpages of our website. With this integration, content from the YouTube website is displayed in parts of a browser window. When you call up a (sub)page of our website on which YouTube videos are integrated, a connection to the YouTube servers is established and the content is displayed on the website by notifying your browser.

YouTube content is only integrated in "extended data protection mode". This is provided by YouTube itself and ensures that YouTube does not initially store any cookies on your device. However, when the relevant pages are accessed, the IP address and, if applicable, other data are transmitted and thus, in particular, which of our websites you have visited. However, this information cannot be assigned to you unless you have logged in to YouTube or another Google service before accessing the page or are permanently logged in. As soon as you start playing an embedded video by clicking on it, YouTube only stores cookies on your device through the extended data protection mode, which do not contain any personally identifiable data, unless you are currently logged in to a Google service. These cookies can be prevented using the appropriate browser settings and extensions.

Requesting the video also constitutes your consent to the placement of the corresponding cookie (Art. 6 para. 1 sentence 1 lit. a) GDPR).

This US company is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may be transferred without further guarantees or additional measures.

You can view YouTube's privacy policy at: <https://www.google.de/intl/de/policies/privacy/>.

### **13.7 Use of Monirot ERP (CRM) and newsletter dispatch**

We use Monitor ERP ("Monitor") as a customer relationship management system (CRM) to manage customer data, control sales and service processes. The organization of the distribution of our newsletter is carried out by Get a Newsletter Scandinavia AB ("Get a Newsletter"). The following points are to be included in your existing privacy policy:

#### **1. processing activities and purposes**

- Customer data management: Collection, storage and maintenance of contact data, communication history, contract and order information.
- Sales and service processes: Planning, tracking and documentation of quotations, orders, service requests and support services.
- Newsletter dispatch: Creation of recipient lists, segmentation according to interests or customer groups as well as automation and dispatch of e-mail newsletters via Get a Newsletter.

#### **2. legal bases**

- The processing of personal data is carried out on the basis of Art. 6 para. 1 lit. b GDPR (implementation of pre-contractual measures and fulfilment of contracts) for contract-related purposes.
- For sending the newsletter, we rely on Art. 6 para. 1 lit. a GDPR (consent) or, if available, on a legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. Consent can be revoked at any time.

#### **3. categories of data processed**

- Master data: Name, address, e-mail address, telephone, company.
- Communication data: Exchange via e-mail, telephone notes, chat protocols.
- Sales and usage data: Quotation and order data, service tickets, product and service information.
- Newsletter data: Consent status (double opt in), dispatch and opening statistics, click behaviour.

#### **4. recipients and third-party providers**

- Order processing: Monitor ERP System AB (Hudiksvall, Sweden) as hosting and software provider.
- Other service providers: Get a Newsletter Scandinavia AB (Stockholm, Sverige) as the newsletter provider. If additional newsletter add-ons or analysis tools are used, third-party providers can be integrated as additional processors (e.g. email gateway service providers). A complete list can be found in the AV Directory.

#### **5 Data transfer to third countries**

All data is generally hosted in data centres in the Microsoft European region (within the EU or EEA). Data is only transferred to third countries if suitable guarantees (standard contractual clauses) are in place.

## 6 Storage period

Personal data in Monitor is deleted as soon as it is no longer required for the above-mentioned purposes. For customer data, a maximum period of 10 years after termination of the business relationship applies, unless statutory retention periods prevent this. Consent and newsletter log data are deleted 3 years after they have been given or cancelled, unless otherwise specified.

## 7 Technical and organisational measures (TOM)

- Use of encryption (TLS) for data transmission and storage
- Regular security reviews and updates of the Dynamics environment
- Access control and logging of all administration and user accesses
- Backup and recovery procedures in accordance with internal guidelines

### 13.8 Microsoft Clarity

We use the analytics and session recording service Microsoft Clarity on our website. This service is provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. Microsoft Ireland Operations Ltd, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, acts as the data controller for users in the EU and EEA.

Microsoft Clarity allows us to understand how visitors interact with our website. The tool records user sessions anonymously and tracks interactions such as:

- mouse movements,
- clicks,
- scroll behaviour,
- time spent on pages,
- and technical parameters (e.g. browser, screen resolution, operating system).

Clarity uses cookies and other technologies to collect this data. Recordings may be used to optimise the usability and performance of our website. No direct personal identification (e.g. name or account data) is processed. IP addresses are anonymised where applicable.

Microsoft processes this data as our processor pursuant to a data processing agreement in accordance with Art. 28 GDPR. Data may be transferred to servers in the USA. Microsoft Corporation is certified under the EU-U.S. Data Privacy Framework, and standard contractual clauses (SCCs) have been concluded to ensure an adequate level of data protection for any international transfers.

The legal basis for the use of Microsoft Clarity is your explicit consent under Art. 6 para. 1 lit. a GDPR. You may revoke your consent at any time with effect for the future.

For more information on Microsoft Clarity's data processing, please visit:

<https://clarity.microsoft.com/terms>

<https://privacy.microsoft.com/en-us/privacystatement>

### **13.9 Storyblok (Content Management System)**

We use the headless content management system (CMS) Storyblok to create, manage and deliver the content on our website. The provider is Storyblok GmbH, Peter-Behrens-Platz 2, 4020 Linz, Austria.

As a headless CMS, Storyblok separates content from presentation and delivers it via APIs to the frontend. When you access our website, your browser may load content directly from Storyblok's content delivery infrastructure.

In doing so, the following data may be technically processed:

- your IP address,
- date and time of the request,
- browser type and version,
- operating system,
- referrer URL,
- and other technical header information.

Storyblok does not use cookies or user tracking mechanisms. Data is processed solely to deliver and maintain the availability and performance of website content. The data is processed exclusively within the European Union.

We have concluded a data processing agreement with Storyblok in accordance with Art. 28 GDPR.

The legal basis for the use of Storyblok is our legitimate interest in the efficient and secure delivery of website content under Art. 6 para. 1 lit. f GDPR.

Further information on data protection at Storyblok is available at:

<https://www.storyblok.com/privacy-policy>

## **14 Your rights as a data subject**

### **14.1 Right to confirmation**

You have the right to request confirmation from us as to whether personal data concerning you is being processed.

### **14.2 Right to information Art. 15 GDPR**

You have the right to receive information from us at any time free of charge about the personal data stored about you and a copy of this data in accordance with the statutory provisions.

### **14.3 Right to rectification Art. 16 GDPR**

You have the right to request the rectification of inaccurate personal data concerning you. You also have the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

### **14.4 Erasure Art. 17 GDPR**

You have the right to obtain from us the erasure of personal data concerning you without undue delay where one of the grounds provided for by law applies and insofar as the processing or storage is not necessary.

### **14.5 Restriction of processing Art. 18 GDPR**

You have the right to demand that we restrict processing if one of the legal requirements is met.

### **14.6 Data portability Art. 20 GDPR**

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller without hindrance from us to whom the personal data has been provided, provided that the processing is based on consent pursuant to Art. 6 para. 1 lit. a) GDPR or Art. 9 para. 2 lit. a) GDPR or on a contract pursuant to Art. 6 para. 1 lit. b)

GDPR and the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

Furthermore, in exercising your right to data portability pursuant to Art. 20 (1) GDPR, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible and provided that this does not adversely affect the rights and freedoms of others.

#### **14.7 Objection Art. 21 GDPR**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6(1)(e) (data processing in the public interest) or (f) (data processing on the basis of a balancing of interests) of the GDPR.

This also applies to profiling based on these provisions within the meaning of Art. 4 No. 4 GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing serves the establishment, exercise or defence of legal claims.

In individual cases, we process personal data for direct marketing purposes. You can object to the processing of your personal data for the purpose of such advertising at any time. This also applies to profiling insofar as it is associated with such direct advertising. If you object to processing for direct marketing purposes, we will no longer process the personal data for these purposes.

You also have the right to object, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out by us for scientific or historical research purposes or for statistical purposes in accordance with Art. 89 para. 1 GDPR, unless such processing is necessary for the fulfilment of a task carried out in the public interest.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you are free to exercise your right to object by automated means using technical specifications.



#### **14.8 Revocation of consent under data protection law**

You have the right to withdraw your consent to the processing of personal data at any time with effect for the future.

#### **14.9 Complaint to a supervisory authority**

You have the right to complain to a supervisory authority responsible, Swedish Authority for Privacy Protection (IMY), for data protection about our processing of personal data.

### **15 Routine storage, deletion and blocking of personal data**

We process and store your personal data only for the period of time required to achieve the purpose of storage or if this is provided for by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a prescribed storage period expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

### **16. duration of the storage of personal data**

The criterion for the duration of the storage of personal data is the respective statutory retention period. After expiry of this period, the corresponding data is routinely deleted, provided that it is no longer required for the fulfilment or initiation of a contract.

### **17. topicality and amendment of the data protection declaration**

This privacy policy is currently valid and is dated: July 2025.

It may become necessary to amend this data protection declaration due to the further development of our website and offers or due to changes in legal or official requirements. You can call up and print out the current data protection declaration at any time on the website under "CHANGE".

This privacy policy was created with the support of the data protection software: audatis MANAGER.