

REGIN'S PRIVACY POLICY FOR CUSTOMERS

In this Privacy Policy for Customers ("**Policy**"), references to "Regin" "we", "us" and "our" will mean the limited liability company Regin (for contact details, see "[Questions and queries](#)" below) where you are a customer or hold a Regin account (collectively, "you" unless the context provides another interpretation).

Since this Policy contains extensive information, you can use the table of contents below to easily navigate to the sections that interest you.

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Why do we inform you?

We know that the manner in which your personal data is processed is important to you. This Policy outlines in detail how we collect, process, use and transfer (collectively, "**process**") your personal data.

Personal data is information that relates to an individual who can be identified using that information. It does not matter whether the information can be linked to you on its own, or whether other information is needed to do so – the information in both cases is considered personal data. We process personal data based on several purposes. For example, we cannot communicate with you without processing personal data. If we do not need your personal data, we will inform you, for example by marking information as optional. Common examples of personal data that we process in our day-to-day operations are names, contact details and information about your purchases. You will

find more detailed information about the data we process and the purposes for which we process it under "[What personal data do we process and how do we process it?](#)" below.

Who is the data controller?

Regin is the data controller, meaning that we determine how and why your personal data is processed. It also means that we are required to ensure that your personal data is only processed in accordance with this Policy and that we have a legal obligation to provide you with the information contained therein. If you have any questions, you can contact us using the contact details under "[Questions and queries](#)" below.

Where we have appointed a Data Protection Officer (DPO), you can contact our DPO using the contact details under "[Questions and queries](#)" below.

What personal data do we process and how do we process it?

Regin processes many types of personal data obtained from various sources. We typically obtain the data from you, or through your use of our website or web shop, or when you make a purchase with us, but we may also get information from public sources or registers. We use your personal data for several purposes. We must always have a lawful basis, in other words, a reason arising from law in order to process your personal data.

Below is a summary of the purposes for which we process your personal data and the associated lawful bases on which this is based, as well as which data is processed and how. Under certain circumstances, several lawful bases may be relevant to certain processing activities. Please note that the information we process about you may vary depending on the information you provide and whether or not you have a Regin account. Sometimes processing is also performed by a third party on our behalf (see "[Does Regin share personal data with third parties?](#)" below). Please also note that certain information is necessary for us to be able to perform what we promised you, such as providing the product you purchased or providing your Regin account.

In certain situations, we may request your explicit consent to process (specific types of) personal data. Under these circumstances, you may withdraw your consent at any time by following the instructions you were given when you gave your consent or via the contact details under "[Questions and queries](#)" below.

Purpose of processing	Data and processing		Lawful basis			
	Personal data processed	Processing performed	Your consent	To fulfil a legal obligation	Our legitimate interests	It is necessary to protect interests that are of fundamental importance to you or another natural person
For you as a customer						
a) To be able to manage your purchase	<ul style="list-style-type: none"> Contact details (e.g. name, address, e-mail and telephone number) Payment history Payment information Credit information from credit reference agencies Purchase information Information about your order User information if you have a Regin account 	<ul style="list-style-type: none"> Delivery and related activities Identification and age check Payment processing Address check in public registers Handling of complaints and warranties Managing your order 	✓			
b) In order to fulfil our legal obligations	<ul style="list-style-type: none"> Name Personal identity number: Contact details (e.g. name, address, e-mail and telephone number) Payment history Payment information Your correspondence with us Information about when and where you have purchased an item from us Any complaints User information if you have a Regin account 	<ul style="list-style-type: none"> Necessary management to comply with legal obligations arising from law, judgment or public authority decisions (e.g. compliance with requirements imposed by the Swedish Accounting Act, the Anti-Money Laundering Act, the Product Liability Act, which may necessitate that we produce communication and information for the public and for our customers in certain situations) 		✓		
c) To manage customer	<ul style="list-style-type: none"> Name Contact details (e.g. name, 	<ul style="list-style-type: none"> Communicate with you and answer 		✓	✓	(we need to be able to

Purpose of processing	Data and processing		Lawful basis			
	Personal data processed	Processing performed	Your consent	To fulfil a legal obligation	Our legitimate interests	To implement an agreement with you or because you have asked us before entering into the agreement.
service matters	address, e-mail and telephone number) <ul style="list-style-type: none"> Your communication with us Information about when and where you have purchased an item from us Information about your customer service matter Technical data about your equipment User information if you have a Regin account 	any questions you may have <ul style="list-style-type: none"> Identify you Investigate any complaints and support issues 				handle your customer service matter in the best possible way)
d) To be able to evaluate, develop and improve our services, products and systems for the customer collective as a whole	<ul style="list-style-type: none"> Personal name Company name Company's place of business Your communication and any feedback concerning our products Purchase- and user-generated data (e.g. click and purchase history) Technical information about your devices and settings Information about how you have interacted with us and used our website and web shop 	<ul style="list-style-type: none"> Customise and make our website more user-friendly (e.g. by simplifying information or highlighting frequently used features) Produce documentation to improve goods flow and logistics flow Develop and improve our products 				✓ (we need to be able to evaluate, develop and improve our services, products and systems)
e) To prevent misuse of a service or to prevent, avert and investigate	<ul style="list-style-type: none"> Personal name Company name Purchase- and user-generated data (e.g. click 	<ul style="list-style-type: none"> Prevention and investigation of any fraud or other violations of the law Prevention of spam mailings, 		✓ (when such an obligation exists)	✓ (we must be able to satisfy our interest in preventing misuse of our services and	

Purpose of processing	Data and processing		Lawful basis		
	Personal data processed	Processing performed	Your consent	To fulfil a legal obligation	Our legitimate interests
breaches against us	and purchase history) <ul style="list-style-type: none"> • Technical information about your devices • Information about how our website and web shop have been used • Information about your customer service matters 	phishing, harassment, attempted unauthorised login to user accounts or other actions prohibited by law or under our terms and conditions <ul style="list-style-type: none"> • Improve and protect our IT environment against attacks and intrusions 	To implement an agreement with you or because you have asked us before entering into the agreement.	To fulfil a legal obligation	It is necessary to protect interests that are of fundamental importance to you or another natural person preventing, averting or investigating breaches against us)
For those who have a Regin account					
f) To create and manage your Regin account	<ul style="list-style-type: none"> • Name • Contact details of the company (e.g. name, address, e-mail and telephone number) • Purchase history • Payment information • Username and temporary passwords for support purposes • Any settings for your profile 	<ul style="list-style-type: none"> • Create a login feature • Verify your identity • Maintain accurate and up-to-date data • Show your personalised product range and prices • Enable you to follow your purchase and payment history • Identify you • Manage any settings for your profile 			<p>✓</p> <p>We must be able to provide full digital service and be able to account for transactions from the web platform</p>
g) To provide a personalised experience of our website and web shop	<ul style="list-style-type: none"> • Name • Username • Country • Purchase history • Purchase- and user-generated data 		✓		
h) To be able to provide information about and market	<ul style="list-style-type: none"> • Name • Contact details of the company (e.g. name, address, e-mail and telephone number) 	<ul style="list-style-type: none"> • Show relevant product recommendations 	✓		

Purpose of processing	Data and processing		Lawful basis			
	Personal data processed	Processing performed	Your consent	To fulfil a legal obligation	Our legitimate interests	To implement an agreement with you or because you have asked us before entering into the agreement.
products and services	<ul style="list-style-type: none"> Information about how you have used our website and web shop Purchase history Purchase- and user-generated data (e.g. click and purchase history) 					
Marketing						
i) To be able to send direct marketing to you	<ul style="list-style-type: none"> Name Contact details of the company (e.g. name, address, e-mail and telephone number) Information about how you have used our website and web shop Purchase history Purchase- and user-generated data (e.g. click and purchase history) 	<ul style="list-style-type: none"> Send direct marketing to you by e-mail, SMS or post 	<p>✓ (see each mailing for details on how to withdraw consent)</p>		<p>✓ (we send postal mailings (including catalogues) based on the legitimate interest we have in sending you relevant marketing)</p>	

Does Regin share your personal data with third parties?

Personal data will only be shared when necessary based on the purposes set out in this Policy. Your personal data may be shared with our group companies, partners or suppliers.

Within the group

We may share your personal data with other companies within our group. However, we only share personal data within the group in a manner that is consistent with the information in this Policy and to the extent necessary. Personal data is never shared with persons other than those for whom the data is necessary to perform their work. We always ensure that those who receive personal data are bound by confidentiality obligations regarding, inter alia, your personal data.

Service providers

We engage third parties that provide us with certain services. Services involved are:

- i. IT support, cloud services and other IT-related services where the supplier helps us manage, for example, our website, financial systems and other systems;
- ii. DHL Transport and Logistics
- iii. payment solutions;
- iv. marketing companies, and
- v. security services.

We have written agreements with all our suppliers that regulate how they may process personal data on our behalf and require that they guarantee an adequate level of security for your personal data.

Third-party access to personal data is limited and granted only in the light of the nature of the assignment, the need for knowledge, depending on job functions and roles. This means that we will never share your personal data with anyone who does not need it for any of the above purposes or to help us perform our tasks according to the same principles.

Disclosure of data to third parties

In addition to the above, in certain circumstances we may be required to share your personal data with third parties based on applicable law. These third parties are:

- i. administrative agencies (such as the Swedish Tax Agency and the Swedish Social Insurance Agency);
- ii. financial institutions;
- iii. insurers;
- iv. police, prosecutors, and
- v. external consultants.

Does Regin transfer personal data to countries outside the EEA?

We may transfer your personal data to a country outside the European Economic Area ("EEA"). Some of our suppliers or partners may be located outside the EEA or use personnel or materials/equipment outside the EEA, and your data may in such cases be processed outside the EEA. We have implemented appropriate safeguards with regard to the protection of your privacy, your fundamental rights and freedoms, as well as the exercise of your rights. If processing of your personal data will take place outside of the EEA, we will always take measures that, for example, ensure an appropriate level of data protection through EU standard contractual clauses based on the European Commission's Decision of 5 February 2010 or any decision which may replace it.

If you would like more information about the relevant regulations or have questions about the transfer of data to other countries, please contact us. See contact details under "[Questions and queries](#)" below.

How is your personal data protected?

Regin uses adequate IT security systems to protect the confidentiality, integrity and access to your personal data. In particular, we have taken appropriate security measures against illegal or

unauthorised processing of personal data and against accidental loss or damage to personal data. Access to your personal data is only granted to persons who need it in order to fulfil their work assignments.

How long does Regin store your personal data?

We will store your personal data for as long as we need it to fulfil the purposes for which it was collected (see above) and to comply with laws and fulfil legal obligations. This may mean that certain data is stored for longer than others. The length of time we store your personal data for is affected by the following for example (i) laws that we are required to comply with, (ii) if we have any legal proceedings between each other or any third party, (iii) the type of personal data we hold about you, and (iv) if you or a competent authority asks us to keep the data and there are reasonable grounds for doing so.

If you have any questions about the length of time we store certain data about you, you are welcome to contact us. For contact details see "[Questions and queries](#)" below. For more detailed information about how long we store your personal data, please read our Data Retention Procedure.

Your rights and how you can enforce them

You have various rights that you can enforce, including the right to be informed about our processing of your personal data, i.e. you have the right to see this Policy.

If you have any questions, please contact us. For contact details see "[Questions and queries](#)" below.

Below is a summary of the other rights you have under the law. The table below also contains information about any conditions and restrictions on how the right can be exercised and how you practically exercise your right.

Your rights	Explanation of the meaning	Conditions to exercise your right
Right of access	You have the right to access the personal data we hold about you.	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, such as the privacy and confidentiality of other persons.
Right to data portability	You may have the right to obtain the data you have provided to us, and which is processed by us, in a commonly used machine-readable format.	GDPR does not establish a general right to data portability. This right only applies if the processing is based on your consent or on our agreement with you and when the processing is carried out by automated means (e.g. not physical documents). The right only affects personal data that was provided by you. Hence as a rule, it does not apply to personal data that we have generated.

Rights in relation to inaccurate or incomplete data	You may challenge the accuracy and completeness of the personal data we process about you. If it is found that the personal data is inaccurate, you are entitled to have the inaccurate data removed, corrected or supplemented as appropriate.	This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or request restriction of processing of your personal data	You have the right to object to or ask us to restrict the processing of your personal data.	This right applies only if our processing of your personal data is expressly based on a so-called legitimate interest (see above under "How and why do we process your personal data?"). Objections must be based on grounds relating to your particular situation. This means that your justification for the objection or restriction request must not be too general.
Right to have personal data erased	You are entitled, on certain grounds, to have your personal data erased (also known as the "right to be forgotten"). This right means, for example, that you are entitled to demand that your personal data is erased if you think that the information we are processing is inaccurate, or the processing is unlawful.	There are various reasons why we may not be in a position to erase your personal data. This may apply (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, (iii) where we have to comply with legal archiving obligations, or (iv) where the personal data is necessary for the performance of our contract with you.
Right to withdraw consent	You have the right to withdraw your consent to any processing for which you have previously given that consent.	The exercise of your right to withdraw consent applies to future processing.

Cookies

We use cookies on our website. A cookie is a small text file which is saved on your computer or mobile device to be later fetched as needed during subsequent visits to the website. For more information about how we use cookies, please read our Cookie Policy.

Questions and queries

If you have any questions or would like further information about our processing of your personal data or your data protection rights, including rights about access to data and correction of inaccurate data, please contact your Regin contact person or contact us via e-mail at info@regin.se or by post to AB Regin / Regin Controls Sverige AB, Box 116, 428 22 Källered (mark the letter with "Data Protection" so that the correct person can be reached).

If you have any questions or concerns related to how we process your personal data, we encourage you to notify us so that we can try to resolve this. If you believe that we are in breach of our obligations under applicable data protection legislation, you are always welcome to lodge a complaint with the Swedish Data Protection Authority (as of 1 January 2021, referred to as the Swedish Authority for Privacy Protection).

Changes to this Policy

We may make changes to this Policy. If the change entails a material change to the nature of the processing (e.g. expansion of the categories of recipients or introduction of transfers to a third country) or a change that may not be material in terms of the processing but which may be significant to or have an impact on you, the updated information will be provided to you well in advance of the change taking effect. We will send the changes to you via e-mail (if we have your e-mail address) to enable you to view and understand the changes. When notifying you of such changes, we will also explain what the likely impact of those changes on you will be. The latest version of this Policy is always available on our website.