

# DATA PROTECTION POLICY

Your private data protection is of utter importance to us and a matter we take very seriously, which is why we set transparency in this regard as a key priority in all our operations: this means you should always be able to feel completely confident and know exactly what is happening and what is recorded when you submit your personal information to us.

Any kind of information directly or indirectly attributable to a physical living person is regarded as personal data. We treat this data in accordance with applicable laws and with this Data Protection Policy we would like to explain clearly how we handle your personal information at all moments.

The Data Protection Policy applies to all our employees, but also when we, as a private entity (Colmis AB), provide services and products that you buy or share as a customer. This is extendable to the purchasing of services from us or if you reach out to us through our contact channels, e.g. when you visit our website.

The legal entity responsible for processing your personal information is Colmis AB, a company registered in Sweden under the organization number 556264-4053, with the following address: Box 22, 93821 Arjeplog. We are responsible for processing your personal information in accordance with applicable laws in Sweden and the European Union.

## WHEN IS YOUR DATA TAKEN?

In order for you to be employed by us, visit our website, purchase our goods or services, contact us for support or information, we must collect and process personal information about you.

The information collected from you when purchasing our services is required to set the grounds to eventually establish an agreement between both parties and consequently provide our services and offerings to you.

## WHY DO WE TAKE YOUR DATA?

The data we store in our database is:

- In order to fulfil our agreements and commitments to you as a customer, such as the execution of a purchase order, invoicing and payment procedures.
- In order to meet the requirements set to and by our employees.
- In order to provide an accurate and efficient customer service (answer questions, provide correct information, etc.)
- In order to manage the customer relationship and provide our service.
- Improve our customer offerings, for example the development of services, products and features.
- Follow applicable legislation, such as accounting laws, etc.
- Assess which payment methods we can offer you, for example through credit assessments.

## WHAT DATA DO WE STORE?

- First and last name.
- Personal identification number, Organization number.

- Address
- E-mail address
- Phone
- Account Number
- Username and password
- IP address and information about your use of our website

## **LEGAL BASIS & STORAGE TIME**

To handle the necessary administration and processes involving our employees, we save the following data in our management system:

- Name
- Address
- Title
- Position
- Personal identification number
- Phone
- E-mail
- Contact details of relatives
- Legal basis for storing the data: Consent
- Storage time: 3 years after the last day of work

*In order to manage your Supersaas login, we save the following data in the user registration system:*

- E-mail
- Name
- Phone
- Payment method
- Username and password
- Legal basis for storing the data: Consent
- Storage time: 3 years after you last logged in

*In order to manage your online registration to access the proving ground, we save the following data in the user registration system:*

- E-mail/Username
- Name
- Company
- Phone
- Coordinator/Team Leader (if applicable)
- Colmis Cold-Climate Driving Licence Expiry Date (if applicable)
- Password
- Legal basis for storing the data: Consent
- Storage time: 3 years after you last logged in

To ensure that legal requirements are met, such as accounting records, we save the following data in the accounting and payroll system:

- Name
- Address
- Personal identification number
- Phone number

- Email
- Position
- Salary
- Contact details of relatives
- Payment reference
- Legal basis for storing the data: Bookkeeping & Accounting purposes Storage time: 7 years

## **HOW WE PROTECT YOUR DATA**

When you submit your personal information to us, you can be sure that:

- No unauthorized personnel will access your personal information.
- We do not share, rent, lease or sell any personal data to any third party, whether companies or individuals.
- We have taken the necessary technical security measures and precautions to protect your personal data from unauthorized access, change and/or deletion.

## **WHO COULD WE EVENTUALLY SHARE YOUR INFORMATION WITH?**

We may disclose your information to third parties in order to fulfil our commitment to you as a customer or employee, e.g. by getting support from third party services, such as payment service providers, communications services, freight handling services or similar, used by you as a customer either jointly with us or simply requesting our assistance and support.

We may also provide your information to companies that provide address updating services to ensure that we have your right address information.

We may disclose your information to companies that make credit assessments to guarantee that you receive credit from us.

Personal data may also be provided by us if it is necessary to comply with applicable legal requirements or government requirements, to safeguard our legal interests or to detect, report or prevent fraud and other security or technical issues.

## **YOUR RIGHTS**

You are entitled to, by means of a written application, be notified by us of the personal information we have stored about you and how we treat it in a record transcript.

You are entitled to make corrections regarding personal data that we are processing about you deem are incorrect.

You are entitled to request that your personal data be removed if it is no longer necessary for the purpose for which it was initially collected. However, please note there may be legal requirements that prevent us from being able to immediately delete all the personal data you request should be removed, for example, when it goes against accounting and taxation laws. In these kinds of cases we will delete all data that does not have a further purpose other than complying with the legislation.

You are entitled to data portability. It implies the right to, under certain conditions, extract and transfer your personal data in a structured, widely used and machine-readable format to another personally responsible person.

You are entitled to object to personal data processing performed on the basis of a balance of interest. If you object to such processing, we will only continue processing the data if there

are legitimate reasons that weigh heavier than your interests.

In such cases, please refer to the following address:

Colmis AB  
Box 22  
93821 Arjeplog

You can also send an email to: [info@colmis.com](mailto:info@colmis.com)

The Swedish Data Protection Authority (DEPA) is responsible for monitoring the application of the law, and the person who considers a company handles personal data incorrectly has the right to file a complaint to them.

You therefore have the right to file any complaints regarding the processing of your personal data to the Swedish Data Protection Authority (<https://www.datainspektionen.se/other-lang/in-english/>).

## **MODIFICATION OF DATA PROTECTION POLICY**

We may make changes to our Data Protection Policy.

The latest version of the policy is always available on the website and also in our management system.

For updates that are critical to our processing of personal data (such as any change of a specified purpose of personal data storage) or updates that are not critical to the processing but which may be of crucial importance to you, you will find updated information on our website and also be notified by e-mail (if you have given us prior consent to send you e-mails) before the updates are introduced.

When we provide information about updates, we will also explain the meaning of the updates and how they affect you.