

## PRIVACY POLICY

It is important for ACG Kinna Automatic AB to safeguard the integrity of you as a customer, partner, supplier or representative of such and that you as a visitor to our website are confident in how the information you provide us with, is handled and protected. The following privacy policy describes how ACG Kinna Automatic AB processes your personal data.

### 1. DATA CONTROLLER

ACG Kinna Automatic AB, reg. no 556321-6810, (“**ACG Kinna**”) is the controller of the personal data which ACG Kinna processes about you and is responsible for securing that such processing is done in accordance with applicable data protection regulations.

### 2. ABOUT WHOM DO WE PROCESS PERSONAL DATA?

ACG Kinna processes personal data in the following categories:

- Customers, i.e., natural persons who are representatives/contact persons of ACG Kinna’s customers.
- Partners, i.e., natural persons who are representatives/contact persons of ACG Kinna’s Partners.
- Suppliers, i.e., natural persons who are representatives/contact persons of ACG Kinna’s Suppliers.
- Advisors, i.e., natural persons who are representatives/contact persons of ACG Kinna’s Advisors.
- Visitors, i.e., natural persons who visits our website or contacts us via forms on our website.

### 3. PURPOSE AND LEGAL BASIS

#### Performance of a contract

ACG Kinna processes personal data about you as a representative or contact person of a ACG Kinna customer, partner or supplier, such as name, e-mail and phone number for the purpose of entering into and performing agreements. The information is used for, among other things, contact you, manage payments, and otherwise handle issues relating to an agreement with your principal. The legal basis for the processing of representatives’ personal data is that it is necessary for the purposes of the of the legitimate interests of ACG Kinna.

### ***Marketing***

ACG Kinna processes personal data about you as a representative or contact person of a ACG Kinna costumer, partner or supplier, such as name, e-mail and phone number for the purpose of direct marketing by sending newsletters and offers to you. The legal basis for this processing is that it is necessary in order to meet ACG Kinna's legitimate interest of marketing and informing you about our services. You have always the right to object to direct marketing.

### ***Contact***

ACG Kinna processes personal data about you as a visitor, such as your name and contact information, for the purpose to communicate with you and otherwise handle your matter. The legal basis for this processing is that it is necessary in order to meet yours and ACG Kinna's legitimate interest of contact and handling of your matter.

### ***Legal obligations***

ACG Kinna may also process personal data about you as a representative or contact person of a ACG Kinna costumer, partner or supplier or as a visitor in order to fulfil its legal obligations, for example regarding accounting and tax. The legal basis for this processing it that it is necessary for compliance with legal obligations to which ACG Kinna is subject.

#### **4. TRANSFER OF PERSONAL DATA TO THIRD PARTIES**

Your personal data may be transferred to and processed by third parties. These may be group companies, service providers, legal advisers, auditors, consultants, courts, authorities, etc. Examples of situations when your personal data may be transferred to third parties is when such action is required due to law, dispute, request for authority or decision, at own request alternatively when required to fulfil ACG Kinna's legitimate interest. ACG Kinna still remains data controller for the personal data that is transferred, while third parties depending on the circumstances, either becomes an independent data controller, joint data controller with ACG Kinna or ACG Kinna's processor.

#### **5. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

ACG Kinna may process your personal data both within and outside EU/EEA. ACG Kinna will and must ensure that the transfer of personal data fulfils the requirements of applicable data protection regulations.

#### **6. STORAGE**

ACG Kinna never stores personal data longer than necessary for the purposes of the process. ACG Kinna therefore regular reviews stored personal data and deletes personal data that is no longer needed.

ACG Kinna generally stores your personal data for up to ten years in order to comply with

legal requirements or because we have a right to do so according to our legitimate interests.

ACG Kinna stores personal data about you as a representative or contact person of a ACG Kinna customer, partner or supplier as long as there is an active agreement. After the agreement has been terminated, ACG Kinna stores personal data for as long as a legal claim can be made in connection with the agreement or to the extent that it is necessary to save the data in order to comply with legal requirements.

ACG Kinna stores personal data about you as a visitor until you have objected to the processing of your personal data, however, for a maximum of three years. If you object to the processing, ACG Kinna will delete your personal data as soon as possible.

## **7. YOUR RIGHTS**

As a data subject, you have several rights concerning the processing of your personal data. If you wish to invoke your rights, you are welcome to contact ACG Kinna. Your rights are subject to certain conditions according to applicable data protection regulations and can be summarised as follows.

### ***Right to Access***

As a data subject you have the right to obtain confirmation as to whether your personal data are being processed or not, and, when that is the case, information regarding the processing. You also have the right to get access to your personal data.

### ***Right to Rectification***

As a data subject, you have the right to obtain, without undue delay, the rectification of inaccurate personal data. You may also have the right to correct incomplete personal data.

### ***Right to Erasure and Restriction***

As a data subject you have, under certain conditions, the right to have your personal data erased without undue delay. This is for example the case if the personal data are no longer necessary in relation to the purposes for which it was collected or otherwise processed, you withdraw your consent and there is no longer a legal ground for the processing, or the processing is unlawful. You also have the right to obtain restriction of the processing, for example if you contest the accuracy of the personal data or the lawfulness of the processing.

### ***Right to Object***

You have the right to object to the processing of your personal data based on balance of interests (legitimate interest). In such case, ACG Kinna may no longer process your personal data, unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of you as a data subject or for the establishment, exercise or defence of legal claims.

As a data subject you always have the right to object to the processing of your personal data for direct marketing purposes. ACG Kinna will in that case cease the processing of your data for such purposes.

**8. DATA PROTECTION AUTHORITY**

If you are dissatisfied with how ACG Kinna is processing your personal data, please contact ACG Kinna, see our contact details in section 10. You also have the right to submit a complaint regarding ACG Kinna's personal data processing to:

*The Swedish Authority for Privacy Protection  
Box 8114  
104 20 Stockholm  
imy@imy.se*

**9. CHANGES TO THIS PRIVACY POLICY**

ACG Kinna may, from time to time, make changes to this policy and will inform you by updating the Privacy Policy on our website.

**10. CONTACT ACG KINNA**

For questions or other requests regarding personal data, please contact ACG Kinna's contact person regarding the processing of personal data:

*Contact information*

Name: Tomas Aspenskog

Address: Maskingatan 12, 51162 Skene, Sweden

Phone number: +46720504903

E-mail address: tomas.aspenskog@kinnaautomatic.com