

# PRIVACY POLICY

This day, 2021-08-01, the following policy has been established for Elpress AB, corporate registration number 556031-5607, P.O. Box 186, 872 24 Kramfors, Sweden, and its subsidiaries as described in section 9 (“Elpress”) (or “We”, “Us” or “Our”).

## 1 Purpose

Your privacy is important for Us. We protect Your privacy and You should be able to feel safe when You entrust Us with Your personal data. Therefore, Elpress have established this policy based on current data protection legislation to clarify how We work to protect Your rights and Your integrity.

The purpose of this policy is to inform and make You aware about how Elpress process Your personal data, what We use it for, who will get access to it and under what conditions and how You can safeguard your rights.

We do not process more personal data than is necessary for the purpose, and We always strive to use the least privacy sensitive information.

Please read this Privacy Policy carefully.

## 2 Personal Data Controller

Elpress AB is responsible for the personal data processed about You. Elpress AB is therefore the data controller for your personal data. Our contact information is stated in section 9 below.

## 3 Processing of personal data

### 3.1 How We access Your personal data

We will primarily get access to Your personal data by You providing the personal data to Us, for example when You visit any of our websites, including <http://www.elpress.net> or <http://www.elpress.se> (the “Website”) and accept cookies, register a Tool or use any of our software, use our services, sign up for a seminar or other education services, sign up for newsletters and other mailings, answer surveys and other polls and investigations, and seek employment with Us, visit Us or in other ways seek contact with Us.

We can also get access to Your personal data through public registers and third parties such as commercial partners and companies within the Lagercrantz Group.

### 3.2 Lawful grounds for processing Your personal data

We strive to process as little personal data about you as possible. We only process personal data when We have a lawful ground. We process personal data with the support of following lawful grounds:

- legitimate interests based on Our agreement with Your company (i.e. Your employer) or when We need to process personal data for advertising or marketing purposes,
- law, so called legal obligation, for example in order to comply with requirements under the Accounting Act, or
- an agreement with You as an individual.

### **3.3 Reasons for processing personal data and types of personal data that We process**

We process personal data depending on our needs, seen to the reasons, in the specific case/situation as follows:

- When We sell Tools, educations and other products to You as an individual, We process information about Your name, address, e-mail address, telephone number and bank account.
- When We sell Tools, educations and other products to You as a contact person for a company, We process information about Your name, assignment/employer, e-mail address, telephone number and bank account.
- When You register Your or Your company's Tools on our website, We process information about Your name, e-mail address and when relevant assignment/employer.
- When Your or Your employer's unique Tool is used, the Tool's unique ID is processed together with the diagnostic data that the Tool provides.
- When You use the software in combination with our Tools, we process information about Your IP address and usage data such as geo-position and Tool data. User data is collected regardless of which digital platform You use (computer, mobile phone, tablet).
- Information about your Tool's unique ID and about you as a customer is processed when contacting our customer service. Personal data processing takes place regardless of which digital platform You use (computer, mobile phone, tablet).
- We process information about Your name, e-mail address, telephone number, purchase history and, where applicable, your employer when sending out market research, newsletters, and other mailings.

- We process information about Your name, e-mail address, telephone number when You contact or visit Us.
- We process information about Your name, e-mail address, telephone number, CV and personal letter when applying for a job with Us.
- When You visit our website and accept the use of cookies, We collect information about Your IP address and search history.

### **3.4 When We share Your personal data**

Elpress may not disclose Your personal data to anyone unless it is required by law or is in accordance with Our Agreement with You (or Your Employer), please see above regarding Our processing of personal data based on Our weighing of interests (legitimate interest).

In some cases, personal data is transferred to Our subcontractors for support, marketing-, information- and follow-up purposes. See more about processors/sub-processors in section 8 below.

We do not transfer personal data to third parties in cases other than those expressly stated in this policy.

## **4 Transfer of personal data to third countries**

We can, in exceptional cases and only if it is necessary, transfer personal data to a subsidiary outside the EU/EEA, if commercially needed and provided that we can ensure a legal ground for transfer of personal data to, or access from, a location outside the EU/EEA. Such legal ground shall be based on a decision from the European Commission that, for example, a certain country outside the EU/EEA ensures an adequate level of protection, with support of Standard Contractual Clauses (SCC), or in special situations and for single cases. All in accordance with chapter 5 of the EU General Data Protection Regulation (GDPR).

## **5 Your personal data is processed in a safe way**

Elpress has routines and procedures for managing your personal data in a safe way.

Only persons who need personal data to perform their duties and Our commitments shall have access to personal data.

Our security systems are developed with your integrity in focus and to protect, to a great extent, against intrusion, destruction and other incidents that could endanger Your privacy.

## **6 Retaining and deleting personal data**



We retain your personal data not longer than what is necessary in order to fulfil the purpose of the processing and We will delete or thin personal data in accordance with applicable law.

When We process personal data with legitimate interests as lawful ground, We store your personal data as long as We believe you are interested in our services and information from Us. We will carry out annual thinning for this type of processing.

## **7 Your rights**

### **7.1 Starting points**

The rights available to you regarding processing of your personal data follow in the sections below. You are welcome to contact Us, in accordance with section 9 below, to exercise your rights.

### **7.2 Right to access (including registry extract)**

You are entitled to request information about which personal data we process about you and how the personal data is being processed.

You also have the right to request extracts from Elpress and Our registries/systems in which personal data about You is processed and, in such extracts, be informed of what personal data about You that We are processing and how We process this data.

### **7.3 Right to rectification**

You are entitled to ask Us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

### **7.4 Right to object to processing**

You are entitled to object to processing of your personal data, for example after a weighing of interest has been made.

### **7.5 Right to erasure and limitation**

You are entitled to ask Us to erase your personal information, for example if you object to processing based on Our legitimate interests (marketing) or if the processing no longer is relevant in relation to the purpose your personal data was collected for.

You are also entitled to ask Us to limit Our processing of your personal data.

### **7.6 Right to data portability**

According to personal data you have given Us, you are entitled to ask that We transfer the information to another organization or give it to you. The information given

to you should be transferred in a structured, commonly used and machine-readable format.

### **7.7 Automatic decision-making, including profiling**

You have the right not to be subject of a decision that is only based on automatic decision-making, including profiling.

### **7.8 Complains**

The Swedish Authority for Privacy Protection (IMY) is the supervisory public authority for privacy protection in Sweden. You are entitled to lodge complaints regarding the processing of personal data to the IMY. Contact information for the IMY can be found on <https://www.imy.se/en/about-us/contact-us/>

## **8 Controller of personal data and our processors**

Elpress always ensures through personal data processing agreements that Our processors/sub-processors only process personal data in accordance with this policy. Upon request Elpress will provide a list of current data processors (sub-processors).

## **9 Subsidiaries and affiliated companies subject to this policy**

The following companies are subject to this policy, in such parts and as long as it is compliant with each company's local governing law.

- Elpress GmbH, Kränkelsweg 24, 417 48 Viersen, Germany
- Elpress A/S, Randersvej 16, DK-8600, Silkeborg
- Elpress AS, Bruket 31, Pb 79, N-1621 Gressvik, Norge
- Elpress Inc, 900 Oakmont Lane, Suite 207, Westmont IL 60559, USA and
- Elpress Beijing Electrical Comp Ltd., RM 1605, DIYAN TOWER No. H2, Dongsanhuan BeiLu Chaoyang District BEIJING 100027, P.R. CHINA

## **10 If you want to know which of the Elpress Group's companies mentioned above who is controller of your personal data, please contact Elpress AB (in accordance with the contact details below) and you will receive further referral to the correct personal data controller of your data. Contact details to Elpress AB**

Controller of personal data: Elpress AB  
Address: P.O. Box 186, 872 24 Kramfors, Sweden  
Phone number +46 612 – 71 71 00  
E-mail address: [gdpr@elpress.se](mailto:gdpr@elpress.se)  
Representative: IT Manager or HR-Manager at Elpress AB