

From: Eleda AB	Date of Approval: 2024-10-23	Version: 1.0	Approved by: Eleda AB Board
Subject: Data Privacy Policy (Integritetspolicy)		Security class: Internal	Page: 1 (5)

DATA PRIVACY POLICY (INTEGRITETSPOLICY)

Document Management

Review cycle	Reviewed every two (2) years
Target group	Any employee that deals with and/or Processes Personal Data
Document owner	Group Privacy Compliance Coordinator

Document history

Name	Date	Version	Comment
Anders Westling	2024-09-18	1.0	First version

Background and purpose

Eleda AB ("the Company") is committed to fulfil the highest standards in relation to personal integrity and to only process Personal Data in accordance with applicable data protection legislation, in a transparent manner and in accordance with Data Subject's expectations.

The purpose of the Policy is to establish a common platform for the Company to ensure the fulfilment of the above general commitment when collecting, using, disclosing, transferring and otherwise Processing of any Personal Data.

Scope

The Policy sets out the rules for employees, consultants and external vendors of the Company and its responsibilities in relation to the Processing of Personal Data.

Any applicable country specific data protection legislation and its requirements shall take precedence over the Policy and related standards and procedures. However, any Processing of Personal Data by the legal entities within the Company hereunder shall always be done in compliance with the EU (2016/679) General Data Protection Regulation ("GDPR"), and these legal entities shall implement the necessary policies, standards and measures to ensure sufficient protection.

The Policy applies to the legal entities within the Company.

Roles and responsibilities

Role	Responsibility
Group Privacy Compliance Coordinator	Owner of and responsible for reviewing and monitoring compliance with the Policy
Platform Privacy Compliance Coordinator	Responsible for implementing this policy within their Platform Company and associated subsidiaries

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Policy statement

The Policy is of a general nature and more detailed guidance as regards specific Processing is found in 'Reference Documents'.

Processing of Personal Data of Data Subjects shall only be done for explicit and specified purposes. The Data Subjects shall, to the extent possible but always as required under applicable legislation, be informed of such purposes in advance together with all other information that is required for the Data Subject's to become aware of how their Personal Data is processed and to enforce their rights.

Personal Data must only be processed if there is legal ground that allows the relevant Personal Data to be processed for the intended purpose. Any new kind of Processing to be conducted must be in accordance with the Policy and applicable legislation and if in doubt, legal advice should be retained from the Platform Privacy Compliance Coordinator.

Security of the Personal Data

Any Processing of Personal Data shall always be conducted in a manner that ensures an appropriate level of security for such Personal Data. Thus, Company entities should have appropriate technical, administrative and organizational security measures in place, that are appropriate to the risk of the Processing to protect the Personal Data against unapproved access, destruction, accidental loss, modification, blocking, copying, spreading, unapproved disclosure or access, and against all other unlawful or unauthorized Personal Data Processing.

Security measures that should be implemented include firewalls, password protection, encryption and access rights, as appropriate depending on the risk related to the Processing.

Only authorized employees and consultants holding a position where it is necessary to process Personal Data to fulfil a working task shall be granted access to the relevant Personal Data. If an employee for any reason has access to Personal Data that is not needed to fulfil such employee's tasks, such employee shall immediately inform its supervisor to ensure that relevant limitation to access of Personal Data is ensured.

All Personal Data is considered confidential information and is subject to confidentiality, whether by relevant employment agreements, consultant agreements or by applicable law.

Types of Personal Data

Generally, only the following types of Personal Data should be processed:

- a) **Employees** – name, personal identification number, photo, title, contact details, employment contract details, job qualifications, educational background, former employers and performance information, working time, work tasks, assignments, absences, work description, length of employment, compensation and benefits related information, bank account and pension details, medical information, username, computer log data and other family.

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- b) **Customers** – name, email address, photo, phone number, IP address, MAC address, complaint and information related to contact with the Company; communications with customers, including email communications, postal communications.
- c) **Suppliers** – name, email address, photo, phone number, status/position, communications with suppliers, including email communications, postal communications, voice recordings, and information concerning use of, and Personal Data transmitted through Company’s information systems.
- d) **Partners** – name, address, e-mail address, phone number, status/position, personal identifier (e.g. internal identification number), business identification number or other identification documents and numbers, information relating to acquisition and divestment due diligence, including proof of identity, proof of address, professional background, position of employment, gender, ownership percentage of business, financial information, staff administration / HR information the Company receives in connection with the performance of services to Partners such as information relating to operations, communications with customers and online services and information concerning the use of (and Personal Data transferred through) the Company’s information systems.

Administration, Rectification, Deletion, Retention and Data portability

Personal Data shall only be processed if it is adequate, relevant and limited to what is necessary to fulfil the purpose of the relevant Processing. When the purpose is fulfilled, the relevant Personal Data will as soon as possible be deleted, unless there is any legal requirement to retain the Personal Data for a longer period or the Personal Data can still be processed for another purpose (in which case it will be stored but only processed for such other purpose).

A Data Subject has always the right to request access to the Personal Data relating to him or her, the type of Personal Data being processed in respect of a Data Subject and the purpose of such Processing. A Data Subject also has the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete. In some cases, the Data Subject may also object to the Processing of Personal Data.

If any inaccurate Personal Data is being processed, measures shall be taken to rectify such inaccurate Personal Data without undue delay.

The Data Subject also has the right to request erasure of his or her Personal Data in certain events and the right to be provided with any Personal Data, which is being processed by automatic means, in a structured, commonly used and machine-readable format and/or that such Personal Data is transmitted to another controller.

Upon receiving a request from a Data Subject regarding access, rectification, erasure, restriction or data portability, the Company shall provide information on any actions taken on the request to the Data Subject within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of the requests. In the event of an extension, the Company shall inform the Data subject within one month of receipt of the request with the reasons for the delay.

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Transfer of the Personal Data

The Company consists of the parent company Eleda AB, established in Sweden, with operational affiliates ("jointly referred to as the "Platform Company") in Norway, Sweden, Finland and Denmark. Personal Data may be shared within the Company to the extent necessary to fulfil a purpose and to the extent allowed under applicable data protection legislation.

The Company also uses third party service providers ("Service Providers"). The Service Providers perform certain services as requested, which may involve the Processing of Personal Data. Such services include the provision of infrastructure, insurances services, hotels services, marketing services and IT services etc. A Service Provider must only process Personal Data to enable the Service Provider to perform the services requested by the Company or applicable subsidiaries. The Platform Company shall evaluate all Service Providers to ensure that only processors providing sufficient guarantees to implement appropriate technical and organisational measures are onboarded.

Only Personal Data that is necessary to fulfil the relevant purposes will be provided to the respective Service Providers. The Service Provider (as a data processor) will always be obliged, under a written agreement with the data controller (being the Company or applicable subsidiary), to act in accordance with data controller's instructions, to follow applicable law and to implement appropriate technical and organizational measures for the protection of the Personal Data. In the capacity of controller, the Company shall ensure, before the transfer of any Personal Data, that there is a written Data Processing Agreement with the Service Provider which ensures, in addition to the above, that persons authorised to process the Personal Data are bound by an obligation of confidentiality.

Personal Data may also be required to be provided to relevant authorities (e.g. the police, social insurance agencies, national tax authorities) based on mandatory law and to fulfil legal obligations.

Further, Personal Data may be transferred to service providers and cooperation partners established outside of the European Economic Area (the "EEA") but only if it is ensured that the Personal Data is adequately protected by the receiving parties in such countries. Adequate protection may typically be to impose on the receiving party contractual obligations that ensure that such party maintains the same high level of privacy and data security as practiced by the Company. Further information or a copy of the safeguards that are in place to ensure lawful transfer of Personal Data is available at the Company.

Training and awareness

The Company is committed to fostering a culture of data protection awareness and responsibility throughout the organization. As such, the Company shall ensure employees, contractors and other staff are aware and understand their obligations under the GDPR. In addition, the Company shall ensure that employees are aware of how to handle and escalate requests from Data Subjects in accordance with GDPR requirements. The Company shall ensure that new employees receive information regarding GDPR as part of their onboarding process.

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Compliance and monitoring

Group Privacy Compliance Coordinator is responsible for reviewing and monitoring compliance with this Policy and to report any deviations to Eleda AB Board.

Definitions

In the Policy, the following defined terms shall have the following meaning:

“Company” means Eleda AB and its operational affiliates.

“Data Subject” means an identified or identifiable natural person.

“Personal Data” means any information relating to a Data Subject who can be identified, directly or indirectly, such as name, identification number, location data, online identifier or factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

“Platform Company” means Eleda AB’s operational affiliates.

“Processing” means any operation or set of operations which is conducted in relation to Personal Data, whether by automatic means. Processing includes for example collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, transferring or otherwise making data available, combining data sets and deletion of data.

All the above listed terms and any other defined or undefined terms herein should have the same meaning as the corresponding term set out in the GDPR.

Reference documents

Document name	Purpose	Owner
IT policy	Guidance on and requirements for how the organisation's employees should work and relate to the Company's IT security and IT resources	Eleda AB
Information security policy	To provide guidance how to handle information security regarding Personal Data	Eleda AB
Data Retention guidelines	To provide guidance on Personal Data retention guidelines	Eleda AB
Data Breach standard	To provide guidance how to handle Personal Data Breaches	Eleda AB