

## EXTERNAL INTEGRITY POLICY

### 1 GENERAL

In this Integrity Policy (“**Integrity Policy**”), we provide more detailed information on how Beijer Alma AB, Corp. Reg. No. 556229-7480, Box 1747, SE-751 47 Sweden (“**Beijer Alma**” or “**the Company**”), processes personal data relating to you in your capacity as a visitor to our website, [www.beijeralma.se](http://www.beijeralma.se), in the event that you apply for employment with the Company (recruitment), to anyone who has chosen to receive our newsletters/press releases and to anyone who has ordered material from our website. The Integrity Policy is also aimed at anyone who represents a company or organization that has any type of professional relationship with Beijer Alma (company representatives).

### 2 PERSONAL DATA CONTROLLER

- 2.1 Beijer Alma is the personal data controller for Beijer Alma’s processing of your personal data and is responsible for ensuring that processing is conducted in accordance with applicable legislation.
- 2.2 The person responsible for personal data issues at Beijer Alma is Jan Blomén, whose tasks include monitoring that Beijer Alma’s processing of personal data is conducted in accordance with applicable legislation. Jan Blomén can be contacted at [jan.blomen@beijeralma.se](mailto:jan.blomen@beijeralma.se) or +46 18 15 71 60.

### 3 WHAT PERSONAL DATA IS COLLECTED?

#### 3.1 Visitors to the website:

Beijer Alma collects information about you that we need to be able to improve, enhance the efficiency of, simplify and develop our website, such as IP address, MAC address, cookies and similar data (unit information).

#### 3.2 Recruitment:

Beijer Alma collects information about you that we need to be able to recruit the right people for employment at Beijer Alma. The personal data collected for recruitment purposes are your name, address, e-mail address and telephone number, CV and other personal data that you choose to provide us with.

#### 3.3 Recipients of newsletters/press releases:

Beijer Alma collects information about you that we need in order to be able to send our newsletters and press releases to you. The information we collect about you for this purpose is your e-mail address. We may occasionally contact you and therefore process your personal data for the purpose of conducting a survey, market analysis or similar activity.

#### 3.4 Company representatives:

The Company collects and stores information about you that we need to be able to contact you in your capacity as a company representative, such as your name, position, postal address, e-mail address and telephone number.

### 3.5 Orderers of materials:

Beijer Alma collects information about you that we need in order to be able to send the materials (mainly financial information) that you ordered on our website. The information we collect about you for this purpose is your name, e-mail address and delivery address.

## 4 OUR PROCESSING OF YOUR PERSONAL DATA

### 4.1 For visitors to our website

Personal data relating to you is collected in conjunction with you visiting our website, [www.beijeralma.se](http://www.beijeralma.se). The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

Categories of personal data	Purpose	Lawful basis
<ul style="list-style-type: none"><li>Unit information (IP address, MAC address, cookies or similar data)</li></ul>	To be able to improve, enhance the efficiency of, simplify and develop the website.	Processing is necessary for the Company's legitimate interest in improving, enhancing the efficiency of, simplifying and developing its website.

### 4.2 For applicants for employment with the Company (recruitment)

Personal data relating to you is collected in conjunction with you applying for employment with the Company. Your personal data can be submitted to us directly by you or by the recruitment firm we retain for recruitment purposes. The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

Categories of personal data	Purpose	Lawful basis
<ul style="list-style-type: none"><li>Name,</li><li>Postal address,</li><li>Telephone number,</li><li>E-mail address,</li><li>CV, and</li><li>Other personal data that you choose to provide to us.</li></ul>	To enable us, in conjunction with recruitment, to determine who is best suited for a position and to ensure that the person in question has the necessary competence.	Processing is necessary for the Company's legitimate interest in employing the right personnel and ensuring that competent people work for the Company.
<ul style="list-style-type: none"><li>Name,</li><li>Postal address,</li><li>Telephone number,</li><li>E-mail address,</li><li>CV, and</li></ul>	For the purpose of establishing, exercising or defending legal claims that may result from a recruitment process.	The Company's legitimate interest in establishing, exercising or defending legal claims.

<b>Categories of personal data</b>	<b>Purpose</b>	<b>Lawful basis</b>
<ul style="list-style-type: none"> <li>Other personal data that you choose to provide to us.</li> </ul>		

#### 4.3 Recipients of newsletters/press releases

Personal data relating to you is collected in conjunction with you informing us that you would like to receive our newsletters/press releases. The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

<b>Categories of personal data</b>	<b>Purpose</b>	<b>Lawful basis</b>
<ul style="list-style-type: none"> <li>E-mail address.</li> </ul>	To be able to send our newsletter to you.	Processing is necessary for the Company's legitimate interest in marketing its products/services and sending information requested to stakeholders.
<ul style="list-style-type: none"> <li>E-mail address</li> </ul>	To be able to conduct surveys, market analyses or similar activities.	Processing is necessary for the Company's legitimate interest in developing its operations and communications.

#### 4.4 Company representatives

Information about you can be submitted to us directly by you or by the company you represent in conjunction with the company you represent conducting business with the Company. The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

<b>Categories of personal data</b>	<b>Purpose</b>	<b>Lawful basis</b>
<ul style="list-style-type: none"> <li>Name,</li> <li>Position,</li> <li>Telephone number, and</li> <li>E-mail address.</li> </ul>	To be able to maintain contact with a representative of the company you represent to administer the assignment/partnership between Beijer Alma and the company you represent.	Processing is necessary to satisfy Beijer Alma's legitimate interest in fulfilling the agreement with the company you represent and administering the relationship between the company you represent and Beijer Alma.
<ul style="list-style-type: none"> <li>Name,</li> <li>Position,</li> </ul>	Fulfill statutory demands, such as bookkeeping requirements.	Processing is necessary to fulfill Beijer Alma's legal requirements.

<b>Categories of personal data</b>	<b>Purpose</b>	<b>Lawful basis</b>
<ul style="list-style-type: none"> <li>• Telephone number, and</li> <li>• E-mail address.</li> </ul>		obligations (legitimate interest).
<ul style="list-style-type: none"> <li>• Name,</li> <li>• Position,</li> <li>• Telephone number, and</li> <li>• E-mail address.</li> </ul>	To enable marketing and customer analyses.	Processing is necessary for the Company's legitimate interest in marketing its products/services to the company that you represent as company representative.
<ul style="list-style-type: none"> <li>• Name,</li> <li>• Position,</li> <li>• Telephone number, and</li> <li>• E-mail address.</li> </ul>	To enable marketing and to enable contact with a representative of the company in question, meaning you in your capacity as company representative.	Processing is necessary for the Company's legitimate interest in marketing its products/services to the company that you represent as company representative and to be able to maintain contact with the company through the company representative.

#### 4.5 **Orderers of materials**

Personal data relating to you is collected in conjunction with you ordering materials (such as interim reports and annual reports) via our website. The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

<b>Categories of personal data</b>	<b>Purpose</b>	<b>Lawful basis</b>
<ul style="list-style-type: none"> <li>• Name,</li> <li>• E-mail address, and</li> <li>• Delivery address.</li> </ul>	To enable Beijer Alma to send the material you ordered to the correct recipient.	Processing is necessary for the Company's legitimate interest in delivering the materials requested to the orderer of such materials.

## 5 **HOW LONG DO WE STORE YOUR PERSONAL DATA?**

Your personal data is stored as long as there is a need to store said data in order to fulfill the purposes for which the data was gathered or for as long as Beijer Alma is obligated by law to store your personal data. The Company also stores the data it requires to be able to establish, exercise or defend any legal claims that could arise. Your personal data will subsequently be erased.

Beijer Alma saves your personal data collected for recruitment purposes to evaluate your possibility of gaining employment with the Company until the vacancy for which you applied has been filled. If you have applied for a position without it being advertised, your application will be held until we have managed to assess whether you will be considered for employment with the Company within a reasonable period of time. We also store the data required to establish, exercise or defend legal claims that could arise as a result of your application.

Personal data that Beijer Alma collects in conjunction with you ordering materials via our website are erased without unnecessary delay after the materials you ordered are sent to you.

The contact information for company representatives is stored for the time that Beijer Alma deems the data necessary for maintaining the relationship with the company. Erasure occurs when it comes to Beijer Alma's knowledge that the data is no longer adequate or relevant for the purpose.

## 6 TRANSFERS OF PERSONAL DATA TO THIRD PARTIES AND THIRD COUNTRIES

6.1 We provide your personal data to third parties as outlined in the table below.

Third party	Reason for providing personal data to a third party
Provider of cloud services	The Company stores its information in a cloud service, which is why your personal data may be provided to the supplier Dropbox by the cloud service.
Suppliers and other partners	The Company may provide your personal data to various suppliers and other partners to our operations. This will occur in the event that the suppliers and partners require your personal data to be able to complete their assignments for the Company.

6.2 The Company will not provide personal data to third parties except in situations when it is a requirement resulting from a legal obligation or to meet the Company's obligation to you. Your personal data will not be transferred or sold to a third party for commercial purposes.

6.3 The Company endeavors to process your personal data within the EU/EEA. The Company will not transfer your personal data to countries outside the EU/EEA other than what is stated below. If personal data is transferred to any country outside the EU/EEA, the Company will take measures to ensure that the personal data remains protected and also take any action required to legally transfer personal data to countries outside the EU/EEA.

6.4 The Company uses Amazon Web Services for the storage of data. Through the Company's use of Amazon Web Services, your personal data may be transferred to the US. The personal data relating to you that the Company collects through your use of the Company's website may be transferred to Google in the US by way of Google Analytics. The Company has ensured that your rights are guaranteed on transfer to the US through Google's and Amazon Web Services' participation in the EU-US Privacy Shield. Further information is available at [www.privacyshield.gov](http://www.privacyshield.gov).

## **7 YOUR RIGHTS**

- 7.1 Provided that Beijer Alma is the personal data controller for your personal data, you are entitled, at any time, to receive a register extract free of charge containing information about what personal data relating to you is registered, the purposes of the processing of this personal data and information regarding where this personal data was obtained or to whom it is to be provided. You are also entitled to receive, in the register extract, information regarding the envisaged period for which the personal data will be stored, or the criteria used to determine that period. Requests to receive such information must be made in writing and sent to Beijer Alma at the address provided below under the section "Contact."
- 7.2 You are entitled to data portability, meaning the right to obtain and transfer your personal data under certain conditions in a structured, generally applied and machine-readable format to another personal data controller.
- 7.3 At your request or on its own initiative, Beijer Alma will erase, correct, anonymize, supplement or erase data that is discovered to be incorrect, incomplete or misleading. In certain instances, Beijer Alma is obligated to process your personal data although you have requested that it be removed.
- 7.4 Under certain circumstances, you may request the restriction of continued processing of your personal data (for example, if you question whether your personal data is correct or if the processing is lawful) as well as having the right to object to processing under conditions prescribed by applicable personal data legislation. You can, at any time, inform Beijer Alma that you no longer wish to receive marketing materials or newsletters/press releases from the Company, and Beijer Alma will then immediately cease to process your personal data for this purpose.
- 7.5 If you want to exercise any of the above rights or if you have any questions regarding personal data held by Beijer Alma, or questions about this Integrity Policy, do not hesitate to contact Beijer Alma (for contact information, see the section "Contact" below).
- 7.6 Please contact Beijer Alma if you are not satisfied with the Company's processing of your personal data and Beijer Alma will do its best to address your complaints. Your integrity is extremely important to Beijer Alma and Beijer Alma always endeavors to protect your personal data in a relevant and secure manner. If Beijer Alma, in your opinion, nonetheless fails in this ambition, please note that you are also entitled to submit a complaint to the Swedish Data Protection Authority.

## **8 PROTECTION OF YOUR PERSONAL DATA**

You should always feel secure when you provide us with your personal data. Accordingly, Beijer Alma has taken the security measures required to protect your personal data against unauthorized access, alteration and erasure. We will not give your data to any other party, other than what is explicitly in line with this Integrity Policy.

## **9 COOKIES**

The Company uses cookies-like technology to provide certain functions on the website, [www.beijeralma.se](http://www.beijeralma.se), and to improve our website and provide better and

more personal service. The information is stored in the form of a file containing encrypted log-in data. The Company uses cookies in accordance with the Company's policy on cookies, see [www.beijeralma.se/cookies](http://www.beijeralma.se/cookies).

## **10 ARE YOU OBLIGED TO PROVIDE DATA?**

You are not obliged, in relation to the Company, to provide any data to the Company. However, providing the Company with your personal data is a necessity for the Company to fulfill the purposes specified under Purposes in section 4 above.

## **11 AMENDMENTS**

The Company is entitled to amend the Integrity Policy at any time. If the Company implements significant changes to the Integrity Policy, the Company will inform you by e-mail, provided the Company has your e-mail address, or, if possible, in another way.

## **12 CONTACT**

Do not hesitate to contact the Company if you have any questions regarding this Integrity Policy, the processing of your personal data or if you wish to exercise any of your rights according to this Integrity Policy.

The Company's contact information:

Corporate Registration Number: 556229-7480

Address: Box 1747, SE-751 47 Uppsala

Telephone number: +46 18 15 71 60

E-mail address: [info@beijeralma.se](mailto:info@beijeralma.se)

Contact information for the person responsible for personal data issues at the Company:

Name: Jan Blomén

E-mail: [jan.blomen@beijeralma.se](mailto:jan.blomen@beijeralma.se)

Telephone number: +46 18 15 71 60