



PRIVACY POLICY, ACG GRUPPEN AB

Processing of your personal data

The Group ACG GRUPPEN AB (referred to below as the ACG GROUP) takes all necessary measures to make sure that we process personal data concerning our customers in a lawful, fair and transparent manner.

When you use our various services, we collect your personal data. Consequently, the ACG GROUP is the data controller of your personal data and processes it in accordance with this privacy policy. This privacy policy explains and clarifies your rights in relation to the ACG GROUP regarding the processing of your personal data and how you can exercise those rights.

The ACG GROUP is committed to protecting your personal data and it is important to us that your personal data are processed in a secure way. We comply with all applicable laws and rules that exist to protect the privacy of individuals, including the Swedish Personal Data Act (1998:204), the Swedish Act on Electronic Communication (2003:389) and other regulations that implement the EU Data Protection Directive 95/46/EC, the Electronic Communications Directive 2002/58/EC and the EU General Data Protection Regulation 2016/679 (GDPR) and any amendments to or regulations that replace such laws, regulations, provisions and rules. We use appropriate and reasonable physical, technical and organisational security measures with respect to the amount and sensitivity of personal data.

It is important that you read and understand this privacy policy before using any of the ACG GROUP's services. You should not use any of our services if you do not agree to this privacy policy.

Some pages on our website contain links to third party websites. These websites have their own privacy policies and the ACG GROUP is not responsible for their operations or their information policies. Any user who sends information to or through these third party websites should therefore review the privacy policies posted on those websites before transmitting any personal data to them.

For information on the collection, handling and storage of information obtained through cookies, please see the "Cookies" section below.

What personal data do we collect and from where?

If you contact the ACG GROUP via our website or otherwise use our services, you may provide information to us that is considered personal data under applicable data protection laws.

Depending on the context, the types of personal data that we collect may include:

- name and contact information including address, mobile phone number and e-mail address
- social security number
- delivery and billing information, payment information and other information that you provide in connection with the purchase or delivery of a product or service
- various types of demographic information
- information about preferences and interests based on the use of the ACG GROUP's websites
- user name and password for our services
- other information that is relevant for customer surveys, advertisements or offers and/or
- other user-generated information that you actively choose to share through our websites

We may collect your personal data from the following sources:

- The ACG GROUP's website, e.g. when you register to obtain the ACG GROUP's services, download a PDF file, or contact us through our contact questionnaire
- third parties via companies with which the ACG GROUP cooperates to provide their services

Why do we process your personal data?

If you have subscribed to the ACG GROUP's services you have entered into an agreement with the ACG GROUP. As a result, we process your personal data to manage your purchase or order, as well as to deliver the service or product that you have ordered.

In addition to processing your personal data to complete your purchase of the ACG GROUP's services, the ACG GROUP may use your personal data for other purposes, based on other legal grounds, as set out below:

- **Performance of a contract:** To handle subscriptions, deliver products, make payments, and to give you access to the ACG GROUP's websites and the services (including customer service) provided there.
- **Consent:** Direct marketing via e-mail, customer surveys, customer service, newsletters and the use of cookies on the ACG GROUP's website.
- **Compliance with a legal obligation:** We save invoice documentation in accordance with applicable accounting laws and regulations.

- **Legitimate interest:** In order to provide, carry out and improve our commitments, products and services, it is necessary for us to process personal data in some other cases as well, e.g. by analysing the buying habits of our customers in order to provide relevant information and marketing, as well as for statistical purposes.

In the event that a service that we provide requires your consent, we will always explicitly ask you to give your consent to such a service and to the processing of your personal data in such a case.

Storage of personal data

The ACG GROUP takes all reasonable steps to ensure that your personal data is processed and stored securely. Your personal data will never be stored longer than permitted by applicable law or longer than necessary to fulfil the above stated purposes. Your personal data will be processed by us during the following time periods:

- **Customer:** If you have registered for any of the ACG GROUP's digital services your personal data is saved until you unsubscribe from our services, but no later than three years after your last purchase. This does not apply if we need to save your personal data for a longer period of time due to any of the reasons stated below.
- **Performance of a contract:** Personal data (for example, name, social security number, address, telephone number, e-mail, billing and delivery information) that is submitted when ordering services from the ACG GROUP is stored for as long as necessary for the ACG GROUP to fulfil the contract we have entered into with you. This includes fulfilling delivery or warranty commitments.
- **Legal obligation:** The ACG GROUP saves any documentation that constitutes accounting information in accordance with applicable accounting legislation.
- **Consent:** In cases where we process your personal data based on your consent, for example for direct marketing mailings, we will only save your personal data for as long as we have your consent to do so.
- **Direct marketing:** We may process your personal data for direct marketing purposes for a period of up to three years after the customer relationship has ended, unless you object to your personal data being used for direct marketing purposes.

Transfer of personal data

Personal data regarding our customers is an important part of the ACG GROUP's operations and we do not sell the personal data to anyone else. We only transfer personal data as described below. We always observe great caution when transferring your personal data and your personal data is only transferred in accordance with this privacy policy and after taking appropriate security measures.

- **Partners outside the group of companies to which the ACG GROUP belongs:** Our partners, i.e. companies outside the group of companies that the ACG GROUP belongs to and which

are approved by the ACG GROUP, may have access to your personal data for the purpose of providing you with access to targeted information and offers about products and services.

- **Business transactions:** If all or part of the ACG GROUP's operations are sold or integrated with any other business, operation or company, your personal data may be disclosed to our advisors, potential buyers and their advisors, and be transferred to the new owners of the operation.
- **Legal obligations:** Your personal data may also be disclosed for the purpose of the ACG GROUP's compliance with certain legal obligations and it may be transferred to the police and other relevant public authorities when permitted and required by law.

The type of transfers mentioned above may only be carried out to companies within the EU or EEA (i.e. all EU member states and Iceland, Norway, Lichtenstein and Switzerland). We do not process personal data outside the EU and the EEA. However, our customers may transfer personal data to countries outside the EU and the EEA by using the ACG GROUP's system. In such cases the customer is the personal data controller.

Withdrawal of consent

In the event that we process your personal data based on your consent, e.g. regarding mailing of marketing material and newsletters, you may withdraw your consent at any time. Such withdrawal may be made in whole or in part. If you do not wish to receive marketing and special offers from us, please contact the CFO at the company in the ACG GROUP where you are registered.

If you withdraw your consent with respect to the use or disclosure of your personal data for other purposes stated in this privacy policy, we may no longer be able to continue to give you access to our websites or provide customer service or other services offered to our users and permitted under this privacy policy.

Your rights

You have the right to request information about the personal data concerning you that we process and how it is being used by contacting us in writing (see contact details below).

You can change your personal details at any time in your account settings online, if you have an account on any of our websites, or by contacting customer service (contact details below). You are also entitled to request correction of your personal data if it is incorrect, incomplete or ambiguous by contacting customer service. For the protection of your privacy and your personal data, we may require that you identify yourself in connection with our assistance.

According to applicable data protection laws, you also have the right to request that your personal data be erased or that processing of your personal data be restricted. In certain situations you also have the right to opt out of the processing of your personal data and request that your personal data be transmitted in an electronic format.

You may file a complaint with the Swedish Data Protection Authority (Datainspektionen) if you believe that the ACG GROUP is not processing your personal data in compliance with applicable laws.

About cookies

Social media features

Our websites have social media sharing features, such as Facebook's *like* button, and other widgets such as the *share* button or interactive mini-programs. These features may register your IP address and the pages you visit on our sites.

For some features the use of cookies is necessary for them to work properly. Social media features and widgets are either hosted by a third party or directly on our own website.

This privacy policy does not apply to the features provided by third parties. Your interactions with these features are governed by the privacy policy and other policies of the companies that provide them to us.

Navigation information

Cookies

We use cookies to personalise your experience. A cookie is a text file that is placed on your hard disk by a web server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by the web server in the domain that issued it. A cookie is a convenience feature and its primary purpose is to save you time by telling the web server that you have returned to a specific page on the website. For example, if you enter personal settings on our websites or choose to subscribe to updates, the cookie helps us to remember your settings the next time that you visit the website. The information you provided last time is found so you can easily use the features customised to your requirements.

You can choose to accept or reject storage of cookies. Most browsers automatically accept cookies, but you can change the settings so you do not accept storage of cookies if you prefer.

If you choose not to accept cookies, you may not be able to use all interactive features.

Logged files

We may collect demographic information, such as your post/zip code, age, gender, preferences and interests by using log files that are not associated with your name or other personal data. We also gather information regarding your computer's hardware and software. This type of information includes IP address, type of browser, domain name, ISP, files you looked at when you visited our website (e.g. HTML pages, images, etc.), operating system, clickstream data, access times, and link references. HubSpot uses this information to be able to run and maintain the quality of the subscription service and to obtain general statistics about how HubSpot's website is used. For these purposes we link this automatically collected information to personal data such as name, e-mail address, address and telephone number.

Changes to the privacy policy

Please note that the terms and conditions of the privacy policy may be changed or amended. Any new version will be published on the ACG GROUP's websites. Consequently, you should review these terms and conditions regularly to ensure that you are satisfied with the changes. If material changes are made, however, we will notify you of such changes by e-mail, if you have provided your e-mail address. If the changes concern processing of personal data that we carry out based on your consent, you will have the opportunity to consent to processing once again.

Contact us

If you have any questions related to this privacy policy, if you suspect a breach of this privacy policy, or if you would like to contact us for any reason stated in this privacy policy, please use the contact details provided below to contact our customer service.

ACG GRUPPEN AB

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