

Effective date: May 20, 2018

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1 Scope and Purpose

This policy is applicable to the Processing of customers' Personal Data at Sectyne AB and Sectyne LLC ("our", "us" or "we"). The purpose of this policy is to provide our current, former and potential customers (jointly referred to as "customers" or "you") with a general understanding of:

- The circumstances under which we collect and process your Personal Data
- The types of Personal Data we collect
- The reasons for collecting your Personal Data
- How we handle your Personal Data
- Distribution of responsibility for the Processing of Personal Data between various legal entities at Sectyne, and
- Contact details for us so you can receive information about and claim your rights in relation to our processing of your Personal Data.

This policy is updated continuously to reflect the measures taken by Sectyne in relation to your Personal Data.

2 Controller

Sectyne AB (a Swedish legal entity with corporate registration number 559153-0927) is the Controller in relation to Processing of your Personal Data for global services offered to customers.

3 Principles of Data Processing

The Processing of your Personal data forms an important part of our provision of products and services to you. We appreciate the trust you place in us when providing us with your Personal data and consider your privacy an essential part of the services we offer. In order to safeguard your Personal Data while increasing the customer value, we adhere to the following five general principles.

3.1 Freedom of Choice

Your Personal Data belongs to you. We strive not to make any assumptions regarding your privacy preferences and aim to design our services so that you can choose whether or not to share your Personal Data with us.

3.2 Balance of Interests

Where the Processing of your Personal Data is necessary for the pursuit of a legitimate interest, and where this interest outweighs the need to protect your privacy, we may

process certain Personal Data without obtaining your consent if so permitted by law. In certain other situations, we may also process your Personal Data without your consent if so is required in accordance with applicable law.

3.3 Proportionality

Sectyne will only process our customers' Personal Data if it is adequate, relevant and necessary in relation to the purpose for which it has been gathered. We aim to anonymize your Personal Data when a function or service can be achieved with anonymized data. If we combine anonymized or non-Personal Data with your Personal Data, it will be treated as Personal Data for as long as it remains combined.

3.4 Transparency and Security

Sectyne believes in being transparent about which Personal Data we process and for which purposes. To us it is also vital to protect your Personal Data since trust and security is the very life nerve of Sectyne. On request, Sectyne will provide customers with further information regarding our Processing and protection of your Personal Data.

3.5 Legal Compliance

It is Sectyne policy to comply with the applicable laws, rules and regulations governing privacy and data protection in each and every country where we operate. Where necessary, we will adjust our Processing of your Personal Data as described in this policy to ensure legal compliance.

The Personal Data which Sectyne collects about you will be used:

- to provide you with products and services, including to verify your eligibility for certain purchases and services;
- to inform you of updates to, or changes in, our products and services, including but not limited to changes to our terms and conditions and policies;
- to inform you of new products, services and events;
- to evaluate and improve our offering to, and communication with customers;
- to comply with legal requirements or lawful authority requests;
- to inform you about our products and services and identify those that may be of interest to you;
- to carry out market research; and
- for analysis and customer profiling purposes (online and social included) done by ourselves and our chosen suppliers.

4 Data Collection

You may provide us with information about you when utilising Sectyne' services or in other contacts with Sectyne, for example through our website or email.

- your contact information (name, address, telephone number, email address, etc.);
- demographic information (age, marital status, etc.);
- location data generated by your activities (search queries, location sharing, etc.); and

We are particularly careful and apply additional measures if and when collecting and Processing Sensitive Personal Data, as required by applicable law. For avoidance of doubt, it is noted that applicable law may require other kind of data to also be treated as Sensitive Personal Data.

5 Notice

Where reasonably practical or as required by applicable law, we will, in connection to collecting or registering your Personal data, provide you with:

- (1) specific information as to the purposes of the Processing of your Personal Data,
- (2) the identity of the Controller,
- (3) the identities of any third parties to whom the data may be disclosed and
- (4) other information which may be necessary to ensure that you are able to safeguard your rights. The above information may, for example, be provided through an agreement which you enter into with Sectyne.

6 Consent

Where reasonably practical or as required by applicable law, we will obtain your consent prior to collecting or using your Personal Data. The request for your consent will be clear and specific and provide you with a reasonable basis with which to make your decision. We will never take your consent for granted. Instead, we will make sure that you can consent in a clear and transparent manner. Your consent is voluntary and may always be revoked, for example by terminating a particular service or contacting Sectyne at the address indicated in the "Information and access" section below. If you do not give your consent, it may not be possible to use services or parts of services.

7 International Transfers

Sectyne may transfer your Personal Data to recipients in countries outside of the European Economic Area which may have differing data protection laws. This includes countries which the EU Commission does not consider to have an adequate level of

protection for Personal Data. If this occurs Sectyne will ensure there is a legal ground for the transfer in accordance with applicable data protection legislation. You will also be informed about the legal ground, what safeguards were implemented, and where you can obtain a copy of information on these safeguards.

8 Data Use

For most Processing acts, you are able to terminate our use of your Personal Data, terminating a particular service, revoking your consent to the Processing by contacting Sectyne at the address indicated in the "Information and access" section below or as otherwise instructed by us. However, and unless otherwise follows from applicable law, you may generally not opt out of the Processing of your Personal Data which we perform in order to comply with our legal obligations.

9 Retention

We will only retain your Personal Data for as long as it is necessary to fulfil the purposes outlined in this policy or the purposes of which you have otherwise been informed. This means that when you have consented to our Processing of your Personal Data, we will retain the data for as long as the customer relationship lasts or until you withdraw your consent. If you have revoked your consent, we may nevertheless retain certain Personal Data for the period required in order for us to meet our legal obligations and defend ourselves in legal disputes. If we have not received your consent for Processing, the Personal Data will only be retained to the extent we are permitted to do so by law.

10 Data Quality

When we process your Personal Data, we strive to ensure that it is correct and up to date. We attempt to delete or correct Personal Data that is incorrect or incomplete. For more information regarding your right to ensure the accuracy of your Personal Data held by us, please see the "Information and access" section below.

11 Information and Access

As stated in the "Notice" section above, we may provide you with specific information concerning our Processing of your Personal Data when collecting or registering such data. You have the right to request (1) a copy of the Personal Data that we store about you, (2) that we correct or remove Personal Data that you think is inaccurate, and (3) to have your Personal Data deleted and to have our processing of your Personal Data restricted in certain circumstances. In addition, you have the right to object to our

processing of your Personal Data as well as to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and to have these transmitted to another Controller.

Requests should be sent to the legal entity stipulated in the end of this document. Your requests will be dealt with in a prompt and proper manner. Where the applicable law provides for an administrative fee for complying with your request(s), such a fee may be charged by Sectyne.

12 Security

Sectyne has taken technical and organizational measures in order to protect your Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access and any other unlawful forms of Processing.

13 Disclosures to Third Parties

Sectyne may share your Personal Data:

- among Sectyne units;
- with other business partners for the purpose of distributing product and service offers and other communications to you or for research and development purposes;
- in connection with the sale or transfer of a Sectyne entity or its assets;
- as required by law, for example in connection with a government inquiry, dispute or other legal process or request;
- when we, in good faith, believe that disclosure is necessary in order to protect our rights, for example in order to investigate potential violations of our terms and conditions or to detect, prevent or disclose fraud or other security issues
- with our product and service providers who work on our behalf in connection with the above uses, such as wireless service providers, companies that host or operate our website, send communications, perform data analytics or system providers necessary to process, store, or manage financial information; and a Sectyne entity being the Controller of your Personal Data will, as a general rule, only disclose your Personal Data to a third party if it has received your consent to do so. However, if permitted by law we may share your Personal Data without your consent, unless we consider your consent necessary in the individual case or your consent is required by law, in the following situations:
 - when disclosure is required by law; and
 - when disclosure is necessary for the purpose of a legitimate interest pursued by Sectyne (for example in order to protect our legal rights, as described above).

14 Data Processing on Our Behalf

We restrict access to your Personal Data to Sectyne' employees and suppliers who need to use the information in order to process it on our behalf, and who are contractually required to keep your Personal Data secure and confidential. We aim to choose the option for Processing services that best safeguards the integrity of your Personal Data towards any third party. Some of these processing activities might be performed outside of the EEA under a specific legal basis as required by national law.

15 Marketing

We will not sell or trade your Personal Data with third parties unless we have your consent to do so. We will not share your Personal Data with third parties for their marketing purposes, unless we have received your consent for such disclosures. If you have provided such consent but wish to stop receiving marketing materials from a third party, please contact that third party directly. We may provide you with information regarding new products, services, events or similar marketing activities. If you wish to unsubscribe to a particular e-mail newsletter or similar communication, please follow the instructions in the relevant communication.

16 Website and Cookies

In general, we may also collect (by means of cookies) anonymous information on how you have used our website prior to such recording. This information will be helpful to us in order to improve our websites or marketing. The Sectyne website open the public include information concerning our use of cookies.

We use Google Analytics. It provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use HTTP Cookies to "remember" what a user has done on previous pages / interactions with the website.

17 Children

Our services are not intended for use by children. We do not knowingly solicit or collect any Personal Data about children under the age of 13 nor market our products or services to them. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 13, please contact us. If we learn that we have inadvertently collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, we will take steps to

delete the information as soon as possible.

18 Monitoring

For Security, we monitor our systems. This means that we collect data from these systems (logs).

19 Definitions

Sectyne makes use of the below listed definitions in this policy:

- **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data;
- **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Sensitive Personal Data** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

20 Lodging of Complaint to Supervisory Authority

Lodging of complaint to supervisory authority If you are of the opinion that we are processing your personal data in violation of data protection laws and regulations you have the right to lodge a complaint with your supervisory authority.

21 Contact Information

For concerns and requests regarding Data Privacy at Sectyne:
gdpr@sectyne.se

Sectyne AB
Att: Security function
Tillgängligheten 3
SE-417 01 Göteborg
Sweden