

## **INTEGRITY POLICY FOR CUSTOMERS AND SUPPLIERS CONTACT PERSONS**

### **Introduction and summary**

Axess Logistics \* (in this policy designated "we") is concerned for your integrity and privacy. It is obvious that we must always endeavour to protect your personal data in the best possible way. Personal data are any type of information and data relating to you, e.g your name, telephone number and e-mail address.

In this policy document, we want to inform you about how we process personal data that we have registered about you as a contact person for one of our existing or potential customers, or in the capacity being our contact person at one of our suppliers. When we use the term "your company" below, we mean your employer or the company you represent.

We process your personal data for the following general purposes:

- Manage the relationship with your company;
- Manage our PDI (Pre Delivery Inspections) customer portal;
- Manage our Transport customer portal;
- Analyze the use of our web sites;
- Evaluate the customer experience with us;
- Submit offers and news releases;
- Contact potential customers; and
- Be compliant with legal requirements and government decisions.

We try to be as clear as possible in how we process your personal data. In the table below the heading "*Detailed description of how we process your personal data*", you can read further details about how we process your personal data.

You have a number of rights in accordance with legislation in effect, among which the right to oppose, at any time, the use of your personal details for marketing purposes. Under "*Your rights*" below, you can read about your rights in greater detail

### **Responsible for your personal data**

Axess Logistics at Turbingatan 8, Kattegatthamnen, S-302 50 Halmstad, with the telephone number +46 35 17 62 00, is responsible for processing your personal data. Below, you can read about the rights you have, e.g. the right to oppose any use of personal data for marketing purposes.

If you have any questions about the processing of your personal data or if you want to contact us in order to exercise your rights, you are welcome to do so by telephone on +46 35 17 62 00 or by e-mail [gdpr@axesslogistics.com](mailto:gdpr@axesslogistics.com).

### **From whom do we collect your personal data?**

We collect your personal data directly from you or your company, e.g. in connection with your registration as their contact person to Axess or as your company's user of our customer portal.

In some cases, we may have received your contact data from other companies in Axess Logistics\* or from other partners, e.g. our partners who processes credit references. We may also have received your data from the Authorities (NO: Statens vegvesen, SE: Trafikverket etc), from who we get VINs (vehicle identification numbers) and car registration data, which can include personal data about you.

In order for you to receive our services or supply your services to us, we need to process certain personal data about you as representative for our customer or supplier. We are not able to comply with legislation or fulfill our agreements if you do not share such personal data that are necessary to comply with legislation or fulfill the agreement that we have with your company. This applies agreements that regulate transport, storage, PDIs or our other services.

If you when visiting our web sites has accepted, we will also use information that Google has register on you from earlier. This is how the Googles own analytic services work.

### **Whom will get access to your personal data?**

When it is necessary to fulfill an agreement with your company or to comply with legislation or decisions made by the authorities, we share your personal data with other companies in the Axess Logistics\* or public authorities.

We share your personal data with our external service providers processing order flows or newsletter mailings for us, as our data processor. We also share your personal data with our IT-service providers which provide IT support for those systems we have stored your personal details in, and with consultants we contract to perform work on our behalf.

Those companies and persons that we share your personal data with process your personal data only for our assigned mission and only have access to those data needed to fulfill their contractual obligations to us.

If you when visiting our web sites gave your consent, we will use Google to make analyzes to learn how the sites work, and Google will have access to your personal data.

### **Processing of your personal data outside EU/EEC**

We and our suppliers and partners process your personal data only inside the EU/EEC. However, when you visit our web sites and portals you risk that your personal data will be stored in the USA when you gave consent to our use of Google in order to improve the web sites. Google has their servers in the USA. As far as possible we have made your personal data anonymous in order for them not to be processed outside EU/EEC.

Google use standard contractual clauses when transferring personal data outside EU/EEC. When transferring Google has taken several measures in order to protect your personal data similiar to the level of protection within the EU/EEC.

The standard contractual clauses have been decided on by the EU commision and can be used by companies to ensure protection when transferring outside the EU/EEC.

If you need further information on how your personal data is processed outside the EU/EEC, you are welcome to contact us. Your will find our contact information in this document.

### **Your rights**

In accordance with data protection legislation, you have certain rights that you can use in order to influence how we process your personal data. Please read the following.

#### Right to withdraw your consent and to oppose against processing

You have the right to *withdraw* all or part of *granted consent* for processing of your personal data. The withdrawal of your consent comes into effect after the withdrawal took place.

You have the right to *oppose processing of your personal data*. You always have the right to *oppose* processing of your personal data for *marketing purposes*, such as our newsletters.

In some matters there are not possible to oppose against processing your personal data (e.g. when we are imposed to store your personal data). You have the right to oppose, at any time, processing of your personal data *based on a balancing of interests*. Read more about what this implies below. This does not apply however if we can demonstrate justified reasons outweighing your interests, rights and freedom or if such processing occurs for the establishment, exercise or protection of legal claims.

#### Right of access

You have the right to *get a confirmation* if your personal data are processed by us. You have the right to *get access* to your personal data and *a copy* of the personal data that are processed by us.

#### Right to have corrections made

You have the right to have corrections made if your personal data is incorrect and you have the right to ask for *incomplete personal data to be completed*.

#### Right of erasure (right to be forgotten) and limitation of processing

You have in certain circumstances the right to request *erasure of your personal data*. Such circumstances exists if, e.g. personal data are no longer necessary for the purposes for which they were collected or processed, or if you withdraw your consent on which processing is based and there are no other legal grounds for processing.

You also have the right to request us to *limit our processing* of your personal data. Such circumstances exist if you, e.g. dispute the correctness of the data or if processing is illegal but you object to erasure your personal data, requesting instead limitation of the processing of data.

#### Right to submit a complaint to a supervisory authority

You always have the right to submit a *complaint to a competent supervisory authority*. Such a complaint shall be submitted preferably to the authority of the EU/EEC member state where you normally reside and/or work, or where a breach of effective legislation and regulations for data protection is claimed to have occurred. The competent supervisory authority in Norway is Datatilsynet, in Sweden Integritetsskyddsmyndigheten and in Denmark Datatilsynet. This right does not exclude any other administrative review procedure or legal remedy.

#### Right of data portability

You have the right request us to *transfer certain of your personal data* to another company (data portability).

The right applies to personal data you have submitted to us in a structured, commonly known and in machine-readable format if:

- processing is based on your consent or on the agreement; and
- processing is automated.

You have the right of direct transfer of personal data from us to another data controller when this is technically possible.

#### **Detailed description of how we process your personal data:**

In the table below, we describe in detail why we process your personal data, which data we process, which legal grounds processing is based on, and for how long we process your personal data. Legal grounds are the supporting arguments that we dispose of, in conformity with data protection legislation (GDPR), to be able to process your personal data legally.

<b>Manage the relationship with your company</b>			
For what purposes are we processing your personal data?	What personal data do we process?	What are the legal reasons for processing?	For how long do we keep processing your personal data for this purpose?
In order to negotiate and enter into an agreement between us and your company, e.g. a customer agreement or cooperation agreement for transport of vehicles.	Your name, your contact information and your position.	Our legitimate interest to process your personal data is to negotiate and make an agreement with your company.	The data is saved until the negotiation is complete or an agreement has been entered into.
To communicate with your company in order to be able to place an order, deliver a vehicle or pay/charge.	Your name, your contact information and your position.	Our legitimate interest in contacting your company in order to fulfill our obligations under the agreements we have on services with your company.	The data is saved for the duration of the agreement with your company, or for a shorter time, if your company informs us that you will no longer be the company's contact person.
To notify you, representing one of our customers, with the status of your vehicle transport.	Your name and your contact information.	Your consent.	The data are saved only until you unsubscribe from our notification service, or until your company requests us to stop sending you notifications.
In order to manage order flows, e.g by processing quotes and orders in our customer portal for PDIs, or to communicate maintenance schedules, where you represent your company and for the purpose of fulfilling our agreement with your company	Your name, your contact information, VIN number and registration number.	Our legitimate interest in contacting your company, in order to communicate with your company.	The information is saved for the duration of the agreement with your company, or for a shorter time, if your company informs you that you will no longer be the company's contact person.

To manage and respond to your contact enquiries by telephone or those submitted via our "Contact Us" form on our web site.	Your name, your contact information, and any personal information you provide in the free text field.	Is necessary to fulfill our agreement with you.	The information is processed from the time your company sends the contact request, until we have answered your request inquiry.
In order to process complaints you have made via our complaint form on our website.	Your name, your contact information, VIN number and any personal information you provide in the free text field.	Our legitimate interest is handling complaints you have submitted from your company, as well as handling any legal claims in connection with complaint.	The information is not stored for a longer period than is necessary to process your complaint and / or handle any legal claims in connection with the complaint.

<b>Manage our PDI (Pre Delivery Inspections) Customer Portal</b>			
For what purposes are we processing your personal data?	What personal data do we process?	What are the legal reasons for processing?	For how long do we keep processing your personal data for this purpose?
In order to create user accounts and login access to our customer portal for PDI as well as to administrate the customer portal.	Your name, your contact information.	Our legitimate interest in being able to fulfill our obligations under the agreement we have with your company on our customer portal.	The data are saved as long as you have an account with us, or maximum two years if you have been passive or your company ceases being customer with us.

<b>Analyze the use of our web sites</b>			
For what purposes are we processing your personal data?	What personal data do we process?	What are the legal reasons for processing?	For how long do we keep processing your personal data for this purpose?
<p>In order to analyze how our web sites are used, we have cookies from Google.</p> <p>We implement improvements on the web sites based on the information we receive from these analyzes.</p>	<p>Your encrypted IP-address and other unit information and information on how you use our web sites, ie. what you click at.</p> <p>Also Google may use information they have.</p>	<p>Our legitimate interest is analyzing how our web sites are used and improve the sites based on such analyzes.</p>	<p>We erase your personal data 3 months after your visit.</p> <p>Google will still use your personal data as independent responsible. How long they save your personal data, is described in their integrity policy.</p>

<b>Submit offers and newsletters</b>			
For what purposes are we processing your personal data?	What personal data do we process?	What are the legal reasons for processing?	For how long do we keep processing your personal data for this purpose?
<p>To submit relevant offers and/or information on news in our business to your company</p>	<p>Your name and contact information, as well as your position.</p> <p>When we send newsletters to you, we get information as to whether the newsletter has reached you, if it has been opened, how many times you have read the mailing, as well as how many times you have clicked on links in the mailing.</p>	<p>It is our legitimate interest to contact you for sending newsletters and for other marketing.</p> <p>If you gave consent to receive our newsletters, the consent is our legal reason for processing.</p>	<p>When our processing of your personal data is based on our legitimate interest to send you marketing material, we save your personal data for one year after our relationship with your company has ceased.</p> <p>If you have consented to get our newsletters, we process your data until you unsubscribe, or until you or your company requests us to stop sending you marketing material.</p>

<b>Contacting potential customers</b>			
For what purposes are we processing your personal data?	What personal data do we process?	What are the legal reasons for processing?	For how long do we keep processing your personal data for this purpose?

In order to contact and communicate with your company, which we consider as a potential, future partner or customer, as well as for similar sales or marketing purposes.	Name, contact information and position.	Our legitimate interest to contact your company, which we think may be interested in our services or in a partnership with us.	The data are saved until they have been used for the purpose for which they were collected. If you want your data to be erased before then, please send an e-mail to <a href="mailto:gdpr@axesslogistics.com">gdpr@axesslogistics.com</a> , in which case we will erase your data within 30 days.
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<b>Compliance with legislation and decisions made by the authorities</b>			
For what purposes are we processing your personal data?	What personal data do we process?	What are the legal reasons for processing?	For how long do we keep processing your personal data for this purpose?
In order to comply with accounting law/legislation.	History of completed payments, transactions and similar that constitute accounting records.	Processing is such as necessary in order to comply with statutory laws, i.e. accounting law.	The data are saved for the period of time during which we are required to save such data as per accounting law in effect, i.e. for ten years (NO) or seven years (SE).
In order to comply with legislation and decisions by authorities concerning customs as well as the handling of hazardous waste.	Your name, your contact information, VIN number and registration number.	Processing is such as necessary in order to comply with statutory laws and/or decisions by authorities.	The data are saved for the period of time during which we are required to save such data as per laws or decisions by authorities in effect, i.e. for five years for customs requirements and for the current year plus three years for the handling of hazardous waste.

**How did we balance our interests when legal reasons are our legitimate interest?**

For certain purposes, we process your personal data based on balancing of interests as legal grounds for processing. In this balancing of interests, we have concluded that our legitimate interest to perform processing outweighs your interest and your basic rights not to have your personal data processed. The table above shows what constitutes our legitimate interest. If you want to learn more about how we have balanced everyone’s interests, please contact us. You will find our contact information below.

*\* By Axess Logistics we mean the companies that are part of the Group and which are listed in the table below. Companies can be contacted by e-mail to «gdpr@axesslogistics.com» or telephone to the head office on +46 35 17 62 00:*

Company	Country	Org.no
Axess Logistics AB	Sweden	556430-0720
Axess Logistics Sweden AB	Sweden	556548-9696
Svensk Autotransport AB	Sweden	556174-5190
Axess Logistics A/S,	Denmark	30515331
Axess Logistics AS	Norway	917722773
Autologistikk AS	Norway	994819348
Nordic Car Logistics AB	Sweden	559036-9269

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