

# Privacy Policy for website visitors

Grundia AB corporate identity number 556802-3401

Established	24/08/2021 by the management group of Grundia
Owner	IT-responsible
Contents	Privacy Policy
Purpose	This Privacy Policy covers Grundia's processing of personal data regarding visitors to Grundia's website. It also includes our processing, of which is performed when you as a customer or supplier, or representative of a customer or supplier, purchase our services or provide services to us. It also includes any owner, insider or restricted employee of the company.
Target group	The Privacy Policy applies to all website visitors, suppliers, customers or customer representatives, as well as insiders and owners.
Deviations from this policy are reported to	the IT-responsible, who in turn is responsible for reporting serious deviations to the CEO.
Follow-up	The policy is evaluated annually by the board, and otherwise where necessary (e.g., when introducing new regulations)

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# Grundia AB's Privacy Policy

## Introduction

We, Grundia AB with corporate identity number 556802-3401 ("Grundia AB") are responsible for the processing of your personal data. All references in this Privacy Policy to "we", "us" and "our" shall be considered to be a reference to Grundia AB. You will find our contact details at the end of this Privacy Policy.

We respect your privacy and care about protecting your personal data.

## Scope of the Privacy Policy

This Privacy Policy covers Grundia AB's processing of personal data regarding visitors to Grundia AB's website <https://grundia.se>. The Privacy Policy also includes our processing that is performed when you as a customer or supplier, or representative of a customer or supplier, buy our services or provide services to us and for anyone registered in our insider and associate registers and/or appearing in our share books. This Privacy Policy contains, among other things, information about the purposes for which we process personal data, who we share your data with and what rights you have in relation to your personal data.

For more information about how we manage cookies, please read our cookie policy <https://www.grundia.se/privacypolicys/>

## What categories of personal data do we process, for what purpose and what is our legal basis for processing personal data?

Grundia AB processes personal data in the manner and for the purposes described in the tables below.

For each purpose, Grundia AB must have a legal basis for this processing. A legal basis can, e.g., be (i) your consent to the specific treatment; (ii) that the processing is necessary to fulfill an agreement where you are a party to the agreement, or (iii) by balancing interests where Grundia AB or a third party has a legitimate interest that outweighs your interest in your personal data not being processed. The tables below show Grundia AB's legal basis for processing for each purpose and for how long we will retain your personal data.

Purpose	Processing performed	Categories of personal data
<p>To maintain and improve our website's functions, the user experience and our work to detect and counter errors, intrusions and incidents.</p>	<ul style="list-style-type: none"> <li>This is done with the support of analysis services from third parties. The statistics we compile and the analyzes we carry out with the support of these services are made using data in an aggregated form and with the support of deidentified or anonymized data.</li> <li>Collection of statistics on and analysis of visitor traffic on our website and other technical information generated during visits to our website.</li> </ul>	<ul style="list-style-type: none"> <li>IP address,</li> <li>Other technical information generated during visits to our website, such as the type of technical device you used, browsers, pages visited and times of the visits (browser information, time zone from the place where you visited our website and other web traffic information).</li> </ul>
<p>Legal basis: Balance of interests, where our legitimate interest is to gather data to maintain and improve the functionality, content and security of our website. The collection of information using cookies and similar technologies takes place with the support of your consent, with the exception of such use which is strictly necessary for you to be able to use our website in an appropriate manner. For more information about how we use cookies and other similar technologies, see our cookie policy <a href="https://www.grundia.se/privacypolicys/">https://www.grundia.se/privacypolicys/</a></p>		
<p>Storage period: We process and store information about how visitors interact with our website for a maximum of six (6) months. In most cases, however, the collected personal data is converted into aggregated data (anonymized) at an earlier stage in connection with our production of statistics.</p>		

Purpose	Processing performed	Categories of personal data
<p>To create a business relationship with you or the company you represent.</p>	<ul style="list-style-type: none"> <li>This includes, i.a., communication via email about our business, our services and our ongoing activities.</li> </ul>	<ul style="list-style-type: none"> <li>First and last name(s),</li> <li>Contact details such as email address, telephone number, place of residence and address,</li> <li>Professional title and information about the company you represent,</li> <li>Information that you otherwise provide us in</li> </ul>

		connection with us communicating with you.
<p>Legal basis: Balance of interests, where our legitimate interest is to create a business relationship with you or the company you represent.</p>		
<p>Storage period: We process and store your personal data for a period of six (6) months after the data was collected. However, if a business relationship is established between us and you or the company you represent during the said time period, your personal data will continue to be processed in accordance with the purposes set out below.</p>		

Purpose	Processing performed	Categories of personal data
<p><b>To maintain and develop our business relationship with you or the company you represent.</b></p>	<ul style="list-style-type: none"> <li>• Contact and communication with you as a contact person for one of our existing customers, partners, suppliers or business contacts in general.</li> <li>• Administration of and communication about our customer, partner and supplier agreements as well as communication via email about our business, our services and our ongoing activities.</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name(s),</li> <li>• Contact details such as email address, telephone number, place of residence and address,</li> <li>• Professional title and information about the company you represent,</li> <li>• Any information that you provide us in connection with us communicating with you.</li> </ul>
<p>Legal basis: Balance of interests, where our legitimate interest is to maintain and develop a business relationship with you or the company you represent.</p>		
<p>Storage period: We process and store your personal data as long as we have a business relationship with you or the company you represent, however, for a maximum of two (2) years from the time we were last in contact with each other due to our business relationship.</p> <p>However, we may need to save data for a longer period of time for other purposes, e.g., if it turns out that we need to take action to be able to establish, assert or defend legal claims. We will also need to save data for a longer period of time to fulfill legal obligations, for example, current accounting according to the Accounting Act.</p>		

Purpose	Processing performed	Categories of personal data
<p><b>To enter into or fulfill agreements between us and you or the company you represent.</b></p>	<ul style="list-style-type: none"> <li>• Administration and communication to enter into or fulfill agreements between you or the company you represent.</li> <li>• This includes, i.a., invoicing and customary handling, follow-up and documentation of contract-related issues.</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name(s),</li> <li>• Contact details such as email address, telephone number, place of residence and address,</li> <li>• Professional title and information about the company you represent,</li> <li>• The information you provide to us in contractual matters, e.g., questions about or views on agreed services.</li> </ul>
<p>Legal basis: The processing is necessary for us to be able to enter into and fulfill agreements with you or the company you represent. If you act on behalf of someone else, e.g., as a representative of a customer, partner or supplier to us, our processing takes place with the support of a balance of interests, where our legitimate interest is to be able to enter into or fulfill the agreement with the company you represent.</p>		
<p>Storage period: We process and store your personal data as long as we have a business relationship with you or the company you represent, however, for a maximum of two (2) years from the time we were last in contact with each other due to our business relationship.</p> <p>However, we may need to save data for a longer period of time for other purposes, e.g., if it turns out that we need to take action to be able to establish, assert or defend legal claims. We will also need to save data for a longer period of time to fulfill legal obligations, for example, current accounting according to the Accounting Act.</p>		

Purpose	Processing performed	Categories of personal data
<p><b>That you and the company you represent get access to our web portal for suppliers to facilitate communication and administration.</b></p>	<ul style="list-style-type: none"> <li>• Storage and use of login information and invoicing information.</li> <li>• Administration and communication to enter into or fulfill and administer agreements between</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name(s),</li> <li>• Contact information such as email address,</li> <li>• Professional title and information about the company you represent,</li> <li>• Username and password,</li> <li>• Any information you provide to us in contractual matters.</li> </ul>

	Grundia AB and you or the company you represent.	
<p>Legal basis:</p> <p>The processing is necessary for us to be able to provide our web portal to you, which is part of entering into, fulfilling and administering agreements with you or the company you represent. If you are acting on behalf of someone else, e.g., as a representative of a supplier to us, our processing is based on a balance of interests, where our legitimate interest is to be able to enter into, fulfill or administer the agreement with the company you represent.</p>		
<p>Storage period:</p> <p>We process and store your personal data as long as we have a business relationship with you or the company you represent, however, for a maximum of two (2) years from the time we were last in contact with each other due to our business relationship.</p> <p>However, we may need to save data for a longer period of time for other purposes, e.g., if it turns out that we need to take action to be able to establish, assert or defend legal claims. We will also need to save data for a longer period of time to fulfill legal obligations, for example, current accounting according to the Accounting Act.</p>		

Purpose	Processing performed	Categories of personal data
<b>To keep a register of restricted employees of Grundia AB to fulfill our legal obligations.</b>	<ul style="list-style-type: none"> <li>Establishment of a list of persons in senior positions and their close relatives who may have special insight into the company's operations.</li> </ul>	<ul style="list-style-type: none"> <li>First and last name(s),</li> <li>Function/role,</li> <li>Email address.</li> </ul>
<p>Legal basis:</p> <p>The processing is necessary for our fulfillment of the legal obligations concerning restricted employees and related parties based on applicable legislation, including the Market Abuse Regulation.</p>		
<p>Storage period:</p> <p>We will store your information during the period we are legally obliged to keep such a register to which the processing relates and you meet the criteria for being classified as a person in a leading position or related to such.</p>		

Purpose	Processing performed	Categories of personal data
To gain access to information about the ownership in Grundia AB.	<ul style="list-style-type: none"> <li>Storage and use of data, reports and analyzes regarding ownership in Grundia AB obtained from Euroclear Sweden AB.</li> </ul>	<ul style="list-style-type: none"> <li>Social security number, name, postal address,</li> <li>Holding of shares and voting rights in the company.</li> </ul>
<p>Legal basis:</p> <p>The processing is necessary for us to be able to fulfill our legal obligations in accordance with applicable legislation, including in accordance with the Swedish Companies Act.</p> <p>We may also process your personal data with the support of a balance of interests, where our legitimate interest is to have access to information about Grundia AB's ownership.</p>		
<p>Storage period:</p> <p>We will store the information we collect as long as you are a shareholder in <b>Grundia AB</b> or as long as it is necessary for the fulfillment of our legal obligations.</p>		

Purpose	Processing performed	Categories of personal data
To keep an insider list of such persons who have access to insider information relating to <b>Grundia AB</b> .	<ul style="list-style-type: none"> <li>Storage of personal data in the logbook for Grundia AB.</li> </ul>	<ul style="list-style-type: none"> <li>First and last name(s),</li> <li>Date of birth,</li> <li>National identification number,</li> <li>Home address,</li> <li>Telephone number,</li> <li>Company name and address,</li> <li>Function and reason why you have access to inside information,</li> <li>Time for receiving inside information.</li> </ul>
<p>Legal basis:</p> <p>The processing is necessary for us to fulfill our legal obligations that follow from applicable legislation regarding the handling of inside information for listed companies.</p>		
<p>Storage period:</p> <p>We store your information in the insider list for 5 years from the time it is established or updated, in accordance with applicable legislation.</p>		

Purpose	Processing performed	Categories of personal data
<p><b>To hold a digital general meeting to fulfill our legal obligations.</b></p>	<ul style="list-style-type: none"> <li>• Manage and send emails with an invitation to a digital general meeting.</li> <li>• Storage of your contact information in connection with, during the preparations for and in the subsequent work with the digital AGM.</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name(s),</li> <li>• Telephone number,</li> <li>• Email address.</li> </ul>

**Legal basis:**

The processing is necessary for us to be able to fulfill our legal obligations in accordance with applicable legislation, including in accordance with the Swedish Companies Act.

We may also process your personal data on the basis of a balance of interests, where our legitimate interest is to hold a digital general meeting due to prevailing circumstances as a result of the spread of COVID-19.

**Storage period:**

We process and save your personal data in connection with the digital general meeting, during the preparations for and in the subsequent work with it, however, for a maximum of two (2) years from the time you were called to a digital general meeting.

However, we may need to save data for a longer period of time for other purposes, e.g., if it turns out that we need to take action to be able to establish, assert or defend legal claims.

Purpose	Processing performed	Categories of personal data
<p><b>Marketing purposes.</b></p>	<ul style="list-style-type: none"> <li>• Administer and send emails.</li> </ul>	<ul style="list-style-type: none"> <li>• Email address,</li> <li>• First and last name(s).</li> </ul>

**Legal basis:**

We only carry out marketing mailings via email to you if you have registered for such mailings and then agreed to receive them.

**Storage period:**

We process and save your personal data to carry out marketing mailings to you by email as long as you have not deregistered (revoked your consent) from receiving further mailings. You can make such deregistration at any time by using the deregistration link included in our mailings.



## Fulfill legal obligations and fulfillment of legal claims

We may process your personal data in order for us to be able to fulfill our legal obligations according to, e.g., law or other statutes to which we are subject or court or governmental decisions that require us to process information about you.

We may also process your personal data so that you or the company you represent, ourselves or the third party concerned, can establish, assert or defend legal claims, for example, in the event of an imminent or ongoing dispute.

## Where do we collect your personal data from?

Grundia AB processes personal data that is collected directly from you, from the company you represent and personal data that is collected via cookies. If you are a shareholder in Grundia AB, we will also collect personal information from the central securities depository Euroclear Sweden AB.

## What happens if you do not provide us with your personal data?

If you choose not to accept cookies, the functionality may be limited on our website.

## With whom do we share your personal data?

In order to fulfill the purposes stated above, Grundia AB will share your personal information with the following recipients.

- (a) Suppliers of analysis tools for our website, and
- (b) IT providers.

## Will we transfer your personal data outside the EU/EEA?

Grundia AB may transfer your personal data to countries outside the EU/EEA. If the European Commission has not decided that a country to which your personal data is transferred has an adequate level of protection for your personal data, we will provide a description of the protection measures taken or the legal basis on which we base the transfer to ensure that your personal data is transferred in accordance with European data protection law. For information on whether we have transferred your personal data to a country outside the EU/EEA, which countries we transferred your personal data to and what security measures have been taken for the transfer, please contact us by sending a written request to the contact details stated at the end of this personal data policy.

## What are your rights?

Below is a summary of the rights you have under European data protection law. It does not cost you to exercise these rights and you can exercise them by contacting us (see the contact information at the end of this Privacy Policy). Do not hesitate to contact us if you have any questions regarding your rights.

Please note that Grundia AB will always make an assessment of a request to exercise a right to determine whether the request is justified. Not all rights listed below are absolute and exceptions may be made.

In addition to the rights listed below, you always have the right to submit a complaint to a supervisory authority regarding Grundia AB's processing of your personal data.

- (a) Right of access. You are entitled to receive a copy of your personal data that Grundia AB processes on request and to receive additional information regarding Grundia AB's processing of your personal data.

- (b) Right to rectification. You have the right to have your personal information corrected and/or supplemented if it is incorrect and/or incomplete.
- (c) Right to deletion of data. You have the right to request that Grundia AB delete your personal data without undue delay in the following situations:
- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
  - you withdraw your consent to the processing and there is no other legal basis for the processing;
  - you make a legitimate objection to the processing of your personal data;
  - Personal data has been processed illegally; or
  - deletion is required to fulfill a legal obligation.
- (d) Right to limitation of processing. You have the right to request a restriction on the processing of your personal data in the following situations:
- the accuracy of the personal data is under investigation;
  - the processing is illegal or no longer necessary for the purposes of the processing, but you oppose the deletion of personal data and instead request a restriction of the processing;
  - Grundia AB no longer needs the personal data, but you need the personal data to establish, exercise or defend legal claims; or
  - you have objected to the processing of your personal data and such objection is under investigation.
- (e) Right to data portability. In certain circumstances, you have the right to receive the personal data that concerns you and that you have provided to Grundia AB to transfer these to another service provider if the processing of the personal data is based on your consent or the performance of an agreement.
- (f) General right to object. You have a general right to, at any time, object to such processing of your personal data that is based on Grundia AB's legitimate interest. If you object, we must show that we have a compelling legitimate reason for such processing or that we need the personal data to establish, exercise or defend legal claims.
- (g) Right to object to direct marketing. You have the right to object at any time to such processing of your personal data that takes place for direct marketing purposes. If you do this, Grundia AB will not continue to process your personal data for such purposes.
- (h) Right to withdraw your consent. If our processing of your personal data is based on your consent, you always have the right to revoke your consent at any time. A revocation of your consent does not affect the legality of the processing that took place based on the consent before it was revoked.

## How can you contact us?

You can get in touch with us as follows:

Grundia AB  
Neogatan 5  
431 53 Mölndal

Phone number: +46 (0) 70 403 17 08

Email: [legal@nordiskbergteknik.se](mailto:legal@nordiskbergteknik.se)