

netmore	ID:QMS-PO0011	Rev:1	Type: Policy	Information security: Internal
	Author: QM		Approver: CISO	Approval date: 2021-09-30

Privacy policy and GDPR

Introduction

Netmore Group AB (including all subsidiaries) is responsible for the processing of personal data that takes place within the company and its subsidiaries. Netmore Group AB protects personal privacy and always processes personal data with a high level of protection. Processing of personal data takes place in accordance with current personal data legislation, which is the European Parliament's Data Protection Regulation - General Data Protection Regulation "GDPR" (EU) 2016/679.

This document describes which personal data is processed by Netmore Group AB or its subsidiaries about you, for what purposes the processing takes place, and what your rights are in connection with the processing of personal data.

Personal information

The personal data processed is information that you as a customer have given us, these can be, for example, name, social security number, address, telephone number, e-mail address, bank account information, credit checks, organization number, billing information, payment method, delivery addresses, including coordinates, information linked to in your capacity as supplier to Netmore Group and its subsidiaries, for example invoicing information.

Other information that is processed is information that arises during the time you are a customer with us, such as data traffic, logs, IP addresses, IP logs and coordinates.

Purpose

Personal data will be processed by Netmore Group AB or its subsidiaries within the organisation for the following purposes:

- To communicate with you
- To administer and fulfil the agreement between Netmore Group AB or its subsidiaries and the customer
- To enable invoicing
- For support matters
- To fulfil Netmore Group or its subsidiaries legal obligations
- For marketing purposes via e-mail, SMS
- To provide, maintain, test, improve and develop Netmore Group AB products and services

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Legal reason

Your personal data is processed with the legal basis of fulfilling agreement as the processing is necessary to fulfil rights and obligations towards you.

Disclosure of personal data

Netmore Group AB may share your personal information with its subsidiaries within the framework of the purposes stated above. Netmore Group AB and its subsidiaries also hires external suppliers to perform tasks on behalf of Netmore Group AB and its subsidiaries, for example to provide IT services or carry out installations. We may also share your personal information with authorities where we are obliged to do so in accordance with law Act (2003: 389) on electronic communication according to Swedish law. However, we will never store or transfer your data outside of the EU.

Security for the protection of personal data

Netmore Group AB and its subsidiaries protects the privacy of personal data, therefore takes appropriate technical and organizational security measures to protect your personal data from unauthorized access, alteration, or dissemination. These measures may involve encryption or other technical solutions.

Storage period

Personal data is stored as long as it is necessary and as long as there is a legal basis for being able to implement Netmore Group AB and/or its subsidiaries rights and obligations towards you.

Data generated or processed in telephony service and message handling via mobile network connection point are stored for six (6) months and location data must, however, be stored for only two (2) months, ch. 16 d § LEK (2003: 389) according to Swedish law.

Data generated or processed during Internet access is stored for ten (10) months. The information is stored for only six (6) months if the information identifies the equipment where the communication is finally separated from the person liable for storage to the individual subscriber, ch. 16 d § LEK (2003: 389) according to Swedish law.

The storage time is calculated from the day the communication ended.

Rights and complaints

You have the following rights:

- Right of access (register extract) - the right to receive confirmation of and information about your personal data processing
- Right to rectification - the right to have incorrect information corrected
- Right to delete - a right to have the data deleted. However, this right is limited to information that by law may only be processed with your consent if you withdraw consent if you object to the processing.
- Right to limited processing - a right to demand that the processing of personal data be restricted, for example if you oppose the accuracy of data. While the accuracy is being examined, Netmore Group AB's and its subsidiaries access to the information is limited.
- Right to data portability - a right to demand that personal data be transferred from one data controller to another. This right is limited to information that you have provided to us.

Data protection in United Kingdom

For subsidiaries registered and operating in UK The Data Protection Act 2018 - UK General Data Protection Regulation (UK GDPR) applies.

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Contact information for the person responsible for personal data in both EU and UK

If you would like further information on how your personal data is processed or if you wish to exercise your right as above, please contact us at:

gdpr@netmoregroup.com or (+46)73 172 10 00

If you consider that Netmore Group AB or some of its subsidiaries processing your personal data is contrary to the General Data Protection Regulation, you can contact to Swedish Authority for Privacy Protection.

IMY – Swedish Data protection authority: imy@imy.se