

# ADDvise Group Privacy Notice

*Last reviewed:* October 2024.

## 1. INTRODUCTION

In this privacy notice, we describe what personal data about you that we use and why, including your rights under the General Data Protection Regulation (GDPR).

## 2. WHO IS COVERED BY THIS INFORMATION

This privacy notice covers you who:

- **Visit** our website and our digital channels, for example our feeds on social media platforms.
- Represent or are a contact person of a **customer** or **retailer** that we do business with (below referred to as “**customer**”).
- Represent or are a contact person of a **prospective** customer.
- Represent or are a contact person of a **supplier** or a **partner** to us.
- Are a **shareholder** or a **board member** in any of the ADDvise companies.
- **Apply for job** with any of the ADDvise companies, including **referees**.
- Otherwise **interact with us**, for example if you contact us or if you sign up for communication such as our newsletter.

## 3. RESPONSIBILITY FOR THE USE OF YOUR PERSONAL DATA

### Data controller

This privacy notice applies to all ADDvise companies in their respective roles as data controllers.

The ADDvise company that is responsible (data controller) for the processing of your personal data is normally the company:

- Which has a business relationship with the organisation that you represent or are a contract person of.
- Whose website or other digital channel that you are visiting.
- In which you are a shareholder or a board member.
- That you apply for a job with.
- That you otherwise interact or communicate with.

In [Appendix 1](#) to this privacy notice, you find a list with names and contact details of all ADDvise companies that are subject to this privacy notice.

When referring to “**ADDvise Group**”, “**we**”, “**us**” or “**our**”, this means the relevant ADDvise company that is responsible (data controller) for the processing of your personal data.

Where any deviations exist in relation to the processing of your personal data, for example if an ADDvise company carries out certain processing activities which are not covered by or accurately described in this privacy notice, we have highlighted such deviations and made clarifications in [Appendix 2](#) to this privacy notice.

### **Joint controllership with LinkedIn**

If you visit our LinkedIn pages, some of the ADDvise companies may use the tool Page Insights provided by LinkedIn to *inter alia* receive information on how you and other visitors have interacted with our company pages. This in order to analyze the use of our company pages and to develop and improve the content on such pages.

The relevant ADDvise company and LinkedIn are joint controllers for the processing of your personal data in connection with Page Insights. Consequently, we have entered into a [Joint Controller Addendum](#) with LinkedIn to establish our responsibilities and roles with regard to the use of your personal data for which we and LinkedIn act as joint controllers. The processing of your personal data in connection with Page Insights is based on your provided consent (Article 6.1 (a) of the GDPR) by accepting the use of cookies and similar technologies for the same purpose on LinkedIn's website.

Please note that the relevant ADDvise company will not have access to or receive any personal data of you which has generated from Page Insights, i.e. all information received will be on aggregated level which cannot directly or indirectly identify you as an individual.

## **4. FROM WHICH SOURCES WE COLLECT PERSONAL DATA**

The personal data that we collect about you is mainly collected directly from yourself when you provide your personal data to us, for example when you contact or otherwise communicate with us, apply for a job or visit any of our website or other digital channels.

We also collect, where necessary, personal data from other sources as described below.

- **Group companies**, which have collected your personal data and shared them with us, for example in connection with communication,
- **The company or organisation** that you work for,
- **Social network platforms** if you follow or interact with us on social media,
- **Partners** that we collaborate with, for example to carry out events or similar activities,
- **External persons** that we communicate with for the purposes described in this privacy notice.
- **Publicly available sources**, for example social networking platforms or public records if you apply for certain positions with ADDvise Group.
- **Referees**, when carrying out reference checks as a part of the recruitment process.

- **Recruitment agencies** that help us recruit for certain positions.

## 5. FOR WHICH PURPOSES WE USE YOUR PERSONAL DATA

We collect and use personal data for various purposes. The purposes for which we in practice process your personal data may, however, vary, depending on your relationship with us or how you interact with us.

To read more about which personal data, which legal basis that we rely on for the processing of your personal data for each purpose and for how long your personal data is stored in relation to the relevant categories of individuals, please see our [detailed information on our use of personal data](#).

## 6. HOW WE SHARE YOUR PERSONAL DATA

### **Transfer of personal data to other external recipients (controllers)**

We share your personal data with various external recipients, where necessary, for the purposes for which we process your personal data as described in this privacy notice. These recipients are responsible (controllers) for their own processing of your personal data, unless we have stated otherwise.

To read more about for which purposes that we share your personal data and the legal bases for such sharing, please see our [detailed information on our use of personal data](#), where we have outlined in relation to each purpose for processing of personal data the external recipients that we share your personal data with.

### **Transfer of personal data to service providers (processors)**

We also transfer personal data to service providers that we have engaged when necessary for the purposes for which we process personal data as described in this privacy notice.

These service providers provide, for example, IT services, development services and communication services to us. The services providers which process personal data on our behalf and in accordance with our instructions act as data processors in relation to us. These service providers may not process your personal data for their own purposes and are legally and contractually obligated to protect your personal data.

### **Where we process your personal data**

We store, as a main rule, your personal data within the EU/EEA area. However, in certain cases we transfer your personal data to recipients established in third countries outside the EU/EEA, for example to service providers which we engage in such third country.

To ensure an essentially equivalent level of protection for your personal data when transferred (or otherwise made available) to service providers in third countries outside of the EU/EEA which do not provide an adequate level of protection, we normally use the EU Commission's adopted [standard contractual clauses for international transfers](#) according to decision 2021/914 and implement.

We also rely upon adequacy decisions by the EU Commission where personal data is transferred to countries and recipients covered by such decision (i.e. when the EU Commission has decided that such country and/or recipient provides an adequate protection for personal data).

## 7. YOUR RIGHTS

### Rights in relation to the use of your personal data

You have the following rights in relation to your personal data under the GDPR:

- Access to and receive a copy of your personal data (Article 15).
- Rectify or supplement your personal data (Article 16).
- Withdraw your consent to a processing of your personal data (Article 7).
- Delete your personal data (Article 17).
- Object to a processing of your personal data (Article 21).
- Restrict a processing of your personal data (Article 18).
- Obtain a copy of your personal data and have your personal data transferred to an external recipient (data portability) (Article 20).

### Automated individual decision-making

We do not carry out any automated individual decision-making which have legal effects or similar significant effects on you.

### Further information on your rights

Please note that each right above comes with certain caveats and exemptions. This means that these rights only may be successfully exercised in certain situations. For more information on your rights and when they apply, see for example the information provided by the Swedish Authority for Privacy Protection available on their [website](#).

### Exercise your rights

If you wish to exercise your rights at any time, please contact us on the contact details under section 8 “*If you have any questions*” below.

If possible, we would be grateful if you use the e-mail address that you have registered with us or used when you have previously been in contact with us. This would make it easier for us to manage your request.

### Right to lodge a complaint

You have the right to lodge a complaint with your supervisory authority. Contact details to the data protection authorities in the EU/EEA can be found [here](#).

## 8. IF YOU HAVE ANY QUESTIONS

Please contact us if you have any questions about this privacy notice, how we use your personal data or if you wish to exercise your rights.

The contact details to each ADDvise company can be found in Appendix 1 to this privacy notice.

## Detailed information on our use of personal data

### INTRODUCTION

In this detailed information on our use of personal data, we in explain the purposes for which we use personal data, the categories of personal data processed for each purpose, our legal basis for the use, for how long we store personal data and with which external recipients (in their role as controllers) that we share your personal data for each purpose.

Further down, we describe which categories of personal data that we process and examples of the type of personal data that is included in each category.

### DETAILED INFORMATION ON OUR USE OF PERSONAL DATA

#### Visitors of our website and digital channels

*Follow up on and evaluate the use of our website and digital channels*

*What we do:* We process your personal data to better understand how our website and digital channels are used, for example by analysing numbers of visitors and activities on our webpages. This is carried out by using cookies and similar technologies which allow us to analyse visitor and user statistics.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• User generated information</li> <li>• Technical information</li> </ul>	<p><i>Consent (Article 6.1 (a) of the GDPR).</i></p> <p>The processing relies on the consent that you provide by accepting the use of cookies and similar technologies for the same purpose.</p>	

*Storage period:* Personal data is stored during the period stated in our cookie policy available on the website of the relevant ADDvise company.

*Provide marketing and tailored content on our website and in our digital channels*

*What we do:* If you visit our website or digital channels, we collect your personal data by using cookies and similar technologies to provide you with marketing and other tailored content which we believe are of interest to you, for example based on your interactions with our digital channels, including our website (such as browsing behaviour and websites visited).

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• User generated information</li> <li>• Technical information</li> </ul>	<p><i>Consent (Article 6.1 (a) of the GDPR).</i></p> <p>The use of your personal data relies on the consent that you provide by accepting the use of cookies and similar technologies for the same purpose.</p>	<ol style="list-style-type: none"> <li>1. Social media providers</li> </ol>

*Storage period:* Personal data is stored during the period stated in our cookie policy available on the website of the relevant ADDvise company.

## Ensure functionality on our website and in our digital channels

*What we do:* We process your personal data to ensure necessary technical functionality and security on our website and in our digital channels, for example by using strictly necessary cookies and other technologies on these platforms.

Since the cookies and similar technologies are necessary in order to provide our website as intended, your consent to our use of cookies and similar technologies is not needed.

### Categories of personal data:

- Technical information

### Legal basis:

*Legitimate interest (Article 6.1 f) of the GDPR.* The processing of your personal data is necessary to satisfy our legitimate interest of ensuring technical functionality on our website and in our digital channels.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, given the purpose of the processing as such and that only basic personal data is processed for this purpose.

### External recipients:

*Storage period:* Personal data is stored during the period stated in our cookie policy available on the website of the relevant ADDvise company.

## Contact persons of customers

### Manage the business relationship with customers

*What we do:* We process your personal data to manage the customer relationship, for example to communicate with you as a contact person or representative of such organisation, register you as a contact person as well as manage orders and invoices.

### Categories of personal data:

- Communication
- Contact information
- Identity information
- Profile data

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest in managing the business relationship with our customers and thereby fulfil our rights and obligations under relevant contracts.

Our assessment is that this legitimate interest outweighs your interest of not having your personal data processed for this purpose, since we otherwise would not be able to manage the relationship.

### External recipients:

1. Group companies

*Storage period:* Personal data is stored for this purpose as long as there is an active relationship with the customer.

## Follow up on and evaluate sales and campaigns

*What we do:* We process your personal data follow up on and evaluate our sales and campaigns that we carry out, for example to compile statistics of orders and in general to better understand what services and products that are used by our customers. This in order for us to obtain a better understanding and insight in our customers' behaviours and patterns, to allow us to develop and improve our business and ADDvise Group for the benefit of our customers.

We do not carry out any profiling activities in relation to your personal data for this purpose, since analyses are made on an aggregated level. We are not interested in your specific behaviour, but instead our customers' behaviours on an aggregated level.

### Categories of personal data:

- Communication
- Feedback data
- Identity information
- Profile data

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest of follow up on and evaluate our sales and campaigns that we carry out.

Our assessment is that this legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since reports and statistics only are saved on an aggregated level and that the information therefore cannot be related to you.

### External recipients:

*Storage period:* Reports and results on an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

## Provide offers and marketing

*What we do:* We process your personal data to provide you offers and marketing in different channels, for example via e-mail, regarding our products and services.

No profiling will take place in connection with this processing. However, we may tailor which target groups that shall receive a certain offer or marketing communication on an organisation level, for example based on where the customer is established geographically and on previous orders – to ensure that the communication is relevant for you.

We will only send you communication for marketing purposes if you have not objected (opted-out) to such communication.

We will, where required under applicable law, obtain your consent before providing you with offers and marketing.

### Categories of personal data:

- Contact information
- Identity information
- Profile data

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest of providing

### External recipients:

you with relevant offers and marketing.

Our assessment is that this legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since you always may decline or unsubscribe to such communication for this purpose.

**Storage period:** Personal data is stored for this purpose as long as we have an active customer relationship with the customer that you represent and for a period of twelve (12) months thereafter.

You can always unsubscribe from the relevant communication by clicking on the unsubscribe link in the e-mail or similar communication field or by contacting us.

## Carry out surveys

**What we do:** We process your personal data to carry out customer surveys, for example to determine to which target group we shall send a survey, which questions to be asked in a survey, send out the survey and to collect and analyse the results from a survey.

Your opinions about our business are important to us and help us to improve our services and products.

You can always unsubscribe from our communication about surveys by clicking on the unsubscribe link in the e-mail or similar communication field or by contacting us.

### Categories of personal data:

- Communication
- Contact information
- Feedback data
- Identity information

### Legal basis:

**Legitimate interest (Article 6.1 (f) of the GDPR).** The processing of your personal data is necessary to satisfy our legitimate interest of carrying out surveys in order to obtain your opinions of our business.

Our assessment is that this legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since it is voluntary to participate in surveys.

### External recipients:

**Storage period:** Reports and results on an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

## Contact persons of prospective customers

### Communicate with you regarding our services and products

**What we do:** We process your personal data to communicate with you about our services and products, for example if you represent- or is a contact person of an organisation that has shown interest in our services and products by interacting with us via e-mail or if we otherwise have reasons to believe that the relevant organisation is interested in our services and products.

We will only use your personal data for marketing purposes if you have not objected (opted-out) to such



communication.

We will, where required under applicable law, obtain your consent before communicating with you regarding our services and products.

**Categories of personal data:**

- Communication
- Contact information
- Identity information
- Profile data

**Legal basis:**

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest of communicating with you about our services and products.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since only limited personal data would be used for this purpose and that you can always opt-out from the processing.

**External recipients:**

**Storage period:** Personal data is stored for this purpose for a period of twelve (12) months from the collection, or until the last communication with you concerning our services and products for this purpose.

You can always unsubscribe from the relevant communication by clicking on the unsubscribe link in the e-mail or similar communication field or by contacting us.

## Carry out sales meetings and demos

**What we do:** We process your personal data to carry out sales meetings and demos of our services and products, including communicating with you for the same purpose.

**Categories of personal data:**

- Picture, video and audio material
- Identity information
- Communication
- Contact information
- Profile data

**Legal basis:**

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest of carrying out sales meetings and demos.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, given the limited impact that the processing of personal data may have.

**External recipients:**

**Storage period:** Personal data is stored for this purpose during the period the meeting or activity is carried out.

## Contact persons of suppliers and partners

### Manage the relationship with suppliers and partners

**What we do:** We process your personal data to manage our business relationship with the company or organisation that you work for or represent, for example to register you as a contact person, manage invoices and to

communicate with you.

We also process your personal data where necessary to register orders for products and services, respond to requests for proposals (RFPs) and communicate with you for the same purpose.

**Categories of personal data:**

- Communication
- Contact information
- Identity information
- Profile data

**Legal basis:**

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest of managing the business relationship with our supplier and partners.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to manage the relationship with the company or organisation that you represent.

**External recipients:**

1. Group companies

**Storage period:** Personal data is stored for this purpose as long as there is an active business relationship with the company or organisation that you work for or represent.

**Follow up and evaluate the supplier and partner relationship**

**What we do:** We process your personal data to evaluate the relationship with the company or organisation that you work for or represent, for example by generating statistics on orders of products and services. This to better understand how the relationship is working between us and the relevant supplier or partner.

**Categories of personal data:**

- Communication
- Contact information
- Identity information
- Profile data

**Legal basis:**

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest of following up and evaluating the supplier or partner relationship.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since reports and statistics only are saved on an aggregated level and that the information therefore cannot be related to you.

**External recipients:**

**Storage period:** Reports and results on an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

## Shareholders

### Manage the shareholder register

*What we do:* If you are an ADDvise Group shareholder, we process your personal data to manage and keep our shareholder register up to date in accordance with applicable law.

*Categories of personal data:*

- Contact information
- Identity information
- Profile data
- Shareholder information

*Legal basis:*

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* The processing of your personal data is necessary to fulfil our legal obligations to manage and keep our shareholder register up to date in accordance with applicable laws.

*External recipients:*

*Storage period:* Personal data is stored for this purpose as long as necessary under applicable laws. By way of example, if you are a shareholder of an ADDvise company established in Sweden, your personal data will be kept for a minimum period of ten years following the dissolution of the relevant ADDvise company, in accordance with the Swedish Companies Act (2005:551).

### Administer, invite to and carry out shareholder's meetings

*What we do:* We process your personal data to prepare for, invite to and carry out shareholders' meetings (or other meetings with shareholders as necessary), which includes e.g. to administer the voting and decide upon dividends.

*Categories of personal data:*

- Contact information
- Identity information
- Profile data
- Shareholder information
- Communication

*Legal basis:*

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* The use of your personal data is necessary to manage and carry out shareholders' meetings in accordance with applicable laws.

*External recipients:*

1. Other shareholders and representatives

*Storage period:* Personal data is stored for this purpose as long as necessary under applicable laws. By way of example, if you are a shareholder of an ADDvise company established in Sweden, your personal data will be stored and made available to all shareholders for a minimum period of ten years following the dissolution of the relevant ADDvise company, in accordance with the Swedish Companies Act (2005:551).

### Manage the relationship with the shareholder in general

*What we do:* We process your personal data to manage our relationship with you as a shareholder, for example to communicate with you as necessary..

*Categories of personal data:*

- Contact information
- Identity information
- Profile data
- Shareholder information
- Communication

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest in managing the relationship with you as a shareholder.

*External recipients:*

1. Other shareholders and representatives

*Storage period:* Personal data is stored for this purpose as long as you are a shareholder.

## *Inform and communicate with the shareholders about the business*

*What we do:* We process your personal data to communicate with you as part of our day-to-day activities. We will also process your personal data to provide you with updates, such as press releases, financial reports and newsletters, about our business that we believe will be of interest for you as a shareholder.

### *Categories of personal data:*

- Contact information
- Identity information
- Profile data
- Shareholder information
- Communication

### *Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest in communicating with you and provide you with news and updates on our business.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since it is information of relevance for you as a shareholder.

### *External recipients:*

1. Other shareholders and representatives

*Storage period:* Personal data is stored for this purpose as long as you are a shareholder.

Please note that you may unsubscribe from newsletters at any time by clicking on the unsubscribe link available in each communication, or by contacting us on the above contact details.

## **Board members**

### *Participate in procurements and similar activities*

*What we do:* We process your personal data to participate in procurements and take necessary measures in connection with know your customer (KYC) procedures.

### *Categories of personal data:*

- Contact information
- Identity information
- Profile data
- Skills data

### *Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest in participating in procurements and similar activities.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to participate in crucial business-related activities.

### *External recipients:*

1. Suppliers
2. Partners
3. Group companies

*Storage period:* Personal data is stored for this purpose during your board assignment.

## Manage the business relationship with board members

**What we do:** We process your personal data to manage the relationship with you as a board member, for example to appoint board members, carry out board meetings, manage remuneration and expenses, document the business (such as information in minutes) and communicate with you as a board member.

### Categories of personal data:

- Contact information
- Identity information
- Profile data
- Picture, video and audio material
- Salary and remuneration data

### Legal basis:

**Performance of contract (Article 6.1 (b) of the GDPR).** The processing of your personal data is necessary to fulfil our rights and obligations under the relevant board member agreement with you.

**Legitimate interest (Article 6.1 (f) of the GDPR).** If we have not entered into a board member agreement with you or if the activity is not strictly necessary to fulfil such agreement, the processing of your personal data is necessary to satisfy our legitimate interest in managing the business relationship with you.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to run our business properly.

### External recipients:

**Storage period:** Personal data is stored for this purpose during the board assignment.

Personal data in business-related documents and contracts of key relevance for the relevant ADDvise company are stored until further notice.

Board minutes are stored as long as they are necessary and relevant for the business in accordance with applicable laws.

## Job applicants

### Manage the recruitment process

**What we do:** We process your personal data to manage the recruitment process, for example to collect and review your application (including resume and cover letter), carry out interviews, evaluate your application and communicate with you during the recruitment process.

### Categories of personal data:

- Contact information
- Identity information
- Performance data
- Demographic data
- Skills data

### Legal basis:

**Performance of a contract (Article 6.1 (b) of the GDPR).** The processing is necessary to take steps at your request prior to entering into a potential employment agreement with you.

### External recipients:

1. Recruitment agencies
2. Group companies

*Legitimate interest (Article 6.1 (f) of the GDPR).* To the extent that you have not requested a specific measure the processing is necessary in order to satisfy our legitimate interest of managing the recruitment process.

*Storage period:* Personal data is stored for this purpose during the recruitment process.

## Carry out background checks

*What we do:* Depending on the position you have applied for and how far you proceed in the recruitment process, we may process your personal data to carry out appropriate background checks, such as social media checks and credit checks. If any background checks will be relevant, we will let you know in advance.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Identity information</li> <li>• Test data</li> <li>• Background check data</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary in order to satisfy our legitimate interest of carrying out relevant background checks.</p> <p>It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we have a strong interest in ensuring that appropriate individuals are hired for the positions in question.</p>	<ol style="list-style-type: none"> <li>1. Recruitment agencies</li> <li>2. Third parties carrying out background checks</li> </ol>

*Storage period:* Personal data is stored for this purpose during the recruitment process.

## Carry out pre-employment tests

*What we do:* Depending on the position you have applied for and how far you proceed in the recruitment process, we will process your personal data when carrying out and reviewing results of pre-employment tests, such as personality and aptitude tests, if you have agreed to participate in such tests.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• Contact information</li> <li>• Identity information</li> <li>• Test data</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing is necessary in order to satisfy our legitimate interest of carrying out relevant pre-employment tests.</p> <p>It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we have a strong interest in ensuring that appropriate individuals are hired for the positions in question.</p>	<ol style="list-style-type: none"> <li>1. Recruitment agencies</li> <li>2. Third parties carrying out tests</li> </ol>

*Storage period:* Personal data is stored for this purpose during the recruitment process.

## Carry out reference checks

*What we do:* We process your personal data to carry out reference checks, for example to communicate and verify the candidate's qualifications and learn more about the candidate's background, experience, and skills.

### Categories of personal data:

- Communication
- Profile data
- Skills data
- Contact information
- Identity information

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing is necessary in order to satisfy our legitimate interest of contacting referees in order to obtain an opinion about the you in connection with the recruitment process.

### External recipients:

1. Referee
2. Recruitment agencies

*Storage period:* Personal data is stored for this purpose during the recruitment process.

## Future recruitment

*What we do:* If you give your approval, we will store your application documents for future recruitment, for example to contact you if we have a recruitment need for a position that suits your profile.

### Categories of personal data:

- Skills data
- Profile data
- Contact information
- Identity information

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing is necessary in order to satisfy our legitimate interest of storing your personal data for future recruitment.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since you have approved to the storage.

### External recipients:

*Storage period:* Personal data is stored for this purpose for a period of 12 months following the end of the recruitment process for the position that the candidate has applied for and for each period of 12 months thereafter for which the candidate has given its approval to the personal data being stored for this purpose.

## Follow up and evaluate the recruitment process

*What we do:* We process your personal data to follow up on and evaluate the recruitment process, for example to create reports and statistics on the number of applications for a position.

### Categories of personal data:

- Skills data
- Profile data
- Identity information

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing is necessary in order to satisfy our legitimate

### External recipients:

interest of following up and evaluating the recruitment process.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since statistics and reports will be stored on an aggregated level.

*Storage period:* Reports and results on an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

## Fulfil legal obligations in connection with the recruitment

*What we do:* We process your personal data to fulfil relevant legal obligations in connection with the recruitment, for example manage work permits as applicable and respond to requests from authorities.

### Categories of personal data:

- Identity information
- Profile data

### Legal basis:

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* The processing of your personal data is necessary to fulfil our legal obligations in connection with the recruitment.

### External recipients:

1. Public authorities
2. Trade unions

*Storage period:* Personal data is stored for this purpose as long as necessary under applicable local laws. By way of example, if your application results in an employment in Sweden, we are obligated to keep information on work permit at least 12 months following the end of the employment.

## Referees to job applicants

### Carry out reference checks

*What we do:* We process your personal data to carry out reference checks, for example to communicate with you as a referee and verify the relevant candidate's qualifications and learn more about the candidate's background, experience, and skills.

### Categories of personal data:

- Communication
- Profile data
- Feedback data
- Contact information
- Identity information

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing is necessary in order to satisfy our legitimate interest of communicating with you as a referee in order to obtain your opinion about the relevant candidate.

### External recipients:

1. Recruitment agencies

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we have a strong interest in ensuring that appropriate individuals are hired by us.



*Storage period:* Personal data is stored for this purpose during the recruitment process.

## All individuals above and other external persons

### Carry out meetings, events and similar activities

*What we do:* We process your personal data to carry out meetings, events and similar activities, for example to register your participation, carry out the activity and to communicate with you about the activity.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• Picture, video and audio material</li> <li>• Communication</li> <li>• Contact information</li> <li>• Identity information</li> <li>• Profile data</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The use of your personal data is necessary to satisfy our legitimate interest of carrying out meetings, events and similar activities.</p> <p>It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially if you have voluntarily signed up for or participates in the activity.</p>	<ol style="list-style-type: none"> <li>1. Partners</li> <li>2. Group companies</li> </ol>

*Storage period:* Personal data is stored for this purpose during the period the meeting, event or activity is carried out.

### Follow up and evaluate activities carried out

*What we do:* If you have participated in an activity that we have carried out, for example a meeting, a demo, or an event, we process your personal data to follow up and evaluate the activity, for example to compile statistics of the number of participants and to plan for future activities.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• Picture, video and audio material</li> <li>• Communication</li> <li>• Contact information</li> <li>• Identity information</li> <li>• Profile data</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing of your personal data is necessary to satisfy our legitimate interest of following up and evaluating activities carried out.</p> <p>It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since it concerns harmless personal data.</p>	

*Storage period:* Reports and results on an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

## Communicate in the course of the business

*What we do:* We process your personal data that you and others share with us in connection with internal and external communication in the course of the business, for example when our personnel communicate with each other and external persons via e-mail to carry out their work duties.

### Categories of personal data:

- Picture, video and audio material
- Identity information
- Communication
- Contact information
- Profile data

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest of communicating internally and externally in the course of the business.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since it concerns harmless data and data normally used for this purpose.

### External recipients:

1. External persons that we interact with or who are included in the communication

*Storage period:* Personal data in communication is stored as long as necessary for the relevant purposes under this privacy notice.

## Document the business

*What we do:* We process your personal data to document the business and activities relating to our business, for example in connection with company milestones, events, including personal data in legal documents and other material which we deem are of interest for the business to keep.

### Categories of personal data:

Relevant categories of personal data as are necessary for the purpose.

### Legal basis:

*Legitimate interest (Article 6.1 (f) of the GDPR).* The processing of your personal data is necessary to satisfy our legitimate interest of documenting the business.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose.

### External recipients:

1. Group companies

*Storage period:* Personal data is stored for this purpose until further notice.

## Develop and improve the business

*What we do:* We process your personal data to develop and improve the business, including our services and products. By way of example, this includes to draft reports, analyses and compile statistics of various activities and events (such as sales, results and partnerships).

### Categories of personal data:

### Legal basis:

### External recipients:

Relevant categories of personal data as are necessary for the purpose. *Legitimate interest (Article 6.1 (f) of the GDPR)*. The processing of your personal data is necessary to satisfy our legitimate interest of developing and improving the business.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose.

**Storage period:** Reports and results on an aggregated level which do not contain any personal data, including statistics, are stored until further notice.

## *Manage transfers and restructuring of all or parts of the business*

**What we do:** If all or parts of the business would be transferred or restructured, we process your personal data where necessary for this purpose. Should the business be transferred to a new shareholder, your personal data would also be transferred and disclosed to the shareholder. The new shareholder would in such case be responsible (data controller) for your personal data and the processing that takes place for the same purposes as stated in this privacy notice, unless you receive any other information in connection with the transfer.

### *Categories of personal data:*

Relevant categories of personal data as are necessary to manage the transfer or restructuring of all or parts of the business in each case.

### *Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR)*. The processing of your personal data is necessary to satisfy our legitimate interest of managing a transfer or restructuring of all or parts of the business.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose if the new shareholder carries out the same or similar type of business that we do.

### *External recipients:*

1. Investors/shareholders
2. Potential shareholders/investors
3. External advisors
4. Group companies
5. Public authorities

**Storage period:** Personal data is stored for this purpose for the period that is necessary to manage the transfer or the restructuring.

## *Manage, defend and exercise legal claims*

**What we do:** We process your personal data where necessary to manage, defend and exercise legal claims in an individual case, for example in connection with a dispute or a court proceeding.

### *Categories of personal data:*

Relevant categories of personal data needed for managing and defending a legal claim in the individual case.

### *Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR)*. The processing of your personal data is necessary to satisfy our legitimate interest of managing, defending and exercising legal claims.

It is our assessment that our legitimate

### *External recipients:*

1. Counterparty
2. Courts
3. Debt collecting companies
4. External advisors
5. Insurance companies
6. Relevant authorities

interest clearly outweighs your interest of not having your personal data processed for this purpose.

*Storage period:* Personal data is stored for this purpose for the period as necessary to manage, defend and/or exercise the legal claims.

## *Fulfil our legal obligations*

*What we do:* We process your personal data where necessary to fulfil our legal obligations, for example accounting obligations and obligations under the GDPR.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
Relevant categories of personal data that are necessary to fulfil the specific legal obligation.	<i>Fulfil legal obligation (Article 6.1 (c) of the GDPR).</i> The use of your personal data is necessary to fulfil our legal obligations.	1. Relevant authorities

*Storage period:* Personal data is stored for such period that is necessary in order for us to fulfil the specific legal obligation. By way of example, personal data in accounting material is stored for seven (7) years calculated from the end of the calendar year when the relevant fiscal year ended according to the Swedish Accounting Act (1999:1048).

## *Ensure technical functionality and security in our IT systems*

*What we do:* We process your personal data to ensure necessary technical functionality and security in our IT systems, for example in connection with backups, access controls and troubleshooting.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
All categories of personal data that are stated in relation to the purposes of processing your personal data.	<i>Legitimate interest (Article 6.1 f) of the GDPR).</i> The processing of your personal data is necessary to satisfy our legitimate interest of ensuring technical functionality and security of our IT systems.  It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose.	

*Storage period:* Personal data is stored for the same period as stated in relation to each relevant purpose of the processing.

## *Respond to legal requests*

*What we do:* We process your personal data to respond to legal requests from authorities, for example law enforcement, tax authorities or any other authorities.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
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All categories of personal data as necessary to respond to and evaluate the request in each case.

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* The processing of your personal data is necessary to fulfil our legal obligations.

*Legitimate interest (Article 6.1 f) of the GDPR).* If there is no explicit legal obligation requiring that we respond to the legal request, but we consider that we and the public authority have a legitimate interest (which outweighs your privacy interest), we rely on this legitimate interest for the use of your personal data for this purpose.

1. Relevant authorities

*Storage period:* Personal data is stored for this purpose for the period that is necessary to respond to the specific legal request and thereafter for the period as necessary to document the request and our response to the request.

## CATEGORIES OF PERSONAL DATA

In the below table we describe what categories of personal data that we process with examples of types of personal data covered by each category.

<i>Categories of personal data</i>	<i>Examples of types of personal data</i>
<i>Background check data</i>	Results from background checks, for example social media, credit and KYC checks, including information from sanctions screening
<i>Communication</i>	Content in e-mail, published posts and other forms of communication
<i>Contact information</i>	Address, e-mail address, phone number
<i>Demographic data</i>	Sex, citizenship, language, age
<i>Feedback data</i>	Grade, feedback, potential evaluation, performance assessment, assessment
<i>Identity information</i>	Name, personal identity number, signature, registration number
<i>Performance data</i>	Goals, fulfilment of goals, performance
<i>Picture, video and audio material</i>	Video, photos, audio recordings
<i>Profile data</i>	Title, position and the company or organisation that you work for
<i>Salary and remuneration data</i>	Bank account, remuneration amount, form of remuneration, expenses
<i>Shareholder information</i>	Shareholder information as necessary to comply with the applicable laws and to manage our relationship with the shareholder, such as identity information, details about shares (e.g. number and type of shares) and notes from annual general meetings
<i>Skills data</i>	Education, professional experience, courses, qualifications, supporting training documentation
<i>Technical information</i>	Type of device, IP address, version of web browser and operating system
<i>Test data</i>	Result, status, date, type of test
<i>User generated information</i>	Click and visit statistics on the website, user preferences, interactions when using the website and other digital channels

## Appendix 1 – ADDvise companies subject to this privacy notice

In the below list you find names and contact details of the ADDvise companies which are subject to this privacy notice.

<i>ADDvise company</i>	<i>Postal address</i>	<i>E-mail address</i>
<i>ADDvise Group AB (publ)</i> Company reg. no. 556363-2115	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisegroup.se
<i>ADDvise Midco AB</i> Company reg. no. 556287-5467	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisegroup.se
<i>ADDvise Newco Lab AB</i> Company reg. no. 559428-8630	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisegroup.se
<i>ADDvise Newco Med AB</i> Company reg. no. 556624-5212	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisegroup.se
<i>MRC Engineering and Fabrication S.L.U.</i> Company reg. no. B-937076777	Travesia Carlos Mackintosh, 3 - A 5 29602 Marbella, Spain	samuel@mrc-cleanrooms.com
<i>Sonesta Medical AB</i> Company reg. no. 556233-0257	Industrivägen 7 171 48 Solna, Sweden	personuppgiftsansvarig@sonesta.se
<i>Sonar OY</i> Company reg. no. 2353862-0	P.O. Box 5, FI-02201 Espoo, Finland	sonar@sonar.fi
<i>Aktiebolaget Germa</i> Company reg. no. 556086-9413	Industrigatan 54 291 36 Kristianstad, Sweden	privacyofficer@germa.se
<i>Seebreath AB</i> Company reg. no. 556830-3043	Birger Jarlsgatan 2 114 34 Stockholm	support@seebreath.com
<i>CliniChain Holding B.V.</i> Company reg. no. 36245097	Televisieweg 62, 1322 AM Almere, the Netherlands	info@clinichain.com
<i>Hettich Labinstrument AB</i> Company reg. no. 556482-6039	Tegeluddsvägen 76 115 28 Stockholm	personuppgiftsansvarig@hettichlabinstrument.se
<i>ADDvise Tillquist AB</i> Company reg. no. 556652-4467	Renvägen 1 352 45 Växjö	GDPR@tillquist.se
<i>Labrum Aktiebolag</i> Company reg. no. 556196-7257	Industrivägen 7 171 48 Solna	personuppgiftsansvarig@labrum.se
<i>Labplan Ltd</i> Company reg. no. 227451	Allenwood Business Park, Naas Co Kildare W91 A4CP Ireland	info@labplan.ie
<i>Clinichain B.V.</i> Company reg. no. 36257699	Televisieweg 62, 1322 AM Almere, the Netherlands	info@clinichain.com
<i>Labrum Klimat OY</i> Company reg. no. 2357819-8	Industrivägen 7 171 48 Solna	personuppgiftsansvarig@labrum.se

<i>Labrum AS</i> Company reg. no. 887 838 062	Industrivägen 7 171 48 Solna	personuppgiftsansvarig@labrum.se
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<i>Graham Medical Technologies, LLC</i> Company reg. no. 20-0105595	16137 Leone Dr. Macomb MI, USA	info@gramedica.com
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EU/EEA representative under  
Article 27 of the GDPR:

<i>ADDvise Group AB (publ)</i> Company reg. no. 556363-2115	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisigroup.se
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## Appendix 2 – Deviations and clarifications on processing activities

In addition to what is described above, please note the following deviations and clarifications regarding the processing of personal data by ADDvise companies under this privacy notice.

### Camera surveillance for the purposes of preventing, exposing and investigating crime

*What we do:* We process your personal data in connection with carrying out camera surveillance on premises for the purposes of preventing, exposing and investigating crime and of maintaining both your safety and ours, for example if you are visiting any of our offices, warehouses or other premises. Camera surveillance areas are clearly signposted including supplementary information notices.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
Video material	<i>Legitimate interest (Article 6.1 f) of the GDPR.</i> The processing is necessary in order for us to fulfil our legitimate interest in carrying out camera surveillance for the purposes of preventing, exposing and investigating crime and for our and your legitimate interest of having a safe environment in connection to our offices and other premises.	<ol style="list-style-type: none"> <li>1. Relevant authorities</li> <li>2. Group companies</li> <li>3. Insurance companies</li> <li>4. External advisors</li> </ol>

*Storage period:* Personal data is stored for this purpose for 72 hours from the time of recording as default, unless the personal data is necessary to keep for a longer period to further investigate an event and take necessary legal actions.

### Relevant ADDvise companies

The following ADDvise companies will act as independent controllers when processing your personal data for the above purpose:

- MRC Engineering and Fabrication S.L.U.
- Aktiebolaget Germa
- Labplan Ltd
- Sonar OY

### Verify the identity of customers and assess risks

*What we do:* We process your personal data to verify the identity of the representatives of the customer, including assessing any related customer-related risks. By way of example, this includes know your customer (KYC) checks as appropriate (such as ID and document verification) and other measures to comply with applicable laws aiming to prevent money laundering and terrorism financing.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> <li>• Communication</li> <li>• Contact information</li> </ul>	<i>Legitimate interest (Article 6.1 (f) of the GDPR).</i> The processing of your	<ol style="list-style-type: none"> <li>1. Group companies</li> </ol>

- Identity information
- Profile data
- Background check data

personal data is necessary to satisfy our legitimate interest in managing the business relationship with our customers and thereby fulfil our rights and obligations under relevant contracts.

Our assessment is that this legitimate interest outweighs your interest of not having your personal data processed for this purpose, since we otherwise would not be able to manage the relationship.

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* Where we need to take measures to comply with applicable legislation, for example to prevent money laundering and terrorism financing, the processing of your personal data is necessary to fulfil such legal obligation.

Any information relating to criminal offences will only be processed where necessary to fulfil a legal obligation.

**Storage period:** Personal data is stored for this purpose as long as there is an active relationship with the customer, including as long as necessary under applicable laws.

## Relevant ADDvise companies

Graham Medical Technologies, LLC will act as an independent controller when processing your personal data for the above purpose.

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## Provide newsletters and other business communication

**What we do:** If you have signed up for our newsletter or similar communication, we process your personal data to send you such business-related communication, including registering you in our sending list.

We will only send you communication for marketing purposes if you have provided your consent to this, which you normally do by actively signing up for the relevant communication.

### Categories of personal data:

- Identity information
- Contact information

### Legal basis:

*Consent (Article 6.1 (a) of the GDPR).*  
The processing of your personal data is based on your consent to obtain newsletters and similar communication.

### External recipients:

**Storage period:** Personal data is stored for this purpose until you withdraw your consent, which you do by unsubscribing to the communication.

You can always unsubscribe from the relevant communication by clicking on the unsubscribe link in the e-mail or

similar communication field or by contacting us.

## Relevant ADDvise companies

The following ADDvise companies will act as independent controllers when processing your personal data for the above purpose:

- ADDvise Midco AB
- ADDvise Newco Lab AB
- ADDvise Newco Med AB
- ADDvise Group AB (publ)
- Graham Medical Technologies, LLC
- Hettich Labinstrument AB
- Labplan Ltd
- Sonar OY
- MRC Engineering and Fabrication S.L.U.
- ADDvise Tillquist AB
- Labrum Aktiebolag
- Labrum Klimat OY
- Labrum AS

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The below ADDvise companies will *not* process any personal data relating to *contact persons of customers*.

## Relevant ADDvise companies

- ADDvise Midco AB
- ADDvise Newco Lab AB
- ADDvise Newco Med AB
- ADDvise Group AB (publ)

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The processing activities relating to *shareholders* mainly apply to the below ADDvise companies.

## Relevant ADDvise companies

- ADDvise Midco AB
- ADDvise Newco Lab AB
- ADDvise Newco Med AB
- ADDvise Group AB (publ)

However, personal data relating to *former shareholders* may also be processed by the other ADDvise companies (see Appendix 1).

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In addition to what is stated above, Graham Medical Technologies, LLC will only process personal data under this privacy notice which relates to the following categories of individuals:

- Contact persons of customers
- Contact persons of prospective customers
- Visitors of website and other digital channels