

Privacy Policy

1. Generally

This Privacy and Marketing Policy ("Privacy Policy") describes how Vertical Positioning Group (VPG) AB, org. No. 556635-3107 Helsingborgsvägen 52, 26272 Ängelholm, email gdpr@vpgab.com, ("VPG", "we") collects, uses, discloses and stores your personal information.

1.1 The Privacy Policy applies when VPG provides services and products related to purchase, service issues and other contact with VPG, such as website visits.

1.2 You should always be able to feel safe when you submit your personal information to us. We want to demonstrate with this Privacy Policy how we ensure that your personal information is processed in accordance with applicable privacy laws.

2. Personal Data Responsible

VPG is personally responsible for VPG's processing of your personal data and is responsible for such processing in accordance with applicable laws.

3. When do we process your personal information

3.1 In order to purchase our goods or services or contact us for service or information, we must collect and process personal information about you.

3.2 VPG collects and processes personal information about you when using VPG support, visiting the VPG website or an event organized by VPG or when you otherwise have contact with VPG. The information collected from you on inquiries and purchases is required for you to enter into agreements with VPG and for VPG to be able to provide services.

4. What personal data do we process about you

4.1 For you who are VPG customers

The personal data VPG collects and treats you as a customer regarding the request or purchase is:

- Name
- Address
- Phone number and e-mail
- Account number
- IP address and information about your use of website

5. Why do we process information about you

5.1 For you who are VPG customers

VPG handles your personal information for different purposes. Mainly, VPG deals with your personal information in order to:

- Comply with our obligations to you as a customer, such as inquiries, purchase execution, invoicing, and provision of support;
- Enable general customer care and customer service, such as answering questions and correcting incorrect information;
- Provide information and targeted marketing, by mail, e-mail, and telephone regarding VPG and selected partners' goods and services;
- Manage the customer relationship and provide our services;
- Provide relevant information and custom offers in newsletters as well as on the web;
- Assess which payment methods we can offer you, for example through credit assessments;
- Improve our customer offering, such as product and service development;
- Prevent fraud and risk management; and
- Follow applicable legislation, such as record keeping in bookkeeping laws.

The data can also provide basis for market and customer analyzes, market research, statistics, business tracking and business/method development related to the purchase of goods and services.

6. The legal basics of our processing of your personal data

VPG bases the processing of your personal data on several legal considerations.

6.1 We treat your personal information to fulfill the agreement with you as a customer, such as to make bookings, purchases, and to fulfill our obligations to you, such as simplified handling and order history.

6.2 VPG does not treat sensitive personal data based on “legitimate interest” and does not provide any treatment that constitutes profiling based on “legitimate interest”.

6.3 In some cases, VPG have a legal obligation to process your personal information. This applies, for example, to processing of personal data to meet the requirements of the Bookkeeping Act.

7. Compilation of our personal data processing

Purpose	Legal basis	Categories of personal data	Storage time
To administer, develop and deliver our goods and services as well as provide support	Completion of purchase agreement (terms of sale)	Name, address, telephone number and e-mail Geographic information IP address, device information, log information	Five years after you last been active at VPG, for example by shopping with us or contacting our sales department
To ensure that legal requirements are complied with, such as the Bookkeeping Act	Legal obligation	Name, address, telephone number and e-mail Geographic information IP address, device information, log information	As long as we are required to store the data in accordance with applicable law
To market VPG's trademarks (Marco, Hymo, Jihab and Saxon) and our affiliates or group companies' goods and services by mail, email, phone	Legitimate interest	Name, address, telephone number and e-mail Geographic information IP address, device information, log information	Five years after you last been active with VPG, for example by shopping with us or contacting our customer service

8. How long do we save information about you

8.1 Your personal information will only be stored as long as there is a need to save them to fulfill the purposes for which the data was collected in accordance with this Privacy Policy. VPG may save the data for longer if it is required to comply with legal requirements or to monitor VPG's legal obligations, eg. if there is a legal process going on.

8.2 VPG saves customer data for a maximum of 5 years after the customer last completed a purchase or otherwise interacted with VPG.

9. Who do we provide personal information to

9.1 VPG may disclose your information to third parties, such as VPG Group companies and other partners such as providers of transport services.

9.2 Third party to whom VPG discloses information or otherwise provides information about a customer may use the information only for the purpose of selling and marketing VPG and VPG partners and group companies' products and services or for the purpose of providing services related to VPG's agreement with you as a customer.

9.3 Personal data may also be submitted by VPG if it is necessary to comply with applicable legal requirements or government requirements, to utilize VPG's legal obligations or to detect, prevent or recognize fraud and other security or technical issues.

9.4 VPG may transfer your personal data to non-EU / EEA countries, if any of VPG's suppliers or partners are located there. If personal data is transferred to any country outside the EU / EEA, VPG will take steps to ensure that personal data remain protected

and take the necessary steps to in a lawful manner transfer personal data to non-EU / EEA countries.

9.5 We will not sell your personal information to third parties unless we have your permission.

10. Application and amendment of the privacy policy

10.1 The latest version of VPG's privacy policy is always available on our trademarks (Marco, Hymo, Jihab and Saxon) website. Our privacy policy applies at any time in the form and to the content published on the site. If you do not accept the changes, you are entitled to terminate the agreement with VPG before the amended Privacy Policy comes into force. You can terminate the agreement by contacting VPG.

10.2 VPG is entitled to update the privacy policy at any time. If the privacy policy changes, the updated policy will be published on the VPG brand's website. We may also inform you via email if there are major changes to the privacy policy.

11. The protection of your personal data

You should always be able to feel confident when you submit your personal information to us. VPG has therefore taken the security measures necessary to protect your personal data from unauthorized access, change and deletion. For example, all information about customers in databases is protected by permission management and firewall.

12. Your rights

12.1 VPG is responsible for processing your personal data in accordance with applicable legislation.

12.2 VPG will, at your request or on its own initiative, correct, disassociate, delete or supplement information that is found to be incorrect, incomplete or misleading.

12.3 You are entitled to request

- a. Access to your personal information. This means that you are entitled to request a registry outline of the processing we conduct regarding your personal data. You are also entitled to receive a copy of the personal data being processed. You are entitled to once a calendar year, by written application, receive a registry extract from which personal data are registered about you, the purpose of the treatment and the recipients the information has been provided or to be disclosed. You also have the right to receive information on where the data has been retrieved if personal data have not been collected from you, the existence of automated decision making (including profiling) and the predicted period during which the

data will be stored or the criteria used to determine this period. You also have the right to obtain information about your other rights listed in this paragraph in the registry extract.

- b. Correction of your personal data. We will prompt you to correct the incorrect or incomplete information we process about you as quickly as possible.
- c. Deletion of your personal data. This means that you are entitled to request that your personal data be removed if they are no longer necessary for the purpose for which they were collected. However, there may be legal requirements that we cannot immediately delete your personal data in, for example, accounting and tax laws. We will then end the processing done for purposes other than complying with the legislation.
- d. Restriction of treatment. This means that your personal information is marked so that they can only be processed for certain delimited purposes. For example, you may request a limitation when you consider your information incorrect and you have requested a correction under item 12.3 b). Meanwhile, the accuracy of the data is being investigated, their treatment will be limited.

12.4 If you do not wish to process your personal data for direct marketing, you are always entitled to object to such treatment by sending an email to gdpr@vpgab.se. Once we receive your objection, we will cease processing your personal information for such marketing purposes.

12.5 You may submit any complaints regarding the processing of your personal data to the Data Inspectorate (Datainspektionen).

13. Cookies

When you visit our website, we use cookies.

14. Contact information

14.1 Contact us if you have any questions about this Privacy Policy, processing your personal information or requesting a registry extract. Contact: gdpr@vpgab.se