

SEALECO AB'S PRIVACY POLICY

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1 Introduction

Your integrity and digital security is of importance to us at SealEco BV ("**SealEco**"). You shall always feel safe when you submit personal data to SealEco. We at SealEco are the controllers for the processing of personal data and you can at any time contact us in order to ask questions on the processing of personal data by posing your questions to us (see contact details in section 9).

This Privacy Policy (the "**Privacy Policy**") has three purposes:

- 1 To **explain how we use** the information that you share with us so that we can offer you investments, products and services, but also in order for us to give you a good experience during your time as a prospect, customer to or investor in SealEco,
- 2 To ensure that **you understand what personal data we collect** with your permission and what we do – respectively do not do – with that information, and
- 3 To **keep us responsible** for the protection of your rights and your integrity under the policy.

Personal data is all the information which directly or indirectly can identify a natural person who is alive, e.g. name, address, telephone number and IP-addresses.

All personal data that we collect on you have a connection to the sale of our products and companies and we do not use the information for any other purpose.

SealEco will always comply with applicable legislation on how your personal data may be processed, including The General Data Protection Regulation (GDPR) and other applicable laws.

2 Which personal data do we collect about you and why?

2.1 General

There are two main categories of information that we collect personal data for:

- 1) information that we must have to fulfil contracts or legal obligations, and
- 2) information that we can use for the purposes set out for such processing, e.g. so that we shall be able to send newsletters to you, perform market researches *etc.*, in case you choose to share such information with us.

Click [here](#) for a complete compilation on what personal data that is being processed, why and for how long.

2.2 How do we process your personal data when you contact us?

2.2.1 Personal data at sign-up for news

When you sign up to our news, SealEco collects a number of personal data, such as e-mail addresses. We need this information to send you news and updates which you might be interested in. Click [here](#) for a complete compilation on what personal data is processed, why and for how long.

2.2.2 Personal data in e-mail and support matters

In some cases, it might happen that you contact our employees or our customer support, e.g. through e-mail or telephone. In such an event we save your e-mail address and the contact details you may come to leave with us due to such contact to deal with your question. We will store these as long as they are needed to assist you in your matter.

Click [here](#) for a complete compilation on what personal data that is being processed, why and for how long.

2.3 Specifically for you as customer or supplier to SealEco

SealEco handles personal data in relation to their customers' and suppliers' employees in accordance with existing legislation and GDPR.

2.3.1 When do we collect personal data?

We collect personal data when:

- Your company becomes a customer or a supplier to SealEco and you are registered as a contact person under the customer or the supplier, or if
- You contact our customer support or employees either by telephone or e-mail for assistance or if you have questions.

2.3.2 How do we use the personal data?

We use your personal data to:

- Communicate with you regarding the contract between your company and SealEco,
- Send and pay invoices if you are registered as reference person,
- Invite you to events, and

- Send market surveys to you in order to improve our service.

Click [here](#) for a complete compilation over what personal data on you as a customer's contact person is processed, why and for how long.

Click [here](#) for a complete compilation over which personal data on you as a supplier's contact person is processed, why and for how long.

2.4 Specifically for you as sole proprietor

When registered as a sole proprietor your personal identity number is utilised as the legal registration number. Based on your consent SealEco will process your personal identity number e.g. when we register you in our customer/supplier register. We will also utilise your personal number when sending or receiving invoices to/from you.

Click [here](#) for a complete compilation on what personal data is processed, why and for how long.

3 How do we share the personal data with other companies?

SealEco uses a number of database and programme suppliers to handle the communication with you as seamless as possible. We always enter into a contract with these external parties who are governed by confidentiality and fulfil the requirements that are imposed in existing legislation on how transfer of the personal data may be executed and how your personal data is allowed to be processed. In that way the safety and the confidentiality of your personal data is guaranteed.

4 Transfer to other countries

SealEco may come to transfer your personal data to a country outside the EU or the EEA if it is necessary for e.g. fulfilment of a contract. Such transfer will always be executed in a safe and legal way. SealEco will ensure that necessary measures are undertaken to ensure that your personal data is not transferred to an external party outside the EU or the EEA which does not meet the requirements for such processing in applicable law. E.g. the GDPR requires that the country is approved by the European Commission, the external party is certified under the Privacy Shield-principles (if transfer to the United States) or that a contract has been entered into which is based on the European Commission's standard clauses. If you would like to know more about the requirements on transfers of personal data to a country outside the EU or the EEA, please read more [here](#).

5 Your rights

It is our obligation to only process personal data which are correct, relevant and necessary with regards to the purposes of the processing, and you are entitled to control that this is the case. SealEco are responsible for that your personal data is processed in accordance with existing legislation.

SealEco will, on your request or on its own initiative, correct, de-identify, erase or complement data which are detected to be inaccurate, incomplete or misleading.

You as an individual have a number of rights under existing legislation. You have the right to:

1 **Gain access to your personal data.**

- We will, on your request and as quickly as possible but no later than within 30 days from when we received your message on gaining access to the data, provide information regarding what personal data we are processing regarding you.
- You are also entitled to obtain a copy of the personal data which is being processed.
- You are entitled to once per calendar year, by a written and signed application, without cost obtain an extraction from registers about which personal data that are registered about you, the purposes of the processing and to which recipients the data have been submitted or shall be submitted. You also have a right to in the extraction from registers gain information about where the data have been collected if the personal data have not been collected from you, the existence of automated decision-making (including profiling) and the predicted period for which the details will be stored, or the criteria used to determine that period.

2 **Demand rectification of your personal data.**

- We will, on your request, as quickly as possible and no later than within 30 days from when we received your message on rectification rectify the inaccurate or incomplete information that we are processing about you.

3 **Demand erasure of your personal data.**

- We will on your request as quickly as possible and no later than within 30 days from when we received your message on erasure erase your personal data if they are no longer necessary for the purpose for which they were collected.
- There may exist reasons causing us to be unable to immediately erase your personal data. We will in that case cease with the processing which is being done for other purposes and inform you about the legal basis and the relevant purpose for continued processing.

4 **Demand limitation of processing.**

- You have a right to mark your personal data in order for it to only be processed for certain limited purposes. You can *inter alia* demand limitation when you consider that your personal data are inaccurate, and you have demanded rectification according to above. Whilst the time when the personal data's correctness is investigated, the processing of it will be limited.
- SealEco will inform you if the investigation results in that the processing shall be limited. We will make sure that necessary rectifications or erasure of personal data and limitation of processing of personal data also is made by the companies to which SealEco have disclosed your personal data (see section 2.3 above).

5 **Demand data portability.**

- You have a right to, under certain circumstances, receive and transmit your personal data in a structured, commonly used and machine-readable format to another controller. Contact us if you wish to know more!

6 **Object to processing of personal data which is being done with the support of a balancing test.**

- You can object to the processing if it is based on a balancing test. If you object to such processing, we will only continue to process your personal data if there are eligible reasons to the processing which outweighs your interest. We will inform you of the reasons if that is the case.

7 **Demand that we cease to process your personal data for direct marketing.**

- You always have a right to object against direct marketing by sending an e-mail to info.nl@sealeco.com. When we have received your objection, we will cease to process the personal data for such marketing purpose.

8 **Complain on our processing of your personal data and compliance with the law to the Swedish Data Protection Authority.**

- You are entitled to complain on the processing that we perform on your personal data to the Swedish Data Protection Authority, if you think that we are in breach of the Privacy Policy, do not fulfil your rights or in any other way are acting contrary to existing law.
- Note that the Swedish Data Protection Authority changes name to the Integrity Protection Authority, Sw. "*Integritetsskyddsmyndigheten*" from 25 May 2018.

If you wish to make use of any of your rights above, please feel free to contact us. Our contact details can be found in section 9.

6 **Security**

You shall always feel secure when you submit personal data to us. Therefore, SealEco have introduced the necessary security measures to protect your personal data against unjustified access, change and erasure.

It is important to us that the information on our customers is processed in a secure manner. Even if we observe necessary precautions for data protection no security measures are completely secure, and we can therefore not guarantee to one hundred per cent the security of your personal data.

If we should lose the control of your personal data which are sensitive in relation to integrity, e.g. personal identity number, we will inform you immediately and no later than within 72 hours from when we detected the incident.

7 **Changes in the Privacy Policy**

Sometimes we may come to do changes in the Privacy Policy. We will send you a message if we do major changes in the Privacy Policy given what is appropriate with regards to the circumstances, e.g. by sending a message by e-mail or a SMS

message to you, or through a pop-up window with information before you get access to SealEco's webpage. In certain cases, we will inform you in advance, and your continued use of the webpage after the changes will constitute your acceptance of the changes. Therefore, we kindly advise you to ensure that you read all such messages carefully.

If you do not wish to continue to use the webpage or do not wish that we continue to process your personal data in our registers in accordance with the new version of the Privacy Policy, you can notify us, and we will erase your personal data within 30 days from your message. Note that we cannot erase your details if there are legal reasons for continued processing. If that is the case, we will notify you of the reasons for continued processing.

8 Information regarding cookies and other technology

SealEco uses cookies on its webpages. For more information regarding how we handle cookies, please see our [Cookie Policy](#)

9 Contact details

Thank you for reading our Privacy Policy. If you have any questions you are most welcome to contact us!

Controller

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