



Erteco Rubber & Plastics AB

General Data Privacy Policy

Innehåll

1. General.....	3
2. For what purposes may Personal Data be processed?	3
3. What types of Personal Data may be processed?	4
4. Security of the Personal Data	4
5. Data protection impact assessments	5
6. Reporting a data breach	5
7. Administration, Rectification, Deletion, Retention and Data portability	5
8. To what third parties may Personal Data be transferred?.....	6
9. To what countries may Personal Data be transferred?	7
10. Further Information and Contact Details	7
11. Updates to or Non-Compliance with this Policy.....	8

1. General

This General Data Privacy Policy (the "**Privacy Policy**") sets out the general commitment of Erteco Rubber & Plastics AB, including its Danish, Norwegian and Finnish branches, ("**Erteco**") when collecting, using, disclosing, transferring and otherwise in any way using information directly or indirectly relating to an identified or identifiable natural person, or that otherwise qualify as personal data under applicable legislation ("**Personal Data**").

The Privacy Policy also contains certain instructions to you as an employee in relation to the processing of Personal Data and on how you should react in certain situations related to the use of Personal Data.

Erteco is committed to fulfil the highest standards in relation to personal integrity. Erteco must only process Personal Data in accordance with applicable data protection legislation, in a transparent manner and in accordance with data subject's expectations.

Please note that this Privacy Policy is of a general nature and any closer details of specific processing is set out in more specific information policies for different functions within Erteco as set out under Section 10 below, and available at **Addsystems**.

2. For what purposes may Personal Data be processed?

Erteco must only process Personal Data of registered persons (the "**Data Subjects**") for **lawful, explicit and specified purposes**. The Data Subjects shall, to the extent possible but always as required under applicable legislation, be informed of such purposes in advance together with all other information that is required for the Data Subjects to become aware of how their Personal Data is processed and to enforce their rights in relation to Erteco. As an employee of Erteco you must always ensure that such information is provided if you are involved in a process that includes collecting or other usage of Personal Data.

In summary, without limitation, Erteco may use Personal Data to the extent required to fulfil the following purposes:

- (a) to fulfil agreements entered with service providers, customers, suppliers, employees, consultants, and other contracting parties;
- (b) to provide important information about Erteco to shareholders, such as annual and quarterly reports, invitations to shareholder meetings, and requests for shareholder consents;
- (d) to provide information, products and services which have been requested from Erteco;
- (g) to provide information about products and services to customers which we think may be of interest;
- (h) to comply with any legal or regulatory obligations, requirements or requests;
or
- (i) to protect, defend or enforce our legal rights, or those of others.

The above purposes are more specified in the Records of Processing of personal data that is administered by Erteco Data Responsible.

Please contact **Erteco Data Responsible (Niklas Olsson or Peter Philip)** if you have any questions as to whether you may process Personal Data for a specific purpose.

Before Personal Data is processed for a purpose that is not set out above, the relevant processing must be analyzed and approved by Erteco Data Responsible.

3. What types of Personal Data may be processed?

Erteco may process the following categories of Personal Data:

- (a) **employees** – *identification details* such as name, personal identification number and photos, *contact details* such as home address, telephone numbers and email address and *information related to the work position* such as employee biography/resume, personal statement and academic records, *account details* such as salary payment details and bank account information, details on personal trading in shares and other financial instruments. For further information, please refer to Section 10 below;
- (b) **customers/suppliers/service providers** – *identification details* such as names and photos, *contact details* of service providers or their representatives, such as telephone numbers, email address, postal address and *account details* such as payment information and bank account details;
- (c) **digital information of website visitors** – *details to analyze website functionality and user friendliness* such as cookies, device identifiers and to ensure security and integrity of Erteco's websites.

No other types of Personal Data must be processed within Erteco unless set out in a specific instruction] or explicitly approved by Erteco Data Responsible.

Please note that data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or sex life and sexual orientation must never be processed and that data concerning health and trade union membership may only be processed for employment related purposes when allowed under applicable legislation and by specifically authorized employees.

4. Security of the Personal Data

Erteco is committed to process Personal Data in a manner that ensures an appropriate level of security for the Personal Data. Thus, Erteco uses technical, administrative and organizational security measures that are appropriate to the risk of the processing to protect the Personal Data against unauthorized access, destruction, accidental loss, alteration, blocking, copying, distribution, unauthorized disclosure or access, and against all other unlawful or unauthorized Personal Data processing.

Security measures implemented include firewalls, password protection and hard drive encryption.

However, it is important that you as an employee at all times remain careful as to how you use your IT equipment and devices in order to minimize the risks related to the security of personal data. Please consult Erteco's IT-security policy for further information.

Only authorized employees holding a position where it is necessary to process Personal Data to fulfil a working task, must be granted access to the relevant Personal Data.

If you for any reason have access to Personal Data that you do not need access to in order to fulfil your tasks, please immediately inform Erteco Data Responsible.

All Personal Data is considered confidential information and is subject to the employee confidentiality undertaking as set out in the employment agreements.

5. Data protection impact assessments

A Data Protection Impact Assessment ("DPIA") is a process that helps an organization identify, assess and manage privacy risks in relation to new systems and projects involving the Processing of Personal Data. A DPIA must also be used when changes are made to existing policies and processes or if an aspect of Erteco's infrastructure is modified where Personal Data is stored/managed or otherwise processed. At a high level, a DPIA presents an overview of the privacy risks, an assessment of the gravity of that risk and possible measures that can be undertaken to manage and/or eliminate those risks. The DPIA also takes into account scenarios where a privacy risk cannot be mitigated or eliminated.

Please contact Erteco Data Responsible to inquire whether a DPIA must be conducted if you are to be involved in a new project, or system or if other initiative or changes to an existing system, practice or initiative will involve the Processing of Personal Data.

6. Reporting a data breach

If you at any time become aware of that a breach of security has occurred that may have resulted in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed, then **you must immediately inform Erteco Data Responsible** thereof together with any details you may be aware of and await further instructions.

7. Administration, Rectification, Deletion, Retention and Data portability

Erteco must only process Personal Data that is adequate, relevant and limited to what is necessary to fulfil the purpose of the relevant processing. When the purpose is fulfilled, Erteco will as soon as possible delete the Personal Data unless there is any legal requirement to retain the Personal Data for a longer period or the Personal Data must still be processed for another purpose, such as to fulfil a contractual obligation (in which case it will be stored but only used for such other purpose).

A Data Subject has always the right to request access to the Personal Data relating to him or her. This right of access includes the right to receive information on the type of Personal Data being processed, the purpose of such processing and the recipients or category of

recipients that personal data has been transferred to. A Data Subject also has the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete.

As soon as Erteco becomes aware of any inaccurate Personal Data being processed, Erteco will always rectify such Personal data without undue delay.

The Data Subject also has the right to request erasure of his or her Personal Data in certain events and the right to be provided with any Personal Data, which is being processed by automatic means, in a structured, commonly used and machine-readable format and/or that such Personal Data is transmitted to another controller.

A Data Subject has also the right to object to certain use of Personal Data and to require the use of personal data to be restricted if the Personal Data is inaccurate, unlawful or no longer necessary.

If you as an employee receive any request from a Data Subject as to the processing of his or her Personal Data, you must always immediately forward such request to Erteco Data Responsible and await further instructions.

8. To what third parties may Personal Data be transferred?

Personal Data should never be disclosed to any unauthorized third parties. However, Personal Data must under certain circumstances be shared with third parties, but only to such parties to which there is a legal ground to do so. The below provides a summary of the third parties that Erteco may provide Personal Data to.

However, before Personal Data is disclosed to any new third party you should always contact Erteco Data Responsible for approval.

Branches

Erteco consists of the parent company Erteco Rubber & Plastics AB, established in Sweden, with operational branches in Denmark, Norway and Finland. Personal Data may be shared within Erteco to the extent necessary to fulfil a purpose and to the extent allowed under applicable data protection legislation.

Service providers

Erteco also uses third party service providers ("**Service Providers**") outside Erteco. The Service Providers perform certain services as requested by Erteco, which may involve the processing of Personal Data. Such services include the provision of consultancy services, valuation services, insurances services, bank services, hotels services, marketing services and IT services. A Service Provider must only process Personal Data to enable the Service Provider to perform the services requested by Erteco. Only Personal Data that is necessary to fulfil the relevant purpose must be provided to the respective Service Providers.

The Service Providers that are acting on behalf of Erteco, and where only Erteco decides the means and purposes of the use of Personal Data (thus the Service Provider is a data processor), must always be obliged, under a written agreement, to follow the instructions of the relevant controller within Erteco. Such agreement must impose obligations on the Service Provider to act in accordance with Erteco's instructions, to follow applicable law

and to implement appropriate technical and organizational measures for the protection of the Personal Data.

No Service Providers that may come to process Personal Data may be engaged unless a data processor agreement has first been negotiated and approved by Erteco Data Responsible. Please see the applicable data processing agreements.

Cooperation partners and customers

Erteco may provide Personal Data to cooperation partners, customers and suppliers to the extent required to fulfill obligations as employer.

Authorities

Erteco may also be required to provide Personal Data to relevant authorities (e.g. [the police, financial supervisory authorities, social insurance agencies, and tax authorities]) based on mandatory law and in order to fulfil legal obligations.

Never transfer Personal Data to any third party unless approved by Erteco Data Responsible].

9. To what countries may Personal Data be transferred?

Erteco operates on a global basis. This means that Personal Data may be transferred to several different countries. Furthermore, Erteco also has Service Providers and cooperation partners, both within and outside the European Union and the European Economic Area (the "EU/EEA"). Erteco must always ensure that transfer of Personal Data to different countries has a legal basis and that it is adequately protected by the receiving parties in such countries. Adequate protection may typically be to impose on the receiving party contractual obligations that ensure that such party maintains the same high level of privacy and data security as practiced by Erteco.

10. Further Information and Contact Details

This Policy only sets out the general principles on Erteco's processing of Personal Data. For further information please see:

- **Employee Privacy Notice**
- **External Privacy Notice for Suppliers and Service Providers**
- **IT-Policy**

The following individuals are responsible in respect of Personal Data processing of Erteco and can answer any question related to such processing:

- Niklas Olsson; niklas.olsson@erteco.se; +46 705 87 00 82
- Peter Philip; peter.philip@erteco.se; +46 708 58 72 17

11. Updates to or Non-Compliance with this Policy

In order to ensure compliance with the applicable data protection legislation, as amended from time to time, this Policy may be amended by Erteco at any given time. Latest version to find in Addsystems.

It is important that Erteco and its employees at all times ensure compliance with this Policy and the applicable data protection legislation. Any breach of the Policy shall be reported to Erteco Data Responsible promptly.

Last updated: May 21st 2018