



Air handling with focus on LCC

5.2.9 Privacy policy

Privacy policy – IV Produkt AB

This policy is applied to all processing (collection, storage, transfer, etc.) of personal data that occurs within IV Produkt Aktiebolag, ("IV Produkt"). IV Produkt processes personal data only in accordance with current personal data legislation to protect personal integrity.

'Personal data' means any information relating to an identified or identifiable natural person. An identifiable natural person is a person who can be directly or indirectly identified by, for example, user name, an identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

All of IV Produkt's employees must be familiar with and follow this policy. IV Produkt works continuously to increase the employees' awareness of the processing of personal data.

Personal data processing

IV Produkt is transparent regarding how and why personal data is gathered and processed.

'Processing' refers to all work with personal data, such as collection, storage and use.

IV Produkt processes the following personal data:

- Names and contact information for ongoing business contacts,
- Names and contact information for earlier business contacts,
- Names, personal ID numbers, user names, salaries, any disciplinary measures, account numbers, certifications, trade union affiliation where applicable (see below) and contact information for employees, employment numbers
- Names and contact information for employees' relatives,
- Names, personal ID numbers and contact information for contracted consultants,
- Names, personal ID numbers and contact information for former employees and

- Names, personal ID numbers, photographs, application documents and contact information for job applicants.

IV Produkt processes no sensitive personal data with the following exceptions. Information on trade union affiliation is only processed to the extent that IV Produkt will negotiate with the union or has an obligation to make salary withholdings for union dues. IV Produkt processes information on employee health to the extent necessary in the scope of IV Produkt's rehabilitation responsibility or calculation of sick pay.

Collection of personal data

IV Produkt primarily collects personal data directly from the data subject according to the following.

- Through a form on IV Produkt's website,
- In e-mail and phone contact,
- Through the website and social media,
- When preparing and entering agreements and
- When recruiting and for ongoing employment conditions,
- Through camera surveillance.

In some cases, IV Produkt collects information from another party than the data subject, such as from publicly available sources and from third parties in the form of contact lists or information from credit rating agencies. When IV Produkt collects data from a party other than the data subject, the data subject is notified of the processing as soon as possible and no later than within one month of when the data was gathered.

Purpose of the processing

IV Produkt only processes data for the purpose for which the data has been collected as per below:

- ***Entering and maintaining contractual relationships***

IV Produkt processes personal data in connection with preparing agreements (potential customers, suppliers and cooperative partners) and for administration and fulfilment of agreements reached (current and former customers, suppliers or cooperative partners).

Personal data on business contacts is registered to maintain a contact list. Processing takes place on the basis of IV Produkt's legitimate interest of maintaining business relationships and in order to communicate with the data subjects. IV Produkt assesses as the starting point that this interest outweighs the data subjects' interest of protection for their personal integrity. Personal data will be processed solely for the intended purpose and only as long as the data subject is a business contact of IV Produkt.

Processing of the personal data is necessary in order for IV Produkt to be able to submit tenders and fulfil commitments as per agreement.

Information on previous customers is removed according to IV Produkt's procedures.

- ***Recruitment***

IV Produkt processes personal data that is collected in connection with recruitment procedures. In connection with such collection, the data subjects are given the possibility to consent to IV Produkt saving personal data for future employment procedures.

It may happen that personal data is processed in computer systems at IV Produkt's associated companies and organisations with which IV Produkt cooperates in the recruitment process. The personal data will be preserved by IV Produkt and its cooperative partners for the time it is necessary, considering the implementation of the recruitment procedure.

In the recruitment procedure, applicants are given the opportunity to consent to IV Produkt saving personal data for IV Produkt's future recruitment needs. The applicant can revoke such consent at any time. When the data subject no longer consents to IV Produkt processing the personal data for future recruitment procedures, the data is deleted.

- ***Maintaining employment relationships***

IV Produkt processes personal data about employees in the scope of the employment relationship. The data is collected for human resources (HR) administration, occupational health services and, where applicable, for use of references in tender procedures and authorisation checks in tender procedures.

IV Produkt registers personal data that is necessary for IV Produkt's HR administration. The data is registered in IV Produkt's HR administrative systems. The processing is necessary in order for IV Produkt to be able to fulfil its contractual obligations according to the respective employment contract and book keeping and reporting obligations according to law.

HR administrative data may be submitted to authorities concerned.

IV Produkt also processes personal data on employees' relatives to be able to contact relatives in the event of an accident or illness. IV Produkt's relative registration is only available to IV Produkt's HR administration.

- ***Marketing***

IV Produkt processes personal data to conduct direct sales, direct marketing and customer service. The personal data is collected when you are in personal contact with us: by letter, phone or social media or through our websites. We can also collect personal data from other legitimate sources, such as third-party data collectors, our marketing partners, public sources or social networks. The data is processed on the basis of IV Produkt's legitimate interest of maintaining a contact list, maintaining business contacts and in order to communicate with the data subject as a business contact. IV Produkt deems as a starting point that these legitimate interests outweigh the data subject's interest of the data not being processed.

- ***Development and improvement of IV Produkt's products***

IV Produkt processes correspondence and feedback regarding the company's products, purchases and user-generated data, such as click and visiting history, technical data regarding units used and information on interaction with IV Produkt, such as data on how long pages were visited and how pages were reached. The data is processed on

the basis of IV Produkt's legitimate interest of being able to develop and improve the company's products and systems. IV Produkt deems as a starting point that these interests outweigh the data subject's interest of the data not being processed.

- **Security**

Personal data collected through camera surveillance within the scope of IV Produkt's operations.

Removal of personal data

Personal data is not stored longer than necessary to be able to fulfil the purpose of the processing. IV Produkt continuously removes personal data when it is no longer relevant for the purposes for which it was gathered. As a starting point, this means that personal data is only saved until all of IV Produkt's and the data subject's dealings are finally settled.

Release of personal data

IV Produkt may share personal data with IV Produkt's personal data processors. IV Produkt's personal data processors process personal data on behalf of IV Produkt and according to IV Produkt's instructions. IV Produkt has personal data processors that process transports and deliveries, marketing, IT services and HR administration.

IV Produkt has written agreements with the company's personal data processors. According to these agreements, the security of the personal data that is processed is guaranteed and the personal data processor undertakes to comply with IV Produkt's security requirements and requirements regarding international transfer of personal data.

IV Produkt may share personal data with companies within IV Produkt's corporate group for internal administrative purposes regarding customers or employees and for direct marketing of Group company products. If such sharing occurs, the companies within IV Produkt's Group are jointly personal data controllers for the personal data.

Release to independent personal data controllers outside IV Produkt's Group only takes place if compulsory law requires it or if the data subject has consented thereto.

Correction, deletion and data portability

The data subject has the right, according to personal data legislation, to request so-called register transcripts with information on what personal data IV Produkt processes regarding the individual. In addition to this, the data subject has the right to demand that IV Produkt transfers the data subject's personal data to the party appointed by the data subject. The request according to this paragraph must be made in writing by the individual personally to avoid unauthorised access to personal data.

The data subject also has the right to, at any time, request that IV Produkt corrects, blocks or deletes the individual's personal data. If IV Produkt is obliged by law to continue with the storage of the personal data, the data can only be blocked.

Rights

Upon the data subject's request, IV Produkt provides information on the extent to which personal data about the data subject is processed, a so-called register transcript. Without delay and no later than within one month after the request has been received, IV Produkt provides information on what personal data is processed, the categories of personal data the processing concerns, the predicted period the data will be stored, where the data was collected, for what purpose or purposes, to whom the data was released and a copy of the personal data.

The data subject has a right to request that IV Produkt corrects or deletes personal data that is incorrect or processed in conflict with applicable law.

In order for IV Produkt to be able to ensure that the request has not been made by anyone other than the data subject, the request above must be made in writing by the data subject.

The data subject has a right at any time to make objections to his or her personal data being processed for direct marketing. IV Produkt will in such a case stop processing the data subject's personal data for this purpose.

In connection with IV Produkt collecting personal data, IV Produkt provides information to the data subject on what company is the personal data controller, the purpose for which the data has been collected and such information as is required for the data subject to be able to safeguard his or her rights in accordance with current personal data legislation.

Information security and measures

IV Produkt implements the technical and organisational measures required to ensure that the processing takes place in accordance with current personal data legislation, this policy and that the personal data shall not be lost, or become available to unauthorised personnel.

Personal data is stored within IV Produkt's network, locally on mobile phones and computers and in e-mail.

IV Produkt uses antivirus software and has procedures for password strength and change of passwords.

Responsibility for personal data

IV Produkt is the personal data controller for the processing of personal data that takes place on behalf of IV Produkt and is accordingly responsible for ensuring such processing is legal and proper.

Any questions, comments and complaints regarding IV Produkt's processing of personal data are to be made to the e-mail address: privacy@ivprodukt.se, or by ordinary postal service to:

IV Produkt AB
Box 3103, Sjöuddevägen 7
350 43 Växjö
SWEDEN

Supervising authority - Swedish Data Protection Authority

If you believe that IV Produkt violates current personal data legislation, you have the possibility of turning to the Swedish Data Protection Authority. More information is available on the Swedish Data Protection Authority's website on what to do.