

29 NOV 2018

PRIVACY POLICY FOR CUSTOMERS, SUPPLIERS AND PARTNERS

This privacy policy has been established by SODEMANN Industrifjedre A/S (hereinafter "SODEMANN") and applies to all SODEMANN's customers and partners. The privacy policy includes information on:

- 1) What is personal data?
- 2) What type of personal data do we process about you and why?
- 3) What do we use your personal data for?
- 4) What are our legal grounds for processing personal data?
- 5) Who do we share your personal data with?
- 6) How is your personal data stored securely?
- 7) What are your rights as a data subject?

1. About SODEMANN

SODEMANN is a company that deals in everything to do with springs, with standard springs being its specialty.

SODEMANN manufactures and sells springs for industry and private individuals.

In connection with SODEMANN's business operations, SODEMANN collects and processes personal data in order to fulfil the purposes described in this privacy policy.

SODEMANN is the controller for the processing of your personal data for these purposes.

If you have any questions about this privacy policy or SODEMANN's processing of your personal data as part of our business operations, you can contact us here:

SODEMANN
Gamma 5
DK-8382 Hinnerup
Denmark
CVR no. 20209445
E-mail: sif@fjedre.dk

2. Data security is important to us

For us, the responsible handling of personal data collected in the operation of our business is critical to our business goals and reputation. This privacy policy outlines how your personal data is collected and used when you are a customer of SODEMANN, and how you can gain access to your own personal data.

3. What is personal data?

Personal data is any information relating to an identified or identifiable natural person.

An identifiable natural person is one who can be identified, directly or indirectly, especially by means of an identifier, e.g. a name, an identification number or one or more factors that are unique to a given person's identity.

4. What type of personal data do we process about you and why?

The data that we collect about you will be used for various purposes in connection with our administration of the customer relationship/partnership and SODEMANN's business operations. The data collected may vary, depending on whether you are a customer, supplier or business partner, but in general it will be data such as contact information for the purpose of customer administration, supplier management, and information concerning SODEMANN's associated rights and obligations.

A refusal to provide personal data on your part may mean that SODEMANN is unable to meet its obligations in connection with your customer or supplier relationship.

SODEMANN only collects and processes "general" personal data in connection with your customer or supplier relationship with SODEMANN.

SODEMANN will typically collect the following data:

Information relating to our customers

Data that you provide us with when you become a customer of SODEMANN, including contact information (in particular company name and address), your preferences in terms of marketing or communications, and data that you provide us with if you contact us with a question, to report a problem or make a complaint, or when you otherwise contact us as part of your customer relationship with SODEMANN (e.g. your work e-mail address, any direct telephone number and your job title).

Information relating to our suppliers and partners

Data that you provide us with in connection with entering into a supply or cooperation agreement, including contact information (position, job title, first name, middle name(s), surname, address, telephone number and e-mail address), data that you provide us with regarding your preferences in terms of marketing or communications, and data that you provide us with if you contact us with a question, to report a problem or when you otherwise contact us as part of our cooperation.

Information we collect and process when you visit our website

Data about the way in which you navigate within and between our sites and the resources that you access, information about your computer, device and browser, including in some cases your IP address, browser type and other hardware and software information. If you access our website from a mobile device, we may also collect a unique identification number assigned to your device.

5. Use of your personal data

SODEMANN processes your personal data for the purposes listed below. Note that not all of the stated purposes, categories of data, recipients of data or types of data processing apply to you in all cases.

SODEMANN only processes your personal data to the extent necessary in connection with your customer, supplier or cooperative relationship (taking into account any interests in each individual case) or in accordance with applicable law.

Administration of customer relationships

SODEMANN processes your personal data in connection with the creation and administration of your customer relationship with SODEMANN, where you are a customer or a contact person at a customer. The processing takes place as part of SODEMANN's business operations, including invoicing, debt collection and marketing. SODEMANN may also process data on other (contact) persons at the customer in connection with customer administration.

Administration of supplier and cooperative relationships

SODEMANN processes your personal data in connection with the administration of the supplier and/or cooperative relationship, when you are the supplier or partner or are the contact person at a supplier or partner that SODEMANN works with as part of its business operations, including the maintenance of our CRM register containing information on our contact persons at our suppliers and partners.

Operation and maintenance of our websites

The provision of our online services on our websites, including support for the ongoing evaluation and improvement of our websites.

Compliance with applicable laws and regulations

Compliance with laws and regulations that SODEMANN is subject to in connection with its business operations, or to comply with various reporting or disclosure obligations in accordance with the applicable laws and regulations to which SODEMANN is subject.

SODEMANN does not use your personal data to make decisions solely based on automatic processing, including profiling.

SODEMANN strives to ensure that all the personal data we process is accurate and up to date. We therefore ask you to always inform us of any changes in your circumstances (e.g. change of address or payment information), so that we can ensure that the data we hold is always accurate and up to date.

6. The legal basis for processing your personal data

SODEMANN only processes your personal data when we have a legal basis for doing so. SODEMANN only processes general data about you.

Our processing of your data is essentially based on one of the following grounds:

- **Consent:** You have given your consent to the processing of your personal data for one or more specific purposes (e.g. for receiving newsletters). Processing on the basis of consent is provided for in Article 6 point 1 (a) of the General Data Protection Regulation.
- **Contract:** The entering into or performance of your customer, supplier or cooperative agreement with SODEMANN. Processing on the basis of a contract is provided for in Article 6 point 1 (b) of the General Data Protection Regulation.
- **Legal obligation:** Compliance with a legal obligation to which SODEMANN is subject. Processing on the basis of a legal obligation is provided for in Article 6 point 1 (c) of the General Data Protection Regulation. This applies in particular to the Danish Bookkeeping Act, which obliges SODEMANN to keep all bookkeeping material for a minimum of 5 years.

In addition to the above, there may be other legislation that obliges SODEMANN to process personal data. This applies in particular to laws and law amendments that are adopted after the creation of this privacy policy, laws/ordinances that are subsequently imposed on SODEMANN as a result of changes at the company, and special conditions that are applicable as a result of your employment relationship.

- **Our legitimate interests:** on the grounds of SODEMANN's legitimate interests, i.e. the purposes described above (e.g. customer analyses and segmentation). Processing on the basis of our legitimate interests is provided for in Article 6 point 1 (f) of the General Data Protection Regulation.
- **Legitimate interests of third parties:** There may also be situations in which we process your personal data for the sake of the legitimate interests of a third party in respect of the purposes described above, unless the consideration of your interests takes precedence. Processing on the basis of a third party's legitimate interests is provided for in Article 6 point 1 (f) of the General Data Protection Regulation.

7. Sharing of personal data

SODEMANN only discloses personal data to the extent necessary as part of its business operations.

SODEMANN may also disclose and/or make available your personal data to other suppliers and/or service providers in connection with the normal operation of our business, e.g. in connection with the external administration of our IT systems, analyses, marketing services, debt collection services, credit assessment, auditing, legal assistance, etc.

SODEMANN strives as far as possible to limit the disclosure of personal data in a personally traceable format in order to restrict the situations in which disclosed data can be traced back to you personally.

SODEMANN will not disclose your personal data, unless this is necessary in order to be able to conduct our business or meet your needs.

SODEMANN does not transfer your personal data to countries outside the EU/EEA.

8. Data integrity and data security

Personal data is not stored for longer than necessary to fulfil the purpose for which it was collected, unless the storage is required to meet national legal requirements, including statutory retention periods in connection with bookkeeping, etc.

SODEMANN in principle stores your personal data for the entire term of the agreement and for a period of up to 5 years after termination of the agreement, unless a shorter or longer retention period is specifically justified (e.g. in the event of a dispute).

It is SODEMANN's policy to protect personal data by taking adequate technical and organisational security measures. Where there is no further need for your personal data, we will ensure that the data is erased in a secure manner.

9. Your rights

In accordance with the General Data Protection Regulation, you have certain rights with regard to your relationship with SODEMANN. You should be aware that we will not always be obliged to observe these rights, and in some cases we will only be able to observe the rights to a limited extent. For example, you are not entitled to have data about you stored by SODEMANN erased if there is legislation that obliges SODEMANN to store said data.

- **Access:** You can request access to the personal data we hold about you and to be informed of what the data is used for and who it is disclosed to, among other things.
- **Objection:** You may object to the processing of data, including objecting to automated decision-making and profiling, or to the use of your personal data for direct marketing purposes.
- **Rectification:** You can request the rectification of any incorrect data about you.
- **Restriction and erasure:** You can request that data about you be restricted or erased if the conditions for this are met.
- **Data portability:** You can invoke your right to data portability in relation to data that you have provided to us, provided that the processing is based on consent or contract, and this is technically feasible in other respects.

In addition, you have the right to withdraw your consent to the processing of your personal data, where the processing is based on your consent.

If you would like to invoke one or more of your rights, please contact Jørgen Sodemann by e-mailing js@fjedre.dk.

Your request will be processed in accordance with the data protection legislation applicable at the time. Complaints regarding SODEMANN's processing of your personal data can be submitted to:

The Danish Data Protection Agency
Borgergade 28, 5. sal
DK-1300 Copenhagen K Denmark
E-mail: dt@datatilsynet.dk

10. Updates

SODEMANN will continuously update and evaluate this privacy policy. Therefore, you should regularly check this privacy policy for any changes that may affect the processing of your personal data.