

# *Privacy Policy*

DECEMBER 2023



## *Privacy Policy Utilifeed*

Utilifeed AB, org. nr. 559080-9280, Masthamnsgatan 5, 413 27 Göteborg, ("Utilifeed"), is the Personal Data Controller and Processor and is responsible for the processing of personal data pursuant to applicable law, including EU General Data Protection Regulation (GDPR). Johan Kensby, johan@utilifeed.com, is the Data Protection Officer at Utilifeed.

This privacy policy states which personal data that is processed by Utilifeed, the purpose of the processing (why we process the personal data), the legal basis of the processing, the data retention period (how long we keep the data), to whom Utilifeed transfer personal data, where the personal data is stored geographically and your legal rights.

### **1. Which personal data do we process, why, on which legal basis and for how long do we keep it?**

Utilifeed processes both personal data that you provide to us and personal data which we collect from you.

When the legal basis is identified as legitimate interest in the tables below, our interest in processing your personal data supersedes your interest in not having your personal data processed.

## 1.1 Before we have entered a business relation with you

Why do we process your personal data? (Purpose)	Which types of personal data do we process?	Which are the legal bases for the processing?	For how long do we keep the personal data?
<i>To create and develop new business relations.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> <li>• Correspondence and documentation</li> </ul>	<p><u>Legitimate interest:</u></p> <p>The processing is necessary for our legitimate interest in creating new customer relations, maintain customer relations and enter into new business relations. These interests override your interest of protecting your personal integrity.</p>	3 months.
<i>For marketing purposes.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> <li>• Correspondence and documentation</li> </ul>	<p><u>Legitimate interest:</u></p> <p>The processing is necessary for our legitimate interest in marketing the products and services of the company. This interest overrides your interest of protecting your personal integrity.</p>	3 months.

## 1.2 When we have entered a business relation with you or your organization

Why do we process your personal data? (Purpose)	Which types of personal data do we process?	Which are the legal bases for the processing?	For how long do we keep the personal data?
<i>To deliver our products and services, to uphold our contracts, to maintain contact with your organization and to follow up business contacts.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> <li>• Personal identification number in the case of digitally signed contracts (necessary to verify the identity of the signee)</li> <li>• Photographs</li> <li>• Correspondence, documentation and logs of your use of our products and services.</li> </ul>	<p><u>Contractual obligations:</u></p> <p>The processing is necessary to uphold our contract.</p> <p>Alternatively</p> <p><u>Legitimate interest:</u></p> <p>The processing is necessary to maintain contact with your organization, deliver products/services and your use of those as well as to uphold our contract. Our interests to do so overrides your interest to protect your integrity.</p> <p>Alternatively</p> <p>Consent.</p>	<p><u>Customer register:</u></p> <p>During contract period and 1 year thereafter.</p> <p><u>Customer contracts:</u></p> <p>During contract period and 10 years thereafter (subject to general limitation period).</p> <p>Photographs: For as long as we have received consent.</p>
<i>In order to evaluate, develop and enhance our products and services.</i>	<ul style="list-style-type: none"> <li>• Contact information in form of email address,</li> <li>• Company of employment and role at company</li> <li>• Logs of your use of our products and services.</li> </ul>	<p><u>Legitimate interest:</u></p> <p>Our and your interest to evaluate, develop and enhance our products and services overrides your interest to protect your integrity.</p>	One year.

<i>For marketing purposes.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> <li>• Correspondence and documentation</li> </ul>	<u>Legitimate interest:</u>  The processing is necessary for our legitimate interest in marketing the products and services of the company.	During contract period and 1 year thereafter.
<i>In order to prevent abuse of our products and services or to prevent or investigate crimes against the company.</i>	<ul style="list-style-type: none"> <li>• Contact information in form of email address,</li> <li>• Company of employment and role at company</li> <li>• Logs of your use of our products and services.</li> </ul>	<u>Legitimate interest:</u> Our interest to prevent abuse or prevent or investigate crimes overrides your interest to protect your integrity.	One year.
<i>For accounting and invoicing.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> </ul>	<u>Legal obligations:</u>  To comply with accounting regulation.	7 years from the fiscal year end.

### 1.3 Suppliers

Why do we process your personal data? (Purpose)	Which types of personal data do we process?	Which are the legal bases for the processing?	For how long do we keep the personal data?
<i>To order services, enter contracts and uphold our parts of contracts.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> <li>• Correspondence and documentation</li> </ul>	<p><u>Contractual obligations:</u></p> <p>The processing is necessary to uphold our contract.</p> <p>Alternatively</p> <p><u>Legitimate interest:</u></p> <p>The processing is necessary to maintain contact with your organization, deliver products/services and to uphold our contract. This interest overrides your interest of protecting your personal integrity.</p>	<p><u>Supplier register</u></p> <p>During contract period and 1 year thereafter.</p> <p><u>Supplier contracts</u></p> <p>During contract period and 10 years thereafter (subject to general limitation period).</p>
<i>For accounting and invoicing.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> </ul>	<p><u>Legal obligations:</u></p> <p>To comply with accounting regulation.</p>	7 years from the fiscal year end.

## 1.4 Partners

Why do we process your personal data? (Purpose)	Which types of personal data do we process?	Which are the legal bases for the processing?	For how long do we keep the personal data?
<i>To enter contracts, share measurements and data/work material, invite to project meetings, seminars and to develop new business opportunities.</i>	<ul style="list-style-type: none"><li>• Name</li><li>• Contact information (such as phone number, email address, address)</li><li>• Company of employment and role at company</li><li>• Correspondence and documentation</li></ul>	<p><u>Contractual obligations:</u></p> <p>The processing is necessary to uphold our contract.</p> <p>Alternatively</p> <p><u>Legitimate interest:</u></p> <p>The processing is necessary for our legitimate interest to acquire new customer contacts and enter new business opportunities, to uphold our parts of contracts and to invite to project meetings. These interests override your interest of protecting your personal integrity.</p>	During contract period and 10 years thereafter (subject to general limitation period).

<i>For accounting and invoicing.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (such as phone number, email address, address)</li> <li>• Company of employment and role at company</li> </ul>	<u>Legal obligations:</u>  To comply with accounting regulation.	7 years from the fiscal year end.
<i>In order to prevent abuse of our products and services or to prevent or investigate crimes against the company.</i>	<ul style="list-style-type: none"> <li>• Contact information in form of email address,</li> <li>• Company of employment and role at company</li> <li>• Logs of your use of our products and services.</li> </ul>	Legitimate interest: Our interest to prevent abuse or prevent or investigate crimes overrides your interest to protect your integrity.	One year.
<i>In order to evaluate, develop and enhance our products and services.</i>	<ul style="list-style-type: none"> <li>• Contact information in form of email address,</li> <li>• Company of employment and role at company</li> <li>• Logs of your use of our products and services.</li> </ul>	Legitimate interest: Our and your interest to evaluate, develop and enhance our products and services overrides your interest to protect your integrity.	One year.



## **2. To whom do we transfer your personal data and where are they processed?**

Your personal data may be processed by other parties than us. As an example, your personal data may be transferred to consultants which we hire, such as accountants, lawyers and IT-consultants. Each party we transfer personal data to is responsible for their processing of your personal data.

We may also transfer your personal data to our service suppliers who process your personal data on our behalf, these parties are so called Personal Data Processors. We have contracts in place with our Personal Data Processors to ensure that they process your personal data according to this privacy policy and all other instructions we give them.

Utilifeed may also transfer your personal data in order to allow for a merger, acquisition or sale of all, or parts of, our assets.

We may also transfer your personal data on a legal request from a governing body.

To the possible extent, we strive to only process your personal data within the EU/EES region. In the event of your personal data being transferred for processing outside of the EU/EES, we ensure that your personal data is being protected to the same extent as it would have been within the EU/EES through Standard Contractual Clauses. The Standard Contractual Clauses are found here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

### 3. Your legal rights

You have the right to, free of charge, request to be given information on which personal data that Utilifeed has collected from you and how the personal data has been used and processed. Any such request should be made via email sent to [privacy@utilifeed.com](mailto:privacy@utilifeed.com). You also have the right to request any correction or addition to your personal data to be made by Utilifeed, should they be erroneous or incomplete.

If you do not wish that we process or keep your personal data for direct marketing or profiling for direct marketing or to uphold the business relation between Utilifeed and your organization, you are welcome to at any time object to this by contacting us at [privacy@utilifeed.com](mailto:privacy@utilifeed.com). You may also at any time recall your consent by contacting us at [privacy@utilifeed.com](mailto:privacy@utilifeed.com). We will then, to the most possible extent, cease to process your personal data for that purpose and delete your personal data. If we need to keep your personal data for any other purpose, we cannot delete the personal data.

In some circumstances you have the right to demand a limited processing. If you have that right, any personal data that are subject to the limitation must be processed in the following manner: The personal data is processed with your consent to establish, practice or defend legal demands or to protect the rights of another physical or legal entity or for public interests. Your personal data will be stored by us.

You have the right to request and receive any personal data that you have provided us with in a structured, machine-readable format and you have the right to transfer this data to another data controller if it is technically feasible.

Contact us with any feedback on our processing of your personal data. You also have the right to file complaints regarding our processing of personal data to the Swedish Data Protection Authority, Integritetsskyddsmyndigheten (IMY), via mail or email to the following addresses:

Integritetsskyddsmyndigheten  
Box 8114  
104 20 Stockholm  
<mailto:imy@imy.se>

This privacy policy is subject to change. Any change will take effect, at the earliest, 30 days after you have been informed by Utilifeed about the changed integrity policy at [Utilifeed.com/privacy](https://utilifeed.com/privacy).