

# Uniter Personal Data Policy

## 1. INTRODUCTION

Integrity and data protection is important for us at Uniter AB (Org no. 556938-8860). This policy states the purposes and the legal basis for Uniter AB processing of your personal data when you are in contact with us. The policy also states your rights as a data subject. Uniter AB will hereinafter be referred to as "Uniter".

You should always be able to feel safe when you leave your own personal data or those of others to us and the purpose of this policy is to explain how Uniter collects and use your personal data.

Uniter is keen to protect your personal integrity and Uniter processes personal data in accordance with applicable laws and regulations. The policy is drawn up in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as *the Data Protection Regulation*), and applicable national legislation.

This integrity policy applies to all who in any way use Uniter's services or products and/or in any other way is in contact with us. In this policy, Uniter explains its processing of personal data and the rights you have in accordance with applicable legislation concerning personal data.

## 2. DEFINITIONS

*Processing:* Any operation or set of operations which is performed on personal data, whether or not by automated means. Processing can consist of collection, recording, organisation, structuring, storage, adaption, alteration, retrieval, consultation, use, disclosure, by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

*Personal data:* Information which directly or indirectly can be related to a living natural person. Such information is, for example, identification numbers, personal e-mail addresses, phone numbers and so on, but also encrypted data can constitute personal data if they can be linked to natural person. All information that can identify a natural persons' physical, physiological, genetic, economic, cultural and/or social identity is personal data.

*Controller:* A natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data. In this policy the controller is Uniter.

*Data subject:* The natural person that is impacted by this policy when Uniter process their personal data in our activities.

### 3. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

We at Uniter are the data controller. Personal data can be processed by us or our partners. Our partners are either our data processors or independent data controllers. When our data processors process your personal data, their processing is in accordance with the purposes and means that have been explained in this policy.

In cases where Uniter is, by way of exception, compelled to leave your personal data to a third party that is not processing your personal data in accordance with Uniter's instructions, the third party is an independent controller regarding the processing. This is the case, for example, when your personal data is provided to partners who are not our data processors or to authorities.

### 4. PURPOSES OF THE PROCESSING

Uniter processes your personal data in order to handle offers, requests, orders, deliveries, project management and sale statistics.

Uniter also processes your personal data when you apply for a job at Uniter, in order to handle invoices, manage our payments and for marketing purposes in order to provide our existing and potential customers information and offers. Uniter also processes your data in order to give our customers access to our web app.

Uniter keeps personal data concerning our clients and their employees and suppliers in order to maintain good relations and to facilitate our contact with you. Uniter also saves personal data in order to fulfil our legal obligations concerning accounting and other mandatory rules of the law.

### 5. WHEN DOES UNITER COLLECT YOUR PERSONAL DATA?

Uniter processes personal data that you or your representative submit to us when you or your representative on your behalf, for example, use our services, place an order or Uniter places an order from you, participate in our events, contact us, or use our digital channels.

Uniter also processes personal data received from someone other than the data subject. This can be the case when a client has information on a partner, a subcontractor or another who is engaged in our mission with the client and that Uniter needs to come into contact with in order to fulfil our agreement with the client.

Uniter might also collect your contact data from other sources than you if Uniter needs to correct or complete this data, whereas this can be collected from public authorities and/or public registers.

Uniter collects and stores the following information from other than the data subject:

#### **Customers**

*Identification data:* First name and surname of the company's contact person and title.

*Contact details:* Company's contact person, title, phone number, e-mail address. Name, e-mail address and phone number of people participating in our projects.

## **Potential employees, potential customers**

*Identification data:* First name, surname and titles. If personal identification number and photos are included in applications of potential employee's this information is processed.

*Contact details:* Phone number, address and e-mail address.

## 6. LEGAL BASIS FOR THE PROCESSING

The legal basis for processing not sensitive personal data of customers, potential customers and potential employees is legitimate interest (to fulfil contract) and the purpose is daily work. When processing not sensitive personal data on customers and potential employees a second lawful basis applies since processing is necessary for compliance with a legal obligation to which the controller is subject.

The legal basis for processing sensitive personal data of potential employees is legitimate interest (to fulfil contract) and the purpose is daily work. Uniter does not process sensitive personal data on customers or potential customers. When processing sensitive personal data potential employees, a second lawful basis applies since processing is necessary for compliance with a legal obligation to which the controller is subject.

## 7. FOR HOW LONG DOES UNITER SAVE YOUR PERSONAL DATA

- The personal data is stored as long as required to fulfil our agreement with the client, meet our obligations under the Swedish Accounting Act and other peremptory laws, ensure that Uniter has necessary information after the completed assignment in case a client demands a measure due to error in the service.
- Identification data and contact details are saved under the guarantee period of ten (10) years.
- Personal data is erased or anonymised when they are no longer relevant for the purposes for which they have been collected.
- Personal data that has been collected for marketing purposes is erased at latest one (1) year after the collection if the client, following a request, has not given their consent to further processing.
- Accounting information is stored during seven (7) years following the calendar year when the accounting year came to an end.
- Data related to the owner or contact person of Uniter's clients and subcontractors are stored for one (1) year from collection of the data or for as long as it is relevant due to our agreement with the relevant party.

## 8. RECIPIENT OF PERSONAL DATA

Uniter only provides data to third parties, i.e. someone outside of Uniter's organisation which is an independent legal person and acts as an independent legal person, when necessary to provide our services or to fulfil our commitments towards, for example, authorities in the public sector. Third parties are e.g. one of our hired subcontractors or partners.

Furthermore, your personal data can be disclosed to Uniter's IT service suppliers.

If Uniter uses other service providers that are transmitting your personal data to countries outside of the EU and EEA Uniter will take measures to protect your personal data in accordance with applicable mandatory rules of the law, for example by demanding guarantees that the supplier protects the data in accordance with applicable data protection rules. Contact us if you want to know more about our safeguard measures.

Personal data can also be disclosed pursuant to law, regulation, order or official decision.

In our organisation, it is only the people that need to process your personal data in order for us to fulfil our commitment toward you as a client who has access to the data.

- CRM data is only accessible to the Uniter Sales Team. Currently this is the CEO and the salesman.
- App data (including passwords) is accessible to all Uniter Employees.
- E-mail is stored at Office365 from Microsoft.
- App data (including passwords) is stored on Microsoft Azure Servers.
- All other data (project data, employee data, customer data) is stored in Storegate Cloud Services.

## 9. WHAT ARE YOUR RIGHTS

- *Request for an extract from the register*  
You have the right to, at any time, request information on the personal data Uniter has about you (an extract from the register). If you request this more than once in each calendar year, Uniter will charge you an administrative fee to provide the information.
- A request for an extract from the register is handled by Uniter. Uniter answers your requests without undue delay. If Uniter for any reason cannot fulfil your wishes, a justification will be provided and Uniter will inform you on how much time Uniter needs to answer your request.
- Your extract from the register will be sent to your registered address or to the e-mail address you left in connection with the start of the processing activities.
- *Request for rectification, alteration and erasure*  
If your data is inaccurate, incomplete or irrelevant, you are entitled to request to have them rectified, altered or erased.
- *Objecting to processing*  
You have the right to object to processing based on the legal ground weighing of interests, i.e. where Uniter has set a legitimate interest as basis for the processing.
- *Data portability*  
If you wish to transmit the personal data that you have shared with us to someone else, you have the right to receive a copy of the personal data concerning you in a commonly-used format.
- *Restriction of processing*  
You can also have the right to request that the processing of your personal data is restricted when possible. However, if you request such restriction of the processing,

it may lead to us not being able to fulfil our commitments toward you during the ongoing restriction.

- *The right to lodge a complaint*  
Uniter asks you to contact us at mail if you are dissatisfied with the way Uniter treats your personal data.
- You also have the right to lodge complaints to the Swedish Data Protection Authority.

## 10. CHANGES TO THE PRIVACY POLICY

Uniter reserves the right to make amendments to the privacy policy. You can always find the latest version on our website. In case Uniter make amendments of greater impact relating to our way of processing personal data it will be communicated to you directly.

## 11. CONTACT TO DATA CONTROLLER

### **Uniter AB**

Hantverkargatan 21, 3tr

112 21 Stockholm

In all matters regarding this policy, please contact:

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