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## **PRIVACY NOTICE FOR THE APPLICATIONS**

2024-12-13

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LINDAB GROUP

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## 1. PRIVACY NOTICE FOR USAGE OF THE APPLICATIONS

*Last updated on: 202412-13 v.1.0*

### **Data controller and personal data processed**

1.1 Lindab AB, Swedish company reg. no 556606-5446 (“**Lindab**”), is committed to protecting your personal data. This privacy notice describes how Lindab processes and uses the personal data that we receive from you when you enter information in connection with your use of any of the applications listed below “**the Applications**” and how you can contact us if you have additional questions regarding our processing of your personal data. Lindab is the data controller of any personal data that may be collected, processed and held by Lindab following your usage of the Applications, unless we inform you otherwise. For questions not related to the Applications, please turn to Lindabs general privacy policy.

The “Applications” includes following product selection tools;

- LindQST
- OneSync
- Vent Tools
- OneLink
- OneSet

1.2 You can reach Lindab using the following contact details:

Lindab AB

269 82, BÅSTAD

[gdpr@lindab.com](mailto:gdpr@lindab.com)

1.2.1 The following personal data regarding you, or your customer, may be collected from your usage regarding the Applications.

- Name                      - Employer              - Country of residence              - Profession
- Address                      - Email                      - Phone              -IP-address

1.3 When creating an account, some information fields on the Applications are marked with \* character. They are mandatory when you fill in your data. The consequence of not providing the information is that Lindab will not be able to set up an account for you.

1.4 If you choose to enter personal data regarding your customer in the Applications, for example the name and email of a customer employee, you are obliged to inform the customer within a reasonable period after having entered the personal data into the Applications, but at latest within one month. Since Lindab does not have any contact with your customer, or the affected customer employee, you can provide the data subject with this privacy notice to make sure that correct information is provided.

### **Why we are processing your personal data and our lawful basis**

1.5 Lindab collects and stores personal data, for example name, address, email, and telephone



number, that you submit in order to obtain information from us. This personal data helps us to process your request for information regarding Lindabs products and solutions.

- 1.6 Lindab also collects and stores personal data that you submit (a) as part of your account details (if applicable) to administer your account and/or (b) in connection with your requests for, or purchase of, products on our website (where such functions exist) to complete your product orders and/or (c) when entering feedback- or bug reports to reconnect and report status back to you. Such information may include your e-mail address and your selected market in the Applications.
- 1.7 In addition to the above-mentioned use and purposes, we may also use your personal data to administrate and improve the Applications, for our internal records, for statistical analysis and/or to contact you regarding sales and as a part of our customer relation procedures. Additionally, we store your preferences you set up when using the Applications.
- 1.8 Lindab has a legitimate interest in processing your personal data for the mentioned purposes. When legitimate interest is the appropriate justification for processing your personal data, we have undertaken a legitimate interests assessment where the needs, expectations, rights and freedoms of all parties have been considered. Before relying on legitimate interest, we have made sure that our interests are compelling enough and will not cause any unwarranted harm. The personal data regarding your account information, which you enter when registering an account in the Applications, are processed based on our legitimate interest to provide services, as well as ensuring that you adhere to, the terms set forth by the Applications terms of use. For other personal data processing, Lindab's legitimate interest for the collection of personal data is based on the necessity to carry out the processes stipulated above in order for Lindab to provide the Applications to customers and prospects. To the extent that Lindab uses the personal data to improve the Applications or for analysing statistics, Lindab's legitimate interest is based on our interest to conduct such improvements and analysis as well as the intention to provide you a better service and more specific information.

#### **Transfer of personal data**

- 1.9 The personal data that is collected and stored is exclusively used by companies within the Lindab Group, except in the following cases where we may submit the data to recipient parties:
- When required by law;
  - To a buyer or a potential future buyer of our business, and/or;
  - To service providers appointed by Lindab who provides services connected to this website or its functions, but only to the extent it is necessary in order to provide these services – for example our supplier of debit card services to process your payments through Lindab's website, provider(s) of transport services so that they can deliver the products you buy and IT service provider(s) which hosts, develops and offers support for Lindab's websites and/or the Applications.
- 1.10 Lindab will take measures to protect all personal data transferred to such third party, or that has been transferred to other countries, in accordance with applicable data protection laws and as stated above. Lindab will not transfer your personal data to a recipient outside the EU/EEA. Any third party which processes data on behalf of Lindab, shall have sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing meets the requirements of the GDPR, and ensures the protection of



the rights of the data subjects. Such processing is governed by a suitable Data Processing Agreement with the relevant processor.

### Storage period

- 1.11 Lindab stores the personal data as long as it is necessary to fulfil the purpose for which the data has been collected. This means that Lindab deletes your personal data when such data is no longer necessary to process a request, an order or to administrate your account or our client relationship.
- 1.12 Statistics which have been anonymised may be saved thereafter. If you chose to copy a project in order to share it with a third party, the personal data contained in the project will be anonymised.
- 1.13 The information containing personalized data, for example existing Webtool projects, have a retention time of 2 years from creation (Unless the relevant Webtool for some reason is to be discontinued, in that case no data will be kept after discontinuation). All personalized data, including project-related data, will thereafter be deleted and cannot be used anymore.

### Your rights

- 1.14 Under data protection law, you have rights including:
  - **Your right of access** – You have the right to ask us for copies of your personal information that we process about you. Through this copy you will be able to understand which of your personal data we have and process. The right of access is applicable when a record contains information where an individual can be identified, and the information is about them. This means that records that are accessible to you will have the personal data about other people redacted where appropriate, in order to protect their right to privacy. Your personal data will be redacted if someone else requests access to a record containing your personal data. Legislation provides other exemptions that may be applicable such as records where legal privilege needs to be observed or there is an obligation of confidentiality in specific circumstances. Any exemption applied will have a relevant legal basis and will be explained to you were necessary.

For more information about the general right of access, please see [the webpage](#) of the Swedish Authority for Privacy Protection.

- **Your right to be informed** – You have the right to be informed of how we process your personal data. This privacy notice is an initial means of informing you about the processing of your personal data. Additional methods of keeping you informed include through FAQs, contractual agreements and through discussions – if you have a question about how we are processing your personal data, you can contact us by writing to [gdpr@lindab.com](mailto:gdpr@lindab.com).

For more information about the general right to be informed, please see [the webpage](#) of the Swedish Authority for Privacy Protection.

- **Your right to rectification** – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Any request to rectify your personal data will also be transferred and actioned by any processor with whom your personal data has been shared. This process is managed by us and will not require any additional action



from you for your right to be exercised in full.

For more information about the general right to rectification, please see [the](#) webpage of the Swedish Authority for Privacy Protection.

- **Your right to erasure** – You have the right to ask us to erase your personal information when the information is no longer necessary to fulfil the purpose of processing the information or if you retract your consent. Please note that deletion could mean that Lindab cannot process requests, or that your account expires. Any request to be forgotten will also be managed by Lindab with any processor that is processing your personal data on our behalf.

For more information about your general right to erasure, please see [the](#) webpage of the Swedish Authority for Privacy Protection.

- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your information in certain circumstances such as if the personal data is not relevant to fulfil our legal obligations.

For more information about the general right to restriction of processing, please see [the](#) webpage of the Swedish Authority for Privacy Protection.

- **Your right to object to processing** – You have the right to object to the processing of your personal data. The right can be invoked when the legal basis is legitimate interest, including profiling. If an objection is made, Lindab must show compelling legitimate interests to continue processing personal data for that specific purpose.

For more information about the general right to object to processing, please see [the](#) webpage of the Swedish Authority for Privacy Protection.

- **Your right to data portability** – You have the right to ask that we transfer the information you gave us to another organisation. This enables you to transfer it in a machine-readable format to another recipient. The right to data portability applies to personal data that is processed based on your consent or to perform a contract. It applies only to such personal data that you have provided Lindab with yourself.

For more information about the general right to data portability, please see [the](#) webpage of the Swedish Authority for Privacy Protection.

- **Your right regarding automated decision-making** – You have the right to request that a review of any profiling that is undertaken using your personal data to be undertaken by a human. However, your personal data will not be subject to any automated decision-making or profiling by Lindab.

For more information about general rights regarding automated decision-making, please see [the](#) webpage of the Swedish Authority for Privacy Protection.

- **Your right to withdraw consent** – You have the right to withdraw consent where this is the lawful basis established for the processing of your personal data i.e. when collected for certain marketing activities.

For more information about the general right to withdraw consent, please see [the](#) webpage of the Swedish Authority for Privacy Protection.



1.15 Lindab is responsible for the processing of your personal data, and requests to exercise your rights as stated above shall be addressed to Lindab. You can contact us using any of the details below if you wish to make a request:

Letter: Lindab AB, "Attn.: Lindab Group GDPR Manager", 269 82, BÅSTAD,

Email: [gdpr@lindab.com](mailto:gdpr@lindab.com) with the subject "To Lindab Group GDPR Manager".

### **Complaints**

If you have a complaint regarding the processing of your personal data by Lindab you are entitled to report such dissatisfaction to Integritetsskyddsmyndigheten ("IMY"), the supervisory authority for the personal data processing of Lindab. The contact details for IMY are as follows:

Postal address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm

E-mail: [imy@imy.se](mailto:imy@imy.se)