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### Purpose.

This privacy policy will provide you with information on what information is being collected when trading with raaco A/S, why it is being collected, how it will be used and who it will be shared with. This privacy policy will also provide you with information on your rights according to the General Data Protection Regulation (GDPR). Personal data is hereinafter referred to as "data" and the EU General Data Protection Regulation as "GDPR".

#### Extent.

This policy applies for one-man businesses, employees of customers and private end users, who have received direct delivery from raaco on behalf of raaco's customers.

### Processing of personal data.

The categories of data that we process may include:

- Master data (such as name and address)
- Contact details (e-mail and phone number)
- Order data (such as invoice address, delivery address, purchase history)

No sensitive data is collected.

We process data for the following categories:

- Employees of customers
- One-man businesses
- Private end users, to whom raaco has made direct delivery on behalf of raaco's customer
- Potential customers, whom we have made contact with e.g. at fairs

#### Purpose of processing.

We process data for the following purposes:

- Signing of agreements with customers
- Customer service and administration, including direct delivery to private end user
- Credit rating of customer
- Compliance with obligations in accordance with legislation, e.g. accounting act

We will only use your data for marketing purposes, if you are an existing customer of raaco and we therefore expect you to have some interest in receiving emails with information about raaco products or campaigns. At any time, you can unsubscribe from these emails by return mail or by contacting <a href="mailto:personale@raaco.com">personale@raaco.com</a>. The legal basis for this is both legitimate interest and contract fulfillment.

#### Legal basis for processing.

We use the following legal bases for the processing of your personal data:

• Processing is necessary for the performance of a **contract**, to which you are party, or in order to take steps at your request prior to entering into a contract cf. GDPR art. 6, para. 1.b



- Processing is necessary for <u>compliance with a legal obligation</u> to which raaco is subject cf.
   GDPR art. 6, para. 1.c
- Processing is necessary for the purposes of the <u>legitimate interests</u> pursued by raaco, except where such interests are overridden by your interests, fundamental rights or freedoms, cf.
   GDPR art. 6, para. 1.f.

# Legal interests pursuing by processing.

As mentioned above, our processing of your data partly relies on legitimate interests, cf. GDPR art. 6, para. 1.f., e.g. in the following examples:

- Credit reports for one-man businesses. The customer also has an interest in us processing
  the report, as we would otherwise require prepayment. The report is deleted, when credit
  rating is done.
- We use the social media Facebook and LinkedIn for lead generation, positioning and employer branding. We actively manage these media, as raaco is jointly responsible for what users do on the media and which personal data is being registered.

#### Sources.

As a rule, we have received your data directly from you. However, in some cases we have been given your data from a distributor, from who you have purchased raaco products, which are to be transported to your home.

# Recipients of your data.

We only disclose or share your personal data with third parties or data processors, if we have legal basis in the GDPR:

- necessary for the performance of a <u>contract</u>, such as sharing of delivery address with freight company cf. GDPR art. 6, para. 1.b. In this case both we and the freight company are independent data controllers.
- necessary for <u>compliance with a legal obligation</u> to which raaco is subject cf. GDPR art. 6, para. 1.c (e.g. auditor or tax authorities).
- or for pursuing <u>legitimate interests</u> cf. GDPR art. 6, para. 1.f. (such as rating credit or as part of debt recovery.

Recipients of your data could be a freight company, a collection agency, our auditor or the tax authorities.

If data is disclosed on basis of a data processing agreement, this will be done in accordance with GDPR art. 28. Please contact <a href="mailto:personale@raaco.com">personale@raaco.com</a> for information about data processors used by raaco.

Your data will not be shared or disclosed for marketing purposes.

#### Transfer to third countries.

Data is not transferred to third countries.



# Storing your information.

We will hold your data for as long as necessary to fulfill the above mentioned purposes. Data will be deleted when we no longer have a valid reason for holding it or when the statutory retention period expires.

## Automated decision-making and profiling.

Data will not be used for automated decision-making or profiling.

# Your rights in respect of our processing of your data.

Under the GDPR, you have a number of rights with regard to our processing of your data. You can, at any time, contact our personnel administration, if you wish to raise a concern.

- You have the right to be informed about the collection and use of your data.
- In certain circumstances, you have the right to access information held about you in a readable format (not physical access).
- You have the right to object to our processing of your data in certain circumstances. If your objection is justified, the processing must cease.
- You have the right to have inaccurate or incorrect data rectified or in certain circumstances erased.
- If our processing relies on your consent, you have the right to withdraw your consent by contacting our personnel administration by mail: <a href="mailto:personale@raaco.com">personale@raaco.com</a>.
- You have the right to lodge a complaint about our processing of your data by contacting your local data protection agency.

# Security.

Protection of your data is important for raaco.

We have in place appropriate technical and organisational safeguards to protect your data against unauthorised or unlawful processing and against accidental loss, destruction or damage. Please contact <a href="mailto:personale@raaco.com">personale@raaco.com</a> for a copy of our "Technical and organisational measures".

#### Changes and updates.

Please keep yourself informed about any changes and updates to this privacy policy.

#### Data controllers.

raaco A/S and raaco Great Britain are jointly data controllers for the data being processed. Further information on the GDPR, the regulations and your rights are available on https://ico.org.uk.

Best regards

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