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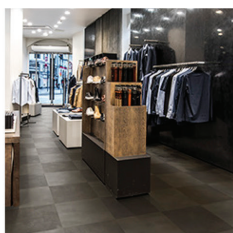
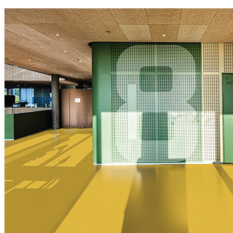
# Kährs Group's Privacy Policy

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## Purpose and Scope

Kährs Group is committed to protecting the privacy of individuals and in this policy we explain how the Kährs Group collects and uses personal data. It also describes the rights of the data subjects towards us and how to exercise the rights.

Kährs Group Management  
2020-10-16



# Kährs Group's Privacy Policy

## Processing of personal data

Kährs Group is committed to protecting your privacy and in this policy we explain how the Kährs Group collects and uses your personal data. It also describes your rights towards us and how you can exercise them. You can always contact us if you have any questions regarding privacy and data protection by sending an email to us at [privacy@kahrsgroup.com](mailto:privacy@kahrsgroup.com).

## What is personal data?

Personal data is any information which directly or indirectly can be linked to your person. It may be obvious details such as your name or your social security number, but also details such as property name or phone number. Even pictures are a form of personal data, if you are clearly distinguishable in the picture.

## What does processing of personal data mean?

Processing means everything that we in the Kährs Group do with your personal data. For example, when we collect, sort, or store personal data.

## How do we collect your personal data?

At Kährs Group, your personal data will, for example, be collected when you apply for our newsletter or create an account on one of our web sites to use our online services. When you send e-mails, order information material, post a comment or question via e-mail, social media or use our e-services, your personal data may be registered.

We may register information obtained from external contact databases and public relations services. We may also register personal data collected from a partner of the Kährs Group e.g. resellers.

We may also collect addresses belonging to forest owners obtained from third parties and we register information from those who plan to sell and deliver timber to our business.

Be careful not to send sensitive personal data to us via e-mail and social media, since this is not a secure way to transmit information. Examples of sensitive personal data include, but are not limited to: ethnic origin, religious and political views, health status, social security number or union affiliations. If you need to send us any sensitive information, we ask that you use an encrypted transmission. You can contact our data protection officer if you need help with this at [dpo@kahrsgroup.com](mailto:dpo@kahrsgroup.com).

## Who is responsible for the personal data?

Kährs Holding AB (publ) "Kährs Group" is a data controller for the processing of your personal data as we determine the means and purposes of the processing. We also use data processors, external suppliers, who help us with the processing. You can read more about this under the heading "Who can see your personal data?".

## Why do we process your personal data?

For Kährs Group to be able to offer its services and to fulfil its commitments, we need to manage information about you. Throughout the processing of personal data, we safeguard your privacy. Below, we describe the purposes of processing your personal data, the legal grounds justifying the processing according to current data protection laws and regulations and how long we store personal data. Kährs Group does not use personal data for profiling or automated decision-making. Automated decision-making means that we would use your personal data to make a decision without any human influence on the decision.

Why do we process personal data?	Legal basis	Storage period
To administer business relations in connection with the purchase and sale of goods and services to meet our obligations under agreements and laws.	Contractual commitments, Comply with applicable law	As long as it is necessary to fulfil our contractual obligation, and as long as it is required by statutory retention periods.
To inform customers of our products and services through newsletters and e-mails.	Contractual commitments, Legitimate interest	As long as it is necessary to fulfil our contractual obligation, or as long as we believe that there is a legitimate interest in the processing. Deletion in the mailing lists occurs on an ongoing basis or through termination of the subscription to the newsletter (opt-out).
In order to inform other interested parties, who do not have a contractual relationship with the Kährs Group, for example; architects, designers, journalists, about our products and services through newsletters and e-mails.	Legitimate interest	As long as we believe that there is a legitimate interest in the information regarding Kährs Group's products. Deletion in the mailing lists occurs on an ongoing basis or through termination of the subscription to the newsletter (opt-out).
To inform forest owners, about the Kährs Group's need to buy timber, by newsletters and mailings. Contact information may be obtained through the purchase of address lists.	Legitimate interest, Contractual commitments	Contact information is revised on an ongoing basis and deletion of personal data is carried out every 36th month.
In order to provide adequate service when we are contacted for information, to provide samples, printed material or similar matters.	Legitimate interest	Data used to carry out the request is saved for a maximum of 36 months. Mail addresses may be transferred to a mailing list for newsletters with the possibility to unsubscribe (opt-out).
In order to provide adequate service when someone contacts us for questions, comments or complaints.	Comply with applicable law, Legitimate interest, Contractual commitments	As long as a case is in progress. In case of a complaint, personal data may be stored for up to the end of the guarantee period.
To offer our business partners/professional customers adequate and appropriate service when using our customer portal Kährs Direct.	Contractual obligation, Legitimate interest	As long as it is necessary to fulfil our contractual obligation, and for as long as it is required by the statutory retention periods.

<p>In order to follow up and coordinate the work with commercial projects, we can store contact information on participants and stakeholders in a CRM system.</p> <p>The information can also be used for sending newsletters and information about our products and services.</p>	<p>Contractual obligation, Legitimate interest</p>	<p>As long as it is necessary to fulfil our contractual obligation, and as long as it is required by the statutory retention periods.</p> <p>Contact lists for newsletters are stored as long as we estimate there is a legitimate interest in our products. Deletion in the mailing lists occurs on an ongoing basis or through termination of the subscription to the newsletter (opt-out).</p>
<p>To recruit employees to positions in our business, we will collect information from job applicants.</p>	<p>Legitimate interest, Comply with applicable law</p>	<p>Personal data gathered during recruitment will be saved while the recruitment process is ongoing. Personal data may be processed for follow-up purposes for a maximum period of one year.</p>

## How long do we keep your personal data?

We will only keep the personal data if there is a purpose to retain the information. We are also required to retain personal information for a certain time according to requirements from various statutes such as the Accounting Act.

## Who can see your personal data?

Your personal data is only available to people who need them to perform their duties. We may also communicate information about you to other companies within the Kährs Group, to third-party marketing companies, retailers, transportation companies, or other business partners - if required to fulfil our commitments under contracts and terms of assignment and for to provide good service on contact with the Kährs Group. Kährs Group may also disclose necessary information to the police, the tax authorities or other public authorities if we are required to do so by law.

## Where do we process your personal data?

Kährs Group always strives to process your personal data within the EU/European Economic Area (EEA). However, in certain situations, the data can be transferred to, and processed in, countries outside of the EEA, since some of our suppliers or subcontractors are international organisations. Kährs Group will take all reasonable legal, technical and organisational measures to ensure that your personal data is processed safely and with an adequate level of protection, both within and outside the EEA. If you want to know if or where your personal data is transferred outside the EEA, you can contact our data protection officer at [dpo@kahrsgroup.com](mailto:dpo@kahrsgroup.com).

## Your rights under the data protection regulation

Each person owns their own personal data, therefore, you have certain rights as an individual which Kährs Group is required to adhere to under certain circumstances. According to the General Data Protection Regulation (GDPR), you can claim the rights which are described below. To do this, contact [privacy@kahrsgroup.com](mailto:privacy@kahrsgroup.com). To claim your rights, you must be able to identify yourself by answering some questions from our staff.

### • The right of access

According to the General Data Protection Regulation, you always have the right to receive information about your personal data which Kährs Group is processing. If you send a request to [privacy@kahrsgroup.com](mailto:privacy@kahrsgroup.com), the Kährs Group will send a transcript to you, containing the personal data that we process and a text that describes how we process it. It will normally take a maximum of one month to receive such a transcript.

### • **The right to rectification and restriction**

If you believe that any personal data about you is inaccurate or misleading, you can request it to be corrected or used in a more limited way in some cases. If this applies to you, please contact [privacy@kahrsgroup.com](mailto:privacy@kahrsgroup.com) and explain what information you believe to be inaccurate and why.

### • **The right to erasure ("right to be forgotten")**

You have the right to request deletion of your personal data stored by the Kährs Group if at least one of the following conditions is met:

- the data is no longer needed for the purpose for which it was collected
- the processing is based on consent, and you withdraw your consent
- the processing concerns direct marketing, and you object to the processing
- you object to personal data processing justified by the legal basis - legitimate interest, and there is no legitimate interest that outweighs your interest
- personal data has been processed illegally
- deletion is required to comply with a legal obligation

You do not have the right to have your personal data deleted in case the Kährs Group:

Need to process the personal data for the performance of a task in the context of a contractual relationship with you, for archiving purposes, to exercise the right to freedom of expression and information, for compliance with a legal obligation or to defend legal claims.

### • **The right to data portability**

You sometimes have a right to have a copy of your personal data in a common, structured and machine-readable format, and in addition, to have your personal data transferred to another organisation (if technically possible). This right is only applicable if the processing is based on consent or contractual obligation and is performed by automated means (e.g. with computers). Please contact our data protection officer if you would like to learn more [dpo@kahrsgroup.com](mailto:dpo@kahrsgroup.com).

### • **The right to object**

You have the right to object to the Kährs Group's processing of your personal data. You may at any time object to direct marketing and Kährs Group will then cease with the marketing. You also have a right to submit complaints to your local data protection supervisory authority.

## **Contact information**

The data controller for processing of personal data is Kährs Holding AB (publ), corporate identity number: 556534-2481. Ångbåtsbron 1, Box 154, SE-201 21, Malmö.

If you want to get in contact with Kährs Group in regards to our processing of your personal data, please send an e-mail to [privacy@kahrsgroup.com](mailto:privacy@kahrsgroup.com).

You can contact our data protection officer via [dpo@kahrsgroup.com](mailto:dpo@kahrsgroup.com).

This information is also available at [www.kahrsgroup.com/en/privacy](http://www.kahrsgroup.com/en/privacy).

