

## **PRIVACY POLICY FOR CUSTOMERS' AND SERVICE PROVIDERS' CONTACT PERSONS**

### **Introduction and preamble**

Axess Logistics \* (in this policy designated "we") is concerned for your privacy. It is obvious that we must always endeavour to protect your personal details in the best possible way. Personal details are any type of information and data relating to you, for e.g. your name, telephone number and e-mail address.

In this privacy policy, we want to inform you as to how we process personal details that we have about you as contact person for one of our existing or potential customers, or in the capacity of our contact person for one of our service providers. When we use the term "your company" below, we mean your employer or company that you otherwise represent.

We process your personal details for the following general purposes:

- To manage the relationship with your company;
- To manage our customer portal for PDIs (Pre Delivery Inspections);
- To enhance customer experience with us;
- To send messages and newsletters;
- To contact potential customers; and
- To comply with legislation and decisions by authorities.

We put great importance on being as clear as possible as to how we process your personal details. In the table below under the heading "*Detailed description of how we process your personal details*", you can read further details about how we process your personal details.

You have a number of rights in accordance with legislation in effect, among which the right to oppose, at any time, the use of your personal details for marketing purposes. Under "*Your rights*" below, you can read about your rights in greater detail

### **Responsibility for your personal details**

Axess Logistics at Turbingatan 8, Kattegatthamnen, 302 50 Halmstad, and with the telephone number +46 35 17 62 00, is responsible for processing of your personal details. You can read about which rights you have, for e.g. the right to oppose any use of personal details for marketing purposes

If you have any questions about the processing of your personal details or if you want to contact us in order to exercise your rights, you are welcome to do so by telephone on +46 35 17 62 00 or by e-mail [gdpr@axesslogistics.com](mailto:gdpr@axesslogistics.com).

### **Who do we collect your personal details from?**

We collect your personal details directly from you or your company, for e.g. in connection with your registration as their contact person for us or as your company's user of our customer portal (PDI).

In some cases, we may have got your contact details from other companies in the Axess Group or from our other partners, for e.g. our partners who processes credit references. We may also have got your details from the Norwegian Transport Administration (Statens vegvesen), from who we get VINs (vehicle identification numbers) and registration numbers, which can constitute personal details about you.

In order for you to be able to benefit from our services and deliver your services to us, we need to process certain personal details about you as representative for our customer or service provider. We cannot comply with legislation in effect or fulfil our agreement if you do not share such personal details that are necessary to comply with legislation or fulfil the agreement that we have with your company. This applies to agreements that regulate transport, storage, PDIs (Pre Delivery Inspections) or our other services.

### **Who can get access to your personal details?**

When it is necessary to fulfil an agreement with your company or to comply with legislation or decisions by authorities, we share your personal details with other companies in the Axess Group or public authorities.

We share your personal details with our external service providers who process order flows or newsletter mailings for us, such as our personal data processor. We also share your personal details with our IT-service providers who provide IT support for those systems in which we store your personal details, and with consultants we contract to perform work on our behalf.

Those companies and persons that we share your personal details with process your personal details only for our assigned mission and only have access to those details needed to fulfil their contractual obligations to us.

We process all of your personal details within the EU/EEA.

*If you want more information on how we share your personal details, you are welcome to contact us using the contact details given at the start of this policy document.*

### **Your rights**

In accordance with data protection legislation, you have certain rights that you can exercise in order to influence how we process your personal details. Read more below.

#### Right to withdraw your consent and to oppose processing

You have the right to *withdraw* all or part of *granted consent* for processing of your personal details. The withdrawal of your consent comes into effect after withdrawal took place.

You have the right to *oppose processing of your personal details*. You always have the right to *oppose* processing of your personal details for *marketing purposes*, such as our newsletters.

In some cases, no such right of opposition exists (for e.g. when we have to store your personal details). You have the right to oppose, at any time, processing of your personal details *based on a balancing of interests*. Read more about what this implies below. This does not apply however if we can demonstrate legitimate compelling grounds for processing which outweigh your interests, rights and freedoms or if such processing occurs for the establishment, exercise or protection of legal claims.

#### Right of access

You have the right to *get a confirmation* if personal details about you are processed by us. You can *get access* to your personal details and *a copy* of the personal details that are processed by us.

#### Right of rectification

You have the right to *rectification* of any wrong personal details about you and to request us to *complete missing personal details*.

#### Right of erasure (right to be forgotten) and limitation of processing

You have, in certain circumstances, the right to request *erasure of your personal details*. Such circumstances exist if, for e.g., personal details are no longer necessary for the purposes for which they were collected or processed, or if you withdraw your consent on which processing is based and there are no other legal grounds for processing.

You also have the right to request us to *limit our processing* of your personal details. Such circumstances exist if you, for e.g., dispute the correctness of the details or if processing is illegal but you object to erasure of your personal details, requesting instead limitation of the use of your details.

#### Right to submit a complaint to a supervisory authority

You always have the right to submit a *complaint to a competent supervisory authority*.

Such a complaint shall be submitted preferably to the authority of the EU/EEA member state where you normally reside and/or work, or where a breach of effective legislation and regulations for data protection is claimed to have occurred. The competent supervisory authority in Norway is Datatilsynet. This right does not exclude any other administrative review procedure or legal remedy.

#### Right of data portability

You have the right request us to *transfer certain personal details* we have about you to another company (data portability).

The right applies to personal details that you have submitted to us in a structured, generally used or machine-readable format if:

- processing is based on your consent or on the agreement; and
- processing is automated.

You have the right of direct transfer of personal details from us to another data controller when this is technically possible.

**Detailed description of how we process your personal details:**

In the table below, we describe in detail why we process your personal details, which details we process, which legal grounds processing is based on, and for how long we process your personal details. Legal grounds are the supporting arguments that we dispose of, in conformity with data protection legislation (GDPR), to be able to process your personal details legally.

<b>Managing the relationship with your company</b>			
<b>For what purposes do we process your personal details?</b>	<b>What personal details do we process?</b>	<b>What are the legal grounds for processing?</b>	<b>For how long do we process your personal details for such purposes?</b>
In order to negotiate and enter into an agreement between us and your company, for e.g. a customer agreement or cooperation agreement for the transport of vehicles.	Your name, contact details and position.	Our legitimate interest to process your personal details for the purpose of negotiating and entering into an agreement with your company.	The details are saved until the negotiations are completed and the agreement comes into effect.
To communicate with your company for the purpose of being able to execute an order, deliver vehicles or make/receive payment.	Your name, contact details and position.	Our legitimate interest to contact your company for the purpose of fulfilling our obligations as per the delivery agreements that we have with your company.	The details are saved for the duration of the agreement with your company, or for a shorter period of time, if your company informs us that you are no longer the company's contact person.
In order to notify you, as representative for one of our customers, as to the status of your vehicle transport.	Your name and contact details.	Your consent.	The details are saved only until you unsubscribe from our notification service, or until your company requests us to stop sending you notifications.
In order to manage	Your name, contact	Our legitimate	The details are

order flows, for e.g. by processing quotes and orders on our customer portal for PDIs (Pre Delivery Inspections), or to communicate maintenance schedules, where you represent your company and for the purpose of fulfilling our agreement with your company.	details, VIN number and registration number.	interest to contact your company for the purpose of communicating with your company.	saved for the duration of the agreement with your company, or for a shorter period of time, if your company informs us that you are no longer the company's contact person.
In order to handle and respond to your contact enquiries by telephone or submitted via our "Contact us" form on our website.	Your name, contact details, as well as any personal details that you enter into the free text field.	Necessary to fulfil our agreement with you.	The details are processed from the time when your company sends the contact enquiry, until we have answered your contact enquiry.
In order to process complaints that you have made via our complaints form on our website.	Your name, contact details, VIN number, as well as any personal details that you enter into the free text field.	Our legitimate interest to process complaints that you have made on behalf of your company, as well as for processing any legal claims in connection with such complaints.	The details are not saved for a longer period than necessary to process your complaint and/or to process any legal claims in connection with the complaint.

<b>To manage our customer portal for PDIs (Pre Delivery Inspections)</b>			
For what purposes do we process your personal details?	What personal details do we process?	What are the legal grounds for processing?	For how long do we process your personal details for such purposes?
In order to create user accounts and manage logins to our customer portal for PDIs (Pre Delivery Inspections), as well	Your name and contact details.	Our legitimate interest to be able to fulfil our obligations as per the agreement we have with your company	The details are saved as long as you have an account with us, nevertheless for a maximum of two full years if you have

as for other administrative tasks on the customer portal.		concerning our customer portal.	been inactive or if your company is no longer a customer of ours.
---	--	---------------------------------	---

<b>Sending messages and newsletter mailings</b>			
For what purposes do we process your personal details?	What personal details do we process?	What are the legal grounds for processing?	For how long do we process your personal details for such purposes?
In order to send relevant messages and/or news information concerning our business to your company.	<p>Your name and contact details, as well as your position.</p> <p>When we send newsletters to you, we get information as to whether the newsletter has reached you, if it has been opened, how many times you have read the mailing, as well as how many times you have clicked on links in the mailing.</p>	<p>Our legitimate interest to contact you for newsletter mailings and for other marketing purposes.</p> <p>Your consent to receive our newsletters constitutes the legal grounds for processing.</p>	<p>When our processing of your personal details is based on our legitimate interest to send you marketing material, we save your personal details for one year after our relationship with your company has ceased.</p> <p>If you have consented to get our newsletters, we process your details until you unsubscribe, or until you or your company requests us to stop sending you marketing material.</p>

<b>Contacting potential customers</b>			
For what purposes do we process your personal details?	What personal details do we process?	What are the legal grounds for processing?	For how long do we process your personal details for such purposes?
In order to contact and communicate with your company, which we consider as a potential, future partner or	Your name, contact details and position.	Our legitimate interest to contact your company, which we think may be interested in our services or in a partnership with us.	<p>The details are saved until they have been used for the purpose for which they were collected.</p> <p>If you want your details to be erased before then,</p>

customer, as well as for similar sales or marketing purposes.			please send an e-mail to <a href="mailto:gdpr@axesslogistics.com">gdpr@axesslogistics.com</a> , in which case we will erase your details within 30 days.
---	--	--	--

Compliance with legislation and decisions by authorities			
For what purposes do we process your personal details?	What personal details do we process?	What are the legal grounds for processing?	For how long do we process your personal details for such purposes?
In order to comply with accounting law/legislation.	History of completed payments, transactions and similar that constitute accounting records.	Processing is such as necessary in order to comply with statutory laws, i.e. accounting law.	The details are saved for the period of time during which we are required to save such details as per accounting law in effect, i.e. for ten years.
In order to comply with legislation and decisions by authorities concerning customs as well as the handling of hazardous waste.	Your name, contact details, VIN number and registration number.	Processing is such as necessary in order to comply with statutory laws and/or decisions by authorities.	The details are saved for the period of time during which we are required to save such details as per laws or decisions by authorities in effect, i.e. for five years for customs requirements and for the current year plus three years for the handling of hazardous waste.

**How have we balanced everyone’s interests when the legal grounds are our legitimate interest?** For certain purposes, we process your personal details based on a balancing of interests as legal grounds for processing. In this balancing of interests, we have concluded that our legitimate interest to perform processing outweighs your interest and your basic rights not to have your personal details processed. The table above shows what constitutes our legitimate interest. If you want to learn more about how we have balanced everyone’s interests, please contact us. You can find our contact details at the start of this privacy policy.

\* With Axess Logistics we refer to the companies that are included in the group and which are listed in the table below. The companies can be contacted by e-mail to

«gdpr@axesslogistics.com» or telephone to the head office at +46 35 17 62 00:

Company	Country	Reg no
Axess Logistics AB	Sweden	556430-0720
Axess Logistics Sweden AB	Sweden	556548-9696
Svensk Autotransport AB	Sweden	556174-5190
Axess Logistics A/S	Denmark	30515331
Axess Logistics AS	Norway	917722773
Autologistikk AS	Norway	994819348
Nordic Car Logistics AB	Sweden	559036-9269

	Document manager: MB	Version: 2	Date: 2019-01-10
Document name Integrity policy Axess Logistics		Doc.nr:	Page: