

## General information regarding processing of personal data

We value and protect your privacy and aim for transparency and a high level of data protection when it comes to our handling of your personal data. We do not process more personal data about you than is necessary and always inform about new treatments before they are carried out.

Should a personal data incident occur, we will inform you as soon as possible if there is a high risk to your personal privacy.

In this privacy policy we outline a detailed description of how and why your personal data is processed, stored, and protected along with information on how you can exercise your rights outlined by the General Data Protection Regulation (2016/679).

### Data controller

MEKO AB, organization number 556692-1971, seated in Stockholm, Sweden with address Box 19 542, 104 32, Stockholm, is responsible for the processing of your personal data in accordance with this policy. If you have any questions regarding our handling of your personal data or if you wish to exercise any of the rights outlined in the General Data Protection Regulation related to the handling of your personal data, you are welcome to contact our GDPR team: [gdpr@mekonomencompany.com](mailto:gdpr@mekonomencompany.com)

### Personal data that we process

What data we process about you depends on your relationship with us.

If you have registered as a subscriber to our press releases and our financial reporting, we store and process your name and contact details (e-mail and telephone number). Apart from information collected directly by us, or data supplied directly by you, no additional information is collected from third parties.

As a shareholder, we store and process your name, contact details (email) as well as national identification number. We will complement and validate your share ownership and contact details using third party registers.

If you represent a supplier or similar party that we have entered a contract with, we may store and process your name and contact details. If your national identification number coincides with your company's registration number or VAT identification number, we may also process your national identification number. The personal data is collected from the company that you represent or directly from yourself.

## How and why do we process your data?

The purpose, processing, outline, duration, and legal basis for the personal data we collect about you is outlined below. Note that, as described in the section entitled “Personal data that we process”, not all processing may be applicable to you as the type of processing conducted depends on your relationship with us.

Purpose	Processing	Categories of personal data	Legal basis	Storage duration
To be able to send press releases and financial reports to you	<ul style="list-style-type: none"> <li>Register you as a subscriber</li> <li>Manage mailing send outs</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Phone number</li> </ul>	Fulfillment of agreement	For the duration of your subscription.
To be able to send out the Annual report to you as a shareholder.	<ul style="list-style-type: none"> <li>Handle the distribution of the Annual Report</li> <li>Maintain correct and updated information through external person registers</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Address</li> <li>National identification number</li> </ul>	Legitimate interest <sup>1</sup> and legal obligation	Until you sell your shares and a time up to one (1) year thereafter
To handle registrations for and carry out the Annual General Meeting as well as take any measure we are obliged to take within the framework of handling the share register	<ul style="list-style-type: none"> <li>Receive and handle your registration for the Annual General Meeting</li> <li>Implement the measures we are obliged to take within the framework of handling the share register</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Address</li> <li>National identification number</li> </ul>	Legal obligation	Until you sell your shares and a time up to one (1) year thereafter.
To enter contracts or administrate existing contracts with suppliers	<ul style="list-style-type: none"> <li>To be able to enter a contract</li> <li>To be able to administrate and ensure the performance of contracts (e.g., questions regarding payment)</li> <li>Place orders</li> <li>Set up vendor system accounts</li> <li>To be able to contact you and/or your company</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Title</li> <li>Email</li> <li>Phone number</li> <li>Potentially national identification number (see “Processing of national identification numbers”)</li> </ul>	Legitimate interest <sup>2</sup>	For the duration of the valid business relationship or until we have been informed by the company that you no longer act as a point of contact

## Processing of national identification numbers

The processing of national identification numbers (social security numbers) is regulated in the Swedish Data Protection Act (2018:218), which supplements the Data Protection Ordinance. According to the law, national identification numbers may only be processed if there is a clear justification for the purpose, if it is required for secure identification or if there is some other considerable reason.

We process national identification numbers to maintain correct and updated contact information for you, which is required for us to fulfill our agreement regarding the distribution of our Annual Report as well as arranging and ensuring correct registration of the Annual General Meeting.

If you represent a supplier, and your national identification number coincides with your company’s identification number of VAT-number, we may store your national identification number for the purpose of

identifying our contracting parties in a safe way, as well as being able to ensure that orders, invoices, and our accounting practices are performed correctly. This purpose is based on our legitimate interest as the legal basis, and the processing is clearly motivated by the purpose stated above.

## Data processors

Your personal data may be transferred or shared with other companies who are acting as our data processor for the purposes outlined below. A data processor is a company processing personal data on our behalf and in accordance with our written instructions. We have written agreements with all our data processor to ensure that the personal data that they process on our behalf is handled in a correct, safe, and compliant way. Our data processors help us with:

- **IT services:** companies that handle operations, technical support, and maintenance of our IT solutions
- **Distribution:** companies that handle the distribution of our Annual Report
- **Ordering:** companies within the MEKO group that purchase products and services from our central suppliers

## Where is your personal data processed?

We aim to process your personal data within the European Union or the European Economic Area ("EU/EEA"), but, in certain situations, your personal data may be transferred to, and processed by recipients in, countries outside of the EU/EEA. In all such cases, we will take all reasonable legal, technical, and organizational measures required to ensure that your personal data is handled securely with an adequate level of protection comparable to and at the same level as the protection offered within the EU/EEA. Examples of appropriate safeguards include approved code of conduct in the recipient country, standard contractual clauses, or binding company-internal rules.

## How long do we store your personal information?

We store your personal information for as long as is necessary for each purpose. See more about specific storage periods under the heading "*How and why do we process your data?*". We may also process your personal data to fulfill legal obligations due to legal requirements, judgments, or government decisions. This may, for example, be a requirement in the Accounting Act. In addition, we may process your personal data for the purpose of defending a legal claim for as long as this can be asserted.

## How do we protect your personal information?

We take the legal, technical, and organizational measures required to ensure that your personal data is not lost, destroyed, tampered with, or accessed by unauthorized parties. Our safety routines are updated as technology develops and improves.

## Your rights

We want to be transparent about how we process your information. If you want to gain insight into the personal data processing that we perform on your data, you have the right to request access to information about the processing.

Upon a request for access to information about the processing conducted on your data, we may ask for additional information to ensure that we disclose the information to the right person and that the information shared matches the request.

You have the right to:

- Get confirmation from us whether we process personal data about you or not, and in the event of us processing your data, you can request access to your personal data that we process (register

extract) free of charge. In the case of manifestly unfounded or unreasonable requests for register extracts, especially if repeated, an administrative fee may be charged, or the request denied.

- Request rectification of incorrect or incomplete personal data.
- Have your information deleted in certain cases, e.g., if your personal data are no longer required for the purpose for which they were collected.
- Restrict the processing of your personal data in certain cases, e.g., if you object to processing based on our legitimate interest, we shall restrict all processing of such data pending the verification of the legitimate interest.
- Obtain or transfer a copy of personal data to yourself or another party (data portability) in certain cases. This right only covers personal data that you have submitted to us for processing under certain legal grounds, such as an agreement with you.

### **Objection to the treatment based on legitimate interest**

You have the right to object to the processing of your personal data based on our legitimate interest. Further processing of your personal data presupposes that we can demonstrate legitimate grounds for the processing which overrides your interest and rights or due to legal claims.

<sup>1</sup> For us to be able to send out our Annual Report and to ensure that we maintain correct and up-to-date information regarding your contact details, we use your national identification number to fetch information from third-party registers. We have made the assessment that the benefit of maintaining correct information outweighs your interest in us not using more information that necessary.

<sup>2</sup> We have concluded that the benefit of us and our affiliated companies being able to contact you as a representative for our supplier in an efficient way, along with ensuring that both parties may perform their obligations within our business relationship, outweighs your interest in us not using more information than necessary.

### **Cookies**

Cookies are small text files that websites store on your computer, mobile device, or tablet with the aim of improving your browser experience as well as a means of generating statistics of the website user base. Common use cases include personalization, targeted ads and allowing for logged-in mode.

Cookies come in two main flavors: session cookies and persistent cookies. Session cookies only exist during the time you have your browser open. Whenever you close your browser all session cookies will be deleted. Persistent cookies are stored on your computer and will remain when you close your browser. How long they persist depends on how they were initially set up and may vary from a few minutes to several years.

Some cookies and tangent technologies are controlled by companies that MEKO partner with, e.g., Google, and are known as third-party cookies. MEKO does not control third-party cookies.

MEKO uses persistent cookies and tangent technologies, including third-party cookies, to generate statistics over our user base to better understand how our website is being used. This ensures that we can improve existing functionality as well as guide us in adding new features to make our website better and easier to use.

We also store user preferences, like what language you prefer to use and whether you have agreed to our cookie policy. These preferences are stored using persistent cookies to ensure your upcoming visits are as functional and enjoyable as possible.

## **Right to complain with a supervisory authority**

If you consider our processing of your personal data as incorrect, you can contact us in the manner set out below. You also have the right to turn in a complaint to a supervisory authority.

## **Updates to our Privacy Policy**

We reserve the right to make changes to this Privacy Policy at any time. All changes made will be published on our homepage ([www.meko.com](http://www.meko.com)) and be reflected through the published Privacy Policy. You should therefore review this policy periodically to make sure that you are satisfied with the changes that have been made. If we make extensive changes of material significance, we will notify you by email (presupposing you have given us your email address).

If the changes concern the processing of personal data that is performed with the support of your consent, we will give you the opportunity to give your consent again.

## **How to contact us**

If you have any questions regarding our handling of your personal data or if you wish to exercise any of your rights related to the handling of your personal data, you are welcome to contact our GDPR team: [gdpr@mekonomencompany.com](mailto:gdpr@mekonomencompany.com)

*This privacy policy was last updated on **2023-04-14***