

Privacy statement for business customer and business partner register

Valid from 1st of January 2026

Joint controllers:

Name: Luotea FM AB
Organisation number: 556473-2260
Address: Box 9060, 171 09 Solna
Phone: +46 (0)8 550 502 00

Namn: Luotea Service AB
Organisations number: 556684-8866
Adress: Armégatan 40, 171 71 Solna
Phone: +46 (0)8 410 334 00

Each Luotea group company is responsible for the processing of personal data in its own business for the purposes and on the legal grounds in accordance with this privacy statement and may use the necessary personal data collected by other group companies for the same purposes, e.g. in marketing, sales and the implementation of agreements and customer relations between the group company and its customers.

Contact person:

Name: Bo Stanser
E-mail: bo.stanser@luotea.com

Name of the register:

Luoteas business customer and business partner register

Legal basis for and the purpose of the processing of personal data:

The legal bases for the processing of the personal data are the legitimate interest of Luoteas group companies and a contract between Luoteas group companies and the business customer or business partner.

Personal data in the register shall be processed for the following purposes:

- the management, maintenance, development, analysis of the contractual relationship between Luotea (or one of its group companies) and the business customer or business partner and creating statistics related to this relationship
- customer communications
- direct marketing of Luotea and its group companies' (including electronic newsletters), targeting and profiling of online advertisement
- conducting opinion and marketing polls
- arranging sales and marketing events
- arranging marketing competitions and prize draws
- the planning and development of Luoteas and its group companies' business operations and services
- customers' user identification and management and resolving errors in electronic services
- media communications

Data subject categories:

Decision-makers and contact persons of Luoteas business customers and business partners and subscribers of the Luotea newsletter

Data content of the register:

Registret innehåller följande personuppgifter:

The register contains the following personal data:

- name
- title, profession, position or role within the company
- company name
- contact details (postal address, email address and telephone number)
- age, year of birth, sex, native language and service language

- LinkedIn profile details
- consent and prohibitions concerning direct marketing
- areas of interest (for example, the data subject's professional interests) and profiling details
- data related to communications (for example, email messages, online chats, electronic service forms, chat messages and recording of phone calls)
- data related to marketing and sales promotions (for example, marketing efforts targeted to the data subject and participation on surveys and events)
- user name and password to the electronic services
- data concerning the use of electronic services and content (for example, browsing and search history, IP addresses and cookies)
- possible additional information provided by the data subject

Data content of the register: The data is primarily collected directly from the data subject by telephone, online, in meetings, upon the use of services or the conclusion of the agreement or during the contractual relationship.

Personal data may be updated and retrieved via publicly available data sources such as company web sites, the trade register, other public and private registers and various service providers.

Regular disclosure and transfer of data:

Data related to waste transportation are disclosed to municipal waste management authorities according to the law. Otherwise, the personal data are not regularly disclosed to third parties outside the group companies.

Luotea reserves the right to transfer the data subject's personal data to Luoteas direct marketing register after the termination of the relevant connection.

Luotea uses external service providers to process personal data for the following services:

- Systems maintenance, development and troubleshooting;
- maintaining data of business customers and business partners;
- maintaining newsletter mailing lists and sending of newsletters;
- recording of telephone conversations; and
- maintenance and processing of data of event participants.

Each service provider processes personal data in accordance with the data processing agreement only to the extent necessary to provide the service.

Transfer of data outside the EU or EEA:

Luotea and its subcontractors may process personal data outside the EU or the EEA. If the European Commission has not issued a decision on the adequate level of data protection in the country in question, as a rule, an agreement on the transfer of personal data will be drawn up in accordance with the standard clauses approved by the European Commission ("Standard Clauses"). As an alternative to the use of Standard Clauses, Luotea has the right to transfer personal data using other means of transfer permitted by legislation.

Principles of register protection: The data in the register is stored in information systems that use both technological and programmatic measures to ensure the sufficient level of data security. Each person using the register has a personal username and password to the system. Only designated people shall have access to the data in the register to the extent required by their tasks.

Data retention period: The personal data in the register are stored for the duration deemed necessary for the purposes of the register while taking the statutory retention periods (arising from, for example, the Accounting Act and the Tax Prepayment Act) into account. The default retention period is five (5) years after the termination of the customer/contractual relationship (except insofar as is required longer by the law).

De registrerades rättigheter: *Right of inspection and right to request rectification or erasure of personal data*

Data subjects have the right to inspect their personal data entered in the register. In addition, data subjects have the right to request the rectification of inaccurate data and erasure of data. Inspection, rectification and/or erasure requests must be submitted in writing by using the above contact details.

Other rights

According to the General Data Protection Regulation data subjects have the right to object to or request a restriction on the processing of their personal data and to lodge a complaint regarding the processing of their personal data to the data protection authority.

The data subject shall have the right to prohibit the use of personal data concerning the data subject for the purposes of direct marketing, marketing or opinion surveying and profiling. Such a prohibition can be set at any time by sending email to **contact person above** or, for example, by unsubscribing from the newsletter according to the instructions in the newsletter.