

Dataväxt AB's Privacy Policy

1. Introduction

Dataväxt AB (“**Dataväxt**”) processes personal data within the framework of its business operations. The personal data concerns;

- Persons who visit and use our websites and social media platforms (“**Digital Channels**”);
- Persons who use our digital services (“**Digital Services**”) or purchase products from us;
- Persons who receive marketing or participate in competitions other marketing activities organised by Dataväxt; and
- Persons who contact us in connection with customer issues.

This Privacy Policy describes how we process your personal data, what rights you have in connection with it.

Your privacy is important to Dataväxt and we ensure a high level of protection of all personal data. All personal data processing carried out within Dataväxt is performed in accordance with applicable data protection legislation. Within the EU/EEA, the General Data Protection Regulation (GDPR) applies¹.

2. What is personal data?

Personal data means any information that can be linked directly, or indirectly when combined with other information, to a living natural person. This means that very different types of information such as name and contact details, IP address, purchase history, customer case information, photographs, location data, information about arable lands and crops and other business data, competition entries, may constitute personal data.

3. What personal data do we collect about you?

3.1 When you visit our Digital Channels

When you visit our Digital Channels, we may collect the following personal data, for the purposes and with the legal basis set out below.

| Personal data | Purpose of processing |
|---|--|
| <u>Data that you provide to us, e.g.:</u> <ul style="list-style-type: none"> • Contact information (e.g.name, postal address, e-mail address) • Information that you provide us in chat messages on social media | <ul style="list-style-type: none"> • To follow-up and evaluate our Digital Channels and Digital Services • To maintain, develop, test and improve our Digital Channels and Digital Services and the technical platforms on which they are delivered; • To generate statistics regarding the use of our Digital Channels and Digital Services; and • To provide you with relevant marketing, which means that so called profiling is conducted e.g. by using Facebook’s “Custom Audiences”. The |
| <u>Data that is generated through your use of the Digital Services:</u> <ul style="list-style-type: none"> • Information collected through cookies (read more about the cookies we use, and how to avoid them, in our Cookie Policy below) | |

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

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| <ul style="list-style-type: none"> • IP address, metadata and other technical data | <p>data used for this profiling derives from the cookies placed on our Digital Channels.</p> |
|---|--|

Legal basis

We process your personal data for the legitimate and justifiable interest of marketing our company to visitors on our Digital Channels, to develop our Digital Channels and Digital Services and to respond to communications submitted by you.

3.2 When you use our Digital Services

When you use our Digital Services, we will process the following personal data, for the purposes and with the legal basis set out below.

| Personal data | Purpose of processing |
|---|--|
| <p><u>Data you provide to us, e.g.:</u></p> <ul style="list-style-type: none"> • Contact information (e.g.name, postal address, e-mail address) • Social security number (if you are a sole trader and thus use it as corporation number) • Financial information (e.g. bank account information and purchase information) • Business information (e.g. information about arable lands and crops coordinates for production and delivery addresses, production profiles including information about area, production orientation, equipment, generated harvest, and economic data including information about work costs, fuel consumption, etc.) • Pictures • Other data that you choose to upload to the Digital Services <p><u>Data that is generated through your use of the Digital Services:</u></p> <ul style="list-style-type: none"> • Location data and movement patterns by use of GPS • IP-address, metadata and other technical data <p><u>Data that we collect:</u></p> <ul style="list-style-type: none"> • If you request it in the Digital Services, we obtain satellite pictures showing your farm and other data from a third party | <ul style="list-style-type: none"> • To deliver the Digital Services that you order and to administer our agreement with you, including providing you with information and for invoicing purposes; • To follow-up and evaluate our Digital Services; • To maintain, develop, test and improve our Digital Channels and Digital Services and the technical platforms on which they are delivered; and • To generate statistics regarding the use of our Digital Services. |
| Legal basis | |
| <p>We process your personal data in order to enter into- and fulfil our agreement with you. We also process your personal data for the legitimate and justifiable interest of developing our Digital Channels and Digital Services.</p> | |

3.3 When you purchase products from us

When you purchase products from us, we will process the following personal data, for the purposes and with the legal basis set out below.

| Personal data | Purpose of processing |
|---|---|
| <p><u>Data you provide to us, e.g.:</u></p> <ul style="list-style-type: none"> Contact information (e.g. name, postal address, e-mail address) Social security number (or, if you are a sole trader, your company registration number) Financial information (e.g. credit details, bank account information and purchase information) <p><u>Data that we collect:</u></p> <ul style="list-style-type: none"> Credit assessment may be obtained from a third party, e.g. UC, if you wish to order products of a high value from us | <ul style="list-style-type: none"> To deliver the products that you order and to administer our agreement with you, including providing you with information and for invoicing purposes; To follow-up and evaluate Dataväxt's product offering; To generate statistics regarding the purchases of our products; and To ensure that you will be able to pay for the product ordered. |
| <p>Legal basis</p> <p>We process your personal data in order to enter into- and fulfil our agreement with you. We also process your personal data for the legitimate and justifiable interest of developing our product offering and to ensure that you will be able to pay for the products you order.</p> | |

3.4 When we send marketing to you or you participate in competitions other marketing activities

When we send you marketing or when you participate in competitions or other marketing activities organised by us, we will process the following personal data, for the purposes and with the legal basis set out below.

| Personal data | Purpose of processing |
|--|---|
| <p>Marketing sent by us:</p> <p><u>Data you provide to us, e.g.:</u></p> <ul style="list-style-type: none"> Contact information (e.g. name, e-mail address) <p><u>Data that we collect:</u></p> <ul style="list-style-type: none"> Information regarding your purchased Digital Services or products Data stored about you in the Digital Services | <p>Marketing sent by us:</p> <ul style="list-style-type: none"> To market our Digital Services and products (including by e-mail and text/picture messages) that may be of interest to you. To analyse and sort our customers according to selections, priorities and preferences, which means that we conduct so called profiling, in order to provide you with relevant and customized marketing. Our profiling is based on e.g. the size and location of your business, what you produce and what kind of products or services you have purchased from us. The data used to conduct this profiling may derive from your use of our Digital Services or from other business you have had with Dataväxt. To analyse and evaluate our marketing activities. |
| <p>When you participate in competitions or other marketing activities:</p> <p><u>Data you provide to us, e.g.:</u></p> <ul style="list-style-type: none"> Contact information (e.g. name, e-mail address, postal address) Competition entry and data that you submit. | <p>When you participate in competitions or other marketing activities:</p> <ul style="list-style-type: none"> To administer competitions and other marketing activities. Competition entries may be published during marketing. |

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|---|---|
| <ul style="list-style-type: none"> • Data necessary to administer prizes • If you participate in an evaluation activity for any of Dataväxt's products, your ratings and suggestions, as well as data on gender and age, will also be processed | <ul style="list-style-type: none"> • To analyse and evaluate our marketing activities. |
|---|---|

Legal basis

We process your personal data with the legitimate and justified interest of marketing our company and the products and services we provide. If you do not wish to receive marketing, please contact us at info@datavaxt.se You can also choose to opt out of electronic marketing by following the link in the e-mail or text/picture message that we send to you.

If you have participated in a competition or other marketing activity, we process your personal data with the legitimate interest of administering the competition or marketing activity. We will always obtain your consent prior to publishing your name or picture for marketing purposes.

3.5 When you are in contact with customer services or communicate with us in other ways

When you communicate with us, for example when you ask customer services something or if you have queries in connection with a complaint regarding a product sold and/or produced by Dataväxt or the Digital Services, we may process the following personal data for the purposes and with the legal basis set out below.

| Personal data | Purpose of processing |
|--|--|
| <p><u>Data you provide to us, e.g.:</u></p> <ul style="list-style-type: none"> • Contact information (e.g. name, e-mail address, postal address) • Case data • Customer number • Complaint information • Requests • Other data you provide about yourself while in contact with us | <ul style="list-style-type: none"> • To communicate with you and deal with your requests (e.g. handle returns/damages, complaints or comments etc.); • To handle and respond to legal claims, e.g. during a dispute or litigation; |
| Legal basis | |
| <p>We process your personal data for the purpose of fulfilling a contract with you regarding a product or the Digital Services, or with a legitimate and justifiable interest to handle your customer service case or complaint and to communicate with you.</p> | |

4. Erasure

Your personal data will only be processed by Dataväxt for as long as it is necessary in order to fulfil the purposes of the processing and in order to comply with any legal obligation, e.g. *bokföringslagen* (1999:1078). We have procedures in place to ensure that your data are thereafter erased. For example, personal data contained in user accounts to the Digital Services that have not been used for a specific period of time will be inactivated and the data erased when no longer necessary to fulfil the purposes of the processing.

5. Security for the protection of personal data

Dataväxt safeguards your personal data with a high level of security and has to this end implemented appropriate technical and organisational security measures to protect your personal data from unauthorised access, amendments, dissemination or destruction.

6. Disclosure of personal data

Dataväxt will not disclose your personal data to any extent other than described in this section.

6.1 Suppliers of Dataväxt

Dataväxt may appoint external service providers to perform tasks on Dataväxt's behalf, such as providing IT services or helping with marketing, data analysis or statistics. The performance of these services may entail that Dataväxt's partners, both within and outside the EU/EEA, gain access to your personal data. Companies that manage personal data on Dataväxt's behalf must always sign an agreement with Dataväxt so that we are also able to ensure a high level of protection of your personal data also with our partners. Specific safeguards are implemented in relation to partners outside the EU/EEA, such as entering into data transfer agreements, including the standard clauses for data transfers adopted by the EU Commission, which are available on the EU Commission's website.

6.2 Disclosure on your request

The data stored in the Digital Services may, upon your request, be exported to a third party, e.g. Lantmännen Ekonomisk Förening or Felleskjøpet AS. Dataväxt provides for options to automatically transfer the data to some third parties but will never export the data without your specific request.

6.3 Disclosure required by law

Dataväxt may also disclose your personal data to other third parties, for example the police or other public authorities, if it concerns criminal investigations or if we are otherwise required to disclose such data by law or public authority decisions.

7. External links

Dataväxt's Digital Channels may sometimes contain links to external websites or services that we do not control. If you follow a link to an external website, we recommend that you familiarise yourself with the principles for personal data processing and cookie information that apply to the site in question. This privacy policy only applies to Dataväxt's Digital Channels.

8. Your rights in connection with our processing of your personal data

You have certain rights in relation to Dataväxt, who is the data controller for your personal data (see the contact details below):

- Right of access (register transcript) – a right to obtain confirmation of and information about the processing of your personal data.
- Right to rectification – a right to have erroneous data rectified.
- Right to erasure – a right to have data removed. This right is limited to data which, by law, may only be processed with your consent, if you withdraw consent and oppose the processing.
- Right to restricted processing – a right to request that the personal data processing is restricted, for example, if you oppose the accuracy of the data. Dataväxt's access to the data is restricted while the accuracy of the data is investigated.



- Right to object - a right to object against our processing if the legal ground for the processing is based on a balancing of interests or if it is used for direct marketing.
- Right to data portability – a right to request that personal data are transferred from one data controller to another. This right is restricted to data that you have supplied to us yourself.

9. Contact details for queries regarding personal data

Dataväxt is the data controller for the processing of your data. If you have any questions concerning how Dataväxt processes your personal data or if you want to exercise any of your rights, please contact Dataväxt at info@datavaxt.se. You also have the right to file a complaint with the competent supervisory authority if you believe your personal data has been processed in violation of applicable data protection regulation.