

External Privacy Policy

This privacy policy applies to the personal data of customers, partners and other external parties and website visitors of NCAB Group (“NCAB”) that is collected or used by NCAB Group AB or its subsidiaries. NCAB appreciates the interest you have shown in our company, products and services by visiting our website www.ncabgroup.com, or related communication channels, including, but not limited to, our social media pages.

This privacy policy applies to all the personal data that NCAB collects when you interact with NCAB such as when you visit our websites, when you apply for a job position, when you purchase NCAB products or services, when you subscribe to newsletters, when you contact customer support, and when you interact with NCAB as a customer, supplier or business partner, etc.

Protecting the personal rights and privacy of each and every individual is the foundation of trust in NCAB’s business relationships.

What is personal data and what does processing mean?

Personal data includes all information that can be directly or indirectly linked to a living individual, i.e. data such as name, personal identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing is more or less any use of personal data. According to law processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who is responsible for your personal data?

The controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. NCAB Group AB Mariehällsvägen 37 A 168 65 Bromma with company registration number 556733-0161, is responsible for the processing of personal data and is responsible for guaranteeing that the processing within the NCAB Group is in accordance to law.

What personal data do NCAB collect about you?

The following personal data may be processed within our customer relationship:

- Contact information (such as name, e-mail address and telephone number)
- Customer category
- Contact preferences

The following personal data may be processed within our partner relationship:

- Contact information (such as name, e-mail address and telephone number)



When you apply for a job position through career@ncabgroup.com, or through any other communication channel, we may process following personal data about you:

- Contact information (such as name, address, e-mail address and telephone number)
- Personal identification number
- Information from your Curriculum Vitae, such as work experience, former employers, references and other information that you provide us with

By sending us your application you will consent to the processing of your personal data. If you want to withdraw your consent please contact our Data Protection Officer, see contact details below.

When you visit NCAB's website www.ncabgroup.com we (and third party service providers acting on our behalf) use cookies and other tools to automatically collect information about you when you use NCAB site, subject to the terms of this privacy policy and applicable data laws and regulation.

How we use cookies

Cookies are used to make websites work more efficiently, but also to provide the owner of the website with certain information. Cookies make it possible to distinguish between users, which in itself can give each user a more customized and positive experience of the website.

What are cookies?

Cookies are small text files with information that are stored on your computer (or other Internet enabled devices, such as smart phones or tablets) when you visit a website. A cookie normally contains the name of the website it originates from, the duration period of the cookie (i.e. how long the cookie will be stored on your device) and a value, which is usually a randomly generated unique number.

What does NCAB Group use cookies for?

NCAB Group uses cookies that are needed for the websites to function properly and that are necessary for you to be able to navigate the website and to use its functions. You do not have to accept absolutely necessary cookies as they are required for us be able to provide the services you request.

The websites use cookies that enable counting the number of users and calculating the traffic to the website, to enhance your experience and to individualize future visits by remembering your user preferences. Cookies are also used to compile anonymous, aggregated statistics to better understand how users use the websites, which helps us improve their structure and content.

Cookies that are used on the websites

There are three types of cookies on the websites:

- Persistent cookies, i.e. cookies that are saved as a file on your computer for a longer period of time. For example, persistent cookies are used in connection

with functions that tell you what information is new since you last visited the specific website. How long the cookie is stored on your device depends on the duration period of the specific cookie and the settings of your browser.

- Session cookies, i.e. cookies that are stored temporarily in the memory of your computer while you are visiting and navigating a site. Session cookies are used, for example, to determine what language you have selected. When you leave a website, the session cookies that have been used are deleted.
- Third-party cookies, i.e. cookies that belong to other domains than those shown in the address bar. Third-party cookies create possibilities in tracing the user's browser history.

This is a list of the cookies we use on this website:

WordPress/PHP:	Session cookie to determine what language you have selected. When you leave the website, the session cookies that have been used are deleted.
Google Analytics:	Long-term cookie used for statistics. Your IP address is anonymized.
Telavox:	Cookie used for some contact pages to show how many calls that are waiting in our telephone exchange (in Sweden).
Simpli.fi:	Cookies to facilitate retargeting and campaign optimization.

How you block and/or delete cookies

Most browsers have standard settings that accept the use of cookies. You can change these settings so that you as a user are warned whenever a cookie is sent to your computer, or to block cookies as a main rule. You can also choose to delete all cookies that are stored on your computer.

How you delete stored cookies or change your settings regarding cookies is specified in the browser instructions or in the help function that most browsers are equipped with. If you use different devices to see and access the website (for example your computer, smart phone, tablet etc.), you must ensure that the website of each device is adjusted in accordance with your wishes regarding cookies.

Note that if you choose not to allow storage of cookies, it is possible that you cannot use all parts of the Websites and that some parts of the websites may not function properly.

Why do NCAB process your personal data?

NCAB will collect and process personal customer data within the scope of our customer relationship processes. The personal data is collected and processed for the following purposes:

- Completing obligations to customers such as execution of purchase, invoicing and providing support,



- Improve and optimize customer offering, such as product development and product features,
- Enable general customer care and customer service, such as answering questions,
- Storing customers preferences for future interactions and communications from NCAB,
- The data can also provide basis for market and customer analyzes, market research, statistics, business tracking and business and method development related to the purchase of goods and services.

The personal data is processed on the basis of NCAB's legitimate interest of being able to maintain and document customer relationships and related activities and in order to fulfill customer agreements between NCAB and our clients and to be able to provide the products and services ordered.

Further on personal data is processed in order for NCAB to comply with its legal statutory obligations stated in applicable legislation, such as accounting laws.

NCAB will also collect and process data in order to identify and develop potential customers and to present offers. This personal data is based on a legitimate interest of being able to reach out to new potential customers. NCAB will provide information about the collecting and processing of personal data when the first interaction with the potential customer occurs. Individuals always have the right to object to processing activities of their personal data.

NCAB will collect and process data about suppliers and business partners in order to manage customer relationships, facilitating information access and to enhance communication in order to fulfill agreements and legal obligations.

Retention periods

NCAB will retain customer personal data for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes. If no interaction occurs between us and a customer NCAB will then erase the personal data pertaining to that customer when no longer necessary.

Product quality, design and tractability is vital for NCAB. If you, in your role as a customer to NCAB, is involved in information exchange regarding the design of our products we will retain our information exchange regarding product design for as long as the product is being used in the market.

Personal data concerning customers, suppliers and business partners regarding verifications will be retained for at least a period of seven years from the end of the calendar year during which the relevant financial year ended for accounting purposes due to legal obligations.

Data processors acting on behalf of NCAB

A processor is an external part, such as service providers, which processes personal data on behalf of NCAB. The processor must only act on the written instructions of NCAB.

- NCAB shall only appoint processors who can provide sufficient guarantees that the requirements of the GDPR will be met and the rights of data subjects protected.
- The level of security measures implemented shall correspond with the measures that NCAB has identified as appropriate to ensure and to be able to demonstrate that processing is performed in accordance with GDPR.
- Where such disclosure entails transfers of personal data outside the EU/EEA, NCAB must ensure that sufficient safe guards will be put in place prior to protect transfers.
- The processor shall not engage another processor without prior specific or general written authorization of NCAB. In the case of general written authorization, the processor shall inform NCAB of any intended changes concerning the addition or replacement of other processors, thereby giving NCAB the opportunity to object to such changes.
- Processing by a processor shall be governed by a contract or other legal act under Union or Member State law.
- Data processing agreements shall be established. Each business unit within NCAB shall review their data processing agreements to ensure that agreements are in place and updated according to the new regulation.

Disclosure to third parties

When you interact with NCAB as a customer NCAB may share your personal data with our suppliers and business partners and other third parties such as our PR agency, customer survey and marketing providers and other parties bearing a necessary relationship for NCAB to provide its services.

When you interact with NCAB as a supplier or business partner, NCAB may disclose personal data to another business partner and or a supplier, such as factories, warehouse and transportation suppliers. NCAB may share your personal data with governmental authorities in order to fulfill legal obligations in the areas of tax and customs, anti-fraud and anti-money laundering legislation.

International transfers outside EU/EEA

NCAB may disclose personal data to companies within the NCAB that may be located in countries outside the EU/EEA.

- NCAB needs to ensure adequate protection of personal data when transferred outside the EU/EEA.

NCAB complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. NCAB has



certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the

Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

NCAB commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

NCAB is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC)

Individuals have the possibility, under certain conditions, to invoke binding arbitration.

NCAB may need to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

NCAB is liable in cases of onward transfers to third parties.

Your rights

Once you have provided us with your personal data, in certain circumstances you are entitled to;

- request confirmation whether or not personal data is processed and obtain access to your information
- object to any processing of your personal data processed on the basis of a legitimate interest, on grounds relating to your particular situation;
- have your personal data erased under certain circumstances, e.g. for direct marketing
- restrict the processing of your personal data under certain circumstances
- request information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”).

To exercise any of the rights mentioned above we refer you to the contact person in each country or the Data Protection Officer (for contact details see below).

You have always the right to lodge complaints pertaining to the processing of your personal data to the competent supervisory authority responsible for data protection matters.

Appropriate safe guards

NCAB recognize and take seriously our responsibility to protect the personal data you entrust to NCAB from loss, misuse or unauthorized access. NCAB uses a variety of security technologies and organizational procedures to help protect your personal data. For example, access controls, firewalls, antispyware, antivirus and secure servers.



We encrypt certain types of data, such as financial information and other sensitive data.

Personal data may be disclosed to external parties, such as service providers which process personal data under the instructions of NCAB. Where such disclosure entails transfers of personal data outside the EU/EEA, NCAB will ensure that appropriate safe guards will be put in place prior to such transfers.

Changes to this privacy policy

NCAB reserve the right to change or add to this privacy policy from time to time and will post any material revisions on our websites. We will post a prominent policy on our privacy policy page to notify you of any significant changes to this privacy policy, and will indicate at the top of the policy when it was most recently updated. We encourage you to check back often to review the latest version.

Contact information

If you have any queries about how NCAB treat your information, the contents of this privacy policy or your rights under local law, please contact our Data Protection Officer Monica Hagström at NCAB; monica.hagstrom@ncabgroup.com or phone no. +46 8 403 000 75, or any of the contact person in each country, see contact details below:

Country	Local contact person	E-mail
Benelux	Jeroen Verbeek	jeroen.verbeek@ncabgroup.com
China FM	Alen Liang	alen.liang@ncabgroup.com
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Controller:

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