## **Privacy policy**

Protecting customer privacy is something we care about at Cellbes. In our privacy policy, we describe how we use and store your personal data – and why we do so.

Cellbes attaches great importance to being as clear as possible about how we process your personal data. Would you like to know more about why we process your personal data? Please refer to the end of this policy. There we describe in more detail why we process your personal data, what data we process and for how long we process it. You can also read about our legal basis for processing your data in accordance with the EU General Data Protection Regulation (GDPR).

Please refer to the summary and table of contents to find the relevant information.

#### **Summary**

When you start a purchase with us without completing it, we process your personal data in order for you to be able to return to your shopping cart.

When you shop with us, we process your personal data in order to:

- Manage your purchase and payment (e.g. sending your goods, enabling you to shop on credit and collecting non-payment);
- Comply with consumer laws and give you the option to cancel your purchase or exchange the goods you have purchased;
- Handle any claims, e.g. in the event of a complaint/claim;
- Comply with the Accounting Act;
- Handle your case when you are in contact with our customer service;
- Detect suspected fraud and errors with your payment or order.

When you have an account with Cellbes online, we process your personal data in order to:

- Manage your account and provide you with necessary information, e.g. when updating our terms and conditions;
- Streamline the purchasing process by automatically filling in relevant information when you shop online; and
- Allow you to view current and past orders.

To communicate with you and provide you with information and offers tailored to you, we process your personal data in order to:

- Send you marketing by email, SMS and post after your purchase;
- Send you newsletters as a subscriber to our newsletter;
- Create personalized and relevant offers for you based on your purchase history and the goods for which you have shown interest, e.g. by clicking on them in our newsletter or SMS mailing, or by adding the goods to your shopping cart;
- Send you market research following a purchase;

- Provide personalized marketing in various digital channels, e.g. Facebook, Instagram and YouTube, and reaching new customers;
- Ensure that the information we hold about you when we communicate with you is accurate, we coordinate your contact details against an updated database; and
- Comply with the Marketing Act. If you have opted out of receiving marketing communications from us, your contact details will be stored in our "unsubscribe register".

<u>In order for us to develop and improve</u>, we process your personal data to analyze how we can improve our services and our offering to our customers.

You have several rights under the GDPR. In summary, you have the following rights: <u>right to complain</u>, <u>right to withdraw your consent</u>, <u>right to access</u>, <u>right to object</u>, <u>right to erasure</u>, <u>right to rectification</u>, <u>right to restrict the processing of personal data</u> and <u>right to data portability</u>.

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#### Who is responsible for the processing of your personal data?

Cellbes AB, with corporate ID number SE556540215201, is responsible for the processing of your personal data. Your privacy is important to us. In this policy, we want to inform you about how your personal data is processed by us when you shop with us, when you visit us online and identify yourself, create and use an account, and when you receive newsletters, SMS mailings, postal mailings, information or other marketing from us.

If you have any questions about the processing of your personal data or if you want to contact us to exercise your rights, you are welcome to do so – the easiest way is via email at customerservice@cellbes.com. Our postal address is Cellbes AB 501 87 Borås, Sweden.

#### How do we protect your personal data?

We and our partners have taken several organizational and technical security measures to protect your personal data. We work actively to comply with the EU General Data Protection Regulation (GDPR). We have different IT systems and functions that help us protect your personal data from unlawful or unauthorized processing. Furthermore, we have internal procedures that ensure that no people other than those necessary have access to your personal data.

# Do you have to provide your personal data to us and what happens if you do not?

In order for us to be able to provide you with certain services and to be able to enter into an agreement with Cellbes, it is necessary that you provide us with certain personal data. For example, if you do not provide the personal data necessary for us to perform our agreement with you, we will not be able to deliver your goods.

If you do not provide the information required for a processing operation that we carry out on the basis of your consent, we will not be able to process your personal data for this purpose. Your consent is required, for example, if you wish to continue to receive newsletters, SMS mailings and postal mailings containing information and offers to you for a longer period than the period we would otherwise send it (see below).

#### Who can access your personal data?

Your personal data is generally only processed by Cellbes. However, your personal data may be shared outside Cellbes if, for example, it is necessary to fulfill our agreement with you and in order for us to be able to carry out tasks that are not our core business and thus be able to offer you good prices on our goods.

Here we list in more detail how we may share your personal data:

• We share your personal data with our external customer service in order to maintain good customer service towards you;

- In order for us to be able to sell the goods you want to buy, we share your personal
  data with the supplier that provides the payment option you have selected.
   Depending on the payment option you have selected, the exact data processed by
  the provider and how this data is processed may vary.
- We share your personal data with our transport provider in order to be able to
  deliver the goods you have purchased to you or when you send the goods back to us
  if you withdraw from or make a claim about your purchase or want to exchange the
  goods. We do this to ensure that the carrier can complete the delivery and send you
  information that the goods are available for collection;
- We share your personal identity number to be able to retrieve and fill in information that you omitted to provide us that is necessary to complete your purchase or create your account with our provider of this service;
- We share your personal identity number with a provider who helps us to ensure that the contact details we have for you are correct;
- We share your purchase history with our supplier to analyze how we can improve our services and our offering to our customers;
- If you do not pay on time, we will share your personal data with the relevant supplier to collect the payment;
- We share your personal data in order to send marketing to the printers and delivery companies we use.

We also share your personal data with selected external IT suppliers that we use, but only to the extent necessary for the suppliers to be able to fulfill their commitment to us.

If you would like more information about the companies or authorities we share personal data with, you are welcome to contact us.

#### Do we transfer your personal data outside the EU/EEA?

As a general rule, Cellbes processes your personal data within the EU/EEA, but in some cases we may use suppliers outside the EU/EEA. When we transfer personal data outside the EU/EEA, this is only done according to the requirements of the EU General Data Protection Regulation (GDPR).

### What rights do you have to influence how we process your personal data?

Under the EU General Data Protection Regulation (GDPR), you have certain rights regarding the processing of your personal data. We have described your rights and what they entail below. To exercise your rights, you are welcome to contact us; please see contact details above.

If you have any questions about your rights or wish to exercise any of them, please contact us using the contact details <u>above</u>.

#### Right to complain – Article 77 GDPR

You have the right to *lodge a complaint* with a competent supervisory authority if you believe that the processing of your personal data violates the GDPR.

#### Right to withdraw consent – Article 7(3) GDPR

You have the right to withdraw your consent at any time by contacting us.

#### Right of access ("right to extract data") – Article 15 GDPR

You have the right to *obtain confirmation* as to whether or not we process your personal data. You can submit a request by <u>contacting us</u>. If we process your personal data, you also have the right to *obtain a copy of the personal data* we process as well as *information about the processing*, e.g. the purpose of the processing and the duration of the data storage.

#### Right to object – Article 21 GDPR

You have the right to *object* at any time to the processing of your personal data for direct marketing purposes (including any profiling) and to the processing of your personal data based on a <u>balance of interests</u> (including any profiling).

#### Right to rectification – Article 16 GDPR

You have the right to have any incorrect personal data concerning you rectified without undue delay. You also have the right to complete incomplete personal data.

#### Right to erasure ("right to be forgotten") – Article 17 GDPR

Under certain conditions, you have the right to have *your personal data deleted by us* without undue delay. For example, if you <u>withdraw your consent</u> and there is no other legal basis for the processing of the data or if the personal data is no longer necessary for the purposes for which it was collected or processed.

#### Right to restriction of processing – Article 18 GDPR

Under certain conditions, you have the right to request that we *restrict our processing* of your personal data. For example, if you dispute the accuracy of the data, or if the processing is unlawful and you object to the erasure of the personal data but instead request a restriction of the use of the data.

#### Right to data portability – Article 20 GDPR

If we process your personal data on the basis of your consent or for the performance of a agreement, you have the *right to obtain the personal data* concerning you. This right applies to data that you have provided to us in a structured, commonly used and machine-readable

format. You also have the right to *transfer this personal data* to another controller, where technically feasible.

### Detailed description of how we process your personal data

Here we describe in more detail why we process your personal data, what data we process and for how long we process it. Please note that the column below only indicates the period of time that we process the data for the purpose indicated in the same row. The same data may be stored for a longer period of time for another purpose.

In the third column, you can also read about our *legal basis* for processing your data in accordance with the EU General Data Protection Regulation (GDPR).

When you start a purchase with us without completing it			
For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?
To save your items in your cart if you abandoned it and to access it on the same device if you visit us online again.  To enable you to access items you have added to your cart if you visit us online again on another device.  We will also send you information about your cart by email; you can find out more below.	A hash (text ID) of the email address you entered when you started your purchase, information about the items you left in your shopping cart, and the links that you clicked on in our newsletters.  If you are logged in to your account with us, the data will be linked to your account.	Our legal basis for processing is our legitimate interest in making it as easy and convenient as possible for you to purchase the item(s) you have shown interest in by adding them to your shopping cart.	The data is processed from the time you add items to your shopping cart and until you make a purchase with us, but no longer than three days from the time you add the items to the shopping cart.

When you shop with	When you shop with us			
For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?	
To be able to know with whom we have entered into an agreement, to deliver the goods to you, and to confirm your purchase by email in accordance with applicable consumer legislation and otherwise administer your purchase.	Name, postal address, email address and customer number.  Order information, e.g. the product you have ordered.	The processing is necessary for the performance of our agreement with you and for us to comply with consumer law.	The data is processed until the purchase is complete and the goods are delivered to you.	
This includes delivering your order, including sharing your personal data with carriers.				
To fill in the details needed to fulfill your purchase for you.	Email and address.	The processing is carried out on the basis of our legitimate interest in facilitating your experience as a customer for the last 36 months.	Your data will be processed for this purpose for 36 months following a purchase.	
To be able to administer your payment if you choose to pay by card.  We do not process the assessment ourselves, but only technically enable you to pay for the purchase through our payment service provider.	Card information, e.g. your card number.	The processing is necessary to fulfill our agreement with you.	The data is processed until the payment has been completed. It is not stored by us, but only by the provider that assists us with card payments.	
To enable you to purchase goods by invoice, installment or other payment methods that involve us giving you credit, and to enable us or our payment service providers to carry out a credit check in	Name, postal address, telephone number, email, personal identity number and debt balance (if applicable) as well as information that we or our partners obtain from credit information	The processing is necessary for you to be able to choose to receive credit and thereby fulfill our credit/payment purchase agreement with you, and the importance of securely identifying you as the person responsible for payment	The data is processed until payment has been completed.  Data that is necessary for the credit check and the result of the credit check are processed from the time that your request	

connection with this to assess your ability to pay.	companies, i.e. information about your financial status.	and taking payment by invoice and thereby being able to fulfill our agreement with you.  The processing of your personal identity number is justified by the importance of securely identifying you as the person responsible for payment of the purchase.	to pay on credit is made, and deleted as soon as your ability to pay has been checked.
For us (and/or the delivery company we use) to be able to send your goods and to notify you that the delivery has been sent and then delivered, as well as for you to be able to follow your delivery during transport.	Name, postal address, email address, mobile number (if you selected SMS notification), order number and package number.	The processing is necessary to fulfill our agreement with you.	The data is processed until we have sent your goods or until the goods have been delivered/collected at the pick-up point (depending on the delivery method).
To enable you to withdraw from your purchase or exchange the goods you have purchased, and to comply with mandatory consumer laws, e.g. to carry out a refund when you exercise your right of withdrawal using the same payment method as at the time of purchase.	Name, postal address, telephone number, email address and information about the purchase, such as the order confirmation and payment method.  When exercising your right of withdrawal or exchange, the information you provide when exercising your right of withdrawal or exchange will also be saved.	The processing is necessary for the performance of our agreement with you and for us to comply with consumer law.	The data is processed from the time you make your purchase and for two months thereafter in order to ensure that we always comply with consumer legislation on, among other things, the right of withdrawal.  If you exercise your right of withdrawal or exchange a product, we will process your data until we have made a decision on the right of withdrawal/exchange and carried out any exchange or refund.
To be able to handle any claims against us,	Name, postal address, telephone number,	The processing is necessary for us to act in	The data will be processed from the

e.g. in the event of a complaint/claim.	email address, information about your purchase and information from our communication with you in connection with your claim (e.g. time of purchase and reason for claim).	accordance with consumer law and is carried out on the basis of our legitimate interest in being able to defend ourselves in the event of a legal claim.	time you submit your claim and for the duration of the claim process. If we reject a claim, we always store information about it for one year in the event that you choose to have your claim reviewed by the National Board for Consumer Disputes.
To collect non- payment.	Contact details, your order confirmation and your personal identity number.	The processing is necessary for the performance of the agreement.	The data will be stored until you have completed your payment.
To comply with accounting legislation.	History of payments, transactions, etc. which constitute accounting material.	The processing is necessary to comply with mandatory law, i.e. the Accounting Act.	The data is processed for seven years in accordance with the Accounting Act.
To handle your case when you are in contact with our customer service via email or telephone.	Email address, telephone number and the information you provide to us about, for example, your purchase.	Our legal basis for processing is our legitimate interest in helping you with the case.	The data is processed from the time you contact our customer service until we have resolved the case.
To be able to troubleshoot our system in the event of suspected fraud or if something goes wrong with your payment or order.	Name, postal address, telephone number, email address, IP address and selected payment method.  If you have provided us with your personal identity number or customer number, we will also process this data.	Our legal basis for processing is our legitimate interest in troubleshooting our system to help you if something goes wrong with your order or payment, or if we suspect fraud.	The data is processed from the time you make a purchase and up to three (3) years afterwards.

When you have an account with Cellbes online				
For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?	

For those of you who have an account with us, we process your data for the purpose of activating, administering and providing your account, and informing you if we update our terms and conditions and our privacy policy.	Name, customer number, postal address, telephone number, email address and purchase history.	If you choose to create an account with us, the processing is necessary to fulfill our agreement with you.	The data is processed from the moment you choose to create your account and until you change the information or choose to close your account. If your account has been inactive for 24 months, we will stop processing your data for this purpose. By inactive, we mean that you have not made any purchase linked to your account or otherwise shown interest in your account, e.g. logged in to your account.  If you contact us and ask us to keep the account, we will keep it (until another 24 months of inactivity).
To fill in the information needed to complete your purchase on your behalf so that you don't have to do so every time you shop online with us.	Name, postal address, telephone number, email address and information about your payment history and payment method.	The processing is necessary to fulfill our agreement with you.	The data will be processed for as long as you hold your account with us.
In order for you to be able to see your current and previous orders.	Order history, e.g. what you ordered.	The processing is necessary to administer your account with us and thereby to fulfill our agreement with you.	The data is processed from the time you order your goods and for 36 months thereafter, after which your purchase history is anonymized.

To communicate w	ith you and provi	de you with informa	tion and offers tailored
For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?

To send newsletters, SMS mailings and postal mailings with information and offers to you following a purchase.	Email address, telephone number and/or address (depending on whether you have opted out of marketing via any channel).	Our legal basis for processing is our legitimate interest in sending marketing to you following a purchase, unless you have opted out of the marketing.	We send postal mailings for 36 months following a purchase.  We send newsletters and SMS mailings for 18 months following a purchase.  If you choose not to receive mailings from us, your personal data will be stored in our unsubscribe register until further notice (see last line in this table).
To send newsletters by email and SMS with information and offers to you as a subscriber of our newsletter.	Email address and mobile phone number.	The consent you have given us.	The data is processed for 36 months from the time you subscribe to our newsletter or SMS mailings.
of our newsietter.			If you choose not to receive mailings from us, your personal data will be stored in our unsubscribe register until further notice (see last line in this table).
To customize the content of our marketing communications that you have opted in to receive, so that you can receive offers and information about products that you may be interested in.	Contact details (e.g. email address and postal address), purchase history, behavior on our website, and the links that you clicked on in our newsletter.	Our legal basis for processing is our legitimate interest in being able to provide you with personalized information and offers.	The data is processed for a period of 18 months from the time you make a purchase or create an account
To send you information about your cart by email if you leave our website without completing a purchase.	Information that you have provided to us in connection with sales, such as your name, email address, and information about items you added to your shopping cart on our website.	Our legal basis for processing is our legitimate interest in sending you relevant marketing in connection with sales.  You have the right to object to marketing when the data is collected and at the time of each mailing.	The data is processed from the time you provide us with your email address and 24 hours thereafter.  If you choose not to receive mailings from us, your personal data will be stored in our unsubscribe register until further notice (see last line in this table).

To send market research to you following a purchase.	Name and email address.	Our legal basis for processing is our legitimate interest in being able to send you market research.	The data is processed during the time required to send the market research to you. We do this for a maximum of 24 months following a purchase.  If you choose not to receive mailings from us, your personal data will be stored in our unsubscribe register until further notice (see last line in this table).
To provide personalized marketing in various digital channels, such as Facebook, Instagram and Youtube, and to reach new customers.	Email address and certain information about you and your online behavior collected via digital channels.	Our legal basis for processing is our legitimate interest in sending you marketing.	The data is processed for the duration of marketing in the digital channels and for a maximum of 36 months following a purchase.
To ensure that the information we have about you when we communicate with you is accurate, we coordinate your contact details against an updated database.	Contact details, such as name, postal address and email address.	Our legal basis for processing is our legitimate interest in ensuring that, for example, our mailings are sent to the right recipients and we maintain good record keeping.	The processing is carried out as long as you have an account with us or receive marketing from us, normally 36 months from the time you make a purchase, or longer if you chose to keep your account or have consented to receive communications from us.
In order to comply with the Marketing Act, we process your personal data if you have notified us that you do not wish to receive marketing from us or if you have withdrawn your consent to marketing. In this case, we will store your email address in a "opt-out register" to ensure	Email address and, where applicable, telephone number.  Information that you no longer wish to receive marketing from us or that you have withdrawn your consent to marketing.	The processing is necessary to fulfill our obligation under the Marketing Act to ensure that you do not receive mailings as per your request.	Your email address will remain in our unsubscribe register until you ask us to have it removed.

that we do not send any marketing to you.		
This is not personal data that we actively process, so we do not refer to or use your email address for anything other than to ensure that you do not receive marketing from us.		

To be able to develop and become even better through analysis				
For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for the processing?	How long do we process your personal data for this purpose?	
To analyze how we can improve our services and our offering to our customers.	Purchase history, name and personal identity number.	Our legal basis for processing is our legitimate interest in ensuring that we can create an even better service for you and other customers.	The data is processed from the time of your purchase until it is shared with the supplier providing the service to us for a maximum of 36 months from your purchase.	

# How have we balanced our interests when the legal basis is our legitimate interest?

For certain purposes, Cellbes processes your personal data in line with our legitimate interest as the legal basis for the processing. We do this on the basis of a balance of interests whereby we have assessed that our legitimate interest in carrying out the processing outweighs your interest and your fundamental rights not to have your personal data processed.