



Diab Group - External Privacy Policy

Latest update: 2018-06-25

1 INTRODUCTION

This privacy policy describes how Diab processes personal data linked to customers (potential and existing) and suppliers as a data controller.

Diab has following contact information:

Website: <https://diabgroup.com>

Questions and opinions regarding this policy or the processing of personal data carried out by Diab can be put to Diab through the contact information above or directly to our co-worker who is responsible for our GDPR compliance:

E-mail: gdpr@se.diabgroup.com

Diab always aim to secure individuals' integrity throughout all of Diab's contacts during the work procedure of Diab's co-workers and its handling, storage and protection of any personal data. Our work procedure is in compliance with applicable laws, meaning up until 25 May 2018 Personuppgiftslagen ("PUL") and thereafter the General Data Protection Regulation ("GDPR") and any complementary national legislation which come into force upon the 25 May 2018.

This policy explains how and why Diab collects and process personal data linked to its potential and existing customers and suppliers (hereafter the persons whose personal data is processed in accordance with this policy are referred to as "you"). This policy also describes the rights granted to you by the GDPR in relation to Diab and how you can claim these rights.

WHAT IS INCLUDED IN THE TERM PERSONAL DATA? Personal data means all types of information which can, directly or indirectly, be used to identify a living physical person. For example information such as name, contact information, personal identity number, photos, phone number or email address are all considered personal data. Furthermore, information which can identify you as a person practicing a profession is considered personal data. This means that your professional experiences, titles, companies where you work/have worked, board of director assignments, memberships in professional organizations, education, grades, languages and other skills (shortly, your resume) are also considered personal data.

2 THE PROCESSING OF PERSONAL DATA

2.1 General

This policy is applicable regarding every personal data which is processed by Diab and which is linked to Diab's potential or existing customers and suppliers (or the suppliers' contact persons). Diab will in these relationships collect, register, store, organize, canvass, put together, use, present, delete or in other ways process personal data (included professional personal data). As the reader of this policy, you only need to read the part of this section 2 which refers to the category of persons you belong to (i.e. potential customer, customer or supplier).

2.2 Customers

Potential customers

Diab collects personal data (from public sources or through recommendations from persons in our network) and store such data related to you as a contact person or key person in your company or organization. We collect personal data such as your name, title/position within the company/organization and your contact information and register this information in our internal systems. We collect the personal data in order to inform you of and be able to market Diab and Diab:s services. The lawfulness of the processing of your personal data is based upon the processing being necessary for the purposes of the legitimate interests of Diab in order for Diab to be able to market its services.

Customers

If you choose to appoint Diab to perform any of the services which Diab offer, we will process your name, title/position within the company/organization, your contact details and other personal data which we need for the purpose of the performance of the agreement entered into between Diab and the company or organization you belong to. In such case, we will collect the personal data in connection to entering into the agreement with the company or organization. The lawfulness of the processing of your personal data is based upon the processing being necessary for the purposes of the legitimate interests of Diab in order for Diab to be able to fulfil its obligations and use its rights in accordance with the agreement.

Information concerning both potential and existing customers

Your personal data will be processed internally within Diab and it is also possible that your personal data could be disclosed to other companies within the Diab group. Such other company within the Diab group will only be able to take notice of the personal data if the company has its own purpose with the processing. Therefore, such company within the Diab group will act as a data controller with regards to such processing. Furthermore, our IT-suppliers and data processors which supply our databases will also process your personal data. We will enter into data processing agreements with the IT-suppliers and

data processors and they will be obliged to process the personal data in accordance with the GDPR.

Our processing of your personal data will cease if you object to the processing and we are unable to identify any right to continue the processing or when our purpose with the processing of your personal data has been achieved.

2.3 Suppliers

Diab collect and store your personal data as the contact person of your company or organization. Diab will collect and store the personal data based upon the need of such information to carry out the agreement entered into between Diab and the company or organization which you belong to. The lawfulness of the processing of your personal data is the processing being necessary for the purposes of the legitimate interests of Diab in order for Diab to be able to fulfil its obligations and use its rights in accordance with the agreement.

Our processing of your personal data will cease when our purpose with the processing of your personal data has been achieved.

3 INFORMATION SECURITY

NN has implemented appropriate technical and organizational measures in order to secure the collected personal data from unintentional or unlawful destruction or unintentional loss, change, unauthorized disclosure or access, especially when the processing includes transfer of personal data in a network, and against any other unlawful form of processing. The security measures which are taken to secure the personal data will be proportionate to the risk of possible damage taken in consideration the type of the secured personal data. We have a general high security concerning our computers, encrypted laptops and passwords on our cellphones.

4 YOUR RIGHTS

4.1 Right to access to your personal data

You can demand a copy of the personal data processed by Diab and verify that your personal data is correct.

4.2 Right to rectification

You have the right to have any of your mistaken personal data corrected and your incomplete personal data completed.

4.3 Right to erasure ('right to be forgotten')

You have the right to obtain erasure of your personal data if the personal data are no longer necessary in relation to the purposes for which they were collected and to the extent we do not have any obligation of any kind to retain the personal data.

4.4 Right to restriction of processing

You have the right to obtain restriction of the processing of your personal data carried out by Diab where (i) the accuracy of the personal data is contested by you and we need a period of time to verify the accuracy of the personal data (the restriction of processing will be carried out during our verification); (ii) the processing is unlawful or no longer necessary for the purposes of the processing but you oppose the erasure of the personal data; or (iii) you have objected to processing pursuant to clause 4.5 below and we need to verify the objection (the restriction of processing will be carried out during our verification).

4.5 Right to object

You have the right to object to the processing of your personal data if the processing is based upon a "legitimate interest assessment". If such objection is made, the reason for the objection has to be explained and we will then assess whether or not your reasons for the objection are overridden by the legitimate interest pursued by us in order to do the processing. If you object to processing for direct marketing purposes, which you can object to at any time, we will cease with the processing of your personal data for such purposes.

4.6 Right to file a complaint at the supervisory authority (Datainspektionen/future Integritetsskyddsmyndigheten)

If you assess that our processing of your personal data is discrepant with applicable legislation, we kindly ask you to contact us firstly through the contact information above but you are also entitled to file a complaint at the supervisory authority, i.e. Datainspektionen/future Integritetsskyddsmyndigheten.

The privacy policy of Diab will continuously be updated by Diab. When such update has been carried out, this privacy policy will be updated and dated on our website.

Should you have any questions regarding this policy and your personal data, we kindly ask you to contact us in accordance with our contact information above.