

General Privacy Notice – Europe

Last updated 2024-04-10

1 Introduction

Gränges AB and its European subsidiaries are committed to safeguarding the privacy of the personal data we process and want you to be familiar with how we process personal data.

This General Privacy Notice (the “**Privacy Notice**”) describes how we process personal data from individuals who are not employed or recruited by us but who we engage with through our customers, suppliers and business partners (both potential and existing) or who are visitors to our website www.granges.com (the “**Website**”) and our physical sites (the “**Sites**”).

References to “**Gränges**”, “**we**” and “**our**” throughout this Privacy Notice, depending on the context, refer to Gränges AB and its European subsidiaries.

When we refer to “**personal data**” we mean any information relating to an identified or identifiable individual.

Gränges may change this Privacy Notice at any time. The date at the top of this page indicates when it was last revised. The revised Privacy Notice will be effective from the time of publication on the Website.

2 Application of this Privacy Notice

This Privacy Notice applies to personal data received from customers, suppliers, business partners (both potential and existing) and visitors of the Website and our Sites, and intends to describe our processing activities related to such personal data.

Information about personal data we collect and process with respect to job candidates and employees is not covered by this Privacy Notice but are described in the privacy notice “Your Privacy at Gränges”.

Any specific local privacy notice of a Gränges company shall take precedence over this Privacy Notice, for example the “Privacy notice - subscribers & email contacts” which describes how we process personal data with respect to email contacts and subscriptions to company communication gathered through the Website.

To the extent this Privacy Notice conflicts with any provisions of national data protections laws, such national data protections laws shall take precedence over this Privacy Notice.

3 Legal base and source of the personal data processed by Gränges

We only process personal data in a lawful and fair manner and in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”) and other applicable national data protection laws and regulations.

When processing personal data we rely on one of the following legal bases:

- You have given your consent to the processing;
- The processing is necessary for entering into, or performance of a contract to which you are party;
- The processing is necessary to comply with a legal obligation;
- The processing is necessary to protect the vital interests of an individual;
- The processing is necessary for the performance of a task carried out in the public interest; or
- We, or a third party, have a legitimate interest in using your personal data to achieve the purposes of processing, except where such legitimate interests are overridden by your interests or fundamental rights and freedom.

Where processing of your personal data is based on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect the lawfulness of any processing carried out before the withdrawal of your consent. Please note that if you withdraw your consent, we may not be able to provide certain services to which such consent relates to.

We receive your personal data directly from you or from your employer (i.e. our customers, suppliers and business partners) or through automated means, e.g. with regard to the Website.

4 Purpose with processing personal data

We use your personal data for legitimate business purposes as described in the overview below.

To manage customer, supplier and business partner relationships (both potential and existing)

Purposes of processing	Personal data categories processed	Legal basis for the processing
<p><i>Potential customers, suppliers and business partners</i></p> <p>Gränges processes personal data about customer, supplier and business partner representatives for: (i) pre-sales related activities, (ii) pre-sourcing related activities (iii) pre-business partnering activities.</p>	<ul style="list-style-type: none"> • Name • Contact details (business email, business phone) • Information about your job role (company, business unit, role, office location) • Other information you may provide (either directly or through your employer) 	<ul style="list-style-type: none"> • We have a legitimate interest in using your personal data to maintain our potential business relationship for as long as such potential business relationship is ongoing.
<p><i>Customer, supplier and business partner relationship management and business administration</i></p> <p>Gränges processes personal data about customer, supplier and business partner representatives for: (i) administrative purposes, (ii) management of the business relationship, (iii) contract management and performance, (iv) sales related activities, (v) sourcing related activities, (vi) customer satisfaction surveys, (vii) delivery of products and services (viii) invoicing.</p>	<ul style="list-style-type: none"> • Name • Contact details (business email, business phone) • Information about your job role (company, business unit, role, office location) • Signatures • Other information you may provide (either directly or through your employer) or we may need for the business administration and relationship management purposes 	<ul style="list-style-type: none"> • We have a legitimate interest in using your personal data to maintain our business relationships • We have a legal obligation to preserve accounting information such as contracts and invoices

To provide and maintain our Website and to ensure security at our Website

Purposes of processing	Personal data categories processed	Legal basis for our processing
<p><i>Website functionality, analytics, improvements, developments and security</i></p> <p>We analyze how the Website is being used to improve functionality, deliver better content and to ensure that the Website is secure to visit.</p> <p>We place a cookie in your browser to recognize your device the next time you visit the site. You can find more information on how cookies are used on our Website.</p>	<ul style="list-style-type: none"> • IP addresses • Information collected via cookies such as Client ID, device type and information about your browsing time and browsing history 	<ul style="list-style-type: none"> • For IP addresses, we have a legitimate interest in using your personal data such as improving and developing the Website and to ensure that it is secure to visit. • For personal data entailed in cookies, you have consented to the processing by giving your consent to cookies. Please note that if you choose to block cookies in your browser, the Website may not work properly or you may not be able to use certain features.

To ensure safety and security at our Sites

Purposes of processing	Personal data categories processed	Legal basis for our processing
<p><i>Visitors at Gränges sites</i></p> <p>Gränges may register personal data about you if you are visiting our Sites for reasons of security and safety of persons and property.</p>	<ul style="list-style-type: none"> • Name • Company 	<p>We have a legitimate interest in using your personal data to keep track of the visitors and to ensure safety and security at our Sites.</p>
<p><i>Camera surveillance</i></p> <p>Gränges may use camera surveillance within and around certain facilities where we conduct business with the purpose (i) to protect and ensure the health and security of our employees and visitors, (ii) to protect the property of Gränges and its employees and visitors and (iii) to prevent and discover crime and incidents.</p>	<ul style="list-style-type: none"> • CCTV recordings where your images and/or car registration number can be identified 	<p>We have a legitimate interest in using your personal data to enhance safety and security and to protect our resources in our Sites.</p>

5 Retention period of personal data

When we determine the retention periods of personal data, the main principle is that we will only retain personal data for as long as it is necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law, for example for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements or to safeguard our interest such as protecting our rights, property and products, enforcement of our contractual terms, applicable statutes of limitations, litigation or regulatory investigations.

6 Disclosure of personal data

In order to carry out the purposes described in this Privacy Notice, your personal data will be accessed by Gränges employees on a need-to-know basis and when necessary to fulfill those purposes. Gränges may also on the same conditions share such personal data with other Gränges companies.

In carrying out our business activities, Gränges engage service providers and other third parties to perform administrative and business management services such as website hosting services, analytics services, information technology and related infrastructure services, facility management services and consultancy services. The engagement of such third parties may include the disclosure of and the processing of your personal data if reasonable necessary to perform such services. We also share your personal data with professional advisors, when deemed necessary to maintain our business or as required by a law, such as with auditors, law firms or accounting firms. All such disclosure of personal data to third parties are always on a confidential basis and in accordance with applicable law.

In exceptional cases we may need to disclose personal data if we are compelled to do so by a court of competent jurisdiction or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property.

We may also disclose or transfer your personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock.

Gränges may always disclose personal information with the consent of the relevant individual(s) or if disclosure is required or authorized by law.

7 International transfers of personal data

As Gränges AB and its subsidiaries are present in different locations and are conducting a global business, we may transfer your personal data outside of the country where you are located and to countries where Gränges' companies and our engaged service providers and other third parties are located. By engaging with us, you understand that your personal data may be transferred to countries which may have data protection rules that are different from those of your country.

Gränges will take the safeguarding measures required in applicable laws when transferring personal data to other countries. Where this involves transferring personal data to countries *outside of the European Economic Area ("EEA")*, we will comply with GDPR and ensure that at least one of the following safeguards is implemented:

- *Adequacy Decisions*: Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection.
- *Standard Contractual Clauses*: For transfers of personal data from EEA to countries outside EEA which are not considered adequate by the European Commission we may rely on the EU Commission's standard contractual clauses available.
- *Derogations for specific situations*. Transfers of personal data may occasionally be made from

EEA to countries outside EEA based on a specific derogation, for example, where you have given consent, it is necessary for important reasons of public interest, in connection with the establishment or defense of legal claims or to protect the vital interests of an individual.

8 Your rights over your personal data

According to GDPR you have the following rights in relation to your personal data processed by Gränges:

- **Right to access your personal data.** You have the right to obtain confirmation on whether we process personal data about you and receive a copy of such data as well as information on how we process your personal data.
- **Right to rectification.** You have the right to rectify any inaccurate personal data we process about you or have any incomplete personal data about you completed.
- **Right to erasure.** You have the right to have your personal data deleted, if (i) your personal data has been unlawfully processed; (ii) we no longer need your personal data for the purposes of the processing; or (iii) the processing is based on your consent and you have withdrawn your consent and provided we have no other legal basis for processing your personal data such as a legal obligation to retain the personal data or if our legitimate interests override your interests.
- **Right to restriction.** You have the right to restrict our processing of your personal data, if (i) you believe that the personal data we process is inaccurate or our processing is in unlawful; (ii) we no longer need the personal data, but you want us to store the data for the establishment, exercise, or defense of legal claims; or (iii) where you require us to restrict the processing of your personal data for the period when we assess your right to object to the processing of your personal data.
- **Right to object.** You have the right to object to our processing of your personal data when we rely on our legitimate interests (or those of a third party). If you object to our processing, we will cease processing your personal data and delete the data, unless we can demonstrate compelling legitimate grounds for the processing overriding your interests, or if the data is needed for the establishment, exercise or defense of legal claims.
- **Right to withdraw your consent.** You have the right to withdraw any provided consent for processing of your personal data at any time. Withdrawal of consent does not affect the lawfulness of the processing before the consent was withdrawn.

Please also note that, for excessive and repetitive personal data requests, we will charge a fee based on the administrative costs to provide you with the requested information. We will let you know about the fee prior to any action is taken to answer the request.

If you wish to exercise your rights or have any questions regarding the processing of your personal data, please contact us using the contact details set out in section 10 (Contact information) below.

9 Protection of your personal data

Gränges are committed to protect all personal data disclosed to us. We have implemented all commercially reasonable technical, administrative and organizational measures to protect your personal data and prevent the loss, misuse or alteration of it. All our service providers and other third parties who we engage and to whom your personal data will be disclosed are also obliged to implement such measures and will be bound by confidentiality obligations.

We will notify you of any loss, misuse or unauthorized alteration of your personal data that may affect you as required by applicable data protection laws, in order to allow you to take the necessary steps

to protect your rights.

10 Contact information

If you have any questions about this Privacy Notice or any questions, concerns or complaints about the processing of your personal data with respect to the Website, please contact Gränges AB by email to privacy@granges.com or by mail to Gränges AB, Box 5505, SE-114 85, Stockholm, Sweden and clearly state that the subject matter is “Personal Data Privacy”.

If you have any other questions, concerns or complaints about the processing of your personal data as described herein, or if you would like to submit a request for access to the personal data that we maintain about you, please contact the relevant Gränges entity to which the question, concern, complaint or request for access relates to by letter or email on the addresses set out on our Website (www.granges.com/contact) and clearly state that the subject matter is “Personal Data Privacy”.

All questions, concerns, complaints or requests are subject to and will be responded to in accordance with the applicable data protection laws.

If you have further concerns or complaints about the processing of your personal data, you may also file a formal complaint with a competent EU/EEA data protection authority for your country where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law has occurred.

A list of EU/ EEA data protection authorities is available at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080