

NOTE Privacy policy

NOTE AB (publ) ("NOTE"), corporate identity number 556408-8770 ("we", "us" and "our"), with postal address Box 3691, 103 59 Stockholm, is dedicated to the protection of your personal integrity. Our ambition is to always protect your personal data in the best way possible and to comply with all applicable data protection laws and regulations. Through this privacy policy we wish to inform you of how we process your personal data.

1. Data controller

NOTE is the data controller for the processing of your personal data and is responsible for ensuring that all processing is carried out in accordance with applicable law. In some cases, NOTE's affiliates are the data controllers, either on their own or together with NOTE.

2. What personal data do we process and what is the purpose and legal basis for our processing?**2.1. Personal data from you**

When you are in contact with NOTE, you may provide us with personal data. NOTE processes your personal data including name and contact details. When recruiting, CVs are processed.

Purposes for processing	Legal basis for processing
Contact and correspondence.	Our or a third party's legitimate interest of managing communication, recruitment, enhancing our services and products and managing expressed interests in our services, product areas or similar.
Recruitment.	
Enhancing our services and products.	
Managing expressed interests in our services, product areas or similar in surveys or in communication.	

2.2. Personal data from the Internet, customers and suppliers

NOTE may collect personal data from publicly available sources on the Internet and from our customers and suppliers. The data consists of:

- Transactional and delivery performance data produced during the use of our services and of delivery of sold products.
- Contact information and correspondence sent to NOTE.
- Customer survey information.
- Expressed interests in our services, product areas or similar in surveys or in communication.
- Usage data derived from our website or social media platforms, e.g. LinkedIn.
- Data needed for managing business risks, legal or insurance claims or coverage, or obtaining business advice.
- User data for operation, safeguarding, maintenance and development of IT infrastructure and systems for suppliers and customer representatives using our systems.

Purposes for processing	Legal basis for processing
Offering, marketing, and selling relevant products and/or services to customers.	Our or a third party's legitimate interest of administering our contracts, fulfilling our contractual obligations, performing our rights towards our customers and suppliers, managing communication, enhancing our services and products, managing expressed interests in our services, product areas or similar.
Forming relevant partnerships with suppliers to deliver NOTE's services.	
Contact and correspondence.	
Enhancing our services and products.	
Managing expressed interests in our services, product areas or similar in surveys or in communication.	
Administering the contractual relationship, including invoices and payments.	
Administering deliveries.	

2.3. Shareholder's data

Shareholder's data, from Euroclear AB is processed. The data processed for the General Meetings consists of:

- Name, personal identity number, address.
- Other contact information, such as e-mail address and/or phone number provided by Shareholders who want to participate at NOTE's General Meetings.
- Holdings of NOTE shares.

Purposes for processing	Legal basis for processing
Fulfilling NOTE's legal obligations.	Fulfilling NOTE's legal obligation to process the data, including processing personal data to comply with applicable laws, for instance the Swedish Accounting Act (1999:1078).

2.4. Electronic subscription

The data consists of:

- Name and e-mail address to persons who have subscribed, at www.note-ems.com, to NOTE's distribution service of financial reports and Press Releases.

Purpose for processing	Legal basis for processing
Managing expressed interests in our services, product areas or similar in surveys or in communication.	Personal data is only processed after you have given your consent in connection with signing up for electronic subscription.

2.5. Data according to EU's Market Abuse Regulation

According to EU's Market Abuse Regulation (MAR), NOTE maintains:

- Insider lists including personal data of the persons that have received share price-sensitive, non-disclosed information regarding the company.
- Lists of the company's persons discharging managerial responsibility and their related natural persons and legal entities.

Purpose for processing	Legal basis for processing
Fulfilling NOTE's legal obligations.	Fulfilling NOTE's legal obligations according to EU's Market Abuse Regulation.

2.6. Data sent to us through GDPR or whistleblower related functions

Customers, suppliers, current and former employees, trainees, candidates, shareholders and volunteers may send personal data to us according to their rights and obligations in GDPR and NOTE's whistleblower policy.

Purpose for processing	Legal basis for processing
<i>GDPR related data</i> Fulfilling NOTE's legal obligations.	<i>GDPR related data</i> Fulfilling NOTE's legal obligations according to GDPR.
<i>Whistleblowing related data</i> Reporting and managing violations of NOTE's code of conduct, other internal policies and inappropriate behaviors.	<i>Whistleblowing related data</i> Our legitimate interest of reporting and managing violations of NOTE's code of conduct, other internal policies and inappropriate behaviors.

2.7. Confidentiality agreements

The data consists of:

- Name, personal identity number, company, corporate identity number.

Purpose for processing	Legal basis for processing
Fulfilling NOTE's legal obligations or relating to students' degree projects at NOTE.	Our legitimate interest of administering our contracts and to fulfill and perform our contractual obligations and rights.

2.8. Website and social media platforms

The data consists of:

- Usage data derived from our website or social media platforms, e.g. LinkedIn.

Purpose for processing	Legal basis for processing
Managing expressed interests in NOTE.	Our legitimate interest of managing expressed interest in NOTE and enhancing our website, social media platforms, services and products.
Enhancing our website, social media platforms, services and products.	

2.9. User data

Purpose for processing	Legal basis for processing
Operation, safeguarding, maintenance and development of IT infrastructure and systems for suppliers and customer representatives using our systems.	Our legitimate interest of operation, safeguarding, maintenance and development of IT infrastructure and systems for suppliers and customer representatives using our systems.

2.10. Cookies

For information about cookies at NOTE's website, please read NOTE's Cookie policy at www.note-ems.com.

3. Who may get access to your personal data?

Your personal data will be processed by NOTE.

We may disclose personal data to any company within the group (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes.

We may further disclose data to insurers and/or professional advisers in order for them to provide services to us to manage risks, obtaining professional advice, legal claims etc.

Furthermore, your personal data may be shared with parties that process personal data on our behalf, i.e. data processors. Such data processors are, amongst others, our IT and system providers.

4. Transfers of personal data to third countries

NOTE has a plant in China, where personal data is processed. NOTE also has IT suppliers, which process personal data on NOTE's behalf outside the EU/EEA. In cases where personal data are processed outside the EU/EEA, we base the processing either on a decision from the European Commission that the relevant third country ensures an adequate level of protection, or appropriate safeguards, e.g. standard data protection clauses, binding corporate rules to ensure that your rights are protected. If you wish to receive a copy the safeguards taken by us or information regarding where these safeguards have been made available, please contact us by using the contact details stated below.

5. How do we protect your personal data?

We, and in relevant cases third parties, have taken several security measures to protect the personal data that is being processed. We have firewalls and antivirus software to protect and prevent unauthorised access to our networks and systems. Our employees have strict instructions to process all personal data in accordance with applicable laws and regulations. Only a limited number of employees have access to the facilities and systems where personal data are being stored and passwords and usernames are required to access these systems.

6. How long do we keep your personal data?

We never process your personal data for a longer period than it is allowed by applicable law, regulation, case law or authority decision. Personal data that we process on the basis of a legitimate interest are normally processed for the period that is necessary to administer the contractual relationship, exercise our rights and fulfill our obligations towards our customers and suppliers.

Generally, we cease to process your personal data when the contractual relationship with our customer or supplier expires or when you end your employment. To comply with legal obligations, e.g. the requirements of the Swedish Accounting Act (1999:1078), we may keep your personal data for a longer period that is necessary for the purposes of the processing. Customer surveys are retained for a maximum period of three years.

Customer personal data (i.e. contact details to customers' contact persons) will be retained as long as there is a contractual relationship with the customer and to fulfill legal obligations such as book keeping obligations. When the contact person is no longer an employee of the customer, the contact details will be erased from NOTE's CRM system, but personal data necessary to manage the customer relationship will be kept.

Supplier personal data (i.e. contact details of suppliers' contact persons) will be retained for as long as there is a contractual relationship with the supplier and to fulfill legal obligations, such as book keeping obligations. When a contact person is no longer an employee of the supplier, the contact details will be erased from NOTE's system, but personal data necessary to manage the supplier relationship will be kept.

Shareholder's personal data will be retained for as long as NOTE has an obligation to retain the data according to law.

E-mail addresses connected to NOTE's electronic subscription, for distribution of financial reports and Press Releases, will be retained as long as the subscription continues.

Data in NOTE's insider lists and lists of persons discharging managerial responsibility will be retained according to EU's Market Abuse Regulation (MAR).

The period of retention of personal data in confidentiality agreements will be determined based on how long the agreement is valid.

7. Your rights

7.1 Right of access

You have the right of access to the personal data we process regarding you.

7.2 Right to rectification

You have the right to obtain rectification of your personal data without undue delay, and, taking into account the purposes of the processing, the right to have incomplete personal data completed.

7.3 Right to erasure

You have the right to obtain the erasure of your personal data without undue delay when one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you object to the processing due to your particular situation and there are no overriding legitimate grounds for the processing, or you object to the processing relating to direct marketing;
- the personal data have been unlawfully processed;
- the personal data must be erased for compliance with a legal obligation in Union or Member State law to which NOTE is subject.

Should the legal basis for the processing of your personal data be your consent, you have the right to obtain erasure of the personal data if you withdraw the consent. The right to erasure does however not apply to the extent that our processing is necessary for the following purposes:

- exercising the right of freedom of expression and information;
- compliance with applicable laws and legal obligations;
- for the establishment, exercise, or defense of legal claims.

7.4 Right to restriction of processing

You have the right to obtain restriction of the processing of your personal data where one of the following applies:

- you have contested the accuracy of the personal data (in this case you have the right to obtain restriction for a period enabling us to verify the accuracy of the personal data);
- the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
- you have objected to processing due to your particular situation and are waiting for the verification whether the legitimate grounds of NOTE override your interests.

Where processing has been restricted in accordance with what is stated above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

7.5 Right to data portability

The right to data portability only applies if the legal basis for processing your personal data is your consent or the performance of a contract between you and NOTE. If your personal data is processed based on your consent or the performance of a contract, and you have provided us with personal data concerning you which is processed by automated means, you are entitled to receive

the personal data in a structured, commonly used and machine-readable format and to transmit the personal data to another data controller. You have the right to have your personal data transmitted directly from us to another controller when technically feasible.

7.6 Right to object

You have the right to object, on grounds relating to your particular situation, to our processing of your personal data, including profiling. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. You have the right to object at any time towards the processing of your personal data for the purpose of direct marketing.

7.7 Right to lodge complaints

If you have any complaints regarding our processing of your personal data you have the right to lodge a complaint with the Swedish supervisory authority Integritetsskyddsmyndigheten or any other competent supervisory authority that monitors enterprises' processing of personal data.

8. Contact us

If you wish to exercise your rights in accordance with what is stated above or otherwise wish to contact us regarding our processing of your personal data you can contact us by e-mail info@note-ems.com, or telephone +46 (0)8 568 990 00.