

INTEGRITY POLICY

KGH Customs Services AB, a legal entity incorporated in Sweden with company registration number 556096-7431, Skandiahammen, Sydatlanten 6, SE-403 36 Göteborg (below referred to as “**KGH**”), processes data in accordance with law, including the General Data Protection Regulation, as a data controller. When we below refer to KGH we also include processing of personal data made by other entities within the group of companies that KGH belongs to.

The type of personal data that KGH processes

KGH will process personal data submitted by you to KGH as well as personal data that KGH will collect from you.

Personal data submitted by you to KGH

When you contact KGH by using our services within operations, strategy and compliance, digital services, contacting us by phone, e-mail, our contact forms on our websites or letter or as a contact person for your organization, participating in our Customs Academy, receiving our newsletter or downloading material from our website, KGH will process the personal data you have provided us with. Personal data that you provide us with and which we process may, for example, consist of first and last name, title or role, company, address, email address, telephone number and status of your relationship with KGH. We may act as a data processor and process personal data about your customers in that capacity. This relationship is further described in our data processing agreement with your organization.

KGH will only process your personal data in accordance with this Integrity Policy and applicable laws and regulations. In order to administrate the services within operations, strategy, compliance and digital services, contacting us by phone, e-mail or letter, participating in our Customs Academy, receiving our newsletter or giving you the possibility to download material from our website, you need to provide KGH with contact details, as the ones explained above. Apart from that, it is voluntary to provide your personal data.

Personal data that KGH will collect from you

When you visit KGH's website or use our contact forms on our website, answer our custom surveys, receive our newsletters or download material from our website, KGH will collect personal data about you. This could, for example, be your IP address, your activities with us and on our website, which subpages you have visited, your response on custom surveys and if you have opened KGH's e-mails.

Personal data that we receive from third parties

KGH may receive e-mails and other correspondence that include personal data from third parties and KGH therefore process such personal data. If required KGH will inform you as third party of the processing.

What are the purposes of the processing and what is the legal basis for the processing?

It is important that you understand the purpose why KGH process your personal data and the legal basis that KGH will be using for processing it.

Contracts between you or your organization and KGH

For the purpose of being able to fulfill KGH's commitment to you as a valued customer when providing KGH's services within operations, strategy, compliance and digital services, having contact with you by phone, e-mail, our contact forms on our websites or letter or as a contact person for your organization, participating in our Customs Academy, downloading material from our website, KGH must process personal data such as your first and last name, title or role, address, email address, telephone number, IP address and status of your relationship with KGH. The legal basis for KGH's processing of your personal data is that the processing is necessary for the performance of a contract or to take steps to enter that contract. If you have contact with KGH as a representative for your organization, KGH will process your personal data mentioned above in order to be able to fulfil the company's commitment in the business relationship KGH has with your organization. The legal basis for KGH's processing of your personal data is that the processing is necessary for the purpose of a legitimate interest which is not overridden by your interests, rights or freedoms. KGH's interest in processing your personal data for the purpose of communicating with a representative for its business partner overrides your potential interest in protecting your personal privacy. If you do not provide us with your personal data we cannot have a business relationship with your organisation or fulfil our commitments to the organisation,

Marketing by KGH

As a customer of KGH, we will provide you with information about our services within operations, strategy, compliance and digital services on a regular basis. KGH will process all of the above mentioned personal data for marketing purposes by, among other, electronic communication services. Direct marketing may be sent by mail, e-mail and by text message. The legal basis for KGH's processing of your personal data is either that the processing is necessary for the purpose of a legitimate interest which is not overridden by your interests, rights or freedoms or your consent. Such a legitimate interest is e.g. to market KGH's products and services which we believe that you or your organization could be interested in. KGH's interest in sending you or your organisation offers and information overrides your potential interest in protecting your personal privacy.

Profiling

In order to tailor our marketing to you and your interests, we may in an automatic manner collect and analyze data from you. Such data is your activity with us and our website (so called profiling). We will provide you with information that we believe that you will experience as relevant based on the result of this analysis. The legal basis for KGH's processing is our legitimate interest to develop our business and to, as far as possible, and in order not to disturb you unnecessarily, provide you with material, invitations and offers that match your wishes and needs.

Accounting legislation and customs law

KGH will process information about the services provided by KGH to you for accounting and custom purposes. KGH are required by accounting legislation and customs law such as the Union Customs Code, to keep records of certain personal data. In light of this, KGH will process your first and last name, title or role, address, email address and telephone number. The legal basis for KGH's processing is that it is a legal obligation.

Even if the other legal bases are no longer applicable, KGH will process your personal data to the extent required with the above mentioned legal/regulatory requirements as a basis.

For how long will KGH process the personal data?

KGH will store your personal data for as long as needed for the processing related to the purposes and legal grounds described above. Your personal data can be stored in different locations and for different purposes. In light of this, personal data which has been deleted from a system, because it is no longer needed, may still exist in another system for a different purpose.

Personal data that KGH process in order to fulfill KGH's commitments in the business relationship KGH has with you, or the organization you represent under a contract or due to a balance of interest, will not be stored longer than it is necessary for KGH to fulfill our contract with you or your organization or for the time during which KGH's interests overrides yours. KGH may process your personal data one year after you have ceased using KGH's services within operations, strategy and compliance or KGH's digital services, participating in our Customs Academy, receiving our newsletter or downloading material from our website for marketing purposes. Personal data that KGH process on the basis of your consent will only be processed as long as KGH has your consent.

If you have given your consent to receive direct marketing from KGH, we will store your name, mobile-, telephone number and e-mail address until you recall your consent or ask us to stop contacting you. In connection therewith KGH will, to the extent that KGH process personal data relating to profiling, delete the personal data which has a connection with the direct marketing.

Personal data that KGH process for accounting purposes will, according to applicable accounting legislation, be stored for up to ten years. Personal data that KGH process for custom purposes will, according to applicable customs law and requirements from the customs authorities, be stored for eleven years.

To whom does KGH transfer your personal data to and where is your personal data processed geographically?

In addition to the processing performed by KGH, your personal data may also be processed by others. Your personal data may be disclosed to and processed by KGH's parent company BDC DOVANA S.A.R.L. and its affiliates included in the KGH Group and by KGH partners. KGH Partners are entities in countries where KGH does not have its own companies and that assist with services in the respective countries. Examples of third parties that we disclose your personal data to are consultants that we engage such as accountants and lawyers. These actors have their own responsibility for their processing of your personal data. Your personal data may also be disclosed to actors who process personal data on KGH's behalf, so-called processors. KGH has contracts in place that ensure that the processors process your personal data in accordance with this Integrity Policy and KGH's instructions.

KGH may disclose your personal data in order to permit a merger, an acquisition or a sale of all or parts of KGH's assets.

KGH may also disclose your personal data to authorities which require that KGH disclose such personal data.

Your personal data will be disclosed to actors both within and outside of the EU and EEA. If your personal data is processed outside of the EU and EEA, we will take measures to see to that the personal data continues to be as protected and also take the measures needed to in a legal manner transfer the personal data to countries outside of the EU and EEA.

Your legal rights

You have the right to free of charge, upon written request to the e-mail address listed below, receive information about what personal data KGH store about you and how that personal data is used and processed.

In the event your personal data is wrong or inaccurate, you have the right to request that KGH correct or supplement your personal data.

You can at any time object to the processing of your personal data for direct marketing or profiling for such purposes or to fulfill KGH's commitments in the business relationship between your organisation and KGH. If you do not want your data to be processed for these purposes, you can notify KGH by sending an e-mail to KGH at integrity@kghcustoms.com. You can also at any time recall the consent you have given. You do that by signing out from our messages through the link at the bottom of each message or by contacting us at integrity@kghcustoms.com. We will then, as far as possible, stop processing and delete your personal data. However, we cannot delete the data if we need to continue processing the data for any other purpose.

Under certain circumstances you have the right to demand that the processing is limited. If you have this right, such personal data will only be processed with your consent, in order to establish,

exercise or defend legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. Your personal data will also be stored by us.

You have the right to receive the personal data about you which you have given us in a structured and machine readable format and have the right to transfer this data to another data controller when this is technically possible.

You may also contact KGH if you have comments on the way KGH is processing your personal data. You have the right to file a complaint with the supervisory authority regarding KGH's processing of your personal data or handling of any inquires related to it. KGH Group has its headquarters and main establishment in Sweden. KGH Group conducts business through affiliates in several other countries. The Swedish supervisory authority Datainspektionen/ Integritetskyddsmyndigheten (the Swedish Data Protection Authority will change its name) www.datainspektionen.se is lead supervisory authority for cross border processing carried out by the KGH Group. You should therefore as a main rule file your possible complaint with the Swedish authority. If your complaint only relates to a business in another member state of the EU, you have the right to file your complaint with the data authority in the relevant country. You can find a list of the data protection authorities here. http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Datainspektionen/Integritetskyddsmyndigheten
Box 8114
104 20 Stockholm
datainspektionen@datainspektionen.se

KGH may change this integrity policy. Such changes will enter into force no earlier than 30 days after KGH informed you of the revised integrity policy on the website <http://kghcustoms.com/en/> by letter or other notification by email or text message.