

INTEGRITY POLICY

KGH Customs Services AB, a legal entity incorporated in Sweden with company registration number 556096-7431, Skandiahallen, 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 trade and customs management services - 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, subscribing to 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, 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 trade and customs management, operations, strategy, compliance and digital services, for you to download material on KGH's website or to subscribe to KGH's newsletter, 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 and download material, subscribe to KGH's newsletter or use contact forms on our website, KGH will collect personal data about you. This could, for example, be your IP address, which subpages you have visited, and if you have opened KGH's email.

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 trade and customs management, operations, strategy, compliance and digital services, when providing downloadable material on KGH's website or newsletters to you, KGH must process 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 to 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.

Marketing by KGH

As a customer of KGH, we will provide you with information about our trade and customs management, 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 will be sent by mail, e-mail and by text message. 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. Such a legitimate interest, e.g. to market KGH's products and services, exists based on the potential benefits for you as a customer. KGH's interest in processing your personal data for marketing purposes overrides your potential interest in protecting your personal privacy.

Personal data included in communication

KGH may receive e-mails containing personal data about third persons and therefore process such personal data. If required, KGH will inform you as a third person of the processing separately.

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 obligations to 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.

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.

KGH will in no event store your personal data longer than one year after you have stopped using KGH's trade and customs management, operations, strategy, compliance and digital services, have downloaded material from KGH's website or stopped subscribing to KGH's newsletter for marketing purposes as described above.

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. 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.

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 inaccurate or wrong, you have the right to request that KGH correct or remove the personal data and that KGH provide you with a copy of the personal data concerning you.

If your request is unfounded or your request is excessive, e.g. should you, frequently and within short intervals, ask to receive information about what personal data KGH store about you or that KGH shall provide a copy or remove the personal data in question, KGH have the right to refuse to act on your request, or to charge a reasonable fee which covers the administrative costs of the action requested by you.

Your rights

You may object to your personal data being processed for direct marketing purposes at any time. If you do not want your data to be used for direct marketing, you can notify KGH by sending an e-mail to KGH 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.

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 during 2018), 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.

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 <https://kghcustoms.com/en/> , by letter or other notification by email or text message.