

Information regarding processing of personal data belonging to individuals serving as contacts on behalf of suppliers

Dagab Inköp och Logistik AB (referred to below as Dagab) take your privacy seriously and want you to feel confident about our processing of your data. This privacy policy explains how Dagab processes your personal data with which it is provided in conjunction with procurement processes (RFI, RFP processes) and in conjunction with the establishment and administration of framework agreements for the purchase of goods from the supplier you represent. It also describes your rights and how to contact us.

Dagab Inköp och Logistik AB, corp. ID no. 556004-7903, is the data controller for the processing of your personal data under this privacy policy.

1. What personal data do we collect and from where?

Dagab processes personal data with which it is provided in conjunction with procurement processes (RFI, RFP processes) and in conjunction with the establishment and administration of framework agreements for the purchase of goods from the supplier you represent. The details Dagab processes include your contact details, such as name, title, e-mail address, telephone number, fax number and postal address to your workplace. In the case your personal identity number comprises the company's corporate identity number, as well as comprising a part of the VAT registration number for the company, your personal identity number will also be processed.

The personal data in question is received from the supplier you represent.

2. With whom might we share your personal data?

For the reasons mentioned below, your personal data can be transferred to, or shared with, other companies within the Axfood Group in which Dagab is included, to contact you regarding ongoing questions concerning the delivery of services. For contacts regarding the design of the product packaging of Dagab's own brand, Dagab might provide your personal data (name, telephone number and e-mail address) to the design firm with whom Dagab cooperates. In those cases in which Dagab sells or purchases operations or assets, any possible registers including your personal data might also need to be provided to a potential seller or purchaser of such operations or such assets. If this takes place, you will be informed of this and you will be informed of the name of the recipient of the data.

3. How and why we use your personal data

The personal data we collect about you is processed in order to be able to contact you in your role of representative for the supplier in matters such as:

- Information prior to entering into an agreement.
- Information during the administration and completion of an agreement (amongst other things, for invoicing, delivery assurance, delivery capacity or authorisation management for a supplier's portal (where the supplier states prices, describes the range or provides information regarding campaigns)).

The processing of your contact details has, after a balancing test of our respective interests, been deemed to be necessary so that we, our Group companies and design firms, can

contact you as a representative of the supplier in an efficient manner, with the aim of both parties being able to provide their services.

The reason that Dagab requires the processing of corporate identity numbers of suppliers is in order to ensure that we can accurately identify our contractual partners and in order to ensure that orders, invoicing and bookkeeping are all handled properly. Dagab has undertaken a balancing test of our respective interests regarding the circumstances in which personal identity numbers comprise the company's corporate identity number, and also comprise a part of the VAT registration number and has made the assessment that processing is clearly motivated with regard to above stated aim of such processing and, in certain cases, in order to fulfil Dagab's obligations vis á vis authorities.

4. How long do we save your personal data?

We save your personal data as long as there is an agreement in effect with the supplier you represent or until we have received information that you have terminated the employment relevant to the agreement.

Your data in the suppliers' portal is saved as long as you can be assumed to be active on the portal, and the data is eliminated no later than after 13 months of inactivity.

5. How Axfood protects your personal data

Axfood takes the legal, technical and organisational security measures required to ensure that your personal data is not manipulated, lost or destroyed, and to ensure that no unauthorised entities have access to it. Our security procedures are updated as technology evolves and improves.

6. Where your data is processed

We strive to always process your personal data within the EU/EEA. However, personal data processed in the IT systems we use to provide our services may be shared with IT providers outside the EU/EEA.

For example, we use IT providers for hosting, operating and support services outside the EU/EEA, which means that your personal data may be processed by these suppliers on behalf of us.

Currently, we share personal data with our hosting and service provider in India when technical support services are necessary.

The processing is necessary to meet our legitimate interest in providing high-quality and reliable services with secure technology. We ensure an adequate level of protection for your personal data through the application of the Commission's standard contractual clauses, thus sharing your personal data with recipients outside the EU/EEA, pursuant to Article 46 (2) of the General Data Protection Regulation.

You can access the standard contractual clauses and more information about these on this link: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

7. Your rights

You are entitled to exercise a number of rights in relation to our processing of your personal data, as described below. In order to exercise your rights, please contact our Data Protection Officer by sending an E-mail to dataskyddsbud@axfood.se.

7.1. Right to access

We strive to be open and transparent about how we process your data. If you would like to understand how we process your personal data, you are entitled to request access to your data. You also have the right to get information about our purpose, categories of personal data, categories of recipients of personal data, storage period or criteria for determining storage period, information on where data was collected and the presence of automated decision making including information about the logic behind and the importance of the treatment.

If we receive a request for access, we may ask for additional information to ascertain what data you wish to view and to ensure we provide information to the correct person. We will answer your request without unnecessary delays.

7.2. Right to rectification

You are always entitled to request that your personal data be rectified if the data is inaccurate. Within the stated purpose, you also have the right to have any incomplete personal data completed. If it is not impossible or causes a disproportionate effort for us, we will notify the recipients who have received your data from us that you have requested a rectification of the data.

7.3. Right to erasure

You are entitled to request the erasure of the personal data we process if:

- the data is no longer necessary for the purposes for which it has been collected or processed,
- you oppose our balancing test of our respective interest and there is no legitimate reason for our interests to override yours,
- you object to processing for direct marketing purposes,
- personal data has not been processed in accordance with current regulations,
- personal data must be erased to comply with a legal obligation to which we are subject.

However, despite your request to erase your personal data, we are entitled to continue processing and not comply with your request if this processing is necessary:

- to comply with a legal obligation to which we are subject,
- in order to establish, exercise or defend of legal claims.

If it is not impossible or causes a disproportionate effort for us, we will notify the recipients who have received your data from us that you have requested the erasure of the data.

7.4. Right to restrict processing

You are entitled to request the restriction of our processing of your personal data if:

- you contest the accuracy of your personal data, for the period that allows us to check if your personal data is correct,
- the processing is illegal, and you oppose the erasure of your personal data, and instead request that its use be restricted,
- we no longer need the personal data for the purpose of the processing, but you need the data in order to establish, exercise or defend legal claims,
- you have objected to a balancing test of our respective interests that we have stated for our purpose.

You may then request restricted processing for the period we need to check if our legitimate interests outweigh your interests in getting the data erased.

If processing has been restricted in accordance with any of the above situations, we may, in addition to the actual storage, process the data to establish, exercise or defend legal claims, to protect someone else's rights or if you have given your consent.

If it is not impossible or causes a disproportionate effort for us, we will notify the recipients who have received your data from us that you have requested the restriction of the processing of your data.

We will inform you in advance if the restriction of personal data processing ends.

7.5. Right to object to treatment based on a balance of interests

You are entitled to object to the processing of your personal data based on a balance of interests. In such cases, we will cease processing your data if we cannot provide compelling legitimate grounds for the current processing that outweighs your interests, rights or freedoms. Otherwise, we may only process the data to establish, exercise or defend legal claims.

7.6. Complaints to the supervisory authority

If you believe that we are handling your personal data incorrectly, you may submit your complaint to the supervisory authority (Datainspektionen - The Swedish Data Protection Authority).

8. How to contact us

If you have questions about our processing of your personal data or if you wish to exercise any of your rights associated with our processing of personal data, please contact us, see our contact details below.

8.1. Data controller's contact details

Dagab Inköp & Logistik AB)

107 69 Stockholm

Visiting address: Norra Stationsgatan 80 C

Telephone: +46 (0)8-553 99 000

Fax: +46 (0)8-730 26 89

E-mail: info@axfood.se

Corp. ID no. 556004-7903

8.2. Contact details for our Data Protection Officer

Switchboard: +46 (0)8-553 99 000 (ask for Axfood Group's Data Protection Officer)

E-mail: info@axfood.se dataskyddsbud@Axfood.se

9. Establishment and changes

This privacy policy was established by Dagab Inköp och Logistik AB on 08 May 2018.

The latest version of this policy is always available in the contact form for *Bli leverantör* on www.axfood.se and as attachment to the contract with the supplier you represent. In the event of updates of the purposes for personal data processing or categories of personal data, you will be informed through your contact person at Dagab or other appropriate communication channel.