
DATA PRIVACY POLICY

1. Introduction

This Data Privacy Policy describes Erik Thun AB's practices with respect to the collection, use, storage and processing of personal information (data) in our daily operations. It is important that the personal information we hold is used lawfully, fairly and in a transparent way in accordance with the General Data Protection Regulation (EU 2016/679) and the Swedish Act SFS 2018:218. In order to comply with the law and to protect personal integrity, the personal information we hold must be:

- Collected only for specified, explicit and valid purposes
- Processed in an adequate, relevant and limited way
- Accurate and kept up to date
- Kept only as long as necessary
- Kept and processed securely

2. Owners (Shareholders)

2.1. Purposes and legal basis

Personal information about owners is collected and used in order to fulfil regulatory requirements in the Swedish Companies Act, such as keeping shareholders register and to distribute dividends.

2.2. Personal information that we process

- Personal contact details such as name, national identification number, phone numbers as well as e-mail, postal and/or residential address
- Bank account details
- Other similar information that is necessary and valid

2.3. Recipients of personal information

Personal information will be received and processed by our CFO, managers, accountant department and internal or external parties administrating shareholders register and dividends.

2.4. Retention

Erik Thun AB will generally only keep the personal information for as long as it is needed for the purposes for which the data was collected and processed. Erik Thun AB will continuously sort out information no longer needed.

According to the Swedish Companies Act, the register of shareholders must be maintained for as long as the company is active and must be kept for a minimum of ten years after the company closes down. If any separate shareholder would dispose of his/her shares, he/she will be removed from the register but Erik Thun AB will still keep the personal information for ten years after the removal, in order to comply with the regulatory requirements.

3. Employees

3.1. Purposes and legal basis

Personal information about employees is collected and used in order to fulfil regulatory requirements in applicable laws, union collective agreements, to enable the employee to perform his/her duties and to fulfil Erik Thun AB's responsibilities under the employment contract, such as:

- Paying wages and other compensations or benefits, as well as performing salary reviews
- General administration, time reporting
- Keep and update contingency plans, emergency contact information
- Provide company health care, holiday
- Administer employment benefits (including pensions and insurances)
- Keep register of sick leave and/or other absences to calculate sick pay and to perform rehabilitation administration in compliance with the Work Environment Act
- conducting performance reviews, managing performance and determining performance requirements
- complying with relevant labour regulations and reporting to supervisory authorities (for example tax regulations and social benefits)

3.2. Personal information that we process

- Personal contact details such as name, personal identification number, phone numbers as well as e-mail, postal and/or residential address
- Bank account details
- Employment information and union membership
- Wage, benefit and tax information
- Working hours, absences, health situation
- Work history, education, professional certificates, promotions and performances
- Other similar information that is necessary and valid

The personal information is generally collected directly from the employee or through the recruitment process, but may also be collected from relevant authorities.

3.3. Recipients of personal information

The personal information will be received and processed by our CFO, personnel department, managers, accountant department and internal or external parties administrating wages and benefits, service/technical support for IT/communication as well as relevant authorities when needed.

3.4. Retention

Erik Thun AB will generally only keep the personal information for as long as it is needed for the purposes for which the data was collected and processed. Erik Thun AB will continuously sort out information no longer needed. Personal information associated with user accounts will be deleted when the accounts are terminated.

If necessary, Erik Thun AB will keep the personal information after termination of the employment to fulfil legal duties, for example information about tax deduction (5 years) and bookkeeping (7 years), or if we have reason to keep the information based on a public interest or for historical purposes.

4. External contacts (for example suppliers and customers and their representatives)

4.1. Purposes and legal basis

Personal information about external contacts will be collected and processed in order to approve, manage, administer, evaluate and effect an agreement/contract, and to process

payments and fulfil other obligations. When applicable, we will also use the personal information to communicate news. The legal basis is legitimate business interests or to comply with our legal obligations such as the Swedish Accounting Act.

4.2. Personal information that we process

- Business card details (such as name, title, company, e-mail and phone)
- Other similar information that is necessary and valid

The personal information is generally collected directly from the contact/ representative him/herself, from the company represented or from the representative at Erik Thun AB.

4.3. Recipients of personal information

The personal information will be received and processed by our management, our accountant department and staff members at our chartering and operations department who have a legitimate business need for access. Our IT department will receive the information in order to process data and keep registers for security reasons. We may provide your personal information to our auditors and similar agents, and to external parties providing service/ technical support for IT/communication, as well as relevant authorities when needed.

4.4. Retention

Erik Thun AB will generally only keep the personal information for as long as it is needed for the purposes for which the data was collected and processed. Erik Thun AB will continuously sort out information no longer needed. Personal information associated with business agreements/contracts will be deleted when the agreement or contract is terminated.

If necessary, Erik Thun AB will keep the personal information after termination of the business relation to fulfil legal duties, for example information about tax deduction (5 years) and bookkeeping (7 years), or if we have reason to keep the information based on a public interest or for historical purposes.

5. Recruitment

5.1. Purposes and legal basis

Erik Thun AB has a legitimate interest in collecting and processing your personal information during the recruitment process for keeping records of applicants and their applications, to conduct interviews and to assess, evaluate and confirm a candidate's suitability for employment.

5.2. Personal information that we process

Name, contact details such as your e-mail address, telephone and postal address and individual data as your personal identification number, possibly personal photograph, test results as well as academic background, professional certificates, work experience and skills.

Most of the information will be received directly from you but will also be collected from your references/previous employers and recruiting firms.

5.3. Recipients of personal information

The personal information will be received and processed by our management, our personnel department, representatives of our staff members included in the recruitment and recruiting firms. In certain cases, the personal information may also be shared with our board of directors.

5.4. Retention

Erik Thun AB will generally only keep the personal information for as long as it is needed for the purposes for which the data was collected and processed. Erik Thun AB will continuously sort out information no longer needed

Erik Thun AB will keep the personal information for recruitment purposes for a period of 26 months, after the termination of the recruitment process, to comply with legal obligations, for example to show that the hiring process was non-discriminatory.

6. Your rights

You have the right to access your personal information. If the information is inaccurate, not complete or up to date, you have the right to ask us to rectify or update the information. You can also request Erik Thun AB to erase the personal information if we do not have a legal reason to continue to process and keep it. In some circumstances, you also have the right to ask Erik Thun AB to restrict how we process the information and you may have the right to object to processing your personal information or ask how to transfer your personal information elsewhere. If you wish to do any of the above, please send an e-mail to support@thun.se.

You have the right to complain to your local data protection authority if you feel that Erik Thun AB has not sufficiently addressed a concern or complaint. The Swedish Data Protection Authority can be reached at +468657 61 00 or by e-mail to: imy@imy.se.

7. Contact

If you have any questions about this data privacy policy or other suggestions concerning how we process personal information, please contact our Data Protection Officer using our e-mail: dataprotection@thun.se.

8. Updates to this policy

Erik Thun AB may update this policy from time to time in response to legal, technical or business developments.

This English version of our Data Privacy Policy is a translation to the best of our knowledge of our Swedish "Integritetspolicy".