

External Privacy Notice

Treyd Services AB

Last updated: 9 November 2022

EXTERNAL PRIVACY NOTICE

Treyd Services AB

1. INTRODUCTION

Treyd Services AB ("**Treyd**", "**we**", "**us**" or "**our**") is processing your personal data when you interact with us in various contexts.

We respect your privacy and duly protect the personal data we process about you. All processing of personal data is carried out in accordance with the requirements set out in the general data protection regulation ("**GDPR**") and other applicable personal data protection legislation supplementing the GDPR.

We may at our own discretion update this privacy notice at any given time (see at the end the date this notice was last updated). If material changes are made, we will provide notice on this website prior to the change becoming effective.

Throughout this privacy notice the term "**processing**" is used to cover all activities involving your personal data, including e.g. collecting, handling, storing, sharing, accessing, using, transferring and disposing of your personal data. The term "**personal data**" refers to any information relating to an identified or identifiable natural person.

Depending on in which capacity you are reading this notice, the processing of your personal data may differ. You may read this notice in the capacity as a (i) website visitor, (ii) supplier representative, (iii) customer representative, and (iv) job candidate. To make this notice more relevant to your particular situation, the notice is divided into sections with specific information related to the various roles that you may have when we are processing your personal data.

2. WEBSITE VISITORS

2.1. How do we collect your personal data?

We collect the data directly from you or data that is generated by you, including your devices, when visiting our website.

2.2. Purposes of the processing of your personal data

2.2.1. Maintain, protect and develop the website

When you are browsing the website, we will process your IP address and browser user agent string to help spam detection. In addition, your personal data may be processed to administrate and improve this website, for our internal records and for statistical analysis.

Categories of personal data	Legal basis
<ul style="list-style-type: none">IP addressDevice typeWebsite (page viewed, content consumed, etc).	<i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest to ensure that our website is continuously maintained and updated and protected against malicious attacks.
Retention period: Processing of personal data is only momentary. The data is aggregated almost immediately upon collection.	

2.2.2. Communicate with you and respond to your questions or feedback

Where we offer you a possibility to communicate with us by asking questions or providing feedback regarding our services and our business, we will process your personal data when you submit a question, comment, feedback or any other message. The purpose of the processing is to be able to communicate with you.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data• Your communication• Incident data• Location data	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to communicate with our website visitors, e.g. to develop our business.
Retention period: One (1) year from the last communication.	

2.2.3. Send marketing communication

When we are given your consent, we use tracking features (cookies) on our website for retargeting purposes.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• User generated information• IP Address	<i>Consent.</i> We only process your personal data using tracking features (cookies) if you have given us your consent to such processing.
Retention period: Retention period is dependent on the type of cookie, as described in Treyd's cookie policy.	

2.3. With whom do we share your personal data?

2.3.1. General

Where necessary in order to achieve the purposes set out in this Section 2.2, we share your personal data with other entities, authorities or actors. Please note however that we, regardless of the recipients' capacity, only will share your personal data with entrusted actors and only to the extent necessary.

2.3.2. Data processors acting on behalf of us

In order to fulfil the purposes of the processing of your personal data and to be able run our business, we transfer personal data to external parties such as third-party service providers that we have engaged, as well as other partners. These external parties will act as our data processors and may only process your personal data in accordance with our instructions and not for their own purposes. We are the data controller for the processing of personal data

that these external parties carry out on our behalf. The purposes of the processing activities carried out by us are outlined in Section 2.2.

2.3.3. Recipients that act as data controllers

The personal data processed by Treyd when you visit our website will not be shared with any third party that will process the personal data in the capacity as a data controller. Supplier representative

2.4. How do we collect your personal data?

We collect the personal data that you, or the relevant supplier/business contact that you represent, have provided us within the scope of our business relationship with the supplier.

2.5. Purposes of the processing of your personal data

2.5.1. Administration of supplier relationship

Your personal data will be processed because we have a legitimate interest of administering the relationship with our suppliers and to be able to manage the overall cooperation and day-to-day activities relating to e.g. orders of products and services (including supplier invoicing).

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Contact information• Identity data	<i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in being able to administer our supplier/other business contact relationships and facilitate e.g. day-to-day communications and supplier invoicing.
Retention period: Your personal data will be processed until the supplier relationship ceases, or until you cease to be contact person.	

2.5.2. Optimize, improve and develop the services

We will analyse suppliers' work, e.g. how much they are working, and tasks performed, in order to improve and optimize services.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Performance data• Identity data	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to optimize, improve and develop the services.
Retention period: Reports and statistics on aggregated level which do not contain personal data is retained until further notice.	

2.5.3. Managing supplier control function for quality inspection

For the purpose of managing and handle quality inspection of goods carried out on behalf of customers.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Your communication Identity data Contact data Organisational information 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to manage and handle quality inspection of goods on behalf of our customers.
Retention period: During the contract period with the relevant supplier.	

2.5.4. Respond to questions and requests

For the purpose of responding to questions or requests sent to us, e.g. via e-mail or phone.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Identity data Contact data Your communication Incident data 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to responding to questions and requests sent to us, e.g. via e-mail or phone.
Retention period: Personal data will be stored for a period of up to ten (10) years, for the purpose of exercising, establishing or defending legal claims.	

2.5.5. Information about PEP (Politically Exposed Persons)

Your personal data will be processed for the purpose of documenting information about PEP in order to fulfil anti-money laundry obligations.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Information on whether the individual is a Politically Exposed Person (PEP) or a family member or known associate of such person. 	<i>Legal obligation.</i> The processing is necessary in order to fulfil our legal obligation of documenting information about PEP.
Retention period: Five (5) years from collection.	

2.5.6. Fulfil legal obligations

We will process your personal data where necessary in order to comply with legal obligations, e.g. accounting obligations.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> All information mentioned above. 	<i>Legal obligation.</i> The processing is necessary in order to with our legal obligations.
Retention period: At least 7 years as from the end of the calendar year during which the accounting year ended.	

2.5.7. Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
<ul style="list-style-type: none">All information mentioned above.	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.
Retention period: As long as necessary to establish, exercise or defend the legal claim.	

2.6. With whom do we share your personal data?

2.6.1. General

Where necessary in order to achieve the purposes set out in this Section 2.6, we share your personal data with other entities, authorities or actors. Please note however that we, regardless of the recipients' capacity, only will share your personal data with entrusted actors and only to the extent necessary.

2.6.2. Data processors acting on behalf of us

In order to fulfil the purposes of the processing of your personal data and to be able run our business, we transfer personal data to external parties such as third-party service providers that we have engaged, as well as other partners. These external parties will act as our data processors and may only process your personal data in accordance with our instructions and not for their own purposes. We are the data controller for the processing of personal data that these external parties carry out on our behalf. The purposes of the processing activities carried out by us are outlined in Section 2.5.

2.6.3. Recipients that act as data controllers

The categories of recipients mentioned in the table below will process personal data in the capacity as data controllers, i.e. these recipients will determine the purposes and means of the processing without our involvement.

Recipients	Purpose	Legal basis
<ul style="list-style-type: none">CourtsExternal advisers	Establish, exercise or defend a legal claim.	Legitimate interest in being able to establish, exercise or defend legal claims.
<ul style="list-style-type: none">The Swedish Financial Supervisory Authority	Notification regarding outsourcing of critical functions.	Legal obligation.

3. CUSTOMER REPRESENTATIVE

3.1. How do we collect your personal data?

- We collect the personal data that you, or the customer that you represent, have provided us within the scope of our business relationship with the customer.
- Treyd may also, from time to time, collect information from publicly available sources and third parties, such as social networks and marketing companies.

3.2. Purposes of the processing of your personal data

3.2.1. Administration of business customer relationship and support

Your personal data will be processed because we have a legitimate interest of administering the relationship with our customers and to be able to manage the overall cooperation and day-to-day activities necessary to provide our products and service, including taking steps prior to entering into customer agreement (including enter into customer agreements).

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Your Communication• Identity data• Contact data• Organisational Information	<i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in being able to administer our customer relationships, and facilitate e.g. day-to-day communications, invoicing, including entering into customer agreements.
Retention period: Your personal data will be processed until the customer relationship ceases, or until you cease to be contact person.	

3.2.2. Screening against sanctions lists

Your personal data will be processed when we screen against sanctions lists (EU sanction list and UN sanction list) in order to avoid commercial relations with listed individuals.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Name• Potential complementary data necessary to fulfil the purpose	<i>Legal obligation.</i> The processing is necessary in order to fulfil our legal obligation of screening against sanctions list.
Retention period: Five (5) years from collection.	

3.2.3. Information about PEP (Politically Exposed Persons)

Your personal data will be processed for the purpose of documenting information about PEP in order to fulfil anti-money laundry obligations.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Information on whether the individual is a Politically Exposed Person (PEP) or a family member or known associate of such person. 	<i>Legal obligation.</i> The processing is necessary in order to fulfil our legal obligation of documenting information about PEP.
Retention period: Five (5) years from collection.	

3.2.4. Answer questions, requests and other communication

Within the scope of our commercial relationship, we will process your personal data when communicating through various channels e.g. to provide answers to questions/requested submitted via our website.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Identity data Contact data Your communication 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to communicate with you, including responding to questions and requests sent to us, e.g. via e-mail or phone.
Retention period: One (1) year from the last communication.	

3.2.5. Send marketing communication

Your personal data will be processed for the purpose of sending marketing information via e-mail.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Contact data (name and email address) 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to send marketing information via email.
Retention period: Personal data will be processed until the data subject opts out.	

3.2.6. Fulfil legal obligations

We will process your personal data where necessary in order to comply with legal obligations, e.g. accounting obligations.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> All information mentioned above. 	<i>Legal obligation.</i> The processing is necessary in order to with our legal obligations.
Retention period: At least 7 years as from the end of the calendar year during which the accounting year ended.	

3.2.7. Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
<ul style="list-style-type: none">All information mentioned above.	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.
Retention period: Your personal data will for this purpose at a maximum be stored for ten (10) years.	

3.3. With whom do we share your personal data?

3.3.1. Disclosure and transfer of personal data

Where necessary in order to achieve the purposes set out in this Section 3, we share your personal data with other entities, authorities or actors. Please note however that we, regardless of the recipients' capacity, only will share your personal data with entrusted actors and only to the extent necessary.

3.3.2. Data processors acting on behalf of us

In order to fulfil the purposes of the processing of your personal data and to be able run our business, we transfer personal data to external parties such as third-party service providers that we have engaged, as well as other partners. These external parties will act as our data processors and may only process your personal data in accordance with our instructions and not for their own purposes. We are the data controller for the processing of personal data that these external parties carry out on our behalf. The purposes of the processing activities carried out by us are outlined in Section 3.2.

3.3.3. Recipients that act as data controllers

The categories of recipients mentioned in the table below will process personal data in the capacity as data controllers, i.e. these recipients will determine the purposes and means of the processing without our involvement.

Recipients	Purpose	Legal basis
<ul style="list-style-type: none">The Swedish Financial Supervisory Authority	Comply with legal obligations.	Legal obligation.
<ul style="list-style-type: none">Swedish Financial Intelligence	Comply with legal obligations.	Legal obligation.
<ul style="list-style-type: none">CourtsExternal advisers	Establish, exercise or defend a legal claim.	Legitimate interest in being able to establish, exercise or defend legal claims.

4. JOB CANDIDATES

4.1. How do we collect your data?

We collect your personal data from:

- **Yourself**, which you submit to us when you apply for one of our positions, e.g. your CV and cover letter.
- **Publicly available sources**, e.g. when carrying out background checks.
- **External recruiters**, that have been involved in the recruitment process and that have provided us with information about you.

4.2. Purposes of the processing of your personal data

4.2.1. Managing the recruitment process

Your personal data will be processed by us within the scope of the general management of the recruitment process. Processing activities included in this process are e.g. collection of your personal data, review of CVs and cover letters, conducting interviews, evaluating you as a candidate and communicating with you within the scope of the recruitment process.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data (including personal id. no.)• Contact data• CV• Cover letter• Audio and video material• Location data• Feedback data• Demographic data• Skills data	<i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in carrying out the recruitment process to ensure that we employ the most suitable candidates.
<p>Retention period: Your personal data will only be processed for this purpose during the recruitment process and until (i) you either have been employed by us or (ii) your application has been rejected.</p> <p>If your application has been rejected, we will still process your personal data for the purposes outlined in purposes 4.2.5 and 4.2.6.</p>	

4.2.2. Review and assessment of personality and abilities

Conduct personality and ability tests (for certain positions) to assess and evaluate job candidate's suitability for applied position.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data (including personal id. no.)• Test data	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate purpose to assess and evaluate job candidate's suitability for applied position.
<p>Retention period: During recruitment process (unless the data is necessary for other purposes).</p>	

4.2.3. Job candidate vetting process

Within the scope of the recruitment, we carry out a vetting process of all potential employees. This will include background checks of you including and, where permitted under national legislation, criminal background check. The vetting process may also include scanning of social media activity and other footprints on the internet.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data• Skills data• Activity on social media and the Internet	<p><i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in carrying out background checks to ensure that we employ appropriate candidates.</p> <p>It should in this context be noted that we will not process any criminal data. Any criminal background checks will be subject to a manual process.</p>
<p>Retention period: Your personal data will only be processed for this purpose during the recruitment process and until (i) you either have been employed by us or (ii) your application has been rejected.</p>	

4.2.4. Concluding the employment agreement

We will process your personal data in conjunction with the conclusion of the employment agreement with you e.g., when collecting references. Your personal data will also be processed in the employment agreement that we conclude and upon the initiation of the onboarding process.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Contact information• Social security number• Organisational information, such as employer company, employment status, operational department, geographical placement, cost centre, organisation, place of employment• Salary• Benefits data• References	<p><i>Agreement.</i> The processing of your personal data is necessary in order for us to take measures prior to entering into an agreement (the employment agreement) with you.</p>
<p>Retention period: Your personal data will be processed momentarily during the conclusion of the employment agreement and will not be stored for this purpose.</p>	

4.2.5. Evaluate and follow-up the recruitment process

Create reports and statistics of e.g. the number of applications per position.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Location data • Skills data • Feedback data • Demographic data 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate purpose to evaluate and follow-up on the recruitment process.
Retention period: Reports and statistics on aggregated level which do not contain personal data is retained until further notice.	

4.2.6. Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • All information mentioned above. 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.
Retention period: Up to 26 months (from decision to turn down a job applicant) to defend against discrimination claims.	

4.2.7. Manage and protect IT systems and services

For the purposes of e.g. logging, troubleshooting, backup, change and problem management in systems and in connection with potential IT incidents.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • All data collected that are necessary to fulfil the purpose. 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to manage and protect our IT systems and services.
Retention period: During the same period as stated in relation to each purpose as set out in this notice. Personal data in logs are stored for troubleshooting and incident handling for a maximum period of thirty (30) days calculated from the date of the logging event.	

4.2.8. Fulfil legal obligations

Besides legal obligations within the field of employment, we will process your personal data for the purposes of fulfilling legal obligations related to work permit checks, including storage of related documentation.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Social security number • Work permit documentation 	<i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations.
Retention period: For unsuccessful job candidates, the personal data will only be stored during the recruitment process and not subject to any further retention. For successful job candidates, the documentation will be stored for at least 12 months from the date of the end of the employment.	

4.3. With whom do we share your personal data?

4.3.1. General

Where necessary in order to achieve the purposes set out in this Section 4, we share your personal data with other entities, authorities or actors. The categories of recipients mentioned in Section 4.3.2 will process personal data on behalf of us in the capacity as data processors (i.e. such actors will only process your personal data in accordance with our instructions). The categories of recipients mentioned in Section 4.3.3 will process personal data in the capacity as data controllers, i.e. these recipients will determine the purposes and means of the processing without our involvement. Please note however that we, regardless of the recipients' capacity, only will share your personal data with entrusted actors and only to the extent necessary.

4.3.2. Data processors acting on behalf of us

In order to fulfil the purposes of the processing of your personal data and to be able run our business, we transfer personal data to external parties such as third-party service providers that we have engaged, as well as other partners. These external parties will act as our data processors and may only process your personal data in accordance with our instructions and not for their own purposes. We are the data controller for the processing of personal data that these external parties carry out on our behalf. The purposes of the processing activities carried out by us are outlined in this Section 4.

4.3.3. Recipients that act as data controllers

Recipients	Purpose	Legal basis
<ul style="list-style-type: none">CourtsExternal advisers	Establish, exercise or defend a legal claim.	Legitimate interest in being able to establish, exercise or defend legal claims.
<ul style="list-style-type: none">External recruiters	Facilitating the recruitment process	Legitimate interest in being able to carry out an efficient recruitment process and ensuring that the best available candidates are employed by Treyd.
<ul style="list-style-type: none">Reference persons	Taking references before deciding to conclude an employment agreement.	Legitimate interest in being able to verify your competence and the information you have provided during the interview.
<ul style="list-style-type: none">External background check companies	Conducting the vetting process	Legitimate interest in carrying out a vetting process before employing an individual. By virtue of the sensitive and heavily regulated business operated by Treyd, it is important to us to be able to ensure that its employees have passed the vetting process.

5. APPROPRIATE SAFEGUARDS FOR TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EU/EEA

We may transfer or disclose personal data to recipients located outside the EU/EEA (third country), mainly in situations where we are using third-party data processors that will process data in a third country.

When we transfer or disclose your personal data to a recipient in a country outside of the EU/EEA, we will always ensure that appropriate safeguards have been taken (such as the EU Commission's standard contract clauses, including other supplementary safeguards as necessary in each case) to protect the personal data. Further, we are regularly carrying out risk assessments to assess what supplementary measures that needs to be taken to protect the personal data subject to the transfer or disclosure.

You are entitled to request to receive a copy of any documentation demonstrating that appropriate safeguards have been taken in order to protect your personal data during a transfer to a third country.

If you would like further details about the processing of your personal data and whether your personal data is transferred to a third country, please contact us on the contact details as set out below under Section 7.

6. YOUR RIGHTS

Under applicable data protection laws, you have certain rights in relation to the processing of your personal data. We process your personal data to the extent necessary in order to fulfil your rights. Please submit requests for exercising your rights by contacting us on the contact details set out in Section 7 below.

You have, under certain circumstances, the right to exercise the following rights:

Access

You may request confirmation whether or not personal data is processed and, if that is the case, access your personal data and additional information such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing. If the request is made by electronic means the information will be provided in a commonly used electronic format if you do not request otherwise.

Object to certain processing

You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concerns your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary in order to manage or defend legal claims.

Rectification

You have at any time the right to have inaccurate personal data rectified, as well as, taking into account the purposes of processing, the right to have incomplete personal data completed which relates to you.

Erasure

You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected. However, we cannot delete your personal data if we e.g. are obligated under law to keep the data.

Restriction of processing

You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased. If the processing of your personal data has been restricted we may only, besides storing the data, process your personal data with your consent, or in order to establish, exercise or defend legal claims or to defend rights of others.

Withdrawal of consent

You have the right to at any time withdraw your consent to processing of personal data to the extent the processing is based on your consent.

Data Portability

You may ask to receive a machine-readable copy of the personal data processed on the basis of your consent or on the basis that the processing is necessary in order to perform an agreement with you, and which personal data have been provided to us by you (data portability) and ask for the information to be transferred to another data controller (where possible).

Complaints to the supervisory authority

You acknowledge that you always have the right to lodge complaints pertaining to the processing of your personal data to the Swedish Authority for Privacy Protection (IMY).

7. CONTACT INFORMATION

If you have any questions or concerns regarding the processing of your personal data, please contact us on the contact details set forth below.

The data controller for your personal data is:

Treyd Services AB, reg. no. 559223-3208

privacy@treyd.io