

Privacy Policy

1. Introduction

This Privacy Policy (the “**Policy**”) describes how Industrikraft i Sverige AB, reg. no. 559484-8961 (“**Industrikraft**”, “**we**”, “**us**” or “**our**”), at the address Box 5747 Advokatbyrå KB, 114 87 Stockholm, Sweden, processes your personal data.

Industrikraft works to secure the long-term energy supply in Sweden. Industrikraft is owned by Swedish industrial companies and provides a common platform for the owner companies to constructively contribute their perspective and expertise on energy issues.

We are responsible for the processing of your personal data as described in this Policy in the capacity of data controller. If you would like to know more about our processing of your personal data, you are welcome to contact us by email: info@industrikraft.se.

It is important to us that you understand how we process your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes to the Policy, the new version will apply from the time it is published on our website.

2. The scope of this Policy

The Policy covers our processing of personal data collected in relation to your interactions with us, if you are a job applicant, newsletter subscriber, or a representative of our business partners and investors.

3. How we collect your personal data

The personal data we process relating to you is collected directly from you or from third party data sources. If you would like to know more about from which third parties we collect your personal data, you are welcome to contact us.

4. How we process your personal data

We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This means that we will have a legal basis for the purposes of our processing of your personal data, which in our context generally means one of the below legal bases. If you are acting on behalf of someone else, e.g., in the capacity of a representative of a company, our processing is carried out with reference to our legitimate interest balanced against your interests or fundamental rights or freedoms, where our legitimate interest is to conclude and perform the contract with the company you represent.

Performance of a contract: the processing is necessary in order for us to provide you with our services or otherwise perform a contract between us or the company you represent, or to take steps at your request prior to entering into a contract.

Performance of legal obligations: the processing is necessary to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are subject to orders or decisions by courts or authorities, which require us to process your personal data.

Legitimate interests: the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, if they are not overridden by your interests or fundamental rights or freedoms.

Consent: the processing is carried out with your prior consent, where we are responsible for clearly informing you of what processing you consent to and your right to withdraw your consent in relation to our continued processing.

Below, we explain more about the categories of personal data we process, for what purposes we process them and what legal bases we rely on when processing your personal data, including for how long we store your personal data.

4.1.1. *Business relations*

To maintain and develop our business relation with you or the company you represent, we will contact and communicate with you in the role as contact person of any of our existing or potential customers, partners, suppliers or business contacts in general.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
<ul style="list-style-type: none"> • Name • Contact details, such as email address, phone number, location, and address • Professional title as well as information about the company you represent • Information which you provide to us when communicating with you 	Our legitimate interest to engage in, maintain and develop our business relation with you or the company you represent.	We share your personal data with our IT-suppliers within the EU/EEA.	We process and retain your personal data while we have a business relation with you or the company you represent, however for a maximum of twenty-four (24) months from the time we last were in contact because of our business relation.

4.1.2. *Contracts*

To enter into or fulfil contracts between us or the company you represent.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
<ul style="list-style-type: none"> • Name • Contact details, such as email address, phone number, location, and address • Professional title as well as information about the company you represent 	We need to process your personal data in order to fulfil our obligations in relation to the contract.	We share your personal data with our IT-suppliers within the EU/ EEA.	We process and store your personal data until the contract terminates and up to ten (10) years thereafter or for a period of time to fulfil legal obligations, for example according to the Accounting Act, whichever is longer.

4.1.3. *Management of account*

To manage your user account and to maintain and develop our relation with you or the entity on whose behalf you represent.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
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<ul style="list-style-type: none"> • Name • Contact details, such as email address, phone number, location, and address • Professional title as well as information about the company you represent 	Our legitimate interest to engage in, maintain and develop our business relation with you or the company you represent.	We share your personal data with our IT-suppliers within the EU/EEA.	We keep your personal data while we have a business relation with you or the entity you represent, however for a maximum of twenty-four (24) months from the time we last were in contact because of our business relation.
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4.1.4. Marketing and newsletters

Personal data is processed to communicate about and market our business and to manage and send newsletters or other marketing communications.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
<ul style="list-style-type: none"> • Name • Contact details, such as email address, phone number, location, and address • Professional title as well as information about the company you represent 	Our legitimate interest in communicating about and marketing our business, as well as managing and sending marketing communications and providing information about our business.	We share your personal data with our IT-suppliers within the EU/EEA.	We process and store your personal data until you chose to unsubscribe. You can unsubscribe from receiving newsletters or other marketing materials at any time using the link provided in the newsletter or marketing material or by contacting us at info@industrikraft.se .

4.1.5. *Maintain and improve our website*

To maintain, facilitate and improve the functions and user experience of our website, as well as support our work on detecting and counteracting flaws, breaches, and incidents.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
<ul style="list-style-type: none"> • IP-address • Other technical information which is generated upon visiting our website, such as what type of device is used and web browser 	Our legitimate interest to gather information to maintain, facilitate and improve the functionality and security on our website.	We share your personal data with our IT-suppliers within the EU/EEA.	We process and keep information on how visitors interact with our website for a period of maximum six (6) months. In most cases, the collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.

4.1.6. *Cookies*

When you visit our website, we collect information about you through cookies. Some of these cookies are always active and are necessary to provide you with a functioning website.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
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<ul style="list-style-type: none"> • IP-address • Other technical information which is generated upon visiting our website, such as what type of device is used and web browser 	<p>Our legitimate interest to gather information to maintain, facilitate and improve the functionality and security on our website.</p>	<p>We share your personal data with our IT-suppliers within the EU/ EEA and the cookie suppliers as set forth in our Cookie Banner.</p>	<p>Please see the retention periods set forth in our Cookie Banner. In most cases, the collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.</p>
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4.1.7. Marketing, statistical and performance cookies

When you visit our website, we also use statistical, performance and marketing cookies to make the website more user-friendly, to measure performance and statistics and for marketing purposes. Some marketing cookies are provided by third parties as further described in our Cookie Banner.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
<ul style="list-style-type: none"> • IP-address • Other technical information which is generated upon visiting our website, such as what type of device is used and web browser • Behavioural information • Please see our Cookie Banner for further information 	<p>The legal basis for the processing is your consent.</p>	<p>We share your personal data with our IT-suppliers within the EU/ EEA and the cookie suppliers as set forth in our Cookie Banner.</p>	<p>Please see the retention periods set forth in our Cookie Banner. You may withdraw your consent at any time by following the instructions in our Cookie Banner. In most cases, the collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.</p>

4.1.8. Recruitment

Recruitment and employment process.

The personal data processed	Legal basis	Sharing of your personal data	Retention period
<ul style="list-style-type: none"> • Name • Contact details, such as email address, phone number, location, and address • Personal data contained in CV, personal letter, letter of recommendations, diplomas, and information provided by references • Information provided by you during the recruitment process 	<p>Our legitimate interest to make it possible for us to evaluate your qualifications and personal qualities in connection with decisions on recruitment.</p>	<p>We share your personal data with our IT-suppliers within the EU/EEA.</p>	<p>We need to retain your personal data after you have participated in a recruitment process to protect our rights under the Swedish Discrimination Act. We therefore save the information from the recruitment process for two (2) years after the application process is over.</p>

5. Security measures

We have taken security measures to ensure that your personal data is handled in a safe way. For example, access to systems where personal data is stored is limited to our employees and service providers who require it in the course of their duties. Such parties are informed of the importance of maintaining security and confidentiality in relation to the personal data we process. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure, or misuse. We also monitor our systems to discover vulnerabilities.

6. Sharing of personal data

For the purposes of conducting our business and complying with legal requirements and contractual obligations, we share your personal data with carefully selected recipients.

We will not share your personal data to third parties except in the event:

- it is agreed between you and us,
- it is necessary to protect legitimate interests,
- it is necessary for us to fulfil a statutory obligation, comply with a public authority or court decision, or comply with legislation,
- we engage a third-party service provider or cooperation partner in order to perform services on our behalf, e.g. to provide IT or system services, administrative services, marketing or to organize events,
- of third-party cookies used on our website, or
- it is otherwise permitted or required under applicable law.

If you wish a complete list of our recipients, please contact us at info@industrikraft.se.

7. Where we process your personal data

We strive to process your personal data within the EU or EEA. However, we will transfer your personal data to service providers who, either themselves or by their sub-contractors, are located or have business activities in a country outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it occurs, e.g. by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission, or by ensuring appropriate safeguards based on the use of standard contractual clauses that the European Commission has adopted and other appropriate measures to safeguard your rights and freedoms.

You may access a list of the countries that the European Commission has decided to provide an adequate level of data protection [here](#).

You may access the European Commission's standard contractual clauses [here](#).

Please contact us for more information concerning which countries outside the EU/EEA to which we currently transfer personal data.

8. Additional retention period

We may use personal data to handle any customer complaints or to defend and/or establish legal claims. We will generally process such personal data for ten (10)

years from creation or for the time necessary to fulfil the purpose in the relevant case. This processing of your personal data is based on our legitimate interest of establishing and/or defending legal claims.

9. Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them. Please note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights.

We also ask you to note that we may need more information from you to confirm your identity before proceeding with your request to exercise your rights.

To exercise your rights or request information about them, you are welcome to contact us.

9.1. Right of access

You have the right to obtain a confirmation as to whether we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.

9.2. Right to rectification

You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.

9.3. Right to erasure

You have the right to obtain that we erase your personal data without undue delay in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- Our processing is based on your consent, and you withdraw your consent to the relevant processing;
- You object to the processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
- The processed personal data is unlawfully processed;
- The processed personal data must be erased for our compliance with one or more legal obligations.

9.4. Right to restriction

You have the right to request that we restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- The processing is unlawful, and you oppose erasure of the personal data and request restriction instead;
- The personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defence of legal claims;
- You have objected to the processing of the personal data which we carry out based on a legitimate interest, pending the verification whether your objection overrides our or another party's legitimate interest to continue with the processing.

9.5. Right to object

You have a right to object to our processing of your personal data when it is based on our or another party's legitimate interest. If you object, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms in order to be allowed to continue with our processing.

9.6. Right to data portability

If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible. We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

9.7. Right to withdraw consent

If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

10. Complaints with the supervisory authority

In Sweden, the Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndigheten) is the authority responsible for supervising the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact us so that we can review your concerns. However, you may lodge a complaint with the Swedish Authority for Privacy Protection at any time.

11. Cookies

The website uses so-called cookies. Cookies are small text files that are saved on your computer or device to help our website perform a number of functions. For example, they can help us monitor the number of people using our website and help us understand more about the way in which people interact with our website. Some cookies on our website collect personal information about you. Our website www.industrikraft.se uses cookies set by us (first party cookies). Please see our Cookie Banner and this Policy for further information on how we may gather and use information about you through your interactions with us, including your use of this website. While browsing a site, you may also receive cookies on your computer from other sites or web services than the website you are visiting (so-called third-party cookies). If you choose not to accept certain cookies, some of the functionalities of the website may be limited.

The cookies serve different purposes and are divided into different categories, 1) Strictly Necessary Cookies; 2) Functional Cookies; 3) Performance- and Analytical Cookies; and 4) Marketing Cookies. Functional-, Performance and Analytical- and Marketing Cookies are optional and only processed if you have provided your consent to them. You may withdraw your consent at any time by changing your cookie settings.

Strictly Necessary Cookies are processed when you use our services and visit our website. Strictly Necessary Cookies let you use all the different parts of the website. Without such cookies we will not be able to provide the service you asked for since they are crucial for the functions of the website.

Functional Cookies help to perform certain functions and enable enhanced functionality and personalization, by e.g., your visiting location, chosen language and other visitor settings.

Performance and Analytical Cookies allow us to analyse the website's key performance indicators and to count visits and traffic sources so that we can measure and improve the performance of the website.

Marketing Cookies may be activated either by us or by our advertising partners, if you have provided your consent to them. Marketing Cookies serve relevant advertisements regarding goods and services that may be of interest to you when you access and use the website.

You can change your cookie preferences at any time by clicking on the Cookie Banner on the website. You can then adjust the available sliders to 'On' or 'Off', then clicking 'Set custom preferences'. You may need to refresh your page for your settings to take effect. In addition, most web browsers allow you to manage cookies via the browser settings. For example you may choose to block cookies in order to prevent your browser from accepting new cookies, delete existing cookies, have the browser notify you when you receive a new cookie or disable cookies

altogether. Please follow the below links to receive instructions on how to change your browser settings from some of the most common browser providers (please note that these are links to third party websites for which we have no control):

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

Please note that by restricting cookies you might not be able to access all parts of our website since some functionality of the website are dependent on cookies.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

You can learn more about cookies, including how to see what cookies have been set and how to manage and delete them, by visiting www.aboutcookielaw.org, www.allaboutcookies.org, or the Swedish Post and Telecom Authority's (PTS) website: www.pts.se/en/. Please note that these are links to third party websites for which we have no control.

12. Contact details

If you have any questions about the processing of your personal data or want to exercise any of your rights, please contact us at:

Email: info@industrikraft.se