PERSONAL DATA POLICY

This privacy policy describes how Codeunit Solutions International AB, reg.no 559108-6508, ("Codeunit") processes your personal data. With the terms "we", "our" and "us" in this policy are meant Codeunit.

We safeguard your privacy and will at all times ensure that your personal data is processed in a lawful manner, which inter alia means that:

- We treat personal data in a correct and open manner.

- We collect personal data for the legitimate purposes set forth in this policy, and do not treat the personal data in any way incompatible with these purposes.

- The personal data we process is adequate, relevant and necessary for the purposes for which they are collected and used.

- The personal data we process is accurate and updated if necessary.

Please see below for more information on how we process your personal data.

1   WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Codeunit is data controller for your personal data and is responsible for ensuring that the processing is conducted in accordance with applicable data protection regulations.

2   WHOM DO WE PROCESS PERSONAL DATA ABOUT?

We process personal data regarding the following categories of persons:

- *Customers and partners*, i.e. private persons who buy or otherwise show interest in our products or services, or private persons who represent our existing or future customers/partners.

3   WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

We may treat both information that you submit to us and which we collect from you.

3.1   **As a customer/partner**

We may process the following personal data, regarding you as a customer/partner, or representative of such:

- Contact information, such as name, address, email address and phone number,

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- Personal identity number,

- User name and password to our services,

- IP-number and information about your use of the Codeunit website,

- Payment data and information that reveals after a credit report.

4   WHY AND ON WHAT LEGAL BASIS ARE WE PROCESSING YOUR DATA?

4.1   In order to conclude and manage agreements with you as a customer/partner, or a representative of such, we collect and process your personal data. The legal basis for our processing of your personal data is that it is necessary in order to fulfil our agreement with you or to take action before entering into such agreement. If you do not provide the above-mentioned personal data, we cannot offer our products and services or otherwise fulfil our commitments to you.

4.2   If you are a representative or contact person for an organization that is a customer/partner, the legal basis for our processing of personal data is a balance of interest, i.e. the processing is necessary for a purpose that concerns our legitimate interests in maintaining and fulfilling our contractual commitments. If you do not provide the above-mentioned personal data, we may not be able to fulfil our commitments to the organization of which you are a representative.

4.3   We collect and process personal data belonging to you as a customer/partner in order to assure the quality of our business, to contact you and/or to offer and promote our products or services to you. We may also send relevant offers to you in the form of, among other, newsletters, promotional offers through email etc. The legal basis is that such processing is necessary for our legitimate interest in being able to develop our business and meet your needs as well as promote products and services that we believe you may be interested in. Our interest of processing personal data for these purposes go beyond your potential interest of protecting your personal integrity, in light of the potential benefits that the marketing brings to you. However, you are entitled to object to the processing of your personal data for the purpose of direct marketing at any time.

4.4   Some personal data may be processed due to Codeunit being required to fulfil certain legal obligations, such as personal data processed as a result of our accounting obligation or other obligations stated in law.

5   FOR HOW LONG IS YOUR PERSONAL DATA BEING STORED?

5.1   Codeunit does not save personal data longer than necessary in relation to the purpose for which the data is being processed. Therefore, we perform screenings of the personal data on a regular basis and remove data which is no longer necessary to process.

5.2 We save data about you as a customer/partner for as long as there is an active agreement. After the contractual relationship has ended, we save personal data for 12 months or as long as a legal claim related to the agreement is or may be enforced. However, we may need to store personal data even after this time period, e.g. in order to manage warranties, insurance or deadlines for complaints, comply with legal requirements, handle other legal requirements that may be directed against Codeunit and which do not derive from any agreement or to promote products or services and send offers that we believe you might be interested in.

5.3 We save data about you as a customer/partner for marketing purposes until you object to the processing of your personal data. If you object to the processing, we will delete your personal data as soon as possible.

6 WHO HAS ACCESS TO YOUR PERSONAL DATA?

6.1 Your personal data may be submitted to and processed by third parties. These may include group companies, service providers, legal advisors, accountants, business consultants, authorities etc. Examples of situations when your personal data may be transferred to third parties are when such action is required due to law, disputes, authority requests or decisions or after a request by you, alternatively when so is required in order to fulfil Codeunit legitimate interest. Codeunit remains personal data controller for the personal data provided to the third parties, while the third parties, depending on the circumstances, become independent personal data controllers, personal data controllers joint with Codeunit or personal data processor to Codeunit.

7 HOW AND WHERE DO WE STORE YOUR PERSONAL DATA?

7.1 Codeunit takes appropriate technical and organizational measures to prevent unauthorized or unlawful processing and access, loss, destruction or damage to personal data, thereby ensuring an appropriate level of security.

7.2 Codeunit will only process personal data within the EU/EEA.

8 WHAT RIGHTS DO YOU HAVE AS A DATA SUBJECT?

8.1 **The right to access –** You have the right to turn to us and request access to the personal data we process related to you. You also have the right to request information about, among other things, the purpose of the processing and the recipients of the data. Codeunit will provide you with a copy regarding the processed personal data, free of charge. If you request further copies, we may charge an administration fee.

8.2 **The right to rectification and limitation –** You have the right to, without undue delay, have your personal data rectified or, under certain circumstances, limited. If you believe that Codeunit is processing personal data regarding you which is inaccurate or incomplete, you may request to have the data rectified or completed.

8.3 **The right to deletion –** You also have the right to have your personal data deleted, e.g. if the data is no longer necessary for the purpose of the processing or if the processing is based on a consent which has been withdrawn. However, there may still be legal requirements or contractual relations preventing us from deleting your personal data.

8.4 **The right to objection –** You have the right, at any moment, to object to the processing of your personal data if the legal basis of processing is based on a balance of interests. You also have the right, at any moment, to object to the processing of your personal data if the data is processed for the purpose of direct marketing.

8.5 **The right to data portability –** You have the right to retrieve the personal data that you have provided to Codeunit and have this data transmitted to another data controller (data portability), provided that such portability is technically possible, and that the legal basis for processing the data is consent or that it has been necessary for the fulfilment of an agreement.

8.6 **The right to file a complaint –** If you are dissatisfied with how we process your personal data, please contact us by using our contact information stated below in section 10. You also have the right to file a complaint regarding our personal data processing to:

Datainspektionen, Box 8114, 104 20 Stockholm
datainspektionen@datainspektionen.se

9 ALTERATIONS OF THE POLICY

Codeunit reserves the right to alter and update the policy. If the policy is materially altered or if current data is to be processed in a different manner than what is stated in the policy, Codeunit will inform about this appropriately.

10 CONTACT CODEUNIT

For questions about the policy or requests regarding personal data, please contact Codeunit contact person by using our contact information below.

Contact information

Codeunit Solutions International AB
Södra Förstadsgatan 23 A, 211 23 Malmö
Sweden
info@codeunit.se

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