

INTEGRITY POLICY FOR CUSTOMERS AND SUPPLIERS CONTACT PERSONS

Introduction and summary

Axess Logistics * (in this policy designated "we") is concerned for your integrity and privacy. It is obvious that we must always endeavour to protect your personal data in the best possible way. Personal data are any type of information and data relating to you, e.g your name, telephone number and e-mail address.

In this document, we want to inform about how we process personal data that we have about you as contact person for one of our existing or potential customers, or in the capacity of our contact person for one of our suppliers. When we use the term "your company" below, we mean your employer or company that you otherwise represent.

We process your personal data for the following general purposes:

- Manage the relationship with your company;
- Manage our PDI (Pre Delivery Inspections) customer portal;
- Manage our Transport customer portal;
- Analyze the use of our web site
- Evaluate the customer experience with us;
- Submit offers and news releases;
- Contact potential customers; and
- Be compliant with legal requirements and government decisions.

We put great importance on being as clear as possible as to how we process your personal details. In the table below under the heading "*Detailed description of how we process your personal details*", you can read further details about how we process your personal data.

You have a number of rights in accordance with legislation in effect, among which the right to oppose, at any time, the use of your personal details for marketing purposes. Under "*Your rights*" below, you can read about your rights in greater detail

Responsibility for your personal data

Axess Logistics at Turbingatan 8, Kattegatthamnen, S-302 50 Halmstad, and with the telephone number +46 35 17 62 00, is responsible for processing of your personal data. You can read about which rights you have, e.g. the right to oppose any use of personal data for marketing purposes.

If you have any questions about the processing of your personal data or if you want to contact us in order to exercise your rights, you are welcome to do so by telephone on +46 35 17 62 00 or by e-mail gdpr@axesslogistics.com.

From whom do we collect your personal data?

We collect your personal data directly from you or your company, e.g. in connection with your registration as their contact person for us or as your company's user of our customer portal.

In some cases, we may have got your contact details from other companies in the Axess Group or from our other partners, e.g. our partners who processes credit references. We may also have got your data from

the Authorities (NO: Statens vegvesen, SE: Trafikverket etc), from who we get VINs (vehicle identification numbers) and registration numbers, which can constitute personal data about you.

In order for you to be able to benefit from our services or deliver your services to us, we need to process certain personal data about you as representative for our customer or supplier. We cannot comply with legislation in effect or fulfil our agreement if you do not share such personal data that are necessary to comply with legislation or fulfil the agreement that we have with your company. This applies to agreements that regulate transport, storage, PDIs or our other services.

When you use our web sites we will also use information that Google has register on from earlier. This is how the Googles own analytic services work.

Who can get access to your personal data?

When it is necessary to make an agreement with your company or to comply with legislation or decisions by authorities, we share your personal data with other companies in the Axess Group or public authorities.

We share your personal data with our external service providers who process order flows or newsletter mailings for us, such as our personal data processor. We also share your personal data with our IT-service providers who provide IT support for those systems in which we store your personal details, and with consultants we contract to perform work on our behalf.

Those companies and persons that we share your personal data with process your personal data only for our assigned mission and only have access to those data needed to fulfil their contractual obligations to us.

If you visit or use our web sites and portals, we use Google to make analyzes to learn how the sites work, and Google will have access to your personal data.

Use of your personal data outside EU/EEC

We and our suppliers and partners use your personal data only inside the EU/EEC. However, when you use our we sites and portals you risk that your personal data will be stored in the USA due to the the location of servers for Google. As far as possible we have made your personal data anonymous in order for them not to be processed outside EU/EEC.

Google are Privacy Shield certified according to a regulation between EU and USA in order to protect the European citizens rights, and to protect the security for companies when transferring data to USA. US companies may apply for the Privacy Shield certificate with the U.S Departemnt of Commerce. Then the fulfillment of high standards for protecting personal data will be controlled.

If you need further information on how your personal data is processed outside EU/EEC, you are welcome to contact us. Your will fin contact information in this document.

Your rights

In accordance with data protection legislation, you have certain rights that you can use in order to influence how we process your personal data. Please read more below.

Right to withdraw your consent and to oppose processing

You have the right to *withdraw* all or part of *granted consent* for processing of your personal data. The withdrawal of your consent comes into effect after the withdrawal took place.

You have the right to *oppose processing of your personal data*. You always have the right to *oppose* processing of your personal data for *marketing purposes*, such as our newsletters.

In some matters there are not possible to oppose against processing your personal data (e.g. when we are imposed to store your personal data). You have the right to oppose, at any time, processing of your personal data *based on a balancing of interests*. Read more about what this implies below. This does not apply however if we can demonstrate justified reasons outweighing your interests, rights and freedom or if such processing occurs for the establishment, exercise or protection of legal claims.

Right of access

You have the right to *get a confirmation* if your personal data are processed by us. You have the right to *get access* to your personal data and *a copy* of the personal data that are processed by us.

Right to have corrections made

You have the right to have corrections made if your personal data is incorrect and you have the right to ask for *incomplete personal data to be completed*.

Right of erasure (right to be forgotten) and limitation of processing

You have, in certain circumstances, the right to request *erasure of your personal data*. Such circumstances exist if, e.g. personal data are no longer necessary for the purposes for which they were collected or processed, or if you withdraw your consent on which processing is based and there are no other legal grounds for processing.

You also have the right to request us to *limit our processing* of your personal details. Such circumstances exist if you, e.g. dispute the correctness of the data or if processing is illegal but you object to erasure of your personal data, requesting instead limitation of the use of your details.

Right to submit a complaint to a supervisory authority

You always have the right to submit a *complaint to a competent supervisory authority*.

Such a complaint shall be submitted preferably to the authority of the EU/EEA member state where you normally reside and/or work, or where a breach of effective legislation and regulations for data protection is claimed to have occurred. The competent supervisory authority in Norway is Datatilsynet, in Sweden Datatilsynen and in Denmark Datatilsynet. This right does not exclude any other administrative review procedure or legal remedy.

Right of data portability

You have the right request us to *transfer certain of your personal data* to another company (data portability).

The right applies to personal data you have submitted to us in a structured, generally used or machine-readable format if:

- processing is based on your consent or on the agreement; and
- processing is automated.

You have the right of direct transfer of personal data from us to another data controller when this is technically possible.

Detailed description of how we process your personal data:

In the table below, we describe in detail why we process your personal data, which data we process, which legal grounds processing is based on, and for how long we process your personal data. Legal grounds are the supporting arguments that we dispose of, in conformity with data protection legislation (GDPR), to be able to process your personal data legally.

| Manage the relationship with your company | | | |
|--|--|--|---|
| For what purposes are we processing your personal data? | What personal data do we process? | What are the legal reasons for processing? | For how long do we keep processing your personal data for this purpose? |
| In order to negotiate and enter into an agreement between us and your company, e.g. a customer agreement or cooperation agreement for transport of vehicles. | Your name, your contact details and your position. | Our legitimate interest to process your personal data is negotiate and making an agreement with your company. | The data is saved until the negotiation is complete or an agreement has been entered into. |
| To communicate with your company in order to be able to place an order, deliver a vehicle or pay / charge. | Your name, your contact details and your position. | Our legitimate interest in contacting your company in order to fulfill our obligations under the agreements we have on delivery with your company. | The data is saved for the duration of the agreement with your company, or for a shorter time, if your company informs us that you will no longer be the company's contact person. |
| To notify you, representing one of our customers, of the status of your vehicle transport. | Your name and your contact details. | Your consent. | The details are saved only until you unsubscribe from our notification service, or until your company requests us to stop sending you notifications. |

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| In order to manage order flows, e.g by processing quotes and orders on our customer portal for PDIs, or to communicate maintenance schedules, where you represent your company and for the purpose of fulfilling our agreement with your company | Your name, your contact information, VIN number and registration number. | Our legitimate interest in contacting your company, in order to communicate with your company. | The information is saved for the duration of the agreement with your company, or for a shorter time, if your company informs you that you will no longer be the company's contact person. |
| To administer and respond to your contact enquiries by telephone or submitted via our "Contact Us" form at our web site. | Your name, your contact details, and any personal information you provide in the free text field. | Is necessary to fulfill our agreement with you. | The information is processed from the time your company sends the contact request, until we have answered your request inquiry. |
| In order to process complaints you have made via our complaint form on our website. | Your name, your contact information, VIN number and any personal information you provide in the free text field. | Our legitimate interest is handling complaints you have submitted from your company, as well as handling any legal claims in connection with complaint. | The information is not stored for a longer period than is necessary to process your complaint and / or handle any legal claims in connection with the complaint. |

| Manage our PDI (Pre Delivery Inspections) Customer Portal | | | |
|---|-----------------------------------|--|---|
| For what purposes are we processing your personal data? | What personal data do we process? | What are the legal reasons for processing? | How long we process your personal data for this purpose? |
| In order to create user accounts and login to our customer portal for PDI as well as to administrate the customer portal. | Your name, your contact details. | Our legitimate interest in being able to fulfill our obligations under the agreement we have with your company on our customer portal. | The data are saved as long as you have an account with us, nevertheless for a maximum of two full years if you have |

| Analyze the use of our web sites | | | |
|---|---|---|--|
| For what purposes are we processing your personal data? | What personal data do we process? | What are the legal reasons for processing? | How long we process your personal data for this purpose? |
| <p>In order to analyze how our web sites are used, we use cookies from Google.</p> <p>We implement improvements in the web sites based on the information we receive from these analyses.</p> | <p>Your encrypted IP-address and other unitinformation and information on how you use our web sites, ie. what you click at.</p> <p>Also Google may use information they have.</p> | <p>Vårt berättigade intresse att analysera hur webbplatsen används och förbättra webbplatsen baserat på sådana n analys.</p> <p>Our balanced interest to analyze how the web sites are used and improve the web sites based on such analyses.</p> | <p>We erase your personal data 3 months after your visit.</p> <p>Google will still use your personal data as independent responsible. How long they save your personal data, is described in their integrity policy.</p> |

| Submit offers and news letters | | | |
|---|--|---|---|
| For what purposes are we processing your personal data? | What personal data do we process? | What are the legal reasons for processing? | How long we process your personal data for this purpose? |
| <p>To submit relevant offers and / or news letters regarding our business to your company</p> | <p>Your name and contact details, as well as your position. When we send newsletters to you, we get information as to whether the newsletter has reached you, if it has been opened, how many times you have read the mailing, as well as how many times you have clicked on links in the mailing.</p> | <p>It is our legitimate interest to contact you for sending newsletters and for other marketing.</p> <p>If you gave consent to receive our newsletters, the consent is our legal reason for processing.</p> | <p>When our processing of your personal data is based on our legitimate interest to send you marketing material, we save your personal details for one year after our relationship with your company has ceased.</p> <p>If you have consented to get our newsletters, we process your details until you unsubscribe, or until you or your company requests us to stop sending you marketing material.</p> |

| Contacting potential customers | | | |
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| For what purposes are we processing your personal data? | What personal data do we process? | What are the legal reasons for processing? | How long we process your personal data for this purpose? |
| In order to contact and communicate with your company, which we consider as a potential, future partner or customer, as well as for similar sales or marketing purposes. | Name, contact details and position. | Our legitimate interest to contact your company, which we think may be interested in our services or in a partnership with us. | The details are saved until they have been used for the purpose for which they were collected. If you want your data to be erased before then, please send an e-mail to gdpr@axesslogistics.com , in which case we will erase your details within 30 days. |

| Compliance with legislation and decisions made by the authorities | | | |
|---|---|---|--|
| For what purposes are we processing your personal data? | What personal data do we process? | What are the legal reasons for processing? | How long we process your personal data for this purpose? |
| In order to comply with accounting law/legislation. | History of completed payments, transactions and similar that constitute accounting records. | Processing is such as necessary in order to comply with statutory laws, i.e. accounting law. | The details are saved for the period of time during which we are required to save such details as per accounting law in effect, i.e. for ten years (NO) or seven years (SE). |
| In order to comply with legislation and decisions by authorities concerning customs as well as the handling of hazardous waste. | Your name, your contact information, VIN number and registration number. | Processing is such as necessary in order to comply with statutory laws and/or decisions by authorities. | The data are saved for the period of time during which we are required to save such details as per laws or decisions by authorities in effect, i.e. for five years for customs requirements and for the current year plus three years for the handling of hazardous waste. |


How did we balance our interests when legal reasons are our legitimate interest?

For certain purposes, we process your personal data based on balancing of interests as legal grounds for processing. In this balancing of interests, we have concluded that our legitimate interest to perform processing outweighs your interest and your basic rights not to have your personal data processed. The table above shows what constitutes our legitimate interest. If you want to learn more about how we have balanced everyone's interests, please contact us. You can find our contact details at the start of this integrity policy.

** By Axess Logistics we mean the companies that are part of the Group and which are listed in the table below. Companies can be contacted by e-mail to «gdpr@axesslogistics.com» or telephone to the head office on +46 35 17 62 00:*

| Company | Country | Org.no |
|---------------------------|---------|-------------|
| Axess Logistics AB | Sweden | 556430-0720 |
| Axess Logistics Sweden AB | Sweden | 556548-9696 |
| Svensk Autotransport AB | Sweden | 556174-5190 |
| Axess Logistics A/S, | Denmark | 30515331 |
| Axess Logistics AS | Norway | 917722773 |
| Autologistikk AS | Norway | 994819348 |
| Nordic Car Logistics AB | Sweden | 559036-9269 |

This document is translated from our Swedish version. If differences, the Swedish version has priority.

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|  | Dokumentansvarig: MB/CAB | Version: 3.0 | Datum: 2020.06.19 |
| Dokumentnamn Integritetspolicy - Axess Logistics _EN | | Dok.nr: | Sida: |