#### PRIVACY POLICY XLMOTO

#### **HOW WE HANDLE YOUR PERSONAL DATA – IN BRIEF**

Privacy is especially important for us at Pierce AB ("**XLMOTO**") and we want to be open and transparent concerning our processing of your personal data. In this privacy policy we describe how we process personal data about you as a customer – when you make a purchase with us, visit our website, contact us, subscribe to our newsletter, or ask us to stop sending you marketing information.

#### How do we handle your personal information?

- If you make a purchase with us we process your personal data to:
  - o Manage your purchase.
  - Send you our newsletter (if you haven't opted out).
  - Save your information in order to seamlessly, in accordance with relevant consumer law, and in accordance with our own warranty regulations deal with questions about your purchases, returns, or complaints.
  - Send requests that you review your purchase.
- When you visit our website we process your personal information, if you have chosen to give your consent, in order to:
  - o Analyse how our website is used with Google and Hotjar analytics services.
  - Show you our other deals that might be of interest on other pages that you visit with the help of Google, Meta, and Microsoft marketing services.
- <u>If you contact us</u> we process your personal information to communicate with you and, for example, answer your questions.
- <u>If you have chosen to subscribe to our newsletter</u> we process your personal information in order to send you, our newsletter.
- If you have asked us to stop sending marketing materials to you, we process your personal information in order to comply with laws on marketing materials and to ensure that we do not directly advertise to you.

We share your personal information with our IT service suppliers who in certain cases can process your personal information outside of the EU/EEA.

You can read more below on how we handle your personal information. You can also click on the links above to read more on how we handle your personal information for each purpose.

#### Your rights

You have the following rights:

- ✓ Right to lodge a complaint with a supervisory authority
- ✓ Right to withdraw consent
- ✓ Right to access
- ✓ Right to object

- ✓ Right to erasure ("right to be forgotten")
- ✓ Right to rectification
- ✓ Right to restriction of processing
- ✓ Right to data portability

Read more on each right and what they involve by clicking on the text above. If you have any questions about these rights or want to exercise any of them, please <u>contact us.</u>

#### PRIVACY POLICY - MORE DETAILS

In order to be as clear as possible, this policy is divided into three parts. In the section above (section one) a summary was given. Below you can read more about your rights, the balance of interests, who receives your data and with whom that data is shared (section two). At the end of the policy (section three) there is a detailed description of how we process personal data for each purpose

Click to read more about:

- Who is responsible for the processing of personal data and contact information?
- Sharing of personal data who has access to your personal information and why?
- Do we transfer your personal information ourside of the EU/EEA?
- What rights you have when we process your personal data?
- Legitimate Interests
- Detailed description of how we process and store your personal data

# Responsibility for personal information processing and contact information

Pierce AB ("**XLMOTO**"), organisation number 556763–1592, is responsible for the processing of your personal information.

If you have any questions concerning our handling of your personal information or if you want to exercise any of your rights you can contact us using our email address: <a href="mailto:dataprotection@xlmoto.com">dataprotection@xlmoto.com</a>. Our postal address is Elektravägen 22, 126 30 Hägersten, Sweden.

# Sharing of personal information – who has access to your personal information and why?

Your personal information is primarily processed by us at XLMOTO. We never sell your personal information. In certain cases, we share your personal information. More details about when we share your personal information, categorised according to purpose, and what personal information we share in these cases can be found in the tables below. In this section we summarise and describe what generally applies in relation to all your personal information.

We share your personal information to companies within our organisation who assist us and only process personal information on our behalf and in their capacity as data processors.

In order for us to have functioning IT systems and run our business efficiently, we will give our IT providers access to your personal data. These IT providers process personal data on our behalf in their capacity as data processors. We transfer your personal data to recipients who are independent personal data processors for the processing of your personal data in certain cases:

- When you have made a purchase with us your personal information is transferred to the payment service provider and the delivery courier that you select. The recipients that process your personal data are listed in the tables below.
- If you visit our website your personal information will be transferred to the marketing and analytics services that we use if you choose to approve it.

If you would like more information about how we share your personal information, please read below or <u>contact us</u>.

## Do we transfer your personal information outside of the EU/EEA?

Two of our IT service providers process personal information outside of the EU/EEA. For us at XLMOTO it is of the utmost importance that all transfers outside of the EU/EEA are done in compliance with the requirements of GDPR.

The personal information which is transferred in relation to each process is given in the relevant tables below. In summary, your personal information will be transferred outside the EU/EEA as follows:

- Your personal information will be transferred to the USA when we use Yotpo.
- Your personal information will be transferred to the UK when we use Trustpilot.

When we transfer your personal information to the UK it is done on the basis that the European Commission has decided that the UK has an adequate level of protection.

When we transfer personal data to other countries outside the EU/EEA, we do so on the basis of the European Commission's standard contractual clauses (GDPR art. 46.1.c), module two. The EU Commission's standard contractual clauses can be found <a href="here">here</a>. In the event that we find that legislation or similar in a specific non-EU/EEA country to which we transfer your personal data affects the effectiveness of the standard contractual clauses, we will adopt the necessary additional measures to ensure adequate protection of your personal data.

If you would like to see our standard contractual clauses or for more information about any additional measures we have taken, please <u>contact us</u>.

#### What rights do you have when we process your personal data?

GDPR gives you several rights that you can choose to exercise in relation to our processing of your personal data. If you have any questions about these rights or would like to exercise any of your rights, please <u>contact us</u>. Read more about your rights below.

#### Right to lodge a complaint with a supervisory authority (GDPR art. 77)

You have the right to lodge a complaint with the competent supervisory authority if you believe that the processing of your personal data is in breach of GDPR. In the Republic of Ireland, the competent supervisory authority is the <u>Data Protection Commission</u>.

**In detail.** Your right to complain applies without prejudice to any other administrative or judicial review procedures and should preferably be addressed to the Member State of where

you are resident, where you work, or where a breach of applicable data protection laws and regulations is alleged to have occurred.

The supervisory authority has a duty to keep you informed of the progress and outcome of your complaint, including informing you of the possibility of a judicial review of your complaint.

#### Right to withdraw consent (GDPR art. 7.3)

You have the right to withdraw your consent at any time by contacting us.

*In detail.* Your withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

#### Right to access (GDPR art. 15)

You have the right to receive confirmation as to whether or not we are processing your personal data. You can send a request by <u>contacting us</u>. If we are processing your personal data, you also have the right to receive a copy of the personal data we are processing and information about the processing.

In detail. The information about the processing we give you access to in such cases is:

- o the purposes for which it is processed;
- o the categories of personal data to which the processing relates;
- o the recipients or categories of recipients to whom the personal data have been or are to be disclosed, in particular recipients in third countries or international organisations,
- o where possible, the envisaged period for which the personal data will be stored or, if this is not possible, the criteria used to determine that period;
- the existence of the right to ask us to rectify or erase the personal data or to restrict or object to the processing of personal data relating to you;
- o the right to lodge a complaint with a supervisory authority;
- o if we do not collect your data, any available information about where that data came from;
- the existence of automated decision-making, including profiling under GDPR art. 22.1 and
   22.4, where you also have the right to receive meaningful information about the logic,
   significance, and likely consequences of this processing; and
- o if the personal data is transferred to a third country or to an international organisation, you also have the right to be informed of the appropriate safeguards that have been put in place for the transfer in accordance with GDPR art.46.

You have the right to obtain a copy of the personal data processed by us. For any additional copies you request, we may charge a reasonable fee based on our administrative costs. If you have requested the information by electronic means, you will receive the information in a commonly used electronic format, unless you request otherwise.

Your right to request copies as described above shall not adversely affect the rights and freedoms of others.

A request is made by contacting us.

#### Right to object (GDPR art. 21)

You have the right to object at any time to our processing of your personal data on grounds relating to your specific situation regarding the processing of your personal data based on GDPR art. 6.1.e or art. 6.1.f, which included profiling based on these provisions.

#### In detail.

- If you object we may no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims
- If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, including profiling where profiling is related to direct marketing. If you object to the processing for direct marketing purposes, you have an unconditional right to have the processing of your personal data for such purposes stopped.

#### Right to erasure ("right to be forgotten") (GDPR art. 17)

You have the right to have your personal data erased by us and we have an obligation to erase personal data without undue delay if any of the following apply:

- the personal data are no longer necessary for the purposes for which they were collected or processed;
- you withdraw consent on which the processing is based, and there is no other legal basis for the processing;
- you object to the processing in accordance with GDPR art. 21.1 and there are no overriding legitimate grounds for the processing, or you object to the processing in accordance with GDPR art. 21.2;
- the personal data has been processed unlawfully;
- the personal data must be erased in order to comply with a legal obligation under
   Union or Member State law to which we are subject; or
- the personal data has been collected in connection with the provision of information society services, in the cases referred to in GDPR art. 8.1. We will notify each recipient to whom the personal data has been disclosed to of any erasure that has taken place as described above, unless this proves impossible or involves a disproportionate effort. If you would like information about these recipients, please contact us.

Please note that our obligation to erase as described above does not apply to the extent that processing is necessary for the following reasons:

- to exercise the right to freedom of expression and information.
- o to establish, exercise, or defend legal claims.

#### Right to rectification (GDPR art. 16)

You have the right to have inaccurate personal data concerning you rectified without undue delay.

**In detail.** Taking into consideration the purpose of our processing of your personal data, you also have the right to complete incomplete personal data, including by providing a supplementary statement.

We will notify each recipient to whom personal data has been disclosed to of any rectification that has taken place, unless this proves impossible or involves a disproportionate effort. If you would like information about these recipients, please contact us.

#### Right to restriction of processing (GDPR art. 18)

You have the right to request that the processing of your personal data be restricted if:

- you dispute the accuracy of the data (but only for a period of time that allows us to verify this);
- you have objected to the processing in accordance with GDPR art. 21.1 pending verification of whether the legitimate grounds of the controller outweigh the legitimate grounds of the data subject;
- the processing is unlawful and you object to the erasure of the personal data and instead request a restriction on the use of the data; or
- you need the personal data to establish, exercise or defend legal claims even though we no longer need the personal data for our purpose of processing.
  - Where the processing referred to above has been restricted, such personal data, with the exception of storage, may only be processed with your consent or for the establishment, exercise, or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of substantial public interest of the Union or Member State. We will notify you before the restriction of processing ends.

We will notify each recipient to whom the personal data has been disclosed to of any restriction of processing as described above, unless this proves impossible or involves a disproportionate effort. If you would like information about these recipients, please contact us.

# Right to data portability (GDPR art. 20)

You have the right to receive your personal data, that you have provided us, in a structured, commonly used, and machine-readable format. You also have the right to have your personal data transferred to another controller where:

- the processing is based on the lawful ground of consent or performance of a contract;
   and
- o the processing is automated.

Your right to data portability does not affect your right under GDPR art. 17 (right to erasure).

Your right to data portability must not adversely affect the rights and freedoms of others.

# **Legitimate Interests**

As we set out in the tables below, we process some of your personal data on the basis of legitimate interests as a lawful basis for the processing. Legitimate interests means that we have assessed that our legitimate interest in carrying out the processing outweighs your interest and your fundamental right not to have your personal data processed. What constitutes our legitimate interest is set out in the tables below.

If you would like to know more about how we have made these assessments, please <u>contact</u> <u>us.</u>

## PRIVACY POLICY – EVEN MORE DETAILS

In this detailed description you can read in more detail about:

- why we process your personal data;
- the categories of personal data that we process;
- the lawful basis for processing your personal data; and
- how long we store your personal data.

If the respective processing involves – in addition to what we mention above regarding our IT providers – sharing personal data or transferring personal data outside the EU/EEA, we also mention that below.

# If you make a purchase with us

When you make a purchase from us, we process your personal data. We collect your personal data from you at the checkout when you make a purchase.

Purpose: To handle your purchase		
Processing carried out.	Personal Data processed	Legal Obligations
<ul> <li>Receiving and recording your personal data to receive, record and process your order.</li> <li>Sending automatic order confirmation and delivery confirmation via email.</li> <li>Delivery of your order</li> <li>Sharing with partners as described.</li> </ul>	<ul> <li>Name.</li> <li>Contact details (postal address, email address and telephone number).</li> <li>Order information, which item(s) your ordered.</li> <li>Payment information.</li> </ul>	Performance of a contract (GDPR art. 6.1.b)  The processing is necessary for us to be able to fulfil the contract relating to your purchase. If the personal data is not provided, you will not be able to make a purchase from us.

**Retention period:** The personal data related to your purchase will be actively processed by us for a few days to administer and manage your order so that you can receive the goods you ordered.

Thereafter, data about your purchase will be stored passively for three years to allow us to deal smoothly, and in accordance with applicable consumer rules and our warranty commitments with, any queries about your purchase, returns and complaints. For more information, please read below.

**Recipients of your personal data:** The payment service provider through which you paid will process your personal data in connection with the purchase. The payment service providers are independent data controllers of the processing of your personal data. Please read the policy of the payment service provider you used for your payment. See Klarna's privacy policy <a href="here">here</a>, Adyens privacy policy <a href="here">here</a>, and Paypals privacy policy <a href="here">here</a>.

We will share your name, address, and contact details with our IT provider and data processor, who will in turn share your name, address, and contact details with the carrier you select at checkout in order to deliver your products.

Addresses and delivery alternatives are handled by <u>Metapack</u> and <u>Ingrid</u>. They are independent data controllers for the processing of your personal data.

The carriers we use are GLS, DHL, An Post and DHL Express. They are independent data controllers for the processing of your personal data. You can read more about how the carrier that transports your goods processes their personal data under the carrier's policy by clicking on your carrier's name here: GLS, DHL, An Post, and DHL Express

Purpose: Send newsletters to you as a customer		
Processing carried out.	Personal Data processed	Legal Obligations
If you have not opted out, we will process your personal data to send you our newsletter.	• Email address.	Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes relating to our <u>legitimate interests</u> in being able to send marketing other goods of ours similar to those that you have previously purchased, to you as a customer, when you have been given an opportunity to object to such marketing.
Unsubscribe from our newsletters if you have not opened any of our newsletters for a period of six months.	<ul> <li>Information about how you interact with our newsletters, for example information about whether you open our newsletter and information about what you click on.</li> <li>IP-address.</li> <li>Email address.</li> </ul>	Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes relating to our <u>legitimate interests</u> in being able to stop sending you marketing when you are no longer likely interested in receiving it.
Develop and improve our newsletters and marketing by analysing how you interact with our newsletters.		Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes related to our <u>legitimate interests</u> to develop and improve our newsletters and our marketing when you are given the opportunity to object to such analysis.

**Retention period:** You will continue to receive newsletters for one year after your purchase unless you opt out of receiving our marketing before then. If you have not opened any of our newsletters for a period of six months, we will stop sending you newsletters earlier than this.

You can opt out of marketing from us at any time. If you unsubscribe from our mailings, your personal data will be stored in our <u>unsubscribe register</u> for 90 days as shown below. If you have not opened any of our newsletters for a period of six months, your personal data will be stored for up to six months thereafter.

The information we process about whether or not you have opened our newsletters is stored until you have clicked on something new in our newsletters, up to a maximum of six months after you have clicked or not clicked on something in a newsletter.

**Recipients of your personal data:** For sending out and analysing our newsletters, we use IT service providers who process these personal data on our behalf as our data processor.

# Purpose: To store your data in order to deal *smoothly* and in accordance with the applicable consumer rules and our guarantee commitments with any questions about your purchase, returns and complaints.

Processing carried out.	Personal Data processed	Legal Obligations
We store your personal data to handle any queries, returns and complaints in a seamless manner and in accordance with applicable consumer rules and our warranty commitments.  If you have questions about your purchase, wish to exercise your right of withdrawal, make a complaint, or otherwise exercise any of your rights under applicable consumer law, we will process your personal data to assist you and comply with applicable law. For example, we may need to look up your order, contact details and payment information for you to exercise your right of withdrawal or make a claim.  Find out more about how we process your personal data to communicate with you if you contact us here.	<ul> <li>Name.</li> <li>Contact Details (postal address, email address and telephone number).</li> <li>Order information, which item(s) you ordered.</li> <li>Information that you choose to provide us, such as product defects and information that we have taken in a return or warranty case (such as repairing a product).</li> </ul>	Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes relating to our legitimate interests in handling your queries, complaints, and other claims in an efficient and customer-friendly manner.  Legal Obligation (GDPR art. 6.1.c)  The processing is necessary for us to act in accordance with consumer law and thereby comply with a legal obligation we have.  Where we have provided a guarantee:  Performance of a contract (GDPR art. 6.1.b)  The processing is necessary for us to be able to fulfil the contract regarding our guarantee commitment.

**Retention period:** We keep your personal data for three years from your purchase to be able to answer questions about your purchase and to allow you to easily complain about your goods and exercise your right of withdrawal in accordance with current consumer purchase legislation.

Read more about how long we process your personal data in out communications when you contact us <u>here</u>.

**Recipients of your personal data:** Your personal data is shared with our IT service providers who process this personal data on our behalf as our data processor.

Purpose: Send a request if you want to review your purchase		
Processing carried out.	Personal Data processed	Legal Obligations
Send requests to participate in surveys about our products and your shopping experience and process the responses you provide in the survey.  To do so, we use the survey services Yotpo and Trustpilot.  Share information about you as a customer with Yotpo and Trustpilot to manage your review and publish it on our website.  Compiling statistics from the results of our surveys.  Your reviews are published on our website. You choose whether you want to give your name	<ul> <li>Name.</li> <li>Email address.</li> <li>Information you provide in the survey in free text.</li> <li>Information about the product you have purchased so that you can review it.</li> </ul>	Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes related to our legitimate interests to be able to contact you with a request to evaluate our service in order to improve our products and our offers.

**Retention period:** Personal data is stored for 60 days after purchase. However, we will stop processing your personal data earlier if you object to our processing.

**Recipients of your personal data:** We share your personal data with Yotpo and Trustpilot. Yotpo and Trustpilot processes this personal data on our behalf as our data processors.

**Transfer outside of EU/EEA:** Through our sharing of your personal data with Yotpo and Trustpilot, this personal data will be transferred to the US and UK. When we transfer your personal data to the UK, we do so on the basis that the European Commission has decided that the UK has an adequate level of protection. When we transfer your personal data to the US, this is done on the basis of the EU Commission's standard contractual clauses (GDPR art. 46.1.c), module two. The EU Commission's standard contractual clauses can be found here.

#### When you visit our website

We analyse how our website is used and show you relevant offers on other pages you visit based on this analysis. We explain this in detail in the tables below.

To protect your privacy, we and our suppliers have taken steps to avoid identifying you when you use our website. For example, we only share an encrypted version of your IP address with Google.

Personal data is collected from your device (e.g. mobile, computer or tablet) when you visit our website. Our suppliers, Google, Hotjar, Meta and Microsoft also use information they have previously to carry out analysis and to show you interesting offers from us.

In order to collect personal data for analysis and marketing purposes as described below, we use cookies and/or similar technologies. In our information text on cookies, which you can find on our website, we explain in more detail how this is done.

Purpose: To analyse how our website is used.		
Processing carried out.	Personal Data processed	Legal Obligations
<ul> <li>Analyse how you use our website using cookies. We do this to improve the functionality of the site, to tailor the site to suit our visitors, and to draw conclusions about our visitors.         To do this, we use an analytics service from Google Analytics that uses a random ID to distinguish your device from other visitors and to confirm patterns in how our site is used.     </li> <li>For the same reason, we use Hotjar analytics service, which records visitor activity on the site and creates activity maps so that we can see patterns of site usage.</li> <li>We are only interested in how visitors interact with us on an overall level. We at XLMOTO do not know who you are and</li> </ul>	<ul> <li>An encrypted version of your IP address that we at XLMOTO cannot link to you as an individual.</li> <li>Information about how you use the website, such as what you click on.</li> <li>Google Analytics also uses information about:</li> <li>Which area of the country you are accessing the website from.</li> <li>How many times you have visited the site, which allows us to count the total number of visitors to the site.</li> <li>Your device/browser, such as your screen resolution.</li> <li>Other information these providers hold about you, such as information about the website from which you found us.</li> </ul>	Consent (GDPR art. 6.1 a)  For the personal data we process to analyse your use of website, we obtain your consent when you visit the website.  You have the right to withdraw your consent at any time. Your withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal of consent.  You can avoid Google Analytics by, for example, downloading and installing this browser software which you can find here  You can read out how to avoid Hotjar tracking your activity here
take no action to find out.		

**Retention period:** The personal data will be used by us during your visit to our website. Thereafter, we use the information about visitors on an overall level.

**Recipients of your personal data:** Your personal data is shared with the analytics services we use. The analytics services we use will continue to process your personal data as independent data controllers. For more information about the personal data processing by the analytics services and how long <u>Google</u> and <u>Hotjar</u> store your personal data, please refer to their privacy policies. Click on the names to read more.

**Transfers outside the EU/EEA:** Through our sharing of your personal data with Google and Hotjar, this personal data will be transferred outside the EU/EEA. When we transfer your personal data outside the EU/EEA, we do so under the EU Commission's standard contractual clauses (GDPR art. 46.1.c), module two. The EU Commission's standard contractual clauses can be found <a href="https://example.com/here">here</a>.

Purpose: Show interesting offers from us on other pages you visit		
Processing carried out.	Personal Data processed	Legal Obligations
<ul> <li>Promote our products by displaying offers and new products we think will be of interest to you. We display marketing tailored just for you on other websites and social</li> </ul>	<ul> <li>Encrypted IP address that we at XLMOTO cannot associate with you.</li> <li>Which area of the country you are accessing the site from.</li> </ul>	Consent (GDPR art. 6.1.a)  For the personal data we process for marketing purposes, we obtain your consent when you visit our website.  You have the right to withdraw your

media you visit.

- We may display offers using marketing services from Google, Meta (Facebook and Instagram), and/or Microsoft (Bing), among others. We do this based on analysis of our website, through cookies or similar technologies, as well as previous information that these parties have about you.
- We may tailor the marketing to suit you based on previous information that the marketing services have about you and based on your prior browsing history with us (so-called profiling\*).
- Information about how you interact with our website or advertisements. For example, information about which pages you visited after clicking on our ad and analysis of how and when you use our site, such as if you add something to your shopping basket, make a purchase or search for something.
- Past information that the marketing services had about you, such as which website you found us from.

consent at any time. Your withdrawal of consent does not affect the lawfulness of the processing, prior to the withdrawal of consent.

Here you can make choices about the marketing you see from Google. Here you can find more information about your choices on Instagram and here on Facebook, under the heading "Ads settings", you can choose what marketing you want to see on Facebook.

**Retention period:** You will see marketing from us for a time after your visit to our website. We adjust the time based on what we think is relevant to our visitors.

**Recipients of your personal data:** Your personal data is shared with the analytics service we use. The marketing services we use will continue to process your personal data as independent data controllers. For more information about the personal data processing of the analytics services and how long <u>Google</u>, <u>Meta</u>, <u>Microsoft</u>, and other marketing services store your personal data, please refer to their respective privacy policies.

**Transfer outside the EU/EEA:** Through our sharing of your personal data with Google and Meta, this personal data will be transferred outside the EU/EEA, including to the United States. When we transfer your personal data outside the EU/EEA, we do so under the EU Commission's standard contractual clauses (GDPR art. 46.1.c) module two. The EU Commission's standard contractual clauses can be found here.

\*Profiling: Your personal data is used in so-called profiling, which the marketing services use to show you the offers that they and we think are best suited to you and to provide personalised marketing. Profiling is done because otherwise we would not be able to show relevant offers and marketing to you and you would see offers that are not relevant to you. You have the right to object to profiling. You can read more about your right to object the above where your rights are explained in more detail.

#### If you contact us

When you have contact with us, for example via social media or our customer service, we will process your personal data as we describe in the tables below. We receive your personal data from you when you contact us.

If you use social media, the social media you use (e.g. Facebook) will also process your personal data and we therefore recommend that you read our information below together with the information you find on these social media sites.

Purpose: To communicate with you if you contact us		
Processing carried out.	Personal Data Processed	Legal Obligations
Communicate with you if you contact us, for example through customer service, our chat, or our social media pages.	<ul> <li>Name.</li> <li>The contact details you use, such as email address, telephone number, and/or address.</li> <li>Other information you provide in connection with our contact.</li> <li>If you contact us through social media (e.g. our Facebook), we also process information from your profile (username and the picture you have chosen in your account).</li> </ul>	Legitimate Interests (GDPR art. 6.1.f)  This processing is necessary for purposes relating to our legitimate interests in being able to communicate with you via the channel you choose to contact us on.  Legal Obligation (GDPR art. 6.1.c)  The processing is necessary for us to act in accordance with the GDPR and thereby comply with a legal obligation that we have.

**Retention period:** We continuously delete those emails that we have no reason to process to ensure that we do not process personal data longer than necessary.

On social media, we delete your comments and our communications upon request. You can delete your own comments/communications yourself. Material that may be found offensive is removed on an ongoing basis. This includes, for example, unpleasant comments, abusive language, or attacks on individuals.

**Recipients of your personal data:** In the context of a customer service case, your personal data is shared with our IT provider Zendesk, which processes this personal data on our behalf as a data processor. If you contact us via social media, the social media platform will also receive your personal data.

# If you subscribe to our newsletter

This table describes how we process your personal data if you have chosen to subscribe to our newsletters. We receive your personal data from you when you choose to fill in your email address when subscribing to our newsletters.

Purpose: Send newsletters and analyse your interaction with them.		
Processing carried out.	Personal Data Processed	Legal Obligations
Send newsletters by email.	• Email Address.	Consent (GDPR art. 6.1.a)  We obtain your consent to send you newsletters. You can object to marketing at any time and withdraw your consent.
Unsubscribe from our newsletters if you have not opened any of our newsletters for a period of six months.	<ul> <li>Information about how you interact with our newsletters, for example, whether you open our newsletter and what information you click on.</li> <li>IP-address.</li> <li>Email Address.</li> </ul>	Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes relating to our <u>legitimate interests</u> to be able to stop sending you marketing when you are no longer likely interested in receiving such.
Develop and improve our newsletters and marketing by analysing how you interact with our newsletters.		Legitimate Interests (GDPR art. 6.1.f)  The processing is necessary for purposes related to our <u>legitimate interests</u> to develop and improve our newsletters and our marketing.

**Retention Period:** You will continue to receive newsletters for one year after you first subscribe to our newsletter unless you withdraw consent or unsubscribe from our mailings list before that time. If you have not opened any of our newsletters for a period of six months, we will stop sending you newsletters earlier than one year. You can unsubscribe from our newsletter at any time.

If you withdraw your consent or unsubscribe from our mailings list, your personal data will be stored in our <u>unsubscribe register</u> for 90 days, see below. If you have not opened any of our newsletters for a period of six months, your personal data will be stored for up to six months thereafter.

The information we process about whether or not you have opened our newsletters is stored until you have clicked on something new in our newsletters, up to a maximum of six months, after you have clicked or not clicked on something in a newsletter.

**Recipients of your personal data:** For sending out our newsletters, we use IT service providers who process your personal data on our behalf as data processors.

# If you have asked us to stop sending you marketing materials

The following describes how we process your personal data if you have unsubscribed from our marketing or if we have stopped sending you newsletters due to inactivity. We have received your information from you.

Processing carried out.	Personal Data processed	Legal Obligations
If you have indicated that you do not wish to receive marketing or if we stop sending you newsletters due to inactivity, as described above, we will store your email address in an "unsubscribe register" to ensure that we do not market to you. This is not personal data we actively process, so we do not look at your email address and do not use it for anything except to ensure that you do not receive marketing from us.	<ul> <li>Email address.</li> <li>Information that you no longer wish to receive newsletters.</li> </ul>	Legal Obligations (GDPR art. 6.1.c)  The processing is necessary to fulfil our obligation under the marketing laws to ensure that you do not receive mailings that you have asked not to receive.

**Retention Period:** If you unsubscribe from our mailings, your personal data will be stored in our unsubscribed register for 90 days. If you have not opened any of our newsletters for a period of six months, your personal data will be stored for up to six months thereafter.

**Recipients of your personal data:** Your personal data is shared with our IT suppliers who process your personal data on our behalf as data processors.

# **Contact information**

Email address: <a href="mailto:dataprotection@24mx.com">dataprotection@24mx.com</a>

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