

Privacy Policy

Datema, which includes. Datema AB, Datema Mobility AB, Datema Retail Solutions AB, Datema ERP Integration AB, Datema Danmark A/S and Datema Norge AS, is very careful about protecting your personal data and we attach great importance to protecting your privacy. For us at Datema, it is exceptionally important that we are transparent about how we process your personal data, and that we provide you with information in a manner that will assist you to understand how we will be processing your personal data. It is our desire and objective to make you feel safe and secure when you submit your personal data to us at Datema. All processing of personal data is based on the provisions of the Swedish legislation providing protection for personal data and complies to GDPR.

We provide information in this privacy policy about how we process information about you as a contact person for a company or organisation, in order to enable us to provide the best service and fulfil our commitments pursuant to our agreement with the company you represent. We use only that information about you that is required to facilitate the contact between the company and Datema, and in a manner customary for this type of business relationship. Under normal circumstances, we will retain information about your name and your contact details, such as e-mail address and telephone number, etc. We will delete the information about you when we no longer need it.

We at Datema have regular procedures that ensure that we do not unnecessarily collect and retain data about you, and we minimise the retention time to the furthest extent feasible. For statistical purposes, certain data can be retained, however in such case it is completely anonymised.

We are required to provide you, upon your request, with information about what information we have about you and how we use it. Whenever the situation arises, you have the right to request that we correct any incorrect information and/or to delete data that is not needed. You may also decline to receive information such as e-mail marketing, etc.

Datema continuously works with on privacy issues and therefore it is likely to occur that we will update this policy. The most recent version of the Privacy Policy can be found at <http://www.datema.se/integritetspolicy> or <http://www.datemaretail.com/articles-knowledge/datema-privacy-policy>

If you have any questions about how we use your personal data, you are more than welcome to contact us at GDPR@datema.se

Responsibility for your personal data

Datema AB, Box 1492 98, SE-171 54 Solna (company registration number 556175-8482), is the data controller responsible for the personal data collected and processed by companies within the Datema Group.

If you provide information to any of our cooperative partners (for instance by clicking on a link to one of our cooperative partners published on our website), our cooperative partner is the data controller responsible for your personal data.

What personal data is processed, for what purpose, what is the legal basis, and how long is the data retained?

Registration of contacts in a register of customers

Datema does not sell products or services directly to individuals, but rather only to other companies and organisations. When a company or organisation purchases a service or product from us, we collect and process the name and contact details of the person representing the company/organisation in order to enable us to manage the assignment. The legal basis for this processing is that it is necessary in order to enable us to fulfil our obligations arising out of the agreement. The information that will be processed is name, address, telephone number and e-mail addresses of the workplace, plus any information about departmental title and position. The personal data will be retained for a period of twelve (12 months) after the termination of the contract.

During the contractual relationship and for a period of twelve (12) months after the completion of the assignment, Datema may process names and contact details to the principle's representative in order to produce statistics at the overall level, for instance for the purpose of evaluating customer satisfaction. It may occur that statistics are saved for a longer period of time, however in such case will be pseudonymised and thus it will not be able to be linked to the principle's representative personally, which is why the data does not constitute personal data.

Direct marketing

For the purpose of providing existing and potential customers with direct marketing of Datema's products and services, it may occur that Datema processes names and contact details of the company's contact persons in our CRM system. This processing is based on a weighing of interests in order to satisfy the legitimate interests of Datema in informing existing and potential customers about Datema's products and services. It may occur that Datema provides information and offer to the principle and its representative via telephone, letter, e-mail, SMS or other similar contact routes for electronic communications. It may occur that corresponding information is sent to you as a contact person for a company that is not yet a customer of us, but whom we believe would be interested in our products and services.

In the event there is an assignment agreement between the data subject's employer and Datema, the processing of the data will take place under the auspices of the contractual relationship and for a period of twelve (12) months after the contractual relationship has ended. Thereafter, the personal data will be deleted, unless consent is obtained.

In situations where the data subject has given their consent to the processing of personal data, the processing will continue until such consent is withdrawn.

Otherwise, the personal data will be deleted after six (6) months.

At all times, the data subject is entitled to make notification that they do not want to receive such information.

Conducting marketing activity

If the data subject has registered for an activity in which Datema has invited them to, Datema will process personal data to the extent required to conduct the activity. This means that Datema processes contact information for the purpose of being able to send out invitations, an attendance list and materials prior to and after the activity. For instance, with participation in marketing activity, it may be necessary to collect and process information about special dietary restrictions or special needs related to a physical disability. The legal basis for this processing is that it is necessary in order to enable Datema to be able to fulfil its commitments in connection with the registration for the activity (an agreement entered into between Datema and the participant).

Once the activity has concluded, Datema will take follow-up measures relating to the activity and direct marketing activities to these individuals. The legal basis for the latter processing is a weighing of interests in satisfying the legitimate interests of Datema in being able to target an offer of Datema's goods and services to the participants. The participant list is saved for management and follow-up, for a maximum of three (3) months.

The participant list may also, if appropriate, form the basis of Datema's bookkeeping financial records of deduction rights for entertainment expenses. This list will be retained for seven (7) years. The legal basis is accounting requirements and legislation and regulations relating to taxation.

Visitor Identification – Cookies and Logs

Datema collects information about how visitors to the website use the website via retrieving information about the number of visits, domain names, web browsers and operating systems, and the time the visitor entered our website plus how they arrived there (e.g. from a weblink) and corresponding information.

This processing is based on a weighing of interests in order to satisfy the legitimate interests of Datema in the ability to be able to further develop the website's functionality and contents, as well as make personal follow-ups.

It may occur that the statistics are saved for a long period of time, however after six (6) months they will be pseudonymised and thus can not be linked to the representative personally, and this is why the data does not constitute personal data.

Determine, assert claims, or alternatively defend legal claims

Datema will archive its assignment documentation, including all personal data processed within the scope of the assignment based on a weighing of interests in order to protect Datema's interests in documenting the assignment. In the event a claim for compensation for damages it may occur that the retained and archived personal data is processed in order to be able to determine if there is a legal claim, or to assert a legal claim or on the other hand to defend Datema against such claim. The

personal data will be retained and archived for a period of eleven (11) years. After that, the data is deleted.

Where do we obtain the personal data from?

The names and contact details of the data subject are collected from the data subject themselves and their employer, plus partly from external address sources.

Transfer and disclosure of personal data

Datema consists of several different legal entities, where products and services may be delivered in cooperation between the units. In order to enable us to offer as excellent customer service as possible, personal data may be shared with other units within the Datema Group.

We do not sell your personal data to third parties. However, it may occur that we share information about you as a contact person for the company in order to enable us to manage and operate our business activities, for example delivering the services/products ordered by the company, providing services, or organising events. In such instances, we have entered into a personal data processing agreement which ensures that there are security measures in place in order to protect your personal data. When we share your information with others, this will be used for the same purpose(s) as we initially collected it.

In the event when Datema employs service and system vendors for IT, who process personal data on behalf of Datema, these vendors may only process the personal data in accord with to Datema's express instructions. They are also obligated to take appropriate technical and organisational security measures so as to protect the data.

Datema may, in relevant situations, also disclose personal data to recipients other than those mentioned above in order to comply with laws and regulations, orders from public authorities and court orders, and to satisfy Datema's legitimate interests in determining, claiming and defending legal claims.

The protection of your personal data

Our objective is to carefully safeguard your personal privacy and to take all the requisite technical and organisational measures to protect personal data, and in addition to ensure that the collection and processing is conducted in compliance with applicable legislation.

However, no technology system is completely protected from intrusion. Datema has taken all reasonable technical security measures required in order to protect personal data against unauthorised access, modification or destruction.

At Datema, only the required information is collected and processed, and this processing done only by those who need to access the data in order so that they will be able to perform their work tasks, and to enable us to provide the best service to our customers.

The data subject's rights

We at Datema always want to be transparent with how we process your personal data. If you would like to obtain knowledge about the processing of your personal data, you are entitled to request access to your information via a registry extract. When we receive such a request from you, we may request additional information in order to ensure that we are providing the information to the proper person. A request for a registry extract must be in writing and signed by you. You are entitled to request a registry extract without charge once a year.

In addition, if you believe that any information about you is incorrect or misleading, you are always entitled to request that your personal data record be corrected.

You may request the deletion of your personal data, to the extent that allows us to comply with applicable law and in accordance with agreements entered into with you, and we will of course always do our best to accommodate your request for deletion.

You may request to be deregistered from different types of direct marketing mailings at any time.

Complaints and supervisory authorities

If you feel that we have processed your personal data in an incorrect manner, you can always contact us at Datema to discuss your concerns. The Swedish Data Protection Authority is responsible for supervision and compliance with the data protection legislation, and you can contact them for assistance or to file a complaint.

If you have questions about how we use your personal data, please contact us at: GDPR@datema.se

Changes to the Privacy Policy

Datema reserves the right to update or amend this policy at any time, and it is a good idea to regularly visit this website in order to obtain the most recent updated version.

Last updated: 05/25/2018