

PRIVACY POLICY

With this Privacy Policy, Ports Group AB ("Ports Group", "we", "our", "us") will explain how we Process your Personal data and how we ensure that data Processing is conducted responsibly and in accordance with applicable legislation. Starting May 25th 2018 the General Data Protection Regulation (GDPR) is applicable within the EU / EEA.^[1].

1. General

1.1 At Ports Group we respect the integrity of our customers and others. We have adopted this policy as a step towards providing strong protection for the Personal data we Process. Taking great care to protect and respect your privacy, we strive to maintain a high level of security in all Processing of Personal data. For that reason, Ports Group has taken necessary and appropriate technical and organisational measures in order to protect your Personal data from improper access, use, change and deletion.

2. Definitions

2.1 'Personal data' is any information relating to an identified or identifiable natural person. Such data may for example be name, picture, social security number, e-mail and home address, IP-address, information regarding skills, education or previous experience. Although a single piece of data may not be enough to identify you as an individual, a piece of data can amount to Personal data if it, in combination with other data, can be linked to you.

2.2 The 'Controller' is the natural or legal person, public authority, agency or other body which determines the purposes and means of the Processing of Personal data, i.e. why and how Personal data is Processed.

2.3 The 'Processor' is an entity that Processes Personal data on behalf of a Controller.

2.4 The 'sub-Processor' is a third party Processor engaged by the Processor that Processes Personal Data pursuant to this Privacy Policy.

2.5 'Processing of Personal data' means, in essence, any operation taken with Personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

3. Our Processing of your Personal data

3.1 Introduction

Ports Group Processes data on your behalf. This means that you determine why and how we Process your Personal data. If you have any questions concerning how your Personal data is Processed, please contact us using the contact details listed on our website.

3.2 What Personal data is collected and why?

Ports Group collects data when you for example use our services, register for our courses and seminars, subscribe for our newsletter, apply for a job, participate in surveys or contact us in different types of matters.

Ports Group collects Personal data which is necessary to administer your customer relation with us and to provide services in accordance with our mutual agreement. This typically includes information such as your name, address, email address, and telephone number, but can also include other information such as IP address. We may collect Personal data about you from different sources, including;

Information you give us directly

We may collect information from you directly when you provide us with personal information. The types of information we may collect from you directly include your:

- name;
- social security number;
- address;
- email address;
- telephone number;
- fax number;
- title and workplace;
- Curriculum Vitae;
- photo;
- copy of ID-card;
- signature.

Information collected automatically when you use our websites

We (and third party service providers acting on our behalf) use cookies and other tools (such as web analytic tools and pixel tags) to automatically collect information about you when you use Ports Group's websites, subject to the terms of this Privacy Policy and applicable data laws and regulations. The types of data collected automatically may include:

- information about the type of browser you use;
- user behaviour and interaction data for the web pages you have viewed;

- your IP address;
- the language set in your browser;
- your geolocation (limited to city and country);
- your network provider.

Information we collect from other sources

We may receive personal information about you from other legitimate sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties. The types of personal information that we may collect from such sources include your:

- name;
- address;
- email address;
- telephone number;
- fax number;
- title and workplace;
- references (in hiring process).

3.3 For what purposes are Personal data Processed?

3.3.1 Ports Group strive to comply with the applicable laws, rules and regulations governing privacy and data protection. Where necessary, we will adjust our Processing of your Personal Data as described in this policy to ensure legal compliance.

3.3.2 The Personal Data which Ports Group collects about you will be used:

- to comply with legal requirements or lawful authority requests;
- for administrative and internal business purposes,
- to provide you with products and services as well as to inform you of new products, services and events;
- to evaluate and improve our offering to, and communication with customers;
- for development of our business and services;
- in data Processing for advertising purposes;
- for statistics.

3.3.3 When evaluating potential new candidates for employment at Ports Group we will also collect Personal Data to be used:

- to evaluate the applicants qualifications;
- for profiling in the employment process.

3.4 Legal basis for Processing Personal data

3.4.1 We will always Process your Personal data in accordance with applicable law.

3.4.2 Consent to data Processing

Data can be Processed following consent by the data subject. Before giving consent, the data subject must be informed in accordance with this Privacy Policy. The declaration of consent must be obtained in writing or electronically for the purposes of documentation. In some circumstances, such as telephone conversations, consent can be given verbally. The granting of consent must be documented.

3.4.3 Data Processing pursuant to legal authorisation

The Processing of Personal data is also permitted if national legislation requests, requires or allows this. The type and extent of data Processing must be necessary for the legally authorised data Processing activity, and must comply with the relevant statutory provisions.

3.4.4 Data Processing pursuant to legitimate interest

Personal data can also be Processed if it is necessary for a legitimate interest of Ports Group. Legitimate interests are generally of a legal (e.g. collection of outstanding receivables) or commercial nature (e.g. avoiding breaches of contract). Personal data may not be Processed for the purposes of a legitimate interest if, in individual cases, there is evidence that the interests of the data subject merit protection, and that this takes precedence. Before data is Processed, it is necessary to determine whether there are interests that merit protection. For example, Ports Group may have deemed that we have a legitimate interest in order to be able to fulfill our obligations towards you and to administer your client account.

3.4.5 User data and internet

If Personal data is collected, Processed and used on websites or in apps, the data subjects must be informed of this in a privacy statement and, if applicable, information about cookies. The privacy statement and any cookie information must be integrated so that it is easy to identify, directly accessible and consistently available for the data subjects. If use profiles (tracking) are created to evaluate the use of websites and apps, the data subjects must always be informed accordingly in the privacy statement. Personal tracking may only be effected if it is permitted under national law or upon consent of the data subject. If tracking uses a pseudonym, the data subject should be given the chance to opt out in the privacy statement. If websites or apps can access Personal data in an area restricted to registered users, the identification and authentication of the data subject must offer sufficient protection during access.

3.4.6 In addition to the purposes specified above, your personal information is Processed for the overall purpose of administering, managing and, fulfilling our obligations to you in accordance with our mutual agreement.

3.4.7 In the event that we will Process your Personal data for any purpose other than those mentioned above, we will inform you.

3.5 **For how long is the data stored?**

3.5.1 The data we collect about you will be saved for the duration of our business relation with the customer. We will, however, delete your personal information three (3) year from when the business relation is terminated.

3.5.2 Please note that certain data must be stored for a longer period of time, even after a business relationship has been terminated, when this is required by national law. Such requirements may for example be included in tax or book keeping laws. Please also note that some domain name registries also require that certain data is stored for a longer period of time.

3.5.3 No information about you will be saved for longer than is necessary or in a manner that is inconsistent with law.

4. **Disclosing of Personal data**

4.1 We are entitled to hire sub-Processors for Processing Personal data on your behalf. We undertake to inform you regarding our possible plans to hire and/or substitute a sub-Processor, giving you the opportunity to object to such changes.

If we hire sub-Processors for Processing Personal data on your behalf, we are fully liable towards you for such sub-Processors' activities.

4.2 Companies that Process Personal data on our behalf will always enter into a data Processing agreement with us in order to ensure that a high level of protection of your Personal data is maintained by our partners. In relation to non-EU/EEA partners, special safeguards are taken, such as to sign agreements that include standardised clauses for data transfer adopted by the EU Commission.

4.3 Your Personal data may also be disclosed to third parties when (i) it is required by law, other statutory or governmental decisions, or (ii) information is provided to insurance companies, banks or benefit partners as described above.

4.4 We may also disclose Personal data to third parties, such as the police, the tax authority or any other authority, in the case of a criminal investigation or if we are otherwise required to provide such information based on law or authority decision.

4.5 Ports Group will not disclose your personal information to any extent other than described in this Section 4.

5. **Your Rights in Accordance with Applicable Data Protection Legislation**

5.1 You are entitled, in accordance with applicable data protection laws, to request access to the Personal data Processed about you at any time. You also have the right to have incorrect Personal data about you corrected, to request that we erase your Personal data, limit our Processing of your Personal data, exercise your right to data portability, and object to the Processing of your Personal data.

5.2 Where Processing is based on consent you have the right to withdraw your consent to that Processing at any time.

5.3 In case you would like to exercise any of your rights, please contact us through the contact details listed below.

5.4 You also have the right to lodge complaints with a supervisory authority at any time if you believe that your Personal data is Processed in violation of applicable data protection legislation.

6. Cookies

6.1 We use cookies on this website. A cookie is a small piece of data sent from a webpage and stored in a user's web browser, mobile phone, tablet or other device while the user is browsing that webpage. A cookie can help the webpage provider to recognize your device the next time you visit that webpage, provide you with access to certain functions on the webpage and/or register your surf patterns. There are other technologies such as pixel tags, web bugs, web storage and other similar files and technologies that may carry the same functions as cookies. We use the term "cookies" for cookies and all such similar technologies.

We use both persistent cookies and session cookies. Whereas persistent cookies remain on your computer for a longer period of time, session cookies are automatically deleted when the browser window is closed.

6.2 We use the following cookies for the purposes set out below:

6.2.1 Functional cookies

We use functional cookies to operate certain functions of the webpage and to optimise your use of our website, meaning that when you continue to use or come back to the webpage, the site will be provided as you have previously requested, e.g. remembering your customisation and preferences of the webpage.

6.2.2 Analytical/performance cookies

These cookies allow us to recognize and count the number of visitors to our website and to see how visitors move around when they are using it. This helps us to improve the way our website works, for example, by ensuring that users find what they are looking for easily. We also use the information for statistical and marketing purposes.

6.2.3 Third party cookies

We may allow our partners to use cookies on the webpage for the same purposes identified above. We may also use service providers acting on our behalf to use cookies for the purposes identified above. Currently, we use a web analysis service and tool provided by a third party that collects data such as your IP address.

6.3 Most web browsers allow you to manage your cookie preferences. You can set your browser to refuse cookies, or delete certain cookies. In general you should also be able to manage similar technologies by using your browser's preferences.

Please note that if you choose to block cookies, the due functioning of this webpage may be affected.

7. Contact details**7.1 Company contact details**

7.1.1 The controller responsible for Processing your information is Ports Group. If you have questions about how we Process your personal information or want information and contact information for the designated responsible person for Personal data, please feel free to contact us via the following contact information:

gdpr@portsgroup.com

legal@portsgroup.com

+46 31 720 20 00