

## Privacy Policy - Information regarding processing of your personal data

For the purpose of this privacy policy, “**Lesjöfors**”, “**we**”, “**our**” or “**us**” means Lesjöfors AB, Reg. No. 556001-3251, Lagergrens gata 2, 652 14 Karlstad, Sweden, and entities directly or indirectly controlled by Lesjöfors AB. Lesjöfors provides a wide range of springs and pressings to customers in diverse industries.

The Lesjöfors company that you, or the company that you represent, are in contact with and/or have a business relationship with, is the data controller regarding the processing of personal data that is conducted within our business including this website, which is described in more detail in this policy. Should you have any questions regarding our processing of your personal data, please contact us at [privacy@lesjoforsab.com](mailto:privacy@lesjoforsab.com).

What kind of processing (which is a generic term in the EU Data Protection Regulation (“**GDPR**”) for operations which is performed on your personal data) that we carry out regarding your personal data, depends on the context in which you come into contact with us and in which capacity you act. To make it easier for you, we have divided this policy into different category sections based on which services you use with us, for example purchases, marketing and customer service, where under each category you can read about what kinds of processing are carried out.

After the category sections, follows multiple sections that are common to all types of services. These sections contain information about e.g., who we share your personal data with, where we process your personal data, what rights you have vis-à-vis us and how you get in touch with us. Below, you can click yourself to each section.

1. [Which personal data are used for what, on which legal basis and for how long?](#)
2. [With whom do we share your personal data?](#)
3. [Where do we process your personal data?](#)
4. [What rights you have vis-à-vis us](#)
5. [Cookies and other tracking technologies](#)
6. [Changes to, and updates of, the Privacy Policy](#)
7. [How you get in touch with us](#)

It is important to us that you feel safe with what types of personal data we collect and, even more importantly, how we process them. Thus, this policy covers the necessary information about this, which is why we think it is important that you read and understand the information.

Please note that our website may contain links to websites managed by someone other than us. In such case, these websites have (or should have) their own regulations about how that company processes personal data. We do not take any responsibility for processing of data on such websites. Thus, if you use such website, we advice that you consult that website's privacy policy.

# 1 Which personal data are used for what, on which legal basis and for how long?

## 1.1 Request for quotations

Why do we process your personal data?	What personal data do we process and from where do they come?	What is the legal ground for our processing?	For how long do we process your personal data for the specific purpose?
To provide you with requested quotations.	From you: <ul style="list-style-type: none"> <li>• name;</li> <li>• e-mail;</li> <li>• phone number;</li> <li>• address; and</li> <li>• personal ID number and VAT number (if you are a sole trader).</li> </ul>	Contractual obligation.	The processing takes place for as long as the quotation is valid.

## 1.2 Purchase of products

Why do we process your personal data?	What personal data do we process and from where do they come?	What is the legal ground for our processing?	For how long do we process your personal data for the specific purpose?
To manage purchases, deliveries as well as associated services/complaints and payments.	From you: <ul style="list-style-type: none"> <li>• name;</li> <li>• e-mail;</li> <li>• phone number;</li> <li>• address;</li> <li>• delivery details;</li> <li>• payment details; and</li> <li>• personal ID number and VAT number (if you are a sole trader).</li> </ul>	Contractual obligation.	This processing takes place for as long as it is required for our performance under the contract.  Invoice documentation is stored in accordance with applicable legislation.
For credit reporting purposes in connection with purchases on behalf of (or due to requirements from) payment and credit companies.	From you, if you are a sole trader: <ul style="list-style-type: none"> <li>• personal ID number and VAT number.</li> </ul> From other sources:	Contractual obligation.	This processing takes place for as long as it is required for our performance under the contract.

	<ul style="list-style-type: none"> <li>• standard information in company credit reports, such as name and phone number of company representative, name of board members, from payment and credit companies.</li> </ul>		Invoice documentation is stored in accordance with applicable legislation.
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### 1.3 Customer service

<b>Why do we process your personal data?</b>	<b>What personal data do we process and from where do they come?</b>	<b>What is the legal ground for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
To answer your questions when you contact us by e-mail, telephone, or through our online questionnaire.	From you: <ul style="list-style-type: none"> <li>• name;</li> <li>• e-mail;</li> <li>• phone number; and</li> <li>• address.</li> </ul>	Legitimate interest.	This processing takes place for as long as the matter for which you requested customer service is operative.

### 1.4 Job application

<b>Why do we process your personal data?</b>	<b>What personal data do we process and from where do they come?</b>	<b>What is the legal basis for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
To carry out recruitment processes.	From you: <ul style="list-style-type: none"> <li>• name;</li> <li>• date of birth;</li> <li>• e-mail;</li> <li>• phone number;</li> <li>• address;</li> <li>• application documents (e.g. a resumé and a personal letter);</li> <li>• notes from interview(s); and</li> <li>• additional information obtained from you</li> </ul>	Legal obligation, legitimate interest.	This processing takes place during the recruitment process and for a period of 2 years thereafter (shorter or longer dependent on applicable employment legislation), in order for us to be able to defend ourselves against any legal claims.

	<p>in connection with your application.</p> <p>From other sources:</p> <ul style="list-style-type: none"> <li>• references.</li> </ul>		
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## 1.5 Marketing

Why do we process your personal data?	What personal data do we process and from where do they come?	What is the legal basis for our processing?	For how long do we process your personal data for the specific purpose?
To contact you by e-mail or telephone for marketing purposes.	<p>From you:</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• e-mail;</li> <li>• phone number;</li> <li>• address; and</li> <li>• personal ID number and VAT number (if you are a sole trader).</li> </ul>	Your consent, which can be withdrawn at any time, see section <a href="#">4.8</a> .	This processing takes place for as long as we have your consent (i.e. until you withdraw your consent).

## 1.6 Membership or registered customer

Why do we process your personal data?	What personal data do we process and from where do they come?	What is the legal basis for our processing?	For how long do we process your personal data for the specific purpose?
To provide you with benefits which apply to memberships and/or registered customers.	<p>From you:</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• e-mail;</li> <li>• phone number;</li> <li>• address; and</li> <li>• personal ID number and VAT number (if you are a sole trader).</li> </ul>	Your consent. You can withdraw this at any time, see section <a href="#">4.8</a> .	This processing takes place until you unsubscribe.

## 1.7 Website users

We collect certain information about you when you visit our website without being logged in. This collection and processing are further described under section 5 below.

## **1.8 Automated decision-making and profiling based on the personal data**

Profiling is the automatic processing of personal data used to evaluate certain personal aspects relating to you. Automated decision-making is an automatic decision made by technical means, without human intervention.

We may carry out profiling/automated decision-making based on the personal data and for the purposes described in section 1.5 provided that we have your consent to do so. This is done to provide you with offers and advertisement that we believe you are interested in receiving. Where personal data are processed for marketing purposes, you have the right to object at any time to the processing of your personal data, including profiling. Information on how to withdraw your consent is set out in section 4.8.

We may also carry out automated decision-making based on the personal data and for the purpose of credit reporting (see section 1.2) when it is necessary to be able to conclude a contract with you. This is used to avoid and diminish the risk of customers entering a contract without being able to pay. This means that the automated decision-making may initially affect your ability to enter a contract with us depending on your credit score/credit rating.

When a decision has been made based on automated decision-making, you will be informed about this as well as about your ability to contest the decision. You also have the right to have the decision reviewed by a real person.

## **1.9 How have we performed the assessment of the balance of interests when the legal basis for processing your personal data is our legitimate interest?**

For certain purposes, we process your personal data and rely on our legitimate interest as the legal basis for the processing. In assessing the legal basis, we rely on a balancing of interests test by which we have determined that our legitimate interests of the processing override your interest and your fundamental right not to have your personal data processed. We have stated our legitimate interest in the tables above. Please contact us if you want to read more about how this test has been performed. Our contact details can be found in section 7.

## **2 With whom do we share your personal data?**

If we process your personal data pursuant to section 1, some or all of such personal data may be shared with certain specific recipients. When we share your personal data, we ensure that the recipient processes them in accordance with this privacy notice, by, e.g. entering into Data Transfer Agreements or Personal Data Processing Agreements with the recipients. The agreements ensure that your data are processed in accordance with the GDPR and this privacy policy. We would like to emphasize that we do not sell your personal data to any third party.

## **2.1 Categories of recipients with whom we may share your personal data**

### **2.1.1 Group companies**

*Recipients:* We may share your personal data with companies within the Lesjöfors Group. Lesjöfors consists of an international group of companies, why your personal data may be transferred to group companies in the EU/EEA and outside of the EU/EEA. In case personal data is transferred to a group company outside the EU/EEA, section 3 is applied.

*Purpose and legal basis:* This may be required for us to provide our products and services to you. We have a legitimate interest of being able to provide these services. If the sharing of your personal data is necessary to fulfil that interest, and that interest overrides your right not to have your data processed, the sharing may be carried out on the legal basis of legitimate interest.

### **2.1.2 Suppliers and subcontractors**

*Recipients:* We have agreements with other companies that perform certain services on our behalf. These services include, e.g. credit information from payment intermediaries and credit companies, deliveries of goods by companies. These companies may gain access to your personal data to the extent necessary for them to fulfill their assignment, but they may not use or share the data for other purposes. These suppliers and subcontractors may be located outside the EU/EEA, if you have requested delivery to a country outside of the EU/EEA.

*Purpose and legal basis:* We sometimes need to access the services of other companies. In such cases, we have a legitimate interest of being able to access these. If the sharing of your personal data is necessary to fulfill that interest, and that interest overrides your right not to have your data processed, sharing may take place on the legal basis of legitimate interest. However, these companies may not process or use your personal for any other purposes than to perform the services pursuant to the agreement.

### **2.1.3 Third party in corporate transaction**

*Recipients:* If we, or a significant part of our business, were to be sold to or integrated with a third party, your personal data may be passed on to the new owner of the business. Thereafter, the new owner of the business will be the data controller of your personal data.

*Purpose and legal basis:* If whole or part of our business is sold or integrated with another business, your personal data may be disclosed to our advisers, the potential buyer and their advisers and passed on to the new owner of the business.

## **2.2 Objections to the sharing of your personal data**

You have the right to object to the sharing of your personal data, due to circumstances in your individual case. More information about your right to object can be found in section [4.5](#).

### 3 Where do we process your personal data?

The transfers described above may be made to recipients in Member States of the EU/EEA as well as in third countries whose legislation may differ from the rules for data protection within the EU/EEA. In the case of transfers to such third countries, we will take appropriate measures to ensure that your personal data are adequately protected.

We will ensure that appropriate safeguards are put in place by ensuring that at least one of the following conditions is met in each such transfer.

Safeguard and description thereof	Which countries we transfer personal data to on the basis of the specified safeguard
<p><b>Adequate level of protection according to art. 45 GDPR</b></p> <p>The European Commission has decided that certain countries outside the EU/EEA have a sufficiently high level of security. This means that personal data can be transferred there without any further action having to be taken with regard to the transfer itself (beyond what applies under the GDPR in general).</p> <p>A list of which countries are included can be found <a href="#">here</a>.</p>	United Kingdom
<p><b>Standard Contractual Clauses according to art. 46.2 GDPR</b></p> <p>Since only a few countries are considered to have an adequate level of protection, the most common measure to ensure sufficient protection in the event of a transfer outside the EU/EEA is to annex the EU Commission's Standard Contractual Clauses pursuant to Implementing Decisions 2001/497/EC, 2010/87/EU or 2021/914/EU, without any changes or amendments in conflict with the clauses.</p> <p>If you want to read them in their entirety, you can download them via the European Commission's <a href="#">website</a> (under the heading <i>Standard contractual clauses for international transfers (Word)</i>).</p>	China Turkey Singapore Mexico Thailand India USA

**Right to obtain a copy** – If you would like to receive further information about transfers to countries outside the EU/EEA, or if you would like to receive a copy of the safeguard we have used, you can contact us using the contact details set out in section [7](#) below.

### 4 What rights you have vis-à-vis us

According to applicable legislation, you have the right to exercise certain rights against us, when we process your personal data. Below we describe each right, and what it means for you in relation to the personal data we process. If you want to read more about what the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*) writes about these rights, there are links under each section to the relevant page on the Swedish Authority for Privacy Protection's [website](#).

If you want to exercise any of these rights, want to know more, or have questions, please feel free to contact us at [privacy@lesjoforsab.com](mailto:privacy@lesjoforsab.com).

#### **4.1 Right to information**

You have the right to be informed about how we process your personal data. In this privacy policy, we generally describe what personal data are processed by us in different contexts. If you want to know more about whether we process your personal data, and to what extent it is done, you can contact us as described above and request information about what personal data we process.

If you want to read more about the right to information – please see [here](#).

#### **4.2 Right to access your personal data (register extract)**

We can also provide you with a copy, a so-called register extract, of the personal data processed by us. In the register extract, we provide information about e.g. which categories of personal data are processed, what the personal data are used for, for how long the data will be stored, with whom the personal data has been shared and where the data come from.

If you want to read more about the right to access – please see [here](#).

#### **4.3 Right to rectification**

We strive to always have accurate personal data about you and to update them when necessary. If you discover that we process inaccurate data about you, you have the right to contact us as described above to have these corrected. You also have the possibility to change your data on 'my page' yourself. You also have the right to ask us to complete incomplete data if this is relevant based on the purposes for which your data are processed, by providing us with additional information.

If you want to read more about the right to rectification – please see [here](#).

#### **4.4 Right to erasure (right to be forgotten)**

You have the right to request the erasure of your personal data. However, this right is not absolute. Certain conditions must be at hand in order for us to erase your data. For example, you may have the right to have data erased if they are no longer necessary for the purposes for which they were collected, if you withdraw your consent or if you object to us using your data for direct marketing.

The right to erasure is also limited in the event that an exception applies to the data in question. For example, we have the right to retain the data if it is necessary for establishing, exercising or defending legal claims.

If you want to read more about the right to erasure – please see [here](#).

## **4.5 Right to object**

You always have the right to object to our processing if the legal basis for the processing (this is stated in the various processing operations above in section [1](#)) is that it is necessary for purposes relating to our legitimate interest.

If you object, we do not have the right to process the data anymore, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or if it is needed for the establishment, exercise or defense of legal claims. If we consider that we have such legitimate grounds, or if the data are needed for the establishment, exercise or defense of legal claims, we will notify you of this, and the reasons for such assessment.

You can also object to your personal data being processed for marketing purposes (including profiling if this is included as part of this). If you do so, we will cease the processing for these purposes.

If you want to read more about the right to object – please see [here](#).

## **4.6 Right to restriction**

You can request that the processing of your personal data should be restricted, for example if you do not think that the information we have about you is correct or if you believe that the processing is unlawful. Such request can also be made during the time we investigate whether our legitimate interests override your interest of privacy when you object to the processing (see more about this under section [4.5](#) above).

If you want to read more about the right to restriction – please see [here](#).

## **4.7 Right to transmit personal data (data portability)**

You have the right to receive your personal data, that you have provided to us (in case the legal basis for our processing is consent or performance of a contract), in a structured, commonly used and machine-readable format. However, this presupposes that the processing takes place by automated means (i.e. not in physical form on paper). If technically possible, and you wish to do so, we may also transmit such personal data to another data controller.

If you want to read more about the right to transmit personal data (data portability) – please see [here](#).

## **4.8 Right to withdraw your consent**

You can withdraw the whole or part of the consent you have given at any time, with effect as from the withdrawal (i.e. the processing of personal data that we have carried out before the withdrawal will not be affected). This can be done by contacting us via the contact details in section [7](#). In the case of direct marketing via e-mail, a withdrawal can be carried out through a link attached in each such e-mail.

## **4.9 Right to lodge a complaint with the competent supervisory authority**

You can lodge a complaint to the Swedish Authority for Privacy Protection or with another supervisory authority if you believe that our processing of your personal data is not in accordance with applicable legislation.

If you want to read more about the right to lodge a complaint – please see [here](#).

## **4.10 Requirements for exercising your rights**

To protect your privacy, we may (if necessary) require you to prove your identity when you contact us to exercise your rights.

We handle your request to exercise your rights promptly. Your request will normally be answered within one month from the date the request was received by us. Only in the case of an unusually complicated request, or if we have received a large number of requests, the response time may be extended by up to two months. If an extension of the response time is decided upon, you will be notified of that.

## **5 Cookies and other tracking technologies**

In order for us to deliver our services with the highest possible quality, we use so-called cookies and similar tracking technologies on our website.

When you visit our website, you will be asked if you consent to our use of cookies (with the exception of such necessary cookies that do not require your consent). You can delete cookies from your browser or adjust your settings for the use of cookies, at any time. You can read more about this in our cookie policy, which you can find on our websites:

<https://shop.lesjofors.com/> and <https://www.lesjoforsab.com/>. In the cookie policy, we describe, e.g. what types of cookies we use, what they are used for and for how long they are stored.

## **6 Changes to, and updates of, the Privacy Policy**

We may make changes to the privacy policy if this is necessary to describe how we process your personal data. All such changes are posted here on the website, which is why you should review the privacy policy at regular intervals and each time you use our services.

## **7 How you get in touch with us**

If you have any questions or comments regarding the processing of your personal data, you can contact us via [privacy@lesjoforsab.com](mailto:privacy@lesjoforsab.com).