

# sql

## **PRIVACY POLICY CUSTOMER AND PROSPECTS**

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SQLI Nordics AB ("SQLI") considers the protection of your personal data and the respect of your privacy to be of the utmost importance, to which it intends to pay particular attention.

This privacy policy (hereinafter the "Policy") is intended to inform you about the processing that is carried out with your personal data when you act on behalf of a client or prospect of SQLI (e.g.: employee, trainee, corporate officer, etc.) ("you" or the "Data Subject(s)").

SQLI Nordics, Kyrkogatan 26, 411 15 Gothenburg, Sweden, registered under number 556646-1876 is the organization responsible for processing your personal data (hereinafter referred to as "we", "us", "our")

## 1. What personal data do we collect?

In the context of your relationship with SQLI, we process the following categories of personal data:

- **Identification data:** your title, surname, first name, contact details, address, internal processing code enabling customer identification, accounting identification code, your image, if applicable, as part of the surveillance system present on our premises; etc.;
- **Data relating to your professional life:** position held, identity of your employer.
- **Data related to dietary preferences:** food allergies, food intolerances, and any other food requirements.

Generally, the communication of your personal data is compulsory, without which we would not be able to formalize and properly manage our relationship with the entity on whose behalf you are acting. For example, if you refuse to provide us with your contact details so that we can send you a contract for signature, we will not be able to enter into a contract with the entity on whose behalf you are acting.

In any case, we will inform you when the communication of your personal data is compulsory.

Such data will only be processed to the extent legally permitted and necessary to the exclusion of any other incompatible purpose. Specific measures will be taken to ensure that the processing of such data remains limited to the strict minimum.

Furthermore, should you be required to provide us with personal data of third parties, you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this Policy and, where required, have consented to the processing of their personal data.

## 2. How do we collect your personal data?

SQLI collects your personal data in the following ways:

- **Directly from you.**

- On the corporate website of the entity you work for, or
- Other public sources such as open professional networks like LinkedIn.

## 3. Why do we use your personal data?

The table below shows the purposes for which SQLI processes your personal data and, for each of them, the legal basis for the processing in question:

PURPOSE	LEGAL BASES	CATEGORIES OF DATA CONCERNED
Management of the relationships with customers and prospects, including in particular: (i) preparation and execution of contracts; (ii) management and follow-up of orders; and (iii) invoicing	The processing is necessary for the performance of the contract concluded with the entity for which you are acting.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>
Compliance with our legal and regulatory obligations, in particular the conduct of our "Know Your Customer" (KYC) procedure.	The processing is necessary to comply with our legal and regulatory obligations.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>
Management and follow-up of unpaid invoices and any disputes with you or third parties.	The processing is carried out based on our legitimate interest consisting in the collection of sums due and the defense of our interests, including by legal means and, where applicable, in the case of the processing of certain categories of data (conviction, offence, security measure), the need to establish, exercise or defend our legal rights.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life</li> </ul>
Accounting and Bookkeeping.	The processing is necessary to comply with the accounting and tax obligations to which we are subject.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>
Access to premises and security management, including CCTV if you need to visit our premises.	The processing is carried based on our legitimate interest in protecting people, our premises and property.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>
Promotional actions and commercial prospecting by electronic means (e-mail,	The processing is carried out based on our legitimate interest in developing our	<ul style="list-style-type: none"> <li>• identification data; and</li> </ul>

SMS) directed to our customers and prospects.	business by offering you new services. You can object to this at any time by clicking on the unsubscribe link at the bottom of each of our electronic communications and/or by contacting us using the details given in section 9 of this Privacy Notice (How to contact us)	<ul style="list-style-type: none"> <li>• data relating to your professional life.</li> </ul>
Carrying out satisfaction surveys, customer/prospect sales statistics and managing opinions on our products and services.	The processing is carried out based on our legitimate interest, which consists of evaluating the quality of our products and your satisfaction with our services for the purpose of improving our range of services.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>
Organization of events (e.g. inaugurations, travels, end-of-year parties, etc.).	The processing is carried based on our legitimate interest to gather and invite our customers and prospects to SQLI events.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> <li>• Data related to dietary preference</li> </ul>
Business gifts (for example, at the end of the year)	The processing is carried based on our legitimate interest to secure the loyalty of our customers within the framework of already existing contractual relationships.	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Information about your professional life</li> </ul>
Where necessary, the study, organization and execution of transactions relating to our activities, in particular in the context of mergers & acquisitions, spin-offs, etc.	The processing is carried out based on our legitimate interest in seeking investors/purchasers likely to be interested in our activities.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life</li> </ul>

In any event, please note that we will not process your personal data for any other purposes that are incompatible with those mentioned above.

## 4. With whom do we share your personal data?

As part of our processing activities, we may communicate your personal data to the following categories of recipients:

- the entities of the SQLI group (e.g. in the context of our accounting/tax and consolidation obligations at group level), the SQLI departments concerned, as well as any person authorized to have knowledge thereof within the scope of their activities and functions (e.g. departments in charge of accounting, etc.).

- service providers, suppliers, agents and co-contractors (e.g. IT service providers, travel agencies).
- where applicable, investors/purchasers and their advisors (e.g. in M&A transactions); and
- competent courts, law enforcement agencies, public authorities, government agencies and public entities, where applicable.

In addition, SQLI may communicate personal data to third parties with whom SQLI has a business relationship. Only data that is relevant and strictly necessary for business management or operational purposes or when required or permitted by applicable regulations will be transmitted.

Regardless of the recipient, we will only disclose your personal data on a strictly need-to-know basis and only to the extent required to achieve the purposes identified in this Policy.

We do not sell your personal data.

## 5. Do we transfer data outside the European Economic Area (EEA)?

Considering SQLI's international activity, your personal data may be transferred to and processed by other entities outside the EEA.

SQLI may transfer personal data to countries that are not recognized by the European Commission as ensuring an adequate level of data protection, namely:

- [Morocco](#)
- [United States](#)

In this context, SQLI ensures that the level of protection afforded to personal data is not adversely affected by such transfers, whether to entities within the group to which SQLI belongs or to recipients outside the group.

In any case, transfers to entities outside SQLI are based at least on one of the following transfer mechanisms:

- the existence of an adequacy decision issued by the European Commission for the country to which your personal data is transferred; or
- the conclusion of standard contractual clauses reproducing the models adopted by the European Commission; or
- the existence of a derogation linked to one of the specific situations exhaustively provided for by the General Data Protection Regulation n°2016/679 ("GDPR"), for example, when you have given your consent to this transfer having been informed of the absence of guarantees, when the transfer is necessary for the performance of a contract concluded between you and us, when the transfer is necessary for the conclusion or performance of a contract entered into, to your benefit,

between us and a third party, or when the transfer is necessary for the establishment, exercise or defense of our legal rights, etc.

You can obtain copies of these documents by sending an e-mail to the following address: [privacyse@sqli.com](mailto:privacyse@sqli.com).

## 6. How long do we keep your personal data?

We keep your personal data for no longer than is necessary for the purposes of the relevant processing activity.

In other words, the retention periods we apply vary according to the purpose for which SQLI processes the data in question. The table below shows how long your personal data will be kept for each purpose:

PURPOSE	DATA CATEGORY	RETENTION PERIOD
Management of relations with the customers and prospects, including: (i) preparation and execution of contracts; (ii) management and follow-up of orders; and (iii) invoicing.	<ul style="list-style-type: none"> <li>identification data; and</li> <li>data relating to your professional life.</li> </ul>	We will keep your personal data for the duration of the contractual relationship with the entity for which you work. Your data may then be stored in an intermediate archive for a maximum period of five (5) years after termination of the contract or our last contact with you, in order to facilitate the formalization of new services requested during this period.
Compliance with our legal and regulatory obligations, in particular our Know Your Customer (KYC) procedure.	<ul style="list-style-type: none"> <li>identification data; and</li> <li>data relating to your professional life</li> </ul>	Your data will be kept for the duration of the statute of limitations of the obligations to which we are subject.
Management and follow-up of unpaid invoices and any disputes with you or third parties.	<ul style="list-style-type: none"> <li>identification data; and</li> <li>data relating to your professional life.</li> </ul>	Your data will be kept for the duration of the collection/litigation process and until all possible avenues of recourse have been exhausted.
Accounting and bookkeeping.	<ul style="list-style-type: none"> <li>identification data; and</li> </ul>	In the form of an intermediate archive: your data is kept for

	<ul style="list-style-type: none"> <li>• data relating to your professional life</li> </ul>	the legal retention period, in particular seven (7) years for accounting obligations
Access to premises and security management, including CCTV if you need to visit our premises.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>	The data required to access the site (e.g. visitor badge) is kept until you leave the site. Other data recorded during your presence on our sites (e.g. video surveillance images, entry and exit times, etc.) are kept for a maximum of one <b>(1) month from the date</b> of recording and may only be kept longer in the event of an incident (for the time required to resolve the incident).
Promotional actions and commercial prospecting by electronic means (e-mail, SMS) for our professional customers and prospects.	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>	If you are acting on behalf of one of our customers, we will retain your personal data for <b>up to three (3) years</b> after the end of our contractual relationship with the customer concerned. If you are acting on behalf of one of our prospects, we will keep your personal data for up to three (3) years after the last contact initiated by the prospect concerned. However, if you object to our commercial prospecting activities, we will immediately delete your personal data for this purpose (except for the data strictly necessary to keep track of your objection and thus not send you any further commercial communications).

<p>Carrying out customer/prospect satisfaction surveys, sales statistics and managing feedback on our products and services.</p>	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> <li>• Data related to dietary preferences</li> </ul>	<p>Your data will be kept for the time required to organize and carry out the event concerned. Your data may then be stored in an intermediate archive for a maximum period of five (5) years after termination of the event when necessary to comply or assess compliance with our Code of Ethics as well as applicable statutes.</p>
<p>Business gifts (for example, at the end of the year)</p>	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Information about your professional life</li> </ul>	<p>Your data will be kept for the duration of the contractual relationship</p>
<p>Where necessary, the study, organization and execution of transactions relating to our activities, notably in the context of mergers &amp; acquisitions, spin-offs, etc</p>	<ul style="list-style-type: none"> <li>• identification data; and</li> <li>• data relating to your professional life.</li> </ul>	<p>Your data will be kept only for as long as is necessary to assess the appropriateness of the transactions envisaged and, where applicable, to carry them out.</p>

In any event, once the applicable retention period has expired, we will irrevocably delete or anonymize your personal data so that you can no longer be identified.

## 7. What rights do you have?

In furtherance of applicable data protection regulations, and most specifically the GDPR, you have the following rights: right of access, rectification, erasure, opposition, limitation of processing, portability of your personal data. Where the processing of your personal data is based on your consent, you may withdraw it at any time.

### • Right of access

You may request access to your personal data at any time. If you exercise your right of access, we will send you a copy of the data in our possession, together with all the information relating to its processing.

### • Right to rectification

You have the right to ask us to rectify or complete any inaccurate or incomplete personal data in our possession.

## • Right to erasure

You have the right to ask us to delete your personal data, for example if it is no longer required for processing.

We will do our best to comply with your request. Please note, however, that we may be obliged to retain all or part of your personal data if we are required to do so by law or if such data is necessary for the establishment, exercise, or defense of our legal rights.

## • Right to object

You may object at any time, for reasons relating to your situation, to the use by SQLI of your personal data. We will then cease processing your personal data unless there are compelling legitimate grounds for us to continue processing your personal data (for example, if your data is necessary to establish, exercise or defend our rights or the rights of third parties in a court of law). If we are unable to comply with your objection, we will inform you of the reasons for our refusal.

## • Right to restrict processing

You may also request that we restrict the processing of your personal data for reasons relating to your situation. For example, if you dispute the accuracy of your personal data or object to its processing, you may also request that we do not process your data for the time necessary to verify and investigate your claims. In this case, we will temporarily refrain from processing your personal data until the necessary verifications have been carried out or until we comply with your requests.

## • Right to data portability

You may request the portability of your personal data. If you so request, we will provide you with your personal data in a readable and structured format that enables you to re-use it easily. We would like to draw your attention to the fact that the portability of your personal data applies only to the personal data that you have communicated to us, provided that the communication of your personal data does not infringe the rights of third parties. If we are unable to comply with your request, we will inform you of the reasons for our refusal.

## • Right to withdraw your consent

Where the processing of your personal data is based on your consent, you may withdraw it at any time. Withdrawal of your consent prevents us from processing your personal data but does not affect the lawfulness of any processing carried out prior to such withdrawal.

## 8. How to exercise your rights

To exercise your rights, please contact our dedicated department using the contact details given in Section 9 (How can you contact us?). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or facilitate the location of the personal data concerned by your request.

Please note that some of these rights are subject to specific conditions dictated by the applicable regulations on the protection of personal data. If your situation does not meet these conditions, we will unfortunately be unable to process your request. We will inform you of the reasons for our refusal.

In any event, if you consider that your rights have not been respected or that your personal data has been processed in breach of the applicable regulations on the protection of personal data and the principles set out in this Policy, you may lodge a complaint with the competent courts or with the competent data protection authority, Swedish Authority for Privacy Protection,

Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden, Sweden.

## 9. How can you contact us?

If you have any questions or requests concerning the processing we carry out with your personal data under this Policy, including the exercise of your rights, as detailed above, you can contact us, by email at the following address [privacyse@sqli.com](mailto:privacyse@sqli.com) or by mail at SQLI Nordics, Lilla Kyrkogatan 4, 411 15 Gothenburg, Sweden.

## 10. Changes and updates to the Policy

We periodically review this Policy to ensure compliance and to keep it up to date with the applicable data protection regulations. We will inform you of any changes to this Policy.