

SÄTILA

Sätila of Sweden's Privacy Policy

This is Sätila of Sweden AB's Privacy Policy. It thoroughly explains how we storage the personal data and personal data we have access to.

Brief explanation

A brief description of why this privacy policy exists is because we at Sätila of Sweden AB want to disclose all applicable personal data and personal data to our customers and visitors as it relates. To make yourself aware and show our transparency on how we collect, process and use your personal data. We also describe in this policy your rights and how you can enforce them.

It is very important that you read through and understand this policy before continuing to use or request what we have to offer. After reading the policy, you should feel comfortable, secure and satisfied in our handling of your personal data and personal data.

If you do not understand the policy, do not feel comfortable, secure and / or satisfied in our treatment of what we have described above, please contact us. Our e-mail address is: satila@satila.com and for more contact info see the section "How do you contact us most easily with questions about data protection?". You are also always welcome to contact us if you have any other concerns or views regarding this privacy policy.

Using the table of contents on the next page, you can easily navigate to the sections that are of particular interest.

Please also read our general terms and cookie policy which we refer to in this privacy policy.

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What is a personal data and what is a processing of a personal data?

Personal data is any kind of information that directly or indirectly leads to a physically living person who can be identified.

Three example:

- ... pictures and sound recordings can be personal data even if no names are mentioned as the information may be sufficient to identify the person.
- ... even unique names may be sufficient to be considered a personal data. For example, the name Maria is not a personal data because there is not enough information to identify only one specific person.
- ... encrypted data and various types of electronic identities (for example IP numbers) are personal data if they can be linked and identify a person.

Processing of personal data is all that happens with the personal data. Every action taken with personal data is a processing, regardless of whether it is performed automatically or not. Examples of common treatments are collection, registration, organization, structuring, storage, processing, transfer and deletion.

Who is responsible for the personal data we have access to?

Sätila of Sweden AB (Registered at the Swedish Companies Registration Office with organization number 556085–0967 and VAT number SE556085096701, is a small company and therefore all employees of the company are jointly responsible for the personal data we have access to.

To get in touch with someone at Sätila of Sweden who is responsible for personal data for the company's processing of personal data, see the section "How do you contact us most easily for data protection issues?".

Terms used in the policy

Below is a number of terms you should be familiar with before continuing to read through this policy.

- ... the concepts we, ours, Sätila, Sätila of Sweden has the same sense as Sätila of Sweden AB.
- ... the term sharp is used to clarify that something is noticeable or ready (like an email that is sent sharply where the draft is the preparatory email).
- ... the term technical data, which means the devices used (such as mobile, computer or tablet) and its settings (for example, language setting, IP address, browser settings, time zone, operating system, screen resolution and platform).
- ... the concept of technical information about integration, which means how you have interacted with us, that is, how you have used services, where and how long different pages were visited, response times, download errors, how to reach and leave the service, etc.
- ... the concepts of website and webpage both have the same meaning and refer to the Sätila of Sweden's website www.satila.com.

What personal data we collect about you and for what purpose?

Purpose: To be able to handle customer services	
Action performed: <ul style="list-style-type: none"> • Communication and answering of any customer service questions (via telephone, email or digital channels including social media). • Identification. • Investigation of possible complaints and support cases (including technical support). 	Categorys of personal data: <ul style="list-style-type: none"> • Name • Contact information (for example address, e-mail, address and phone number). • Correspondence with customer. • Information about time of purchase, place of purchase, possible errors / complaints. • Technical information of your equipment. • Any information you choose to submit.
Legal grounds: Justified interest. Treatment is necessary to meet our and your legitimate interest in handling customer service matters.	Storage period: Until the customer service case has been completed and no feedback has been made within a necessary period of time (which may be due to a legitimate interest), we will cease processing the email address for this purpose.

Purpose: To handle order and purchase	
Action performed: <ul style="list-style-type: none"> • Delivery (including notification and contact regarding delivery). • Identifying and age control. • Handling of payment (including analysis of possible payment method which could include control against payment history and collection of credit control from Klarna). • Handling of claims and warranty issues. • Control of address in register. 	Categorys of personal data: <ul style="list-style-type: none"> • Name • Social security number. • Age • Contact information (for example address, e-mail and phone number). • History of payment. • Payment information. • Credit information from credit collection companies. • Purchaseinformation (for example which item that has been ordered or if item should be delivered to different address or person). • Any information you choose to submit.
Legal grounds: Execution of the purchase agreement. This collection of your personal data is required for us to fulfill our obligations under the purchase agreement. If the information is not provided, our commitments cannot be fulfilled and we are therefore forced to deny the purchase.	Storage period: Until the purchase has been completed (including delivery and payment) and for a period of 36 months thereafter in order to be able to handle any complaints and warranty issues.

Purpose: To be able to perform, manage and conduct competitions and / or events	
Action performed: <ul style="list-style-type: none"> • Communication before, during and after participating in a contest or event (for example, confirmation of notifications, questions and / or evaluations). • Age identification and control. • The choice of winners and the delivery of any winnings. 	Categories of personal data: <ul style="list-style-type: none"> • Name • Social security number. • Age • Contact information (for example address, e-mail and phone number). • Information submitted in contest entries. • Information submitted in evaluation of contest. • Any information you choose to submit.
Legal grounds: Justified interest. Treatment is necessary to meet our and your legitimate interest in managing your participation in contest and / or events.	Storage period: In the relevant and / or current time period linked to the contest or event (including any evaluation). A competition or event usually takes place sharply during a weekend or a day, open registration and preparation usually take place in due time and can mean up to a year before a sharp day or earlier. Feedback and information about the event can also be done longer time after a competition or event has ended.

Purpose: In order to use and / or publish relevant personal data for information purposes. Inform of contest or event This applies to persons who have been aware, direct or indirectly, that they have been caught on, for example, a picture, or other identifiable material that can be linked to the person.	
Action performed: <ul style="list-style-type: none"> • Control and review of relevant and irrelevant material. • Distribution of material. 	Categories of personal data: <ul style="list-style-type: none"> • Name (if you share or if it is relevant or necessary) • Identifying image or text/description. • Any information you choose to submit.
Legal grounds: <i>Execution of journalistic purpose.</i> These relevant personal data are mostly intended for images but also where the person may be reflected in a related text / description or other identifiable material. This personal data is significant for a shown interest in the event or the competition Sätilla of Sweden has arranged, participated in or sponsored.	Storage period: In the relevant and / or current time period linked to the competition or event (including any evaluation). A competition or event usually takes place sharply during a weekend or a day, open registration and preparation usually take place in due time and can mean up to a year before a sharp day or earlier. Feedback and information about the event can also be done long after a competition or event.

Purpose: To use and / or publish relevant personal data for marketing purposes This applies to persons who have acted models or other persons in question such as employees / staff, etc.	
Action performed: <ul style="list-style-type: none"> • Communication about the personal data material and before, during and after the use of the material (for example, the writing of agreements and / or consent, for feedback for further collaborations and / or work). • Age identification and control. • Communication with people connected to the person the material affecting (for example parent responsible for minors). 	Categories of personal data: <ul style="list-style-type: none"> • Name • Identifying image or text/description. • Identifierande bild eller text/beskrivning. • Contact information (for example address, e-mail and phone number). • Any information you choose to submit.
Legal grounds:	

Execution of agreements and consent. These relevant personal data are mostly intended for images but also where the person may be reflected in a related text / description or other identifiable material. This personal data is important for Sätilla of Sweden's marketing and branding.

Storage period:
 For models, we mostly adapt to the standard period for the use of model images, which is a year of use, but can be used longer and usually for a maximum of two years. The images will most likely, for example, always remain in history and in feeds on our digital channels (including / for example social media) and Sätilla of Sweden's archive destination (the archive destination is intended for inspiration for new and upcoming photo sessions). With regard to staff and employees, the images are used in accordance with an internal consent and / or agreement.

Purpose:
 To be able to handle booking of services
 For example personal shopping or surprises.

Action performed:

- Receipt of bookings, rebates and cancellations.
- Mailing out confirmation of booking.
- Communication about booking

Categorys of personal data:

- Name
- Social security number.
- Identifying image or text/description.
- Contact information (for example address, e-mail and phone number).
- Any information you choose to submit.

Legal grounds:
Execution of the service agreement. This collection of your personal data is required for us to fulfill our obligations under the service agreement. If the information is not provided, our obligations cannot be fulfilled and we are therefore forced to deny you the service.

Storage period:
 Until service is provided and obligation is fulfilled.

Purpose:
 To be able to send or share direct marketing with, which includes our newsletter

Action performed:

- Securing your identity (need not necessarily mean more personal data than your e-mail address, if the e-mail address is authentic and functioning, we consider it to be a security of identity).
- Maintaining correct and updated e-mail address.
- Customization of services to become more user-friendly (eg change the user interface to simplify the flow of information or to highlight features that are often used by customers in our newsletter).
- Analyzes of the data we collect for the purpose. Based on the data we collect (for example, age and gender), you are sorted into a customer group (so-called customer segment) for which analyzes are then done at an aggregated level using de-identified or pseudonymized data, without any connection to you as an individual. The insights from the analysis form the basis for what measures are taken and how we then develop the experience for those who receive, for example, our newsletter.

Categorys of personal data:

- E-mail address (may include name, address, social security number and / or even more personal data depending on what the owner of the e-mail address named his unique e-mail address for).
- Correspondence and feedback regarding our marketing.
- Purchase and user-generated data (for example, click and visit history).
- Technical data.
- Technical information on integration.

<p>Legal grounds: <i>Execution of consent.</i> This collection of your personal data is required for us to send or share direct marketing to you. If the information is not provided, our obligations cannot be fulfilled and we are therefore forced to deny you the service.</p>	<p>Storage period: As long as you allow us to send or share direct marketing to you, the personal data you have provided to us will be used until you no longer wish to receive our offers or information.</p>
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<p>Purpose: To be able to evaluate, develop and improve our services. This applies, for example, to products, services and systems for the customer collective in general.</p>	
<p>Action performed:</p> <ul style="list-style-type: none"> • Customization of services to become more user-friendly (eg change the user interface to simplify the flow of information or to highlight features commonly used by customers in our digital channels). • Development of documentation with a view to improving the flow of goods and logistics (eg by being able to forecast purchases, inventory and deliveries). • Production of documentation to develop and improve our product range • Production of documentation to develop and improve our resource efficiency from an environmental and sustainability perspective (eg by streamlining procurement and planning of deliveries). • Development of documentation with a view to planning new and possible establishments / de-registrations of various stores and / or warehouses. • Give our customers the opportunity to influence our range. • Development of documentation to improve IT systems in order to generally increase the security of the company and our visitors / customers. • Analyzes of the data we collect for the purpose. Based on the data we collect (for example, purchase history, age and gender) you are sorted into a customer group (so-called customer segment) for which analyzes are then done at an aggregated level using de-identified or pseudonymized data, without any connection to you who individual. The insights from the analysis form the basis for which products are purchased and how we then develop the user experience on, for example, Sätila's website and web shop. 	<p>Categories of personal data:</p> <ul style="list-style-type: none"> • Name. • Social security number. • Age. • Gender • Contact information (for example address, e-mail and phone number). • Correspondence and feedback regarding our product and services. • Purchase and user-generated data (for example, click and visit history). • Technical data. • Technical information on integration.
<p>Legal grounds: <i>Justified interest.</i> The treatment is necessary to meet the legitimate interest of our and our customers, visitors and users in evaluating, developing and improving our services, products and systems.</p>	<p>Storage period: From collection and for a period of 36 months thereafter.</p>

Purpose: To prevent abuse of a service For example to prevent and investigate crimes against the company.	
Action performed: <ul style="list-style-type: none"> • Prevention and investigation of possible fraud or other law violations against Sättila. • Prevention of spamming, phishing, harassment or other measures prohibited by law or our terms of purchase or service. • Protection and improvement of our IT environment and systems against attacks and intrusions. 	Categories of personal data: <ul style="list-style-type: none"> • Name • Social security number. • Contact information (for example address, e-mail and phonenumber). • Buy and user generated data (eg click and visit history). • Technical data. • Information how our digital services is used.
Legal grounds: <i>Execution of legal obligation</i> (if any) or legitimate interest. If no legal obligation exists, the treatment is necessary to meet our legitimate interest in preventing the abuse of a service or investigating crimes against the company.	Storage period: From collection and for a period of 36 months thereafter.

Purpose: In order to fulfill the company's legal obligations	
Action performed: Necessary handling for compliance with the company's legal obligations according to legal requirements, judgments or government decisions (for example, the Accounting Act, the Money Laundering Act or the rules on product liability and product safety, which may require the communication of information and information to the public and customers about product alarms and product recalls, for example a defect or hazardous item).	Categories of personal data: <ul style="list-style-type: none"> • Name • Social security number. • Contact information (for example address, e-mail and phone number). • History of payment. • Payment information. • Correspondence. • Information on time of purchase, place of purchase, any errors / complaints. • Technical information (if necessary).
Legal grounds: <i>Justified interest.</i> To comply with laws and regulations.	Storage period: Necessary period to be able to comply with laws and regulations (such as the Accounting Act).

From what sources do we retrieve your personal data?

In addition to the information you provide to us, or which we collect from you based on your purchases and how you use our services, we may also collect personal data from third party. The information we collect from third parties is following:

- Address information from public registers to make sure we have the right address information to you.
- Information on creditworthiness from credit rating agencies, banks or information companies.

Who can we share your personal data with?

In cases where it is necessary for us to be able to offer our services, we share your personal data with companies that are so-called personal data assistants for us. A personal data assistant is a company that acts on behalf of and processes the information on our behalf and according to our instructions. We have personal data assistants who help us with following services:

1. Transport (logistic companies and forwarder).
2. Warehouse (which mainly handles distribution of orders).
3. Payment services (card-redeeming companies, banks and other payment service providers).
4. Marketing (print and distribution, social medias).
5. Media and other communications services, such as our newsletter service Mailchimp or other media and advertising agencies).
6. IT-services (companies that handle necessary operation, technical support and maintenance of our IT solutions).

When your personal data is shared with personal data assistants, it only happens for purposes that are compatible with the purposes for which we have collected the information (for example, in order to fulfill our obligations under the purchase agreement or our loyalty program such as newsletters). We check all personal data assistants to ensure that they can provide adequate guarantees regarding the security and confidentiality of personal data. We have written agreements with all personal data assistants through which they guarantee the security of the personal data processed and undertake to comply with our security requirements as well as restrictions and requirements regarding international transfer of personal data.

We also share your personal data with certain companies that are independently responsible for personal data. The fact that the company is independently responsible for personal data means that it is not us who controls how the information provided to the company should be processed. Independent Personal Data Managers with whom we share your personal data are:

1. State authorities (police, tax authorities or other authorities) if we are obliged to do so by law or on suspicion of crime.
2. Companies handling public transport (logistics companies and freight forwarders).
3. Companies that offer payment solutions (card-redeeming companies, banks and other payment service providers).

When your personal data is shared with a company that is independently responsible for personal data, it applies to that company's privacy policy, personal data management and general terms and conditions.

Where do we process your personal data?

We always strive for your personal data to be processed within the EU / EEA and all our own IT systems are located within the EU / EEA. However, with systemic support and maintenance, we may have to transfer the information to a country outside the EU / EEA, e.g. if we share your personal data with a personal data assistant who, either himself or through a subcontractor, is established or stores information in a country outside the EU / EEA. In these cases, the deputy may only access the information relevant to the purpose (for example, log files). Regardless of the country in which your personal data is processed, we take all reasonable legal, technical and organizational measures to ensure that the level of protection is the same as in the EU / EEA.

In cases where personal data is processed outside the EU / EEA, the level of protection is guaranteed either by a decision by the European Commission that the country in question ensures an adequate level of protection or by

the use of so-called appropriate safeguards. Examples of suitable safeguards are approved code of conduct in the recipient country, standard contract clauses, binding corporate internal rules or Privacy Shield. If you would like a copy of the safeguards that have been taken or information about where these have been made available, you are welcome to contact us.

You can read more about these protective transfer mechanisms here (only available in English):
https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en

For how long time do we save your personal data?

We never save your personal data longer than what is necessary for each purpose. Read more about the specific time for storage under section "purpose" in section "What personal data do we collect about you and for what purpose".

Your rights, You have the...

Right to access

A so-called register transcript. We are always open and transparent with how we process your personal data and if you want to gain a deeper insight into what personal data we process about you, you can request access to the data (the information is provided in the form of a register transcript with a statement of purpose, categories of personal data, categories of recipients, storage periods, information about where the information was collected and the existence of automated decision-making). Please note that if we receive an access request, we may ask for additional information to ensure the efficient handling of your request and that the information is provided to the right person. Please read our general terms and conditions regarding the time it will take for us to complete a register extract.

Right to correction

You can request that your personal data should be corrected if the information is incorrect. Within the scope of the stated purpose, you also have the right to supplement any incomplete personal data.

Right of deletion and restriction

You can demand deletion of personal data we handle about you in case:

The information is no longer necessary for the purpose for which it has been collected or processed.

- You object to a balance of interest we have made based on legitimate interest and your reason for objection weighs heavier than our legitimate interest.
- You object to treatment for direct marketing purpose.
- Personal data is processed in an illegal manner.
- Personal data must be deleted in order to fulfill a legal obligation to which we are subject.
- Personal data has been collected about a child (under the age of 13) for whom you have parental responsibility and collection has taken place in connection with the provision of information society services (eg social media).

Please note that we may have the right to deny your request if there are legal obligations that prevent us from immediately deleting certain personal information. These obligations come from accounting and tax legislation, banking and money laundering legislation, but also from consumer law legislation. It may also be that the treatment is necessary for us to establish, enforce or defend legal claims. Should we be prevented from responding to a request for deletion, we will instead block the personal data from being used for purposes other than the purpose that prevents the requested deletion.

You have the right to request that our processing of your personal data be restricted. If you dispute that the personal data we process is accurate, you may request a limited processing period for the time we need to verify whether the personal data is accurate. If we no longer need the personal data for the stated purpose, but you do, however, need them in order to be able to establish, assert or defend legal claims, you can request limited processing of the data with us. This means that you can request that we not delete your information.

If you have objected to a balancing of legitimate interests that we have made as a legal basis for a purpose, you can request limited processing during the time we need to check whether our legitimate interests outweigh your interests in having the information deleted.

If the processing has been restricted according to any of the situations above we may only in addition to the actual storage, process the information to determine, make or defend legal claims, to protect someone else's rights or if you have given your consent.

Right to object to certain type of treatment

You always have the right not to have direct marketing sent to you and to object to all processing of personal data based on a balance of interests.

Right to legitimate interest

In cases where we use a balance of interests as a legal basis for a purpose, you have the opportunity to object to handling. In order to continue processing your personal data following such an objection, we need to be able to show a compelling, justifiable reason for the treatment in question that outweighs your interests, rights or freedoms. Otherwise, we may only process the information in order to establish, exercise or defend legal claims.

Right to influence the direct marketing targeted at you

This includes analyzes performed for direct marketing purpose. You have the opportunity to object to your personal data being processed for direct marketing. The objection also includes the analyzes of personal data (so-called profiling) performed for direct marketing purposes. Direct marketing refers to all types of outreach marketing measures (primarily via e-mail, but can also occur in rare cases also through physical mail).

Marketing measures where you as a customer actively chose to use one of our services or otherwise contact us out to find out more about our services are not counted as direct marketing (for example product recommendations or other features and offers). If you object to direct marketing, we will stop processing your personal data for that purpose, as well as discontinue all types of direct marketing measures.

Right to data portability

If our right to process your personal data is based either on your consent or the performance of an agreement with you, you have the right to request that the data relating to you and which you have provided to us be transferred to another personal data controller (so-called data portability). A prerequisite for data portability is that the transfer is technically possible and can be automated.

How do we handle your social security number?

We will only process your Social Security number when it is clearly justified for the purpose, necessary for secure identification or if there is some other considerate reason. We always minimize the use of your social security number to the greatest extent possible by using your birth number instead.

What is a cookies and how do we use it?

Cookies are a small text file consisting of letters and numbers that are sent from our web server and stored on your browser or device. At Sätilla we use the following cookies:

- Session cookies (a temporary cookie that expires when you close your browser or device).
- Durable cookies (cookies that remain on your computer until you remove them or expire).
- First-party cookies (cookies set by the website you visit).
- Third-party cookies (cookies set by a third-party website. These are used primarily for analysis, such as Google Analytics).

The cookies we use usually improve the services we offer. Some of our services require cookies to work properly, while others improve the services for you. We use cookies for overall analytical information regarding your use of our services and to save functional settings such as language and other information. We also use cookies to be able to send relevant marketing to you.

You can read more about cookies at www.satila.com/cookiepolicy/. It also describes how you can adjust, accept and limit specific cookies, block or delete them.

Keep in mind that some of our services may not work if you block or delete cookies.

How is your personal data protected?

We use IT systems to protect the privacy, privacy and access to personal data. We have taken special security measures to protect your personal information from illegal or unauthorized processing (such as illegal access, loss, destruction or damage). We have also made sure that only those people who actually need to process your personal information are the only ones who can access it. This is so that we can fulfill our stated purpose.

What does it mean that the Data Inspectorate is a supervisory authority?

The Data Inspectorate is responsible for monitoring the application of the legislation, and anyone who considers that a company not handling of personal data correctly can file a complaint with the Data Inspectorate incorrectly.

How do you contact us with questions about data protection?

We take data protection very seriously and ask you to contact us through if there is any questions or concerns:

E-mail: satila@satila.com

Phone: +46 301-223 30

Send a letter to us:

Grebbeshult 2

SE-511 99 Sätilla

Sweden

Upgrading and changes of our private policy

We may make updates or changes to our Privacy Policy. You will always find the latest date that policy was updated in same docuemnt. Latest version should always be found on our webpage

www.satila.com/integritetspolicy.

If we need to make updates or changes that will have significant impact in how we treat your personal data that will be informed in due time via e-mail or on www.satila.com

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