

Data Privacy Policy

1. Introduction

This Data Protection and Privacy Policy (the "Policy") describes how SigmaTech Nordic ("us", "we" or "our") collects personal data collected via our website(s), contracts, orders, filled forms, client accounts, telephone calls and emails sent to the company. The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the "GDPR") and the rules included herein on information to be provided to you.

SigmaTech Nordic is committed to protecting the privacy and confidentiality of personal information entrusted to us. The Data Privacy Policy outlines our approach to data protection, including the types of personal information we collect, how we use it, and the measures we take to ensure data security.

2. Scope

This policy applies to all employees, contractors, and third-party service providers of IT systems with access to personal data in the course of their duties.

3. Types of personal data processed

We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data:

- a) Contacts: Name, title, address, telephone number, email, username
- b) Purchasing history: Customer number, Invoicing and bookkeeping data and documentation, account status (customer points, payments etc., bank account and/or payment card details)
- c) Website and Social Media Platforms: IP addresses, visitor statistics and communication interactions

When exchanging sensitive personal data as specified in GDPR, Art. 9, is needed for solving our duties or contracted tasks, we will engage with the party via a Data Controller and/or Data Processor Agreement with instructions for handling sensitive personal data.

If we need to collect more personal data than specified above, we will inform you by updating this Policy.

3. Purposes of processing the personal data

We will only process personal data if we have a legitimate purpose and in that case in accordance with the rules of the GDPR. The personal data we collect about you is processed for the following purposes:

- a) Purchase & Orders: To deliver products and services, to respond to inquiries or complaints, to provide service messages and information, and to store personal data to comply with applicable legislation requirements such as bookkeeping acts, to provide support and service messages, including responding to questions and complaints and sending updates about our products and services.
- b) Communication: To send newsletters and direct marketing (such as e-mails or other forms of direct messages on social media, etc.), to send newsletters by e-mail, to communicate and exchange data with public authorities when required by law, to improve our products, services, or website, and facilitate a sales

or purchasing process.

4. Legal basis for processing personal data

We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) The legal basis for the processing of such personal data is consent, in accordance with GDPR, Article 6(1)(a). You can withdraw your consent at any time by contacting us via the contact details provided at the end of this Policy. If you withdraw your consent, the personal data processed will be deleted, unless it can or must be processed in order to comply with legal obligations.
- b) The processing is necessary for the performance of a contract to which the data subject is a party in accordance with GDPR, Article 6(1)(b), the first indent.
- c) The processing is necessary to comply with applicable legislation in accordance with GDPR, Article 6(1)(c).
- d) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data in accordance with GDPR, Article 6(1)(f).

If we send you direct marketing, including by email, we will ask for your prior consent in accordance with the applicable rules such as marketing acts.

5. Disclosure and transfer of personal data

We only transfer personal data to other entities when legally permitted or required. We transfer personal data to the following recipients from the EU/EEA:

- a) To stakeholders where we ensure mutual contracted obligations of data processing in accordance with GDPR
- b) Tax authorities in connection with accounting, etc.
- c) Banks in connection with payments, etc.
- d) Authorities when there is a legal basis for data processing

From time to time we use external entities as suppliers to assist us in delivering our products and services. The external suppliers will not receive or process personal data unless applicable law or the content of the assignment is needed for personal data transfer and processing.

Where the external parties are acting in the role of data processors, the processing is always based on a contractual basis where the supplier must commit to applying to GDPR. For sensitive personal data, we request a data processing agreement in accordance with the requirements under GDPR.

Where the external parties are acting in the role of controllers, the processing of personal data is based on such external parties' data privacy policy and the relevant legal bases which the external parties are obligated to inform about unless the applicable legislation allows otherwise.

Where we transfer personal data to countries or international organisations outside the EU/EEA area, we transfer in accordance with applicable law inside and outside the EU or EEA areas:

- when we use cooperation partners or service providers for data processing or if the transfer of personal data is necessary for the purpose of fulfilling an order in the sense of a sales partnership
- when we are distributing products via shipping companies and dropshipping providers, payment service providers, service providers for handling the order and IT service provider
- when are using using Website analytics services
- when we are using social media plug-ins to optimize the advertising of our products and services.

6. Erasure and retention of personal data

We ensure that the personal data is deleted when it is no longer necessary for processing purposes. However, we retain your personal data to the extent that we are legally obligated, as is the case with i.e. accounting and bookkeeping materials and records. If you have any questions about our retention of your data, you may contact us by using the email mentioned in the last section of this Policy.

7. Data subject rights

As a data subject under GDPR, you have a number of rights. You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.

- a) You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your data to others.
- b) You have the right to have incorrect information rectified.
- c) You have the right to have certain personal data deleted.
- d) You may have the right to restriction of our processing of your data.
- e) You may have the right to object to our processing of your data based on reasons and circumstances that pertain to your particular situation. Objection can also be to the processing of personal data for direct marketing.
- f) You may have the right to object to our processing of your data based on reasons and circumstances that pertain to your particular situation. Objection can also be to the processing of personal data for direct marketing.
- g) You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision (1) is necessary for entering into or performing a contract between you and the Organization, (2) is authorised by law, or (3) is based on your explicit consent.
- h) If the processing of your data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal.
- i) You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- j) You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- k) You can always lodge a complaint with the data protection authority.

Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing. More information about data subject rights can be found in GDPR.

We will try hard to meet your wishes about our processing of personal data, but you can always file a complaint with the data protection authorities.

8. Changes to this Policy

We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. If we make significant changes, we will provide notification by way of a visible notice, for example on our website or by direct message.

9. Contact

You may contact us at the below-specified email if you:

- a) disagree with our processing or consider our processing of your data infringes on the law,
- b) have questions or comments on this Policy, or
- c) want to invoke one or more of your rights as a data subject described in this Policy.

If you have questions or comments on this Policy or if you would like to invoke one or more data subject rights, please contact us at SigmaTech Nordic ApS (Company Reg. No.: DK44281007), email:

info@sigmatechnordic.com