



# PRIVACY POLICY

Approved by the board September 2021

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## ARLA PLAST AB's PRIVACY POLICY

Arla Plast AB, corp. ID 556131-2611 ("**Arla Plast**", "**we**" or "**us**"), processes personal data in connection with our different business activities. Arla Plast primarily trades and interacts with other companies and thus is active in the "Business to Business, B2B" segment. However, in connection with such interaction, Arla Plast both needs to receive and process personal data from and relating to employees and other individuals employed by and otherwise acting in the name of or for the benefit of its customers, suppliers, agents, distributors/partners and other third parties.

We respect the privacy of individuals and do not collect or process any personal data, unless it has been provided to Arla Plast by the individual concerned or has been obtained from a third party, which has rightful access to and the right to transfer such personal data to Arla Plast (and in which case Arla Plast will inform the concerned individuals of its use and processing of such data).

Arla Plast continuously strives to comply with all applicable data and integrity protection laws that governs the processing of personal data. This privacy policy ("**Privacy Policy**") has been adopted to harmonize Arla Plast's processing of personal data with the requirements of the General Data Protection Regulation ("**GDPR**")<sup>1</sup> and other applicable data protection legislation.

Arla Plast does not sell or share personal data with third parties, unless (i) your prior consent has been obtained or (ii) such transfer is necessary for the purposes, as set out more in detail in this Privacy Policy.

This Privacy Policy therefore describes how, when and why Arla Plast processes your personal data when you represent any of our current or future customers, suppliers or partners, access or use any part of the websites [www.arlaplast.com](http://www.arlaplast.com) and [www.arlaplastgroup.com](http://www.arlaplastgroup.com) the "**Websites**"), when we send you newsletters or other marketing material, when you visit our premises, when you participate in recruitment matters, when you are an investor or shareholder or when you are closely associated with a person in the Company's management or in any other way have access to insider information concerning the Company.

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<sup>1</sup> 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



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## **THE ARLA PLAST COMPANY GROUP**

Arla Plast is the parent company of the Arla Plast company group and is also the primarily responsible entity for the Arla Plast company group operation. Arla Plast is the company, which has the direct controlling influence of the subsidiary/-ies in the Arla Plast company group and also controls, manages and defines certain intra company group responsibilities. The information contained in this Privacy Policy is also applicable to the other companies in the Arla Plast company group, unless the relevant group company has adopted a privacy policy of its own, in which case such policy shall have precedent over this Privacy Policy, as applicable. Arla Plast's subsidiaries may therefore have a legitimate interest to transfer certain personal data to Arla Plast for its internal administrative, marketing, statistical and other purposes for the entire Arla Plast company group. To the extent such transfer is made, Arla Plast and the relevant subsidiary therefore are joint controllers of such personal data and have entered into a corresponding understanding in order to define their roles as joint controllers of such personal data. Your primary contact in these matters is and will remain Arla Plast. Contact details to the other companies in the Arla Plast group may be found at [www.arlaplast.com](http://www.arlaplast.com).

## **PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy is meant to help you understand what personal data we collect, why we collect it and what we do with it. You will also find information about how you can affect the processing of your personal data and what rights you have.

## **WHAT IS PERSONAL DATA?**

Personal data means any information relating to you that, directly or indirectly, may be used to identify you, for example your name, phone number and your e-mail address, but also information such as your IP-number and your user behavior when using the Website(s), may be personal data.

## **WHO IS RESPONSIBLE FOR PROCESSING OF YOUR PERSONAL DATA?**

When your personal data is being processed by us for our purposes, in the way set out in this Privacy Policy, Arla Plast AB, Swedish corporate reg. no 556131-2611, is the data controller regarding such processing, subject to what is set out above regarding intra company group processing of Arla Plast.

If you have any questions about our processing of your personal data or your rights connected hereto, you can always contact Arla Plast by e-mail, [privacy@arlaplast.com](mailto:privacy@arlaplast.com).

## **FROM WHOM DO WE RECEIVE PERSONAL DATA ABOUT YOU?**

Most of the personal data that we process about you is information that you have chosen to provide us with regarding yourself in different situations; normally in your capacity as an employee or consultant of one of our customers, partners or as a candidate for a job opportunity. For example, when sending us e-mails, in connection with quotations and orders for Arla Plast's products, when you register for an event or market activity hosted by us and/or when you sign up for our newsletter, as well as when you contact us in any other way (for example contacting our customer service or through social media channels, if and to the extent applicable).

We also collect personal data when you, or the entity that you represent, purchase or sell products and/or services from or to us, visit the Website(s) or interact with us in any other way. Personal data we collect from you normally only relates to your name, contact details (address, phone number and e-mail address), possibly also your use of the Website(s),



information about your geographical location and interaction data. Some of the information we collect is collected through our use of cookies.

When you sign up for participation at an Arla Plast event (exhibits, trade fairs and similar), a survey, or other activity that we arrange together with our business partners we receive the information that you have chosen to provide us or our partner with at such event, survey or activity.

If you are a shareholder or representative for a shareholder your personal data may be collected from your representative or the shareholder you represent or from Euroclear Sweden AB. We may also collect personal data from persons closely associated to you, for example if you are closely associated with a person discharging managerial responsibilities in Arla Plast.

**WHAT DO WE DO WITH YOUR PERSONAL DATA AND WHY DO WE DO IT?**

We process your personal data for different purposes. Below you can read more about why and how we process your personal data, what legal basis we have for the processing and more. Please note, in some cases we transfer certain personal data to third parties. Such third parties process your personal data for their own purposes, or on behalf of Arla Plast. For more information regarding this, please see further below under “Do we transfer your personal data to third parties?”.

**When you visit our Website(s)**

*Purpose: To ensure and improve the Websites’ contents and continuously provide you the best user experience and relevant marketing, primarily by use of cookies (as set out in our cookie policy)*

**Processing made:**

- Collection and use (through our use of cookies that are not strictly necessary) and necessary processing to review how our Websites are used in order to improve the content of our services.
- Collection and use (through our use of cookies that are not strictly necessary) and necessary processing to provide you with relevant marketing on social media channels and third party websites.

**Personal data processed:**

- Technical data regarding the units you use and its settings (for example IP-address, geographical location, browser settings, platform).
- User generated data (for example information about the pages you have visited and time spent on our Websites, what links you have clicked and what content you have watched).

**Legal basis:**

Your *consent*.

You can withdraw your consent at any time (read more about this under “What rights do you have relating to the processing of your personal data?”)

*You can read more about our use of cookies in our cookie policy <https://www.arlaplastgroup.com/cookie-policy/>.*

**When you represent one of our customers, suppliers, other partners or prospective customers**

To enable Arla Plast to complete any purchase of a product that has been made by the entity that you represent and fulfil our obligations, we need to process certain personal data about you in addition to certain information regarding your employer or the entity that you represent. If the data is not provided to us, we may be unable to carry out such sales or purchases or they may be subject to unnecessary delays. Accordingly, if the entity that you represent, sells products or services to Arla Plast, we normally record the name, contact



details and possibly also other data exchanged between us during discussions and interaction, for the purpose to make business decisions and to enable us to execute Arla Plast's orders for such products and/or services.

<p><i>Purpose: To enable negotiations and communicate with you prior to, during and/or after the entering into an agreement</i></p>		
<p>Processing made:</p> <ul style="list-style-type: none"> <li>Collection, organization and storage of personal data in order to confirm your identity and verify your contact information and to communicate with you regarding a potential/ongoing agreement with the entity you represent.</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Identity and contact information - name, postal address, e-mail address, phone number etc and other personal data, if you provide such to us and to the extent necessary for the purpose..</li> </ul>	<p>Legal basis:</p> <p>The processing is necessary for the purposes of our <i>legitimate interest</i> of communicating with the entity you represent.</p>
<p><i>Purpose: To administer and complete purchases of products or services from Arla Plast (including follow-up and complimentary orders of previously purchased products) and to administer Arla Plast's purchases of products and services for its own account</i></p>		
<p>Processing made:</p> <ul style="list-style-type: none"> <li>Collection, organization and storage of personal data in order to confirm your identity and verify your contact information</li> <li>Administration of delivery of sold or purchased products (including potential notices or contacts to contact persons regarding possible delays and other particulars relating to delivery)</li> <li>Administration of possible cancellations, complaints and claims for warranties</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Identity and contact information - name, postal address, e-mail address, phone number etc.</li> <li>Order information (for example what product and /or services that has been ordered with you as a reference person)</li> </ul>	<p>Legal basis:</p> <p>The processing is necessary for the purposes of our <i>legitimate interest</i> of entering into and administrating a contract with your employer or other entity that you represent. If you do not provide us information of your identity and contact details (name, e-mail address, phone number) we may not be able to complete the relevant sale or purchase or may only be able to do that with delays.</p> <p>To administer possible cancellations, complaints and claims for warranties is necessary for us in order to <i>comply with applicable legislation</i>. Arla Plast also has a <i>legitimate interest</i> of defending itself in connection with a potential claim in relation to the purchase.</p>

**When you communicate with us (irrespective of your relation to us)**

<p><i>Purpose: To provide you and, if applicable, the entity you represent with support and customer service and to communicate with you in relation to such and similar matters, and/or other enquiries from you.</i></p>		
Processing made:	Personal data processed:	Legal basis:

<ul style="list-style-type: none"> <li>• Collection, organization and storage of personal data in order to confirm your identity and contact information</li> <li>• Communication and correspondence with you by e-mail, telephone or our digital channels</li> <li>• Reply to your comments and questions</li> <li>• Internal administration of your support matter or comments or questions to our customer service</li> </ul>	<ul style="list-style-type: none"> <li>• Identity and contact information - name and e-mail address etc</li> <li>• Information that you provide us for example in such communication, such as information on products or the questions you ask about our products and services</li> <li>• If you interact with us via social media channels (Facebook, Instagram, Twitter, YouTube), if applicable: your profile name and photo</li> </ul>	<p>The processing is necessary for the purposes of <i>our legitimate interest</i> of helping you with your query, product support matter or reply to your comments and questions and in order to meet your request for communication with us.</p>
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### When we send you newsletters, offers or other marketing material

*Purpose: To send you information about Arla Plast's products and services and information about special offers or campaigns*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>• Collection, organization and storage of personal data in order to administer and send newsletters with information about our products and services and information about special offers or campaigns</li> <li>• Administration and sending of adapted recommendations, offers and communication so that you receive offers and information about products and services that we think you are interested in</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>• Identity and contact information: name, e-mail address, telephone number, address and other personal data, if you provide such to us and to the extent necessary for the purpose.</li> </ul> <p>For adapted communication, we also process this personal data:</p> <ul style="list-style-type: none"> <li>• Information about your product preferences (if you have provided it to us)</li> <li>• Purchase history with regard to purchases made by the entity you represent with you as a contact person</li> </ul>	<p>Legal basis: Your <i>consent</i> <u>or</u> our <i>legitimate interest</i>.</p> <p>If you want information about our products and services and information about offers or campaigns you can sign up for our newsletters and/or personally adapted recommendations, offers and communication. You can withdraw your consent at any time (read more about this under "What rights do you have relating to the processing of your personal data?") and we will stop sending you newsletters and/or personally adapted recommendations, offers and communication.</p> <p>If your employer or other entity that you represent recently has purchased one of our products (with you as a contact person) or if you represent one of our prospective customers, we may send you newsletters and/or personally adapted recommendations, offers and communication based on our <i>legitimate interest</i> of marketing our products and services. You have the right to object to such</p>
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		marketing at any time and we will stop sending you newsletters and/or personally adapted recommendations, offers and communication.
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### When we process data in order to comply with legal obligations or to prevent fraud/abuse

*Purpose: To comply with legal obligations and to prevent fraud*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>Necessary processing in order to comply with legal obligations that we are subject to, for example applicable sale of goods legislation, the Swedish Accounting Act, Swedish tax legislation, the Swedish rules on product liability or Swedish rules on statutes of limitation</li> <li>Necessary processing to ensure that you are entitled to act for your employer and/or other party that you represent, as to ensure that only valid orders are made, offers accepted and the like</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Identity and contact information for purchases where you are named as a contact person</li> <li>Information about purchased products by your employer or other entity</li> <li>Information about time/date for purchases and possible cancellations, complaints and claims for warranties</li> <li>Excerpts from business registers and other publicly available data sources</li> </ul>	<p>Legal basis:</p> <p>The processing is necessary in order for us to <i>comply with legal obligations</i> we are subject to. If the information is not processed we are unable to comply with our legal obligations and will therefore be forced to deny the purchase.</p> <p>Further we have a <i>legitimate interest</i> to ensure that we interact with relevant and duly authorized representatives of such companies, with which we interact and conduct business together.</p>
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*Purpose: To prevent and investigate abuse of our services or potential violation of law*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>Necessary processing in order to prevent potential violation of law</li> <li>Necessary processing in order to protect our IT environment towards attacks and intrusions</li> <li>Necessary processing in order to prevent unpermitted use possible customer/partner log-in areas on the Website.</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Customers purchase history connected to contact persons contact details</li> <li>Technical data regarding the units you use and its settings (for example IP-adress, geographical location, browser settings, platform)</li> </ul>	<p>Legal basis: The processing is necessary for the purpose of our <i>legitimate interest</i> of protecting our IT environment and our products and services from attacks and intrusions and other abuse.</p>
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### When you visit our premises

*Purpose: To register your visit at our premises to be able to produce an evacuation list in the event of a fire, accident or other incident and thereby ensure compliance with applicable security regulations and/or internal procedures*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>Registering and administration of our visitor log. Necessary processing in the event of a fire, accident or other incident</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Name together with the company name of the organisation you represent.</li> </ul>	<p>Legal basis:</p> <p>The processing is necessary for the purpose of our <i>legitimate interest</i> of maintaining a high level of security and ensuring the</p>
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may also include transfer of personal data from the visitor log to relevant authorities.		safety of all visitors at our premises.
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### When we process data relating to recruitment matters/procedures

*Purpose: To conduct our recruitment procedures of employees and/or consultants of Arla Plast*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>Necessary processing in order to administer, organize and finalize our continuous ongoing and specific recruitment procedures. Such processing that is necessary to ensure that we in connection such recruitment comply with legal obligations that we are subject to, for example applicable labor law rules, non-discrimination regulations or Swedish rules on statutes of limitation</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Identity and contact information where you are named as an applicant for a position at Arla Plast or an Arla Plast group company</li> <li>Such information about you that you have provided with your application or that has been provided by you during interviews and tests</li> <li>Information about education and school courses, professional certificates, earlier employments, grades and certificates</li> <li>Excerpts from official registers and other publicly available data sources, including social media platforms where you are active as a member</li> </ul>	<p>Legal basis:</p> <p>We have a <i>legitimate interest</i> to ensure that we interact with the individual named in the application and to evaluate his/her application and the data submitted together with it. The legitimate interest also relates to such additional data, which may derive from interviews, tests and other results from the recruitment procedure. The processing is necessary in order for us to <i>comply with legal obligations</i> that Arla Plast is subject to. If the information is not processed we are unable to comply with our legal obligations and may, in some instances, be forced to deny your application.</p>
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*If and when a recruitment procedure has been finalized by you entering into an employment at Arla Plast, you will be informed about Arla Plast's processing of personal data in relation to its employees according with the relevant internal policies.*

### When you are an investor or shareholder, or represent a shareholder in connection with a general meeting of the Company

*Purpose: To comply with our obligations towards investors and shareholders*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>Necessary processing, such as administration, in order to maintain and update the shareholders' register as well as to comply with legal requirements for a CSD-registered company (Swe. avstämningsbolag) with regard to shareholders' registers.</li> <li>Other processing which is necessary in order for us to</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>Identity and contact information (such as address, telephone number and e-mail address).</li> <li>Personal ID no.</li> <li>Information on shareholding in the Company or other financial information.</li> </ul>	<p>Legal basis:</p> <p>The processing is necessary in order for us to <i>comply with legal obligations</i> that Arla Plast are subject to in accordance with the articles of association, the Swedish Companies Act and stock market regulations. If the information is not processed we are unable to comply with our legal obligations and the processing is thus necessary in order for you to be a shareholder and for</p>
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<p>comply with our obligations relating to the public nature of the shareholders' register.</p> <ul style="list-style-type: none"> <li>• Preparation and issuance of notices to attend general meetings.</li> <li>• Administration of attendance to the general meeting, including preparation of voting register.</li> </ul>		<p>example participate at shareholders' meetings.</p>
<ul style="list-style-type: none"> <li>• Enabling shareholders possibility of attending and voting by proxy at general meetings.</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>• Information included in the proxy, such as name, address, telephone number, personal ID no of the holder of the proxy as well as corresponding information of the shareholder.</li> </ul>	<p>Legal basis: The processing is necessary for the purpose of our <i>legitimate interest</i> of complying with our obligations to our shareholders.</p>

**When you are closely associated with a person in the Company's management or in any other way have access to insider information concerning the Company**

*Purpose: To comply with our obligations under EU's market abuse regulation and other related regulations.*

<p>Processing made:</p> <ul style="list-style-type: none"> <li>• Preparation and administration of a list of persons closely associated with persons discharging managerial responsibilities.</li> <li>• Provision of information to persons closely associated with persons discharging managerial responsibilities and necessary administration in connection thereto.</li> <li>• Reporting to relevant authorities on transactions in shares and debt instruments issued by the Company, made by persons closely associated with persons discharging managerial responsibilities.</li> <li>• If necessary, transfer of information to regulatory authorities.</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>• Identity and contact details (such as address, telephone number and e-mail address).</li> <li>• Personal ID no.</li> <li>• Information on the association with a person discharging managerial responsibilities.</li> <li>• Other personal data that you provide us in your report of transactions.</li> </ul>	<p>Legal basis: The processing is necessary in order for us to <i>comply with legal obligations</i> that Arla Plast are subject to in accordance with the EU market abuse regulation and other related regulations.</p>
<ul style="list-style-type: none"> <li>• Preparation and updating as well as administration of an insider list.</li> </ul>	<p>Personal data processed:</p> <ul style="list-style-type: none"> <li>• Identity (including your sur name at birth) and contact details (such as address,</li> </ul>	<p>Legal basis: The processing is necessary in order for us to <i>comply with legal obligations</i> that Arla Plast are subject to in accordance</p>

	<p>telephone number and e-mail address).</p> <ul style="list-style-type: none"> <li>• Personal ID no.</li> <li>• Work title.</li> <li>• Corporate details (such as your corporate e-mail address, telephone number).</li> <li>• Other personal data contained in the insider list and/or that you provide us.</li> </ul>	<p>with the EU market abuse regulation and other related regulations.</p>
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**DO YOU WANT TO KNOW MORE ABOUT OUR LEGITIMATE INTEREST?**

As we have described above under “What do we do with your personal data and why do we do it?” we sometimes process your personal data based on our legitimate interest. If you have any questions about this or want to know more about how we have determined our legitimate interest, you are welcome to contact us.

**DO WE TRANSFER YOUR PERSONAL DATA TO THIRD PARTIES?**

Yes, in some cases we share your personal data with third parties. We conduct reasonable technical, organizational and legal security measures in accordance with applicable data protection regulation in order to ensure that your personal data is handled in a secure way when the data is transferred or shared with third parties. Arla Plast will however not sell your personal data to any third party without your consent.

If you want more information about the third parties that we share your personal data with, you are always welcome to contact us. Below a description of such third parties (and what type of personal data is subject of such transfers) is listed:

*Suppliers of ICT systems and their partners for use, development and support:* We use different types of IT systems and services which is necessary in order for us to be able to provide you with the services you request and for us to conduct our business. Your personal data is stored and processed in some of these. We also use certain third party providers for web analytic services. The suppliers are engaged by us as our data processors and only processes the personal data on our behalf and according to our instructions; subject to written data processing agreements (DPA).

*Partners who administer payments:* We may share your personal data (as a contact person) with a third party payment solution provider that administrates payments for our products and ensures rightful payments. The payment solution provider can also share the data with credit institutions or contractual partners if this aids processing of an order for which you are named as contact person.

*Freight companies/Carriers:* If the entity you represent has purchased a product that Arla Plast shall deliver, we share information about such entity’s shipping address (possibly with you as named contact person) with a third party carrier in order to send you the product.

*Marketing and analytics partners:* In order to improve our services and to market Arla Plast’s products to you (as a customer or partner representative or as a customer), for example by providing you with relevant marketing on other websites, sending you newsletters, offers or other information (including surveys) we may share your personal data with the companies that provide us with marketing and analytics services.

*Recruitment partners:* If you have contacted us (or our employment partner) in an employment matter, we may share your personal data in such matter with the recruitment partner that provides us with such services and we may also, in some instances, receive personal data from that partner in relation to such information that you have provided them during the recruitment procedure such as, but not limited to, application documentation, interview memorandums, test results and other personal data collected by the partner (or us).

*Authorities and/or courts of law:* If and to the extent we have legal obligation to do so or in case of a legal claim, personal data may be transferred to relevant authorities or courts of law.

*Euroclear Sweden AB, other shareholders, authorities and the public:* Personal data is transferred to Euroclear Sweden AB, which handles the shareholders' register of Arla Plast. Personal data relating to the shareholding of Arla Plast is also transferred to other shareholders authorities and the public when Arla Plast is legally obligated to do so.

#### **DO WE TRANSFER YOUR PERSONAL DATA TO THIRD COUNTRIES?**

Yes, we do. Some of our suppliers and partners have their businesses in countries outside EU/EEA. Therefore, in some cases, we transfer personal data to such countries. When such transfer is made, we will take all reasonable legal, technical and organizational measures in order to ensure that your personal data is handled securely and with an adequate security level and in accordance with current data protection legislation. This means that the transfer of personal data may be based on for example an adequacy decision by the European Commission or Model Contract Clauses.

#### **HOW LONG DO WE STORE YOUR PERSONAL DATA?**

Please note that the same type of personal data may be processed for different purposes and based on different legal grounds, for example processing which is based on legal obligations based on our legitimate interest or based on your consent. This means that certain personal data may still be stored by us even if you withdraw your consent and the processing that your consent concern ceases.

This also means that certain personal data may be eliminated from one system because it is no longer necessary for one particular purpose, but still be stored in another system based on your consent or for another purpose for which the personal data is still necessary.

Any personal data (normally in your capacity as a contact person) that we process in connection with *negotiations and communications with you prior to, during and/or after the entering into an agreement* and in connection with *purchases of products* as well as to administrate or to fulfill our obligations to a customer or supplier under a contract (with you named as a contact person) will be processed for as long as we have any remaining contractual obligations in relation to such transaction. If you represent a prospective customer the processing will continue for up to 12 months.

If a *cancellation, claim or warranty request* is made (with you named as a contact person) we will process your personal data for as long as the process regarding the cancellation, claim or warranty request is active.

When we process personal data as a result of your *communication with us*, in for example support and customer service matters, the processing will continue until the latest of (i) Arla

Plast's responsibilities or rights under the relevant sale or purchase of products have terminated, (ii) your support matter or customer service matter has been completed or, in any event, (iii) for six (6) months following such contact or communication.

When processing is made in order for us to comply with *legal obligations*, your personal data will be processed for as long as is set out in the relevant legal obligation. When processing is made in order to *prevent and investigate abuse or violations of law* the processing may be made up to twenty-four (24) months after collection of such data.

When processing is made in connection with *your visit at our premises*, your personal data will be processed for twenty-four (24) hours or, in case of incidents, such longer period as required under the applicable legal regulations.

When we process user generated data from the Website which is collected through our use of cookies, the time for processing will vary depending on the type of cookies that are used. You can find more information regarding this in our cookie policy.

When we process your personal data in connection with *recruitment matters/procedures* such processing will continue until we have taken a final decision in the employment matter and such following period, that is necessary to ensure that Arla Plast timely and rightfully has complied with its legal obligations in such matters. If and to the extent a recruitment results in an employment with you, our processing will thereafter continue for as long as the employment is active and such following period that is necessary to determine that Arla Plats timely and rightfully has complied with its legal obligations during the employment and/or possible termination of the same, as more detailed set out in Arla Plast's relevant internal policies.

When processing is made to *comply with our obligations towards investors and shareholders*, you personal data will be processed for as long as you are a shareholder or for as long as is necessary in accordance with an agreement with you or in accordance with applicable legislation.

When processing is made to *comply with our obligations under EU's market abuse regulation and other related regulations*, personal data will be stored for as long as you are closely associated with persons discharging managerial responsibilities and five (5) years thereafter, and if you are listed on our insider list, the personal data will be stored for five (5) years after the the insider list has been prepared and/or updated.

When personal data is processed based on your *consent* the processing will continue until you withdraw your consent, or otherwise indicate to us that you no longer wish to be subject to the processing.

When we process your personal data based on our *legitimate interest*, you have the right to object to the processing at any time.

Your personal data may be stored longer than the above, to the extent Arla Plast is required to do so by law, regulation or decisions made by authorities.



## **WHAT RIGHTS DO YOU HAVE RELATING TO THE PROCESSING OF YOUR PERSONAL DATA?**

Below you will find a description of your rights regarding the processing of your personal data. If you wish to exercise any of these rights, you are welcome to contact us by e-mail, [privacy@arlaplast.com](mailto:privacy@arlaplast.com).

### *Right to obtain access to information*

You have the right to obtain access to information about the personal data we process about you and you also have the right to request correction of your personal data.

### *Right to control of your personal data*

You have the right to object, at any time, to processing of your personal data which is based on our legitimate interest. Under certain circumstances, for example if you withdraw all or part of a given consent on the processing of personal data, object to our processing or if you think that the processing is not necessary for the stated purposes, you have the right to request deletion or restriction of your personal data. Under certain circumstances, you also have the right to receive the personal data concerning you that you have provided us with, in a structured, commonly used and machine-readable format and have the right to transfer such data to another data controller.

### *Right to withdraw your consent*

You have the right to withdraw a given consent at any given time. The withdrawal of consent may, however, have no effect on our processing of your personal data for the period prior to the withdrawal took place. You also have the right, at any time, to object to the processing of your personal data for direct marketing purposes.

### *Right to submit complaints*

If you have any complaints regarding our processing of your personal data, you have the right to submit such complaint to the Swedish Supervisory Authority ([www.imy.se](http://www.imy.se)) or to another applicable supervisory authority.

All communication and measures taken by us in connection with you exercising your rights is provided free of charge. If you make an obviously unreasonable or unjustified request, we do, however, reserve the right to charge you with a reasonable fee for the costs that arise for us in order to provide you with the requested information or to take the steps necessary to fulfil your request or to decline such request.

## **DO WE USE COOKIES?**

Yes. We use cookies at the Website in order to provide you with access to various functions and the full user experience on the Website as well as for analyzes and user behaviour.

For more information on our use of cookies including the storage time in relation to the different cookies, your rights connected to our use of cookies and how you can decline the use of cookies and other tracking devices, please see our cookie policy <https://www.arlaplastgroup.com/cookie-policy/>.

## **WHAT DO WE WANT TO DO IN THE FUTURE?**

We always want to develop and improve our products and services that we offer you. If we introduce new features that affect the purposes for which we process your personal data or features that we think is, in any other way, of importance to you we will notify you of the changes at our website and by e-mail (if we have your e-mail address) before the relevant changes come into effect.



If you, for any reason, do not like the changes we make, your rights under applicable data protection legislation will of course remain. You will always find the latest version of the Privacy Policy on the Website.

**DO YOU HAVE ANY QUESTIONS?**

If you have any questions regarding the way Arla Plast handles personal information, regarding the information in this Privacy Policy or if you have any requests regarding the processing of personal data, do not hesitate to get in touch with us.

Our postal address is, Arla Plast AB, Box 33, SE-591 06 Borensberg, Sweden, Switchboard + 46 141 20 38 00 and E-mail: [privacy@arlaplast.com](mailto:privacy@arlaplast.com)