



# INTEGRITY POLICY

Last Updated  
2023-05-22

## 1 Introduction

- 1.1 On May 25, 2018, the General Data Protection Regulation (EU) 2016/279 "GDPR" entered into force. The Data Protection Regulation aims to protect the fundamental rights and freedoms of natural persons, especially their right to the protection of personal data. PolarCool protects your personal integrity and it is important to us that you feel safe with how we handle your personal data.
  
- 1.2 In this privacy policy, we explain how we, as the data controller for your personal data, process your personal data according to the data protection regulation. We specify which personal data we process and which reasons are the basis for the processing. We also tell you how you can get access to your personal data and how you should express your views to us about the processing.

## 2 What personal data we process, purpose and legal basis

### Representatives from companies/organizations

PolarCool processes information about you that we need to be able to contact you as a representative of a company/organization. Your data is often collected from you directly or from the company/organization you represent.

<b>CATEGORY OF PERSONAL DATA</b>	<b>PURPOSE OF THE TREATMENT</b>	<b>LEGAL BASIS</b>
Personal and contact information (name, e-mail, address, telephone, e-mail, function at the company/organization)	The processing is necessary to be able to communicate with the company/organization regarding the administration and performance of services, delivery of goods, technical issues, etc.	Necessary to fulfill the agreement with the company/organization.  PolarCool has a legitimate interest in fulfilling the agreement and administering the business relationship with the company/organization. (balancing of interests)
	Fulfil legal requirements, for example, accounting obligations	The processing is necessary to fulfill the company's legal obligations.
	Enable marketing and communication with the company/organization	PolarCool has a legitimate interest in being able to market the company and its products/services.

## 2.1 Persons in a leading position and their relatives

The company is, according to the EU's market abuse regulation (MAR), obliged to keep records of the company's persons in a leading position and their relatives.

<b>CATEGORY OF PERSONAL DATA</b>	<b>PURPOSE OF THE TREATMENT</b>	<b>LEGAL BASIS</b>
Name, function in PolarCool in which way the person is related.	Meet legal requirements.	Necessary to fulfill the company's legal obligations.

## 2.2 Persons with access to inside information about the company

According to the EU's market abuse regulation (MAR), the company is obliged to keep an insider list.

<b>CATEGORY OF PERSONAL DATA</b>	<b>PURPOSE OF THE TREATMENT</b>	<b>LEGAL BASIS</b>
Name (including surname at birth), telephone number for work, name of company the person represents, company address, function, date of birth, private telephone number, full home address	Meet legal requirements.	Necessary to fulfill the company's legal obligations.

## 2.3 Persons seeking employment with us

<b>CATEGORY OF PERSONAL DATA</b>	<b>PURPOSE OF THE TREATMENT</b>	<b>LEGAL BASIS</b>
Contact details such as name, address, telephone number, e-mail, CV and possibly personal letter.	To be able to fulfill the company's recruitment needs.	The processing is necessary for the company's legitimate interest in recruiting the right personnel to the company (balancing of interests).

## 2.4 People who contact us spontaneously

<b>CATEGORY OF PERSONAL DATA</b>	<b>PURPOSE OF THE TREATMENT</b>	<b>LEGAL BASIS</b>
Personal and contact information such as name, title, address, e-mail and telephone number.	In order to enable and facilitate communication with potential customers, shareholders, suppliers, partners and other stakeholders	The processing is necessary for the company's legitimate interest in being able to communicate with potential customers, shareholders, suppliers, collaboration partners and other stakeholders.

### **3 From where do we collect your personal data?**

- 3.1 PolarCool processes personal data that you yourself have provided to us when you contact us. We may also collect information from public records.

### **4 Who do we share your personal data with?**

- 4.1 PolarCool does not share your personal data with third parties.

### **5 Transfer to third countries**

- 5.1 PolarCool only processes your personal data within the EU/EEA, i.e. personal data is not transferred to third countries.

### **6 How long do we store your personal data?**

- 6.1 We do not store your personal data for longer than necessary with regard to the purpose for which the personal data is processed. Some personal data is saved if it is necessary to be able to fulfill statutory provisions, for example, according to the Accounting Act.

### **7 Safety and Security**

- 7.1 PolarCool has taken adequate technical and organizational security measures to protect your personal data from unauthorized access, modification, or dissemination.

### **8 Your Rights**

- 8.1 8.1 Regardless of what personal data we have saved about you, you must always have control over your own personal data. Therefore, according to the data protection regulation, you have the following rights
  - 8.1.1 *Right to access and transparency ("register extracts")* - You can request extracts of registered personal data and verify the information we have about you.
  - 8.1.2 *Right to correction* - You have the right to have incorrect or incomplete information about you corrected.
  - 8.1.3 *Right to be forgotten* - You have the right to request to have your personal data deleted if the data is no longer necessary for the purpose for which it was collected. If the data is saved due to statutory obligation to save certain information, however, you do not have the right to deletion.

- 8.1.4 *Right to limitation* – You have the right to limit further processing, for example if you question whether the processing is legal.
- 8.1.5 *Right to data portability* – i.e. right to have some of your personal data transferred to another personal data controller.
- 8.1.6 *Right to object* - You always have the right to stop direct marketing or to object to such processing of personal data based on a balancing of interests

## **9 If you are dissatisfied with our processing of your personal data**

- 9.1 If you are dissatisfied with our processing of your personal data, you have the right to submit a complaint to the Swedish Data Protection Authority.

## **10 Changes to this Privacy Policy**

- 10.1 We reserve the right to update or change this policy as necessary. You should regularly visit the website, [www.polarcool.se](http://www.polarcool.se) to obtain the latest version.

## **11 How to contact us**

- 11.1 Do you have questions regarding our processing of personal data or do you want to exercise any of your rights linked to the processing of your personal data. please contact  
Personal data controller: PolarCool AB (publ)  
Organization number: 559095-6784  
Address: Medicon Village, 223 81 Lund  
Email: [info@polarcool.se](mailto:info@polarcool.se)