

# Privacy policy for WLK- Wennerström Ljuskontroll AB

Thanks for choosing to use the WLK website. We always safeguard our customers' interests and strive to protect your personal data in the best possible manner. In this privacy policy, we explain how we collect, save and use your personal data. The policy also describes your rights to the data and how you can act on it. The policy is based on the GDPR (General Data Protection Regulation).

## When does the privacy policy apply?

The privacy policy applies when Wennerström Ljuskontroll AB (WLK) supplies products and services in connection with purchases, quotations, services such as support and complaints and other contact with WLK such as visits to our website and the use of an account in the WLK online store, participation in seminars and courses and visits to trade fairs.

## Who is responsible for the personal data we collect?

Wennerström Ljuskontroll AB Head Office (corporate identity number 556493-8982) is the controller for the company's processing of personal data.

## When do we process your personal data?

WLK collects and processes personal data in connection with purchases of our products, requests for quotations, making price agreements, contact with our support department, complaints, visits to and registration of accounts on the WLK website, participation in customer activities arranged by WLK and other forms of contact with WLK.

Personal data that is collected in connection with purchases is data that is required (such as email address, phone number, company name and address) to make a contract with WLK and to enable WLK to supply products and services.

If you have an account on the WLK website, we collect data to register the account and data required for further administration of the account. The data is also required to permit you to use the account's functions such as saving lists of favourites, viewing your prices, orders and invoices, managing several delivery addresses and smoother management of complaints online.

In addition to the personal data provided in connection with purchases and other contact with WLK, we collect data about companies' credit ratings from credit bureaus, banks or reference agencies.

We may also update a company's address details via third party services for address updating.

## Which personal data do we process?

WLK only does business with other companies, B2B, and therefore has little need to process personal data. Our approach is to use the least privacy-sensitive data and not process more personal data than is necessary to perform our undertakings in relation to you, our business customers.

### **As a business customer of WLK**

Name

Corporate identity number

Address

Phone number

Email

Payment details

Customer number

Credit rating

IP address when using the WLK website and IP services for connected lighting and buildings

Information on registration for our customer activities

### **As a WLK website account holder**

Name

Corporate identity number

Address

Email

Payment details

Customer number

IP address

Data on business customers' purchases

Data on your account

Title and authorisation rights

Sensitive personal data such as race, ethnic origin, political views and religious or philosophical beliefs and data concerning health or sex life is not processed by WLK.

The WLK website contains links to other websites. We are not responsible for the content of these websites, nor for their processing of personal data.

### **With whom may we share your personal data?**

The number of persons who have access to the data is limited. Where necessary to enable us to offer our products and services, we share your personal data with our processors, companies that process data on our behalf according to our instructions. A separate confidentiality agreement (processor contract) is signed with our processors for this purpose.

We have processors that help us with:

- Logistics
- Transport
- Payment solutions and payroll management (banks and other payment services suppliers)

- IT services (companies that manage the necessary operation, technical support and maintenance of our IT solutions)

If personal data is managed by companies that are independent controllers, the privacy policy and personal data management of these companies apply.

We will not sell your personal data to any third party for use in third party marketing campaigns.

Personal data may be disclosed to comply with existing statutory requirements or requirements from public authorities and to safeguard WLK's legal interests or to identify, prevent or highlight fraud and other security or technical problems.

### **Where do we process your personal data?**

We only process your personal data within the EU/EEA, and all of our IT systems are located within the EU/EEA. Your personal data is therefore never transferred to third countries.

### **Why do we process your personal data?**

WLK processes your personal data primarily to perform our obligations to you as our business customer and to comply with statutory requirements.

Our obligations to you as our business customer concern processes such as purchases, deliveries, invoicing, support and complaints. And offering and assessing payment methods.

To comply with statutory requirements such as those in accounting laws.

The data is used largely to manage customer relationships and to supply our products and services. The data may therefore form the basis of business follow-up and may help us improve our customer offering in the form of development of services, products and functions.

Your personal data is also processed in order to provide information and send marketing via email and in connection with follow-up on sales and services. We may also send marketing when canvassing prospective customers.

### **Legal basis of our processing of your personal data**

WLK bases the processing of your personal data on a number of legal bases.

Contract:

One of the reasons we process your personal data is to perform the contract with you as our business customer or as an account holder at our online store, for example to be able to implement purchases and simplify the administration of cases and order history.

Balancing of interests:

Part of the processing of personal data by us is based on a balancing of interests. For example, this applies to the information we send you about our products, services and seminars/courses. WLK never processes sensitive personal data based on a balancing of interests.

Legal obligation:

We process your personal data in certain cases based on a legal obligation to meet various statutory requirements such those in the Swedish Accounting Act.

### For how long do we save data about you?

We save personal data for as long as it is necessary to fulfil the purposes for which the data was collected under our privacy policy. Certain data may be saved for longer for legal reasons.

WLK saves data about customers for as long as is required under contracts of sale. The storage time also depends on warranty periods, complaints management and multiannual projects.

WLK saves data about account holders for as long they have a registered WLK account.

WLK saves personal data for companies that have, in any way, interacted with or shown interest in WLK's products and services.

WLK is liable to ensure that your personal data is processed in pursuance of existing legislation. At your request or at our own initiative, we will rectify, anonymise, erase or supplement data that is found to be inaccurate, incomplete or misleading.

### Your rights

Right to access:

You are entitled, at any time, to be informed about the personal data that WLK processes about you by requesting a record extract. The request must be submitted in writing, signed by you, by post to WLK and may consequently not be sent by email. This is to permit us to prevent disclosure of personal data to unauthorised persons.

Right to rectification:

You may request that your personal data be rectified if the data is inaccurate, and you may also supplement any incomplete personal data.

Right to erasure:

You may request that personal data we process about you be erased if it is no longer necessary for the purposes for which it was collected. Or if you object to a balancing of interests we have done based on a legitimate interest and your grounds for objection are weightier than our legitimate interest.

However, there are statutory requirements that may prevent us from immediately erasing certain personal data, for instance in accounting and tax legislation. If we are prevented from complying with a request for erasure, we will instead block the personal data so that it can only be used to comply with the legislation.

Right to restriction of processing and objections to certain types of processing:

You may request a restriction on how your personal data is processed instead of erasure so that it can only be used for certain defined purposes. You are always entitled to object to all types of processing that are based on a balancing of interests and to withdraw any consent.

Right to data portability:

Under certain circumstances, you are entitled to request receipt of your personal data in a machine-readable format and to transfer it to another controller.

Swedish Data Protection Authority:

The Swedish Data Protection Authority is a supervisory authority responsible for monitoring

the application of the GDPR. If you consider that a company is processing personal data incorrectly, you are entitled to submit a complaint to the Swedish Data Protection Authority.

### **How do we protect your personal data?**

We use IT systems to protect your personal data and have taken measures to prevent unlawful or unauthorised processing. Only those persons who actually need to process your personal data to permit us to fulfil our specified purposes have access to it.

### **Amendment of the privacy policy**

WLK is entitled to make amendments to the privacy policy at any time. The most recent version is always available on the WLK website.

The privacy policy was most recently updated on 10 May 2022.

### **Use of cookies on our website**

When you visit our website, we use cookies. A cookie is a small text file that is stored on your computer and contains information. Cookies are used for purely technical reasons to improve website functionality. There are two types of cookies – one that saves a file permanently on your computer, and another that is saved temporarily while you are on the site.

We use temporary cookie files that are saved for as long as you are logged in. The exception to this is if you choose automatic login. In such cases, your username and password are stored in a cookie file between logins.

If you do not want cookies stored on your computer, you can disable the function in your browser settings. If you do this, some functions on our website will not work for you as a user.

### **Contact information**

If you have any questions about this privacy policy or the processing of your personal data or you want to request a record extract, please contact us at:

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Jan Inghes Torg 34  
120 71 Stockholm, Sweden