

Policy for integrity and marketing activities

Latest update: 21 May 2018

1. General

At Dustin, we want you to feel safe when you provide us with your personal data. This privacy policy describes how we collect, use, transfer and store your personal data, and how we make sure that your personal data is processed lawfully. It is important that you read and understand this privacy policy and that you feel safe about how we process your personal data.

2. Who is the personal data controller?

2.1 Dustin AB, with corporate registration number 556237-8785 and postal address P.O. Box 1194, SE-131 27 Nacka (referred to in this policy as “Dustin”), is the controller in relation to the processing of your personal data when Dustin offers and markets our goods and services, and in relation to your other contacts with Dustin, such as visits in our web shop or support matters via email or phone. As a controller, Dustin is responsible for making sure that your data is handled in a correct and secure way pursuant to applicable legislation.

2.2 Dustin has a shared IT infrastructure with some affiliated companies within the Dustin Group. All business transactions with our customers, as well as any personal data and databases related thereto, that is being processed in this infrastructure are managed and directly owned by Dustin. Dustin thus has the controlling influence over your personal data and ensures control and safe processing of your personal data through agreements with the affiliated group companies.

3. What personal data do we process?

Dustin collects and processes the following categories of personal data about you as a customer and potential customer when you complete a purchase and use our services, and when we market and sell our goods and services.

- Contact details such as name, title and attestation rights, email address, delivery address, invoicing address and phone number.
- Age
- Account information such as customer account number, user name, password and registration date.
- Customer settings for marketing communication and personalized offers.
- Identification number, i.e. national personal identity number or corporate registration number.
- Order information such as order number, goods or services ordered, order date, price, discount and purchasing history.
- Payment details such as payment method, card number, cardholder, transaction time, amount, IP address and payment history.
- Financial information such as credit valuation reports.

- Correspondence and other information related to support matters such as call recordings, notes and emails from contacts with customer service.
- User-generated data about your interaction with Dustin's marketing communication and websites, e.g. IP address, device information (technical information about the computer, mobile phone and other devices you use, for example browser settings, time zone, operating system), location information, replies to questionnaires, and click and visit history that indicates which goods and offers you have shown interest for, how you interact with our newsletters, which of our events you have been registered for and attended, as well as results from market/customer satisfaction.
- If you are entitled to any special offers or discounts through membership with unions or associations that have negotiated an agreement with Dustin for their members.
- Information provided in competition entries and registrations to and evaluations of events or other marketing activities, including information about your health such as details of allergies.
- Video surveillance recordings from our stores.

4. From which sources do we collect data about you as our customer?

4.1 Dustin collects your personal data directly from you when you place an order, visit Dustin's website, attend our events, click on links in our digital marketing that has been sent to you, communicate with our customer service or contact Dustin and in any other way and provide information about yourself. Personal data is collected on these occasions to enable you to enter into agreement with Dustin and enable Dustin to offer its goods and services to you.

4.2 If you have a Dustin account, Dustin also collects personal data about you when you register for the account and during the period when you are an account holder, e.g. your purchase history, your behavior on Dustin's website, your customer settings to receive marketing communication and which special offers you have shown interest in by visiting our web shop and reading or clicking on links in our digital send-outs.

4.3 In addition to the information that Dustin collects directly from you, we may also collect personal data about you from someone else, i.e. third parties. We obtain information from public registers through third-party services for updating addresses, e.g. Bisnode, to make sure that Dustin have correct contact details to you. We obtain information about your creditworthiness from credit agencies, public records or banks, e.g. UC.

4.4 Dustin also collects certain personal data via cookies which log your website behavior and thus your web content preferences. You can read more about how we use cookies in [Dustin's cookie policy](#).

5. Why do we process personal data about you?

Dustin collects and processes personal data about you for various purposes. These purposes set the limit for our use of your personal data. Below, we explain the purposes of our processing and provide examples of processing activities that may take place

under each purpose. Kindly note that some of your personal data may be processed for multiple purposes.

a) To manage orders and purchases

Processing of personal data for this purpose includes activities to identify you and verify your age, send order confirmations, assess which payment methods we can offer you (based on contact details, goods ordered, payment history and financial information) and manage payment transactions for ordered goods and services, deliver orders, send delivery notifications and handle complaints and warranty matters for purchased goods and services.

Our collection and processing of personal data to manage your orders and purchases is required to fulfill our obligations pursuant to [Dustin's general terms of sale](#). If the necessary data is not provided, we cannot fulfill our obligations, so we may cancel your order or purchase.

b) To provide and manage Dustin accounts

We process personal data for this purpose to, for example, provide you access to log in to the account, verify your identity, create your personal pages, maintain correct contact details, manage your settings for marketing communication and personalized offers, facilitate your shopping in our web shop by means of pre-entered data and saved digital shopping baskets, facilitate your handling of cases and complaints, and allow you to monitor your order and payment history.

Read more about registering for a Dustin account in the [Terms and Conditions for the Dustin Account](#). Our collection and processing of personal data to provide and manage your Dustin account is required to fulfill our obligations pursuant to the Terms and Conditions for the Dustin Account. If the necessary data is not provided, we cannot fulfill our obligations so we may decline your registration or terminate the account.

c) To provide personalized information and offers and a personal experience of our web shop to you with a Dustin account

We at Dustin want you to have the best possible experience when you visit our website and when we communicate with you. Therefore, we process personal data for this purpose in order to improve your user experience as to create, offer and provide you with personalized content in our communication and marketing via mail, email, text message/MMS and phone with tailored offers, recommendations, invitations to events and other information that we believe is relevant to you, and to remind you of any abandoned digital shopping cart. To enable this, analyses are carried out on the data collected by Dustin, e.g. age, place of residence, order history and user-generated data.

Read more about how we personalize our offers and communication to your personal aspects and how you can decline personalized offers in the [Terms and Conditions for the Dustin Account](#). Our collection of personal data for this purpose is required to fulfill our obligations pursuant to these terms and conditions. If the necessary data is not provided, we cannot fulfill our obligations, so we will restrict discounts and other benefits associated with your account.

d) To market and provide other information about goods and services

We process personal data for this purpose to market and inform you about goods, services and offers from the Dustin Group via mail, email, text message/MMS and phone, as well as to present recommended goods and services, remind you about abandoned digital shopping cart and to invite you to events, competitions and market/customer satisfaction surveys.

If you have a Dustin account, you can find out more about our marketing communication in the [Terms and Conditions for the Dustin Account](#). Our collection of personal data for this purpose is required to fulfill our obligations pursuant to these terms and conditions. If the necessary data is not provided, we cannot fulfill our obligations, so we will restrict discounts and other benefits associated with your account.

e) To coordinate and administrate participation in events, competitions and other marketing activities

Processing of personal data for this purpose includes measures to, for example, identify attendants, communicate with competition participants as well as elect winners and deliver prizes, verify participants' age, and communicate with attendants before and after an event (e.g. confirmation of registration, reminders and evaluations). Note that information about your participation in any event is included in the category of user-generated data, which is processed for other purposes.

f) To manage matters for Dustin's support functions

Processing of personal data for this purpose includes Dustin's activities to, for example, communicate, verify customer's identity, investigate complaints and other support matters, reply to questions received by customer service or other support functions via email, phone or digital channels, rectify incorrect data, provide technical support and attend to the customer relationship.

g) To fulfill legal obligations required of the Dustin Group

Personal data is processed for this purpose in order for the Dustin Group to fulfill legal obligations pursuant to laws and regulations, court judgements, and governmental decisions. Examples of such obligations include product liability and product safety, such as communication and information about product alerts and product recalls (e.g. in the event of defects or products that are harmful to your health) and archiving requirements under applicable Accounting Act. If the necessary data that Dustin collects for this purpose is not provided, we cannot fulfill our legal obligations, so we may cancel your order, purchase or other activity that gives rise to our legal obligations.

h) To avoid, prevent and investigate improper use and crime in our business operations

Personal data is processed for this purpose to, for example, avoid improper use of Dustin accounts and prevent and investigate suspicions of theft and fraud. So, we have video surveillance in our physical stores. We also perform fraud screenings when you place an order on invoice where we analyze the ordered goods, delivery address, value of the goods, etc. Typical fraud behavior is flagged and followed up by manual assessment to investigate and evaluate any risk of attempted fraud. Suspicion of crime and attempted crime may be reported to the police.

i) To evaluate, develop and improve Dustin Group's services, goods and systems for our customers in general

Processing of personal data for this purpose includes activities to, for example, make our web shop and other services more user-friendly, develop or highlight digital functions, improve our customer offering (e.g. development of goods and services), produce data to improve the flows of goods and logistics (e.g. to forecast purchases, stock and deliveries), develop and improve the company's product range and resource efficiency, improve our IT systems to enhance security, generate statistics for market and customer analyses, business follow-up and business and method development related to orders and purchases, automatic archiving of behavior that may need to be examined for security reasons, and provide customers with the opportunity to influence Dustin's product range. To fulfill this purpose, Dustin performs general analyses in

aggregated form, i.e. not at individual level, relating to, for example, click and visit behavior, device information, order history, geographical location and feedback from individual customers.

6. What are the legal bases for our processing of your personal data?

For Dustin to lawfully collect and process your data, we must have a legal basis for each purpose for which the data is processed. The legal bases for our processing purposes are described in this section. Kindly note that several legal bases may be applicable to the same processing activity.

a) Legal obligation

This basis signifies that our processing is necessary for compliance with a legal obligation that is required of Dustin, for example to record payment details in order to fulfill the legal obligations under applicable Accounting Act.

b) Contractual obligations

This basis represents that our processing is necessary for either the performance of a contract to which you as a customer is party or to take steps prior to entering into a contract at a later stage. If you have a Dustin account, you have entered into a contract with Dustin by accepting the [Terms and Conditions for the Dustin Account](#), which sets the limits for our processing of your personal data to provide, manage and administrate our services associated with the account, e.g. analysis of your personal aspects to provide personalized offers. When placing an order or making a purchase, we process your data to fulfill obligations in accordance with Dustin's general terms and conditions of sale. It may then be necessary for Dustin to, for example, register your contact details so that we can fulfill our obligation to deliver the goods or services, and request a credit valuation report if you choose invoice as a payment method so we can confirm your creditworthiness.

c) Legitimate interests

This basis expresses that our processing is based on a so-called balancing of legitimate interests, meaning that the processing is necessary based on our assessment that Dustin has a legitimate interest in processing your personal data which is not overridden by your interest not to have your personal data processed. On this basis, we process your personal data to, for example, avoid improper use of any Dustin account and to avoid, prevent and investigate crime in our business operations. If we believe that a crime or an attempted crime has been committed and we submit a report to the police, Dustin will also continue to process your personal data to establish, exercise or defend legal claims.

7. For how long do we retain your personal data?

7.1 Dustin will store your personal data for as long as necessary to fulfill the purposes for which the data is being processed. So, the retention period depends on the purpose for which the data is being processed. Dustin may also store data for a longer period if it is necessary to establish, exercise or defend a legal claim, e.g. if there is an on-going dispute or a crime has been reported to the police. We perform regular disposals and erase personal data that is no longer necessary to process.

7.2 Dustin stores personal data related with your Dustin account for as long as you are active by interacting with Dustin in various ways. If you have been inactive for a certain period, the account will be automatically terminated and the personal data we have collected and processed to provide the Dustin account and the services associated with the account will be erased. Read out more about this and how we define inactive customers in the [Terms and Conditions for the Dustin Account](#).

8. Overview of our personal data processing

Below is a table of our personal data processing activities in order to provide you with a clear overview of which personal data categories we process for our various purposes, the legal basis on which our processing is based and how long we retain the data.

Purpose	Legal basis	Categories of personal data	Retention time
To manage your orders and purchases	Contractual obligations pursuant to Dustin's general terms of sale	<ul style="list-style-type: none"> • Contact details, e.g. name, postal address, email address • Account information • ID number • Order information • Payment details, e.g. card number and cardholder • Financial information 	Five years after your order has been paid for and delivered or, if the warranty for purchased goods or services is longer, after that period has expired.
To provide and manage your Dustin account	Contractual obligations pursuant to the Terms and Conditions of the Dustin Account	<ul style="list-style-type: none"> • Contact details, e.g. email address • Account information, e.g. user name and password • ID number • Order information such as order history • Payment details • User-generated data • Customer settings 	For as long as you have a Dustin account.
To provide personalized information and offers and a personal experience of our web shop if you have a Dustin account	Contractual obligations pursuant to the Terms and Conditions of the Dustin Account	<ul style="list-style-type: none"> • Contact details • Age • Account information • Order information such as order history • Payment details • User-generated data such as click and visit history, as well as location information • Customer settings • Employment or membership generating discounts 	For as long as you have a Dustin account.

Purpose	Legal basis	Categories of personal data	Retention time
To market and provide other information about goods and services	Contractual obligations pursuant to the Terms and Conditions of the Dustin Account if you are an account holder Legitimate interest if you are not a Dustin account holder	<ul style="list-style-type: none"> • Contact details such as place of residence • Account information • Age • Order information such as order history • User-generated data such as click and visit history • Customer settings such as the option to receive marketing information 	For as long as you have a Dustin account, if you are an account holder. Two years after you last clicked on a link in our communication if you are not a Dustin account holder.
To coordinate and administrate participation in events, competitions and other marketing activities	Legitimate interest	<ul style="list-style-type: none"> • Contact details • Account information • ID number • Data provided in competition entries, applications and evaluation 	One year after the end of the event or the competition.
To manage matters for customer service and other support functions	Legitimate interest	<ul style="list-style-type: none"> • Contact details, e.g. phone number and email address • Account information • ID number • Order information such as order number, purchased goods and delivery date • Payment details such as payment method • User-generated data • Employment or membership generating discounts • Data provided in support matters such as technical information about the customer's equipment 	Five years after the last contact in the matter or, if the warranty period for the purchased goods or services to which the matter relates is longer, after that period has expired.
To fulfill legal obligations such as requirements related to accounting, product liability and the protection of your personal data in our systems	Legal obligation	<ul style="list-style-type: none"> • Contact details, e.g. name and address • Account information • ID number • Order information such as date of purchase • Payment details • Data provided in support matters 	For as long as we are obliged to save the data in accordance with applicable law or governmental decision.

Purpose	Legal basis	Categories of personal data	Retention time
To avoid, prevent and investigate improper use and crime in our business operations	Legitimate interest	<ul style="list-style-type: none"> • Contact details, e.g. name and phone number • Account information • ID number • Order information, e.g. ordered goods or services • Payment details such as payment method • User-generated data, e.g. click and visit history • Video surveillance recordings from our stores 	For the period during which necessary checks are carried out. If processing results in a report to the police, the data will be saved for as long as is necessary to pursue the report and to confirm, defend or submit a legal claim.
To evaluate, develop and improve Dustin Group's goods, services and systems for our customers in general	Legitimate interest	<ul style="list-style-type: none"> • Contact details, e.g. place of residence • Account information • Age • Order information • Payment information • User-generated data such as click and visit history, as well as device information • Customer settings • Correspondence and other information about support cases, e.g. feedback on goods and services, and response times 	<p>For as long as you have a Dustin account, if you are an account holder.</p> <p>Five years after you last interacted with Dustin, if you are not a Dustin account holder, e.g. visited our website, logged in to a previous Dustin account or clicked on a link in our communication to you.</p>

9. With whom do we share your personal data?

9.1 Dustin may share your data with other companies to provide you with our offers, goods and services. The recipients of your personal data may be either processors to Dustin, i.e. companies that process your data on our behalf and in accordance with our instructions, or independent controllers, i.e. companies that are independently responsible for the processing of your data as they have a direct relation with you as a customer, for example Klarna.

9.2 Dustin may also share your data with governmental authorities if necessary to comply with laws, regulations or governmental decision, or for Dustin to establish, exercise or defend legal claims.

9.3 Depending on how you have interacted with Dustin, e.g. whether you are a Dustin account holder or if you receive marketing communication, Dustin may share your personal data to the following recipients:

- Other companies within the Dustin Group acting as processors on behalf of Dustin to fulfill the various purposes set out in this policy. The legal bases for transfer to affiliated companies of the Dustin Group are the same as for our own processing.
- Companies that provide information from the national population register or other public records to ensure that we have correct contact details to you, so we can process your orders and purchases as well as your Dustin account and services associated with your account. The personal data transferred includes identity numbers and contact details and the transfers are made due to our contractual obligations to you as the legal basis.
- Analysis and marketing companies that provide services such as automated marketing tools, analyses, communication, printing and distribution. These recipients assist Dustin in analyzing your data as well as marketing and informing you about the goods and services offered by Dustin. The personal data transferred includes contact details, account information, customer settings, order details and user-generated data. The transfers are made on the legal bases legitimate interests as well as contractual obligations to you as a Dustin account holder.
- Governmental authorities such as the police or the national tax agency, to which we are obliged to transfer your personal data either pursuant to legal requirements or governmental decisions or because of reporting suspected crime or attempted crime. The categories of data transferred are contact details, identity numbers, account information, order information, payment details, user-generated data and video surveillance recordings. The transfers are made due to Dustin's legal obligations or to establish, exercise or defend legal claims.

9.4 If you place an order with or make a purchase from Dustin, we may also share your personal data to the following recipients to manage your order and purchase based on our contractual obligations towards you as the legal basis:

- Suppliers, manufacturers, distributors and subcontractors of goods and services offered by Dustin that, for example, provide the goods and services and help us with support services such as the maintenance, repair and scrapping of returned goods. The personal data transferred is contact details and order information.
- Logistic companies and freight carriers that provide us with transport services so we can deliver our goods and services to you. We transfer contact details and order information to these recipients.
- Insurers which provide insurances for some of our goods and services. Personal data transferred when you purchase insurance is contact details and order information.
- Business partners and suppliers of payment solutions, e.g. card issuers, banks, credit institutions and other financial actors, which ensure that you can make payments and offer you different financing solutions. The personal data transferred is contact details, identity numbers and payment details.

- Credit rating institutions, credit agencies or banks that provide us with information so we can assess your creditworthiness, e.g. credit reports, when you apply for invoicing in relation to managing your orders and purchases. The personal data transferred is identity numbers.
- Companies that provide financial services such as ledger for accounts payable and receivable or debt collection to ensure that Dustin receives payment for delivered goods and services when managing your orders and purchases. The personal data disclosed is of contact details, identity numbers, order information and payment details.

9.5 Dustin will not sell your personal data to any third party without your consent to do so.

10. Where do we store your personal data?

Dustin will primarily process your data within the EU/EEA. But we may also transfer your personal data to a country outside the EU/EEA if we need to share your data with Dustin's suppliers or business partners that are outside or store personal data in a country outside the EU/EEA. If your personal data is transferred to a country outside the EU/EEA, Dustin will take the necessary measures in order to transfer the personal data legally by ensure that your personal data is processed securely and with an adequate level of protection that is comparable with the protection offered within the EU/EEA, for example by creating an agreement with the recipient that includes the EU Commission's standard contract clauses or, if data is transferred to the USA, by ensuring that the recipient is certified to observe the principles set out in the Privacy Shield.

11. What are your rights as a registered customer?

11.1 Dustin is responsible for ensuring that your personal data is processed in accordance with current legislation. This section describes your rights associated with our processing of your personal data. At your request or on our own initiative we will rectify, anonymize, erase or supplement data that is discovered to be incorrect, incomplete or misleading. If you have any questions about this or wish to exercise a right, please contact us via the contact details at the end of this policy.

a) Right to access your personal data

At Dustin, we hope to be open about how we process your personal data. If you would like an insight into our processing of data about you, you have the right to request information about the processing activity, including a copy of your personal data being processed, what is referred to as a register extract. This includes information about purpose, categories of personal data, categories of recipients of personal data, storage period or criteria for how the storage period is defined, information about where data has been collected from and the existence of automated decision-making, including information about the logic behind and the significance of the processing activity. Please note that when there is a request for access we may ask for additional data about you to ensure that we are disclosing the data to the correct person and to clarify which data you wish to access. The register extract is free of charge, although in the event of repeated requests Dustin has the right to charge an administrative fee of SEK 100.

b) Right to rectification of your personal data

It is very important to Dustin to collect accurate and updated personal data. If we have collected incorrect personal data from you, you have the right to request that it be

rectified. You also have the right to supplement any incomplete personal data, e.g. if we have the correct street address but do not have the house number. At your request, we will rectify the incorrect or incomplete data we are processing about you as quickly as possible.

c) Right to erase your personal data

We respect that the personal data we are processing has been borrowed from you. You therefore have the right to request that Dustin erase your personal data if the data has been processed in an illegal way, must be erased to fulfill a legal obligation to which Dustin is subject, is no longer necessary for the purposes for which it has been processed or when you object to a balancing of legitimate interest performed by Dustin and there is no legitimate interest for Dustin or a third party that carries great weight (see section f) below for information about the right to object). We are, however, not always able to approve your request as there may be reasons that give us the right to process data, e.g. if the personal data is being processed to fulfill a legal obligation as the legal basis, such as a requirement of the applicable Accounting Act, or if the data is necessary to confirm, submit or defend legal claims.

d) Right to data portability

You have the right to a copy of your personal data in a structured format and in certain cases to have the data transferred to another controller. This right, however, only relates to data that you yourself submitted to Dustin and that we are processing with the support of your consent or a contractual obligation towards you as legal basis.

e) Right to restriction of processing

You have the right to request that our processing of your personal data be restricted in certain situations, which means that the data may only be processed for certain purposes. You can, for example, request a restriction of incorrect data when you have requested rectification. During the period when Dustin is investigating the correctness of the data, the processing of it will be restricted.

f) Right to object to a certain kind of processing

When Dustin processes your personal data based on a balancing of legitimate interest as legal basis or for direct marketing, you have the right to object to our processing activity. An objection to Dustin's balancing of interest can be submitted when you have personal reasons that relate to the situation. In the event of such an objection, Dustin assesses whether our legitimate reasons for processing that carry more weight than your interest in protecting your privacy. If this is the case, Dustin may continue to process your personal data even though you have objected to the processing activity.

You can submit an objection to direct marketing and analyses performed for direct marketing purposes without having to state a reason. You control this yourself through the settings on My Pages within your Dustin Account, where you select whether you want to receive marketing communication and personalized offers. You are also given the opportunity to decline marketing in every single digital mailing. If you object to direct marketing, we will cease with the processing of your personal data for that purpose as well as all kinds of direct marketing measures such as sending newsletters and special offers. If you only decline personalized offers, marketing communication to you will be general, as we find it difficult to assess which kind of marketing is relevant for you if we are unable to analyze your personal characteristics. Find out more about how we adapt our special offers and communication according to your personal characteristics and

how you can object to such processing under the [Terms and Conditions for the Dustin Account](#).

11.2 If you believe that we are processing your personal data in an incorrect way, you are welcome to contact us. Our contact details are at the end of this policy. You also have the right to submit any complaints regarding the processing of your personal data to [Office of the Data Protection Ombudsman](#) which is the supervisory authority responsible for the processing of personal data in Finland.

12. How do we keep your personal data secure?

You should always feel safe when you provide us with your personal data. Therefore, Dustin has taken appropriate technical and organizational security measures in order to protect your personal data against unlawful or accidental disclosure, use, access, destruction, alteration or harm to your personal data. For example, all customer data is stored in a database protected by firewall and access control so only employees within the Dustin Group who need access to your personal data to perform specific tasks have such access.

13. Term and changes to this privacy policy

13.1 The most recently updated version of Dustin's privacy policy is always available on our website. Our privacy policy is valid at any time in the form and with the content that is published on the website.

13.2 Dustin has the right to update the privacy policy at any time. If the privacy policy is amended, the updated policy will be published on Dustin's website. You will also be informed that the privacy policy has been amended when you next log in to your Dustin account. We may also inform you by email if there are major changes to the privacy policy. If you do not wish to accept the amended policy, you can close your Dustin account by contacting customer service (see the contact details at the end of this policy).

14. Contact details

Do not hesitate to contact us if you have any questions about this privacy policy, if you would like more information about how we process your personal data or if any data is incorrect and you want us to rectify it.

- Are you a consumer? Please contact customer service on 030-623 85 01 or send an email to asiakaspalvelu@dustinhome.fi.
- Do you represent a company? Please contact customer service on 030-623 85 01 or send an email to asiakaspalvelu@dustin.fi.
- You can also contact our special employees who work with the processing of personal data by email at dataprivacy@dustingroup.com. Dustin's external data protection officer, lawyer Caroline Olstedt Carlström, is available via the same email address. If you would like to send any question or an information to her, please state that your message is intended for Dustin's data protection officer.