

Dustin Marketplace – Privacy Policy

We at Dustin AB, corp. reg. no 556237-8785 (“Dustin”), are committed to protecting and respecting your privacy. This privacy policy describes how we process your personal data (as defined in the General Data Protection Regulation (EU) 2016/679, “GDPR”) in connection with visiting and/or conducting any activity on Dustin’s Marketplace available at services.dustin.fi (“Marketplace”). Dustin’s Marketplace allows you to, amongst other things, purchase software and other IT-related products (“Products”). For the avoidance of doubt, this privacy policy also describes how we process your personal data when you order any Products through Dustin’s Marketplace.

For more information about your rights under the GDPR and how you enforce them, please see Section 10 of this privacy policy.

Dustin’s Marketplace is not directed to individuals under the age of 18, and we request that such individuals do not provide us with personal data through Dustin’s Marketplace.

Since this privacy policy includes a large amount of information, we have included a table of content below, by using this you can quickly navigate to the section that interests you the most.

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1. Who is the personal data controller?

Dustin is responsible for the processing of your personal data as described herein, meaning that Dustin is the so-called data controller. As a data controller, Dustin is responsible for making sure that your personal data is handled in a correct and secure way pursuant to the GDPR and other applicable legislation.

In cases where Dustin processes personal data on behalf of you or your employer as data processor, we will process personal data in accordance with the instructions we have received under the personal data processing

agreement we have entered into with you or your employer. That processing is not included in this privacy policy since this privacy policy describes the processing we conduct as a data controller. Therefore, “**you**” hereinafter refers to you who uses Dustin’s Marketplace or is in contact with us on behalf of a legal entity who, for example, might be your employer.

2. Contact Details

Do not hesitate to contact us if you have any questions about this privacy policy or if you would like more information about how Dustin processes your personal data:

Dustin.
Box 1194
SE-131 27 Nacka
Sweden

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 questions or information to her, please state that your message is intended for Dustin’s data protection officer.

3. What personal data do we process?

Dustin processes the following categories of personal data about you:

- **Account data**, such as your name, phone number, email address, username and e-mail address. Please note that this information is necessary to provide you with access to Dustin’s Marketplace.
- **Contact information**, such as your name and phone number.
- **Company-related data**, i.e., information regarding the company you work for, including company name, job title, workplace and sometimes information regarding your right to represent your company. This is applicable when you contact us in the role of representative of a company.
- **Personal identification number**. If you are a sole trader, we will process your personal identification number as it is the same as your company registration number.
- **Transactional data**, such as order number, Products ordered, date of order and purchasing history.
- **Billing data**, such as invoice reference, Products ordered and applicable prices.
- **Customer marketing options**, such as your preferences in receiving marketing from us and our business partners.
- **Communication data**, such as information included in your e-mails when contacting us. Because email communications are not always secure, we encourage you to not include sensitive data in your emails to us.

- **Technical data**, such as IP-address, browser type, screen resolution, preferred language, geographic location and operating system. We will collect technical data from the computer (or other device) you use in connection with your use of Dustin's Marketplace. Even though we do not normally use technical data to identify individuals, sometimes individuals can be recognized from it.
- **User generated data**, such as data relating to your activity in Dustin's Marketplace.
- **Survey data**. We may contact you to participate in online customer satisfaction surveys. If you decide to participate, you may be asked to provide certain information which may include your personal data.
- **Information about your financial position**. If you are a sole trader, we may collect data about your financial position from credit information bureaus.

4. From which sources do we collect information about you?

Information you give to us. Most of the information we process about you is received from you. You may directly or indirectly give us information about yourself in different ways, for example when you register a customer account under Dustin's Marketplace and/or order Products through Dustin's Marketplace. You can always choose not to provide us with certain information. However, not providing such personal data may prevent us from granting you access to Dustin's Marketplace and/or prevent you from ordering Products.

Information we collect about you. In addition to the information that Dustin collects directly from you, we may also, responsibly and with your privacy in mind, collect personal data about you from third parties. We obtain information from public registers through third-party services for updating addresses to make sure that we have correct contact details to you. If you are a sole trader, we also obtain information about your creditworthiness from credit information bureaus.

Automated technologies or interaction. As you interact with functions included in Dustin's Marketplace, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive such technical data about you if you visit other websites employing our cookies.

5. Purpose, legal basis and retention periods

Purpose and legal basis

Dustin collects and processes personal data about you for various purposes. These purposes set the limit for Dustin's processing of your personal data. For Dustin to lawfully collect and process your personal data, we must have a legal basis for each purpose for which the data is processed. The principal legal bases that justify Dustin's processing of your personal data are:

- **Performance of a contract.** Where processing of your personal data is necessary to enter into or perform Dustin's contracts with you. Such contracts include [Dustin's Marketplace Terms of Use](#) and [Dustin's Marketplace Terms of Sale](#).

- **Legal obligation.** Where processing of your personal data is necessary for Dustin to comply with Dustin's legal obligations. Such obligations include applicable bookkeeping and accounting laws.
- **Legitimate interests.** Where processing of your personal data is necessary to achieve a legitimate interest and Dustin's reasons for using it outweigh any prejudice to your data protection rights.

Retention of personal data

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 performs regular disposals and erases personal data that is no longer necessary to process. For example, if you have been inactive for a certain period, your customer account may be automatically terminated and the personal data we have collected and processed for that purpose will be erased.

6. Overview – How Dustin processes personal data

Below, we explain the purposes of and legal bases for our processing of your personal data as well as the applicable retention periods. Kindly note that some categories of your personal data may be processed for multiple purposes and that several legal bases may apply to the same processing activity.

You can always choose not to provide us with certain information. However, as pointed out above, some personal data is necessary for Dustin to process in order to grant you with access to Dustin's Marketplace and/or offer you Products.

Purpose	Legal basis	Categories of personal data	Retention period
To register your customer account.	Enter into a contractual relationship with you or the company you represent.	- Account data	For as long as you are active on your customer account or there is a legal claim. If you are not active on your account, it will be deleted after 24 months (unless you have an administration account and still have active licenses).
To manage your customer account and optimize your customer experience. Dustin processes your personal data to, e.g., verify your identity, create your personal pages, maintain	Fulfill Dustin's obligations to you or the company you represent. Dustin's legitimate interest of being able to optimize the functionality and user	- Account data - Contact information - Company-related data - Pers. id. number (sole trader) - Customer marketing options	For as long as you are active on your customer account or there is a legal claim.

correct contact details and monitor your orders and payment history.	experience of Dustin's Marketplace.	- User generated data	
To administer our agreements. Dustin processes your personal data to, e.g., provide you with order confirmations and manage payment transactions for ordered Products.	Fulfill Dustin's contractual obligations to you or the company you represent.	- Account data - Contact information - Company-related data - Pers. id. number (sole trader) - Transactional data - Billing data	For as long as you have a valid agreement with us or there is a legal claim.
For billing purposes. Dustin processes your personal data for invoicing purposes if you have ordered Products through Dustin's Marketplace.	This processing is necessary and is based on Dustin's legitimate interest of being able to bill.	- Contact information - Company-related data - Pers. id. number (sole trader) - Billing data	For as long as you have a valid agreement with us and all payments due have been paid in full, or there is a legal claim.
To communicate with you. Dustin will, when necessary, process your personal data when you contact Dustin by e-mail or phone with any questions or inquiries.	Fulfill Dustin's contractual obligations to you or the company you represent. Dustin's legitimate interest in effective communication with our customers and business partners.	- Account data - Contact information - Communication data	For as long as there is an active license or up to 36 months.
To provide customer support. Dustin will, when necessary, process your personal data to investigate, respond to and resolve complaints and problems associated with the functionality of Dustin's Marketplace.	Fulfill Dustin's contractual obligations to you or the company you represent. Dustin's legitimate interest of being able to optimize the functionality and user experience of Dustin's Marketplace.	- Account data - Contact information - Communication data - Transactional data	Five years following our most recent contact on the matter or for as long as there is a complaint on a defect Product that has not been closed. Audio recordings of conversations with customer support or other support functions will be deleted after 20 days.
To market the Products.	Dustin's legitimate interest of	- Account data	For a period of up to

Dustin will process your personal data when we recommend Products to you or remind you about an abandoned digital shopping cart.	being able to market the Products. Feel free to follow the unsubscribe instructions contained in the e-mail received from us or contact us directly.	<ul style="list-style-type: none"> - Transactional data - Technical data - User generated data - Customer marketing options 	24 months following a relevant marketing activity.
<p>To fulfil Dustin's legal obligations.</p> <p>Your personal data will be processed for Dustin to fulfill legal obligations (e.g., archiving requirements under applicable bookkeeping and accounting laws).</p>	Dustin's legal obligations under applicable law.	<ul style="list-style-type: none"> - Contact information - Company-related data - Pers. id. number (sole trader) - Transactional data - Billing data 	For as long as Dustin is required to save the data pursuant to applicable laws (e.g., bookkeeping laws, requiring 7 years) or governmental decision.
<p>To protect Dustin's business interests and legal rights.</p> <p>Dustin will use your personal data where we believe it is necessary to protect and enforce our legal rights, interests and the interests of others (e.g., in connection with legal claims and audit functions).</p>	Dustin's legitimate interest of being able to enforce and protect Dustin's business interests and legal rights.	<ul style="list-style-type: none"> - Contact information - Company-related data - Pers. id. number (sole trader) - Transactional data - Technical Data - Communication Data 	For as long as necessary to investigate, defend or submit a legal claim.
<p>To develop and improve Dustin's Marketplace.</p> <p>Dustin processes your personal data and other aggregated and non-personal information to develop and improve Dustin's Marketplace (e.g., testing, troubleshooting and data analysis).</p>	Dustin's legitimate interest of being able to develop and improve Dustin's Marketplace.	<ul style="list-style-type: none"> - Account data - Technical data - User generated data - Survey data 	For as long as you have an active customer account or for a period of up to 24 months following receipt of the personal data.
<p>In connection with a merger or acquisition.</p> <p>Due to strategical or business-oriented reasons, a potential merger, sale of company assets or financing, the personal data we retain</p>	Dustin's legitimate interest of being able to develop Dustin's business.	<ul style="list-style-type: none"> - Contact information - Company-related data - Pers. id. number (sole trader) - Transactional data 	For as long as there are ongoing discussions or negotiations on such matter.

about you may be processed, shared or transferred, to parties involved in the process.			
<p>To conduct customer surveys.</p> <p>By continuously collecting qualitative feedback from you and other users, Dustin can gain a deeper understanding of our users' problems and needs.</p>	<p>Dustin's legitimate interest of being able to develop and improve Dustin's Marketplace.</p>	<ul style="list-style-type: none"> - Account data - Survey data - Contact information 	<p>For a period of 24 months after receipt of the information.</p>

7. How do we share your personal data?

Sometimes, we need to share your personal data with other trusted individuals and companies. Your personal data may be shared with:

- **Dustin's employees and consultants.** Your personal data will, when appropriate, be shared with some of our employees and consultants. However, we will restrict access to those of our employees and consultants who need it to perform their jobs, for example to provide you with customer support. Our employees and consultants are of course subject to strict confidentiality.
- **Other companies within the Dustin Group.** We transfer to or share your personal data to other companies within the Dustin Group that act as processors on behalf of Dustin to fulfill the various purposes set out in this policy. The legal bases for transfers to affiliated companies of the Dustin Group are the same as for our own processing.
- **Our business partners and service providers.** We share your personal data with our business partners who help us provide Products through Dustin's Marketplace. 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 proprietors of Products you have purchased through Dustin's Marketplace.
- **Credit information bureaus.** If you are a sole trader, we may share your personal data (Pers. id. number) when you apply for invoicing in relation to Products that you have ordered.
- **Authorities and other public actors.** Sometimes legal obligations may require us to share information about you, for example to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities. We may also disclose information if needed to detect and prevent fraud or in connection with a legal process, e.g., to enforce our agreements or to protect our rights, you or others.

- **Insurance companies.** We may need to share information with our insurers in connection with an insurance claim or other insurance matters in connection to our business activities.
- **Professional advisors.** We may need to share information with our advisors in connection with our legitimate business activities, e.g., law firms or accountants.

8. Where do we process your personal data?

Dustin will primarily process your personal data within the EU/EEA. However, 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 to transfer the personal data in accordance with the GDPR and applicable legislation. Dustin will 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, e.g., by creating an agreement with the recipient that includes the EU Commission's standard contract clauses. You are welcome to contact us if you would like further information on potential transfers to countries outside of the EU/EEA and security measures in place.

9. 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 Dustin who need access to your personal data to perform specific tasks have such access.

10. Your rights

Dustin is responsible for ensuring that your personal data is processed in accordance with the GDPR and applicable legislation. This section describes your rights associated with our processing of your personal data and how you enforce them.

- **Right to object.** You have the right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests. You can always contact us for more information on the balance test that has been made. You may also object to your personal data being processed for direct marketing purposes.
- **Right to access your personal data.** At Dustin, we are open about how we process your personal data. If you would like an insight into our processing of your personal data, 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 and information about where data has been collected. The register extract may be requested free of charge, however

if you make repeated and unreasonable requests for copies, we might charge you with an administrative fee.

- **Right to rectification of your personal data.** You have the right to correct inaccurate or incomplete information about yourself. At your request, we will rectify the incorrect or incomplete data we are processing about you as quickly as possible.
- **Right to erase your personal data (right to be forgotten).** You have the right to request that we delete personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.
- **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.
- **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.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.
- **Right to complain.** You have the right to lodge a complaint to the Supervisory Authority in the country you live or work in, if you believe that we have not complied with our obligations regarding your personal data.

In Finland the Supervisory Authority is Tietosuojavaltuutetun Toimisto, which is the supervisory authority for processing of personal data in Finland, and you can find more information at their website: www.tietosuoja.fi.

Please note that if you request restriction or erasure it might affect our abilities to provide Dustin's Marketplace and/or Products to you. Moreover, legal rights or obligations (such as confidentiality, accounting and tax legislation) may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information.

11. Term and changes to this privacy policy

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

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 Marketplace. You will also be informed that the privacy policy has been amended when you log in to your Marketplace customer 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 Marketplace customer account by contacting customer service (see the contact details in Section 2 of this privacy policy).