

DUSTIN PRODUCT LIFECYCLE PORTAL – 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 our Product Lifecycle Portal (“**PLP**”).

The PLP is a digital portal which allows companies and other legal entities (“**Customers**”) to, amongst other things, purchase, return (takeback) and manage assets such as laptops and mobile phones (“**Products**”) for use in the Customer’s internal business operations. The Customer will enable its employees, consultants and representatives to create user accounts for the PLP. “**Users**” or “**you**” therefore refers to you, a person using PLP for example in your role as an employee of a Customer.

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

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

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 some of the processing activities related to your use of PLP, meaning that Dustin is the so-called data controller for the described processing activities. 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.

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 AB
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 account username and e-mail address.
- **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.
- **Transactional data**, such as delivery address, order number, Products or services ordered, date of order and purchasing history.
- **Billing data**, such as invoice reference and price to be paid for ordered Products.
- **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 emails to us.

- **Technical data**, such as IP-address, browser type, screen resolution, preferred language, geographic location and operating system. 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 PLP.

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 your PLP account, when you order Products or when you order takeback through PLP. You can always choose not to provide us with certain information. However, not providing such personal data may prevent you from registering a PLP account, ordering Products or ordering takeback.

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. If a Customer who employs you chooses to register you for a PLP account manually or by synchronizing their HR-system with PLP then we will obtain Contact information and Company related data about you from the Customer or the HR-system respectively.

Automated technologies or interaction. As you interact with functions included in PLP, we may automatically collect technical data about your equipment, browsing actions and patterns.

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 as PLP Terms of Use.
- **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 which is no longer necessary to process.

6 OVERVIEW – HOW DUSTIN PROCESSES YOUR 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 PLP and/or offer you Products.

Purpose	Legal basis	Categories of personal data	Retention period
<p>To enter into agreements with a Customer.</p> <p>If you act as the signatory and/or representative for a Customer entering into an agreement or placing an order with us, Dustin will process your personal data to archive the agreement and related documentation which can constitute part of the agreement between Dustin and the Customer (e.g. correspondence, appendices and so on).</p>	<p>Dustin's legitimate interest of entering into and fulfilling agreements with Customers.</p>	<ul style="list-style-type: none"> - Contact information - Company related data 	<p>For the duration of the agreement with the Customer and until ten years pass from the end of the agreement between Customer and Dustin.</p>

<p>To manage the Customer's agreement with Dustin.</p> <p>If you act as a representative for a Customer, Dustin processes your personal data to manage the Customer's account in PLP. For example to maintain correct configurations, inform the Customer of PLP status, and to monitor the Customer's payment history.</p>	<p>Dustin's legitimate interest of performing in accordance with the PLP agreement Dustin has with the Customer.</p>	<ul style="list-style-type: none"> - Contact information - Company-related data 	<p>For as long as you are the designated representative of the Customer or until three years pass from the end of the agreement between Customer and Dustin.</p>
<p>To uphold the Terms of Use.</p> <p>When you create a PLP account, you agree to be bound by the PLP Terms of Use. Dustin processes your personal data to uphold and enforce the Terms of Use.</p>	<p>To perform in accordance with the agreement (PLP Terms of Use) Dustin enters into with you.</p>	<ul style="list-style-type: none"> - Account data - Contact information - Company-related data 	<p>For as long as your account is active.</p>
<p>To administer Product orders.</p> <p>If you order Products through PLP Dustin processes your personal data to provide you with order confirmations, to deliver the purchased Products, to invoice the Customer, to manage payment transactions for ordered Products and to provide support for the Products.</p>	<p>Dustin's legitimate interest of being able to deliver, invoice and provide support for Products.</p>	<ul style="list-style-type: none"> - Account data - Contact information - Company-related data - Communication data - Transactional data - Billing data - Recorded calls to Dustin support. 	<p>Up to five years from the delivery and payment of the ordered Products. Or until the guarantee for the Products expires, whichever is later.</p>
<p>To administer takeback.</p> <p>If you order takeback for hardware, Dustin will process your personal data to provide</p>	<p>Dustin's legitimate interest of being able to deliver, invoice and provide support for takeback.</p>	<ul style="list-style-type: none"> - Account data - Contact information - Company-related data 	<p>Up to five years from the performance and payment takeback service.</p>

<p>you with takeback confirmation, to perform takeback, to invoice the Customer, to manage payment transactions for ordered Products and to provide support for the takeback service.</p>		<ul style="list-style-type: none"> - Communication data - Transactional data - Billing data - Recorded calls to Dustin support. 	
<p>To respond to incoming communication.</p> <p>Dustin will process your personal data if you contact Dustin by e-mail or phone with any questions or inquiries.</p>	<p>Dustin's legitimate interest of handling incoming communication.</p>	<ul style="list-style-type: none"> - Account data - Contact information - Communication data 	<p>For 3 months after your conversation with us, in our view, ends.</p>
<p>To send service messages in PLP.</p> <p>Dustin will process your personal data to provide you with information related to your use of the PLP, such as information on updates, new functions or scheduled maintenance.</p>	<p>Dustin's legitimate interest of informing users about the functionality of PLP.</p>	<ul style="list-style-type: none"> - Account data - Contact information - Company-related data 	<p>For as long as your account is active.</p>
<p>To fulfill Dustin's legal obligations.</p> <p>To fulfill legal obligations such as obligations related to bookkeeping, product liability and protection of personal data.</p>	<p>Dustin's legal obligations under applicable legislation.</p>	<ul style="list-style-type: none"> - Contact information - Company-related data - Transactional data - Billing data - Communication data 	<p>For as long as necessary under the applicable law or governmental decision.</p>
<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</p>	<p>Dustin's legitimate interest of being able to enforce and protect Dustin's business interests and legal rights.</p>	<ul style="list-style-type: none"> - Contact information - Company-related data - Transactional data - Technical Data - Communication Data 	<p>For as long as necessary to investigate, defend or submit a legal claim. Assessed on a case-by-case basis.</p>

others (e.g., in connection with legal claims and audit functions).		- Account data - User generated data	
To develop and improve PLP. Dustin processes your personal data and other aggregated and non-personal information to develop and improve PLP (e.g. testing, troubleshooting and data analysis).	Dustin's legitimate interest of being able to develop and improve the PLP.	- Account data - Technical data - User generated data	For as long as you have an account and for five years after the deletion of your account.

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 PLP. 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 (such as data hosts, software providers, providers of IT-infrastructure), 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 (credit providers who help you in financing Products, if you choose to engage them).
- **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, your rights or the rights of 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** (for example law firms or accountants). 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, if the Customer with whom you are associated has chosen to use certain additional services associated with PLP we may also transfer your personal data to a country outside the EU/EEA to Dustin's suppliers who provide such additional services.

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 Sweden the Supervisory Authority is Integritetsskyddsmyndigheten, which also is our lead supervisory authority, and you can find more information at their website: www.imy.se

Please note that if you request restriction or erasure it might affect our abilities to provide PLP 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 PLP. Our privacy policy is valid at any time in the form and with the content that is published on PLP.

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