

Privacy policy

Issuer organization: WA3RM AB (Org. No. 559017-5096)

Issued by: WA3RM AB Head of Legal

Approved by: WA3RM AB Executive Management

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WA3RM Privacy Policy

Introduction

This Privacy Policy relates to WA3RM’s processing of personal data of representatives of customers, suppliers and leads. In this Privacy Policy, WA3RM provides information to you on how we process your personal data, as well as setting out what rights you have in relation to our processing of your personal data.

Who is processing the personal data?

As indicated above, the data controller for the processing of your personal data is WA3RM AB. To make this notice easier to read, WA3RM is referred to as WA3RM, we or us for the rest of this document. As the data controller, if you have any questions, comments or queries about your personal data, we can be contacted using the details below:

WA3RM AB
 Drottninggatan 34,
 211 41 Malmö
 Sweden

info@wa3rm.com

WA3RM aims to be compliant in everything we do. As such, we invite you to contact us whenever you feel it is necessary so we can partner with you in addressing any comments or concerns you might have.

What personal data are we processing?

The type of personal data we process about you depends on several factors and the nature of our relationship with you. The processing of your personal data could include the following although certain information may not be relevant for you:

- **Business partner representatives and contacts:**

Identifiers	Contact data	Location data
Name	Phone number	Address
Job title	e-mail address	

- **Leads and prospects:**

Identifiers	Contact data	Location data
Name	Phone number	Address
Job title	e-mail address	

The contact and location information processed relates to data used in a professional capacity and may come directly from you or from the facility you are working for.

Why are we processing personal data?

The type of personal data we process about you depends on several factors and the nature of our relationship with you. The processing of your personal data could include the following although certain information may not be relevant for you:

- **Representatives of Business Partners:**
 - To carry out our projects and fulfil our contractual commitments, including ordering of work and material for business projects, as well as managing such projects in relation to Business Partners and provide support to Business Partner representatives.
 - To manage our legal, regulatory and statutory obligations as well as to maintain accurate and reliable administrative and accounting records, which include managing queries, concerns and investigations.

- **Leads and prospects:**
 - To pursue our commercial interests through marketing activities.

No automated decision making is undertaken.

Which lawful basis do we use for processing personal data?

WA3RM only process personal data if there is a legal ground which is needed to secure a lawful basis for the processing. For the processing described in this privacy policy, WA3RM uses the following lawful basis for processing:

Lawful basis for processing	Processing activities
Legal Obligation.	Activities linked to our regulatory and statutory requirements.
Legitimate Interest.	Marketing activities including managing our relationship with you as a contact of WA3RM. Processing of business partner representatives' personal data is necessary to manage and distribute projects, services and material for our projects and to fulfil our obligations towards business partners.

Where we rely on a Legal Obligation to justify the processing of your personal data, this is to ensure that our regulatory and statutory requirements are fulfilled. This is important in order to maintain the quality of the service and products that many stakeholders rely on.

There may also be times when Legitimate Interest is the appropriate justification for processing your personal data. In this situation, we have undertaken a Legitimate Interest's assessment where the needs, expectations, rights, and freedoms of all parties have been considered. Before relying on Legitimate Interest, we have made sure that our interests are compelling enough and will not cause any unwarranted harm.

For how long do we process your personal data?

We save information for as long as the information is necessary to fulfil the purposes for which the information was collected. The information can be saved for a longer period of time if it is required by applicable law, such as bookkeeping or tax legislation. WA3RM is responsible for establishing routines to ensure that we do not store unnecessary information about you.

- **Information regarding representatives of Business Partners:**
 - Most commercial, customer or financial information, relating to e.g. purchase, order and order history in a project, is retained for seven years.
 - Information relating to a customer service case is saved until the matter is resolved.
- **Information regarding prospects and leads:**
 - Information regarding representatives of potential business partners is saved for three years after the last contact from you.

Where are we processing personal data and who do we transfer personal data to?

Your personal data will not be transferred outside of the EU/EEA.

We use different systems and platforms to manage the data we process, and our key data processors are listed below:

- Microsoft Outlook – used for e-mail.
- Microsoft Sharepoint – our main system, used for storage of your contact information for our commercial, production, logistical, operational, research and administrative activities.
- Fortnox – is used for invoicing purposes.

We may also share personal data with partners and in line with our regulatory or statutory obligations. In all instances, data will only be shared in line with an appropriate lawful basis for processing. Data sharing is frequently undertaken following a privacy impact assessment and a transfer risk assessment to ensure the necessary safeguards and control measures are in place prior to any data sharing.

What are your rights in relation to this data processing?

Under data protection law, you have rights including:

Your right of access

To carry out our projects and You have the right to ask us for copies of your personal information that we process about you. Through this copy you will be able to understand which of your personal data we have and process. The right of access is applicable when a record contains information where an individual can be identified, and the information is about them. This means that records that are accessible to you

will have the personal data about other people redacted where appropriate, in order to protect their right to privacy. Your personal data will be redacted if someone else requests access to a record containing your personal data. Legislation provides other exemptions that may be applicable such as records where legal privilege needs to be observed or there is an obligation of confidentiality in specific circumstances. Any exemption applied will have a relevant lawful basis and will be explained to you were necessary.

For more information about the general right of access, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to be informed

You have the right to be informed of how we process your personal data. This Privacy Notice is an initial means of informing you about the processing of your personal data. Additional methods of keeping you informed include through FAQs, contractual agreements and through discussions – if you have a question about how we are processing your personal data, you can contact us by writing to info@wa3rm.com.

For more information about the general right to be informed, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to be rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Any request to rectify your personal data will also be transferred and actioned by any processor with whom your personal data has been shared. This process is managed by us and will not require any additional action from you for your right to be exercised in full.

For more information about the general right to rectification, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to erasure

You have the right to ask us to erase your personal information when the information is no longer necessary to fulfil the purpose of processing the information or if you retract your consent. WA3RM is obliged to keep certain records in accordance with our legal obligations. As such, WA3RM may not be able to delete every record that is processed about you, however this will be explained where relevant. Any request to be forgotten will also be managed by WA3RM with any processor that is processing your personal data on our behalf.

For more information about your general right to erasure, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances such as if the personal data is not relevant to fulfil our legal obligations.

For more information about the general right to restriction of processing, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to restriction of processing

You have the right to object to the processing of your personal data. The right can be invoked when the legal basis is Legitimate Interest, including profiling. If an objection is made, WA3RM must show compelling Legitimate Interests to continue processing personal data for that specific purpose.

For more information about the general right to object to processing, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to data portability

You have the right to ask that we transfer the information you gave us to another organisation. This enables you to transfer it in a machine-readable format to another recipient. The right to data portability applies to personal data that is processed based on your consent or to perform a contract. It applies only to such personal data that you have provided WA3RM with yourself.

For more information about the general right to data portability, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right regarding automated decision-making

You have the right to request that a review of any profiling that is undertaken using your personal data to be undertaken by a human.

For more information about general rights regarding automated decision-making, please see the [webpage of the Swedish Authority for Privacy Protection](#).

Your right to withdraw consent

You have the right to withdraw consent where this is the lawful basis established for the processing of your personal data i.e. when collected for certain marketing activities.

For more information about the general right to withdraw consent, please see the [webpage of the Swedish Authority for Privacy Protection](#).

You are not required to pay any charge for exercising your rights in most instances. If you make a request, we have one month to respond to you.

Please contact us using any of the details below if you wish to make a request.

WA3RM AB
Drottninggatan 34,
211 41 Malmö
Sweden
info@wa3rm.com

Finally, you have the right to complain to a data protection authority. For WA3RM, the relevant supervisory authority is the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten) and can be reached using the details below:

Integritetsskyddsmyndigheten (IMY) / Swedish Authority for Privacy Protection.
Box 8114, 104 20 Stockholm
0046 (0)8-657 61 00
imy@imy.se.

If this isn't also your local data protection authority, you can contact your local data protection authority who will advise as to how to best to proceed. In some instances, such as within the EEA, you can report to your local data protection authority and have no additional need to communicate with IMY.

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WA3RM AB address:
Drottninggatan 34
211 41 Malmö
Skåne Sweden

Website:

www.wa3rm.se