



Nomo Privacy Policy

At Nomo, we care about your privacy and strive to maintain a high level of data security. You must always feel secure when providing us with your personal data. We therefore always do our utmost to protect your personal data in the best possible manner and comply with applicable data protection regulations. Nomo has therefore taken the appropriate security measures to protect your personal data against unauthorised access, alteration and deletion.

This Privacy Policy explains how we collect and use your personal data. It also describes your rights and how you can exercise them. It is important that you read and understand this Privacy Policy and feel secure regarding our processing of your personal data. You are always welcome to contact us if you have any questions or concerns.

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1. General

The purpose of this Privacy Policy is to inform you about how we process your personal data, what we use it for, who is permitted to view it and under what circumstances, and how you can exercise your rights. Our full contact information can be found at the end of this Privacy Policy.



The Privacy Policy applies whenever Nomo processes data about you as a customer when you place an order, visit our website, contact customer support or otherwise come into contact with Nomo.

We may also use your personal data in order to send you information about any of Nomo's services, campaigns and events that we think you may be interested in, as well as to further develop our website and measure the effectiveness of our marketing.

This Policy also applies to data processed in our contacts with suppliers or when you apply for a job with us.

The intention of this Privacy Policy is to demonstrate how we ensure that your personal data is processed in accordance with applicable data protection legislation.

2. Controller of personal data

Nomo Kullager AB, company reg. no. 556308-7641, of Gribbylundsvägen 2, 187 62 Täby, is the *controller* for the processing of your personal data, i.e. in cases where Nomo has decided the purpose and means of processing, and we are responsible for ensuring that any such processing takes place in accordance with applicable legislation.

3. What is personal data?

Personal data is any information relating to an identified or identifiable natural person. For example, photographs and videos processed on a computer may be personal data even if no names are given. Encrypted data and various types of electronic identifiers (e.g. IP addresses) are personal data if they can be linked to a natural person.

Processing of personal data means any operation or set of operations which is performed on personal data. Every operation performed on personal data constitutes processing, irrespective of whether it is performed by automated means or not. Examples of standard processing activities include collection, registration, organisation, structuring, storage, adaptation or alteration, retrieval, transmission and erasure.

In order for you to be able to purchase our goods or services, visit our website or contact us for service or information, we need to collect and process your personal data.

4. What personal data do we process about you as a Customer or prospective customer and why do we do so?

We strive to create and maintain long-term personal relationships with our customers. In the contact between us we process your personal data in a number of ways:

Purpose	In order to process orders/purchases and to fulfil the company's legal obligations.
Processing performed	<p>Tenders and order handling Receiving orders/tenders, order confirmations, delivery advices and other contacts relating to orders.</p> <p>Handling payments Including analysis of possible payment solutions, which may include checks on payment history and credit worthiness.</p> <p>Handling warranty and other claims</p>
Legal basis	<p>Fulfilment of purchase agreements and compliance with the Swedish Book-keeping Act (SFS 1999:1078) This collection of your personal data is necessary in order to fulfil our undertakings according to the purchase agreement. If this data is not submitted, we will be unable to meet our obligations and will therefore be forced to refuse to sell to you.</p>
Personal data	<p>Applies to all stakeholders: Name, email address, user information for <i>Mina sidor</i> (e-commerce customers) and <i>Din korrespondens</i>.</p> <p>The following only applies to sole traders or private individuals: Personal identity number, contact information, payment details, credit reports, purchase information.</p>
Storage period	Until the purchase is completed (including delivery and payment) and for a period of 7 years thereafter, in order to deal with any warranty and other claims, and to meet our obligations pursuant to the Swedish Book-keeping Act.



Purpose	In order to deal with customer service cases.
Processing performed	Communication and responding to any questions to customer services Via telephone or digital channels, including social media. Identification Investigation of any complaints and customer support cases
Legal basis	Legitimate interest Processing is necessary in order to protect our own and your legitimate interests in dealing with customer service cases.
Personal data	Applies to all stakeholders: Name, email address, user information for <i>Mina sidor</i> (e-commerce customers) and <i>Din korrespondens</i> , technical data and information regarding any faults/complaints. The following only applies to sole traders or private individuals: Personal identity number, contact information, payment details, credit reports, purchase information.
Storage period	Until the purchase is completed (including delivery and payment) and for a period of 36 months thereafter.

Purpose	In order to implement and administer participation in competitions and/or events.
Processing performed	Communication prior to and after participation in competitions and events Confirmation of entry or registration, questions and evaluations. Selection of winners and notification of any prizes.
Legal basis	Legitimate interest Processing is necessary in order to protect our own and your legitimate interests in administering your participation in the competition and/or event.
Personal data	Applies to all stakeholders: Name, email address, telephone number, Information submitted in competition entry Information submitted in evaluating an event
Storage period	For the duration of the competition/event (including any evaluation).

Purpose	In order to evaluate, develop, improve and inform you about our services, products and system for the customer collective as a whole.
Processing performed	<p>Preparing a basis for developing and improving our resource efficiency from an environmental sustainability perspective Carried out through streamlining of procurement and delivery planning.</p> <p>Preparing a basis for developing and improving our range of products and services.</p> <p>Preparing a basis for improving our goods and logistics streams In order to forecast procurement, warehousing and deliveries.</p> <p>To provide our customers with the opportunity to influence our range</p> <p>Adaption of IT systems for improved user friendliness and increased security For example, updating interfaces to simplify the information stream or to highlight functionality that is often used by customers on our digital channels.</p>
Legal basis	<p>Legitimate interest Processing is necessary in order to protect our and the customer's legitimate interests in the evaluation, development and improvement of our services, products and systems.</p>
Personal data	<p>Applies to all stakeholders: Correspondence and feedback regarding services and products. Purchase data and user-generated data (e.g. click and visiting history). Technical data regarding devices used and their settings (e.g. language settings, IP address, browser settings, time zone, operating system, screen resolution and platform). Information regarding how you have interacted with us, i.e. your use of the service, login method, which pages you visited and for how long, response times, download errors, how you access and leave services, etc.</p>
Storage period	From collection and for a period of 36 months thereafter.



Purpose	In order to prevent misuse of a service or to prevent and investigate crime against the company.
Processing performed	Prevention and investigation of any fraud or other criminal offences Prevention of junk mail For example, phishing, harassment, attempted unauthorised login to user accounts or other actions prohibited by law or our terms of sale or service terms and conditions. Protection and improvement of our IT environment against attack and intrusion
Legal basis	Fulfilment of legal obligations, alternatively legitimate interest If no legal obligation exists, then processing is necessary in order to exercise our legitimate interest in preventing the misuse of a service or to prevent and investigate crime against the company.
Personal data	Applies to all stakeholders: Purchase data and user-generated data (e.g. click and visiting history). Technical data regarding devices used and their settings (e.g. language settings, IP address, browser settings, time zone, operating system, screen resolution and platform). Data on how our digital services are used.
Storage period	From collection and for a period of 36 months thereafter.

Purpose	In order to deliver individually tailored offers and product and service recommendations, as well as to follow up visits to trade fairs.
Processing performed	Analysis of user behaviour and search patterns on the company's digital platforms.
Legal basis	Legitimate interest Processing is necessary in order to protect our and the customer's legitimate interests in obtaining relevant information regarding Nomo's products, services and trade fairs.
Personal data	Applies to all stakeholders: Name, email address, customer number, position Purchasing history, payment information, user name and password Stated customer preferences regarding products and services Stated customer preferences regarding channels of communication
Storage period	Until membership is terminated (either manually or automatically due to inactivity for a period of 24 months).



As an e-commerce user:

Purpose	In order to administer you as a user of Nomo's e-commerce solution.
Processing performed	Creating the log-in function. Maintaining correct and updated information. Allowing you to monitor your orders. Administering your customer selections For example, your profile and settings.
Legal basis	Legitimate interest Processing is necessary in order to protect our and the customer's legitimate interests in providing and using Nomo's e-commerce solution.
Personal data	Name, email address, telephone number, customer number, purchasing history, payment information, user name and password. Your profile and personal settings.
Storage period	Until membership is terminated (either manually or automatically due to inactivity for a period of 24 months).

5. What personal data do we process about you as a Supplier and why do we do so?

We strive to create and maintain long-term personal relationships with our suppliers. In contact between us we process your personal data in a number of ways, such as:

Purpose	To fulfil our contractual obligations, administer orders, prepare tender documentation and maintain a good supplier relationship.
Processing performed	Administer enquiries, orders and consultation For example, to send orders and to receive tenders, order confirmations, delivery advices, invoices and other contacts regarding orders. Administer warranty and other claims.
Legal basis	Fulfilment of purchase agreements and compliance with the Swedish Book-keeping Act. This collection of your personal data is necessary in order to fulfil our undertakings according to the purchase agreement. If this data is not submitted, we will be unable to meet our obligations and will therefore be unable to make purchases.
Personal data	Name, email address, telephone number, supplier number, position.
Storage period	For 7 years after an agreement has been terminated. Transactions - 7 years in accordance with the Swedish Book-keeping Act.



6. What personal data do we process about you as a Candidate and why do we do so?

The personal data that Nomo processes about you as a candidate when you apply for a job with us is based on the information you yourself submit to us via email. We process your personal data in a number of ways, such as:

Purpose	To identify the most suitable candidate for the announced position.
Processing performed	An evaluation of you as a candidate We make an assessment of the extent to which you are qualified for the position in question.
Legal basis	Consent
Personal data	Name, address, email address, qualifications, certificates, references, competences and work experience, test results and any other information you may choose to provide during the recruitment process.
Storage period	Your personal data will be stored for a maximum of twenty-four (24) months from the date on which you submitted your application.

Purpose	To create a relationship with an individual who may fill a possible future vacancy.
Processing performed	Evaluate you as a candidate and store your information for possible future requirements
Legal basis	Consent
Personal data	Name, address, email address, qualifications, certificates, references, competences and work experience and any other information you may choose to provide when contacting us.
Storage period	Your personal data will be stored for a maximum of twenty-four (24) months from the date on which you submitted your documentation to us.

7. From what sources do we collect your personal data?

Aside from data that you provide us with or that we collect from you based on your purchases and how you use our services, we may also collect personal data from third parties. The data we collect from third parties is as follows:

- 1) Visitor data from trade fairs at which Nomo exhibits and that you have registered information about yourself.
- 2) In interactions with Nomo sales representatives.



The following only applies to sole traders:

- 3) Data on credit worthiness from credit rating institutions, banks or credit reporting agencies.

8. Who do we disclose personal data to?

Processors Where necessary in order to be able to offer our services, we will share your personal data with companies who process personal data on our behalf. A *processor* of personal data is any company that processes data on behalf of and as instructed by Nomo in its capacity as the controller of the data in question. We have processors who assist us with:

- 1) Transport (logistics and freight companies).
- 2) Payment solutions (banks and payment-service providers).
- 3) Marketing (customer surveys, printing and distribution, social media, media or advertising agencies).
- 4) IT services (companies that supply necessary operational and technical support and maintenance of our IT solutions).

Your personal data is only shared with processors for purposes that are compatible with the purposes for which we collected the data. We have written agreements with all processors that guarantee the security of your personal data, in which processors undertake to comply with our security requirements and limitations on processing and international transfer of the personal data.

Organisations that are independent controllers.

We also share your personal data with certain companies and organisations that are independent controllers of personal data. That a company or organisation is an independent controller of personal data means that we have no control over how the data we transfer to the company or organisation is processed.

Independent personal data controllers with whom we share your personal data are:

- 1) Public authorities (the Police, Swedish Tax Agency or other public authorities), where we are obliged to do so pursuant to applicable legislation or where crime is suspected.
- 2) Companies that provide general transport of goods (logistics and freight companies).
- 3) Companies that provide payment solutions (credit and debit card companies, banks and other payment-service providers).

When your personal data is shared with companies or organisations that are independent controllers, it is that company's or organisation's privacy and personal data processing policies that applies.



9. Your rights

Right of access to your data

You have the right to receive a copy of your data and to verify what data we have about you. You will not be charged for the copy and we will always do our best to reply to such a request within 30 days.

Right to rectification

You have the right to have inaccurate or incomplete data about you rectified/supplemented.

Right to erasure ('the right to be forgotten')

If you no longer wish us to store your data, you have the right to have your data erased, on condition that the personal data are no longer necessary in relation to the purposes for which they were collected. However, legal obligations may exist that prevent us from immediately erasing some of your data, for example the provisions of the Swedish Book-keeping Act. If this is the case, we will only retain the data necessary for us to meet our legal obligations. If processing is based on consent and you withdraw your consent, your personal data will be erased.

Right to restriction of processing

You have the right to demand that processing is restricted if any of the following apply:

- you contest the accuracy of the personal data
- the processing is unlawful
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.

Right to object

You have the right to object to the processing of your personal data based on balance of interests.

Right to data portability

You have the right have the personal data you have provided us with, and which is being processed by automated means, transmitted to you or to another controller where the legal basis for processing is consent or the necessity to fulfil a contract and this does not adversely affect the rights of any third party.

Your rights with regard to profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which may have legal consequences for you or similar significant effects on you. However, this does not apply if:

- it is necessary for entering into or fulfilling a contract with you
- it is permitted in accordance with applicable legislation
- you have consented to processing

Right to withdraw consent

You always have the right to withdraw any consent you may have given to Nomo.

10. Cookies

What are cookies and how do they work?

A cookie is a small text file that the websites you visit will request to save on your computer. Cookies are used to provide visitors to websites with functionality. The information contained in a cookie sometimes makes it possible to follow a user's online behaviour.

There are two types of cookies. One type is saved on your computer for a longer period. These are used for functions such as telling you what's new since your last visit to a website. The other type are called session cookies. These are stored in your computers memory for the duration of your visit to a site for functions such as remembering your language selection. Session cookies are not stored long-term on your computer, they are deleted when you close your browser. (Source: Swedish Post and Telecom Authority, <http://www.pts.se/>)

What does Nomo use cookies for?

Session cookies

Nomo uses session cookies. These are stored for as long as your browser remains open. A new session cookie is created when you open a new session.

If you only accept session cookies

You can use our website fully, even if your settings only allow session cookies.

If you don't accept any cookies

If you don't accept any cookies, you will not be able to use the full functionality of our website.

- You will be able to read information
- You will be able to look at products, see pricelists and related information
- You will not be able to log in
- You will not be able to place orders
- You will not be able to place products in your shopping cart

Irrespective of which type of cookies you accept, you should get in the habit of logging out when leaving our website.

The cookies we use do not store any personal data or data relating to which pages you visit.



11. Contact information

Please don't hesitate to contact us if you have any questions about this Privacy Policy or our processing of your personal data, or if you would like to request a register extract. Our contact information can be found below.

Nomo Kullager AB

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