### **Privacy policy**

#### Introduction

SiteTel Sweden AB, 556654-4176, (the "**Company**") is the controller of personal data for the processing of your personal data related to the usage of the remote management solution –  $ACE^{TM}$  – provided by our subsidiary Northstar Battery LLC (the "**Service**") as well as when we process sales orders, communicate with our customers and their respective contact persons, and to fulfill legal obligations and is therefore responsible to ensure that all personal data is processed in a correct manner and in accordance with applicable data protection legislation.

This Privacy Policy (hereinafter the "**Privacy Policy**") describes the Company's processing of your personal data and has the purpose of ensuring you that we, in our capacity as controller of personal data, are processing the information about you in accordance with applicable data protection legislation. This Privacy Policy describes the Company's processing of your personal data.

Personal data means all types of information which can, directly or indirectly, be associated with a living physical person. Within the Company's activities there may occur personal data relating to name, title, contact information, company information, and location data (hereinafter collectively referred to as "**Personal Data**").

If you cannot find answers to your questions, please get in touch with us. You will find information about how to contact us under the heading "Contact Information" below.

### **Processing of Personal Data**

Purpose	Type of processing	Categories of
		Personal Data
To locate the site or the vehicle when setting up the ACE™ solution and provide services agreed upon with customer.	<ul> <li>Gathering Personal Data from the person requesting the installation code.</li> <li>Storing Personal Data.</li> <li>Communicating with individual installing the ACE™ solution.</li> </ul>	<ul> <li>Name</li> <li>Contact information</li> <li>Employer information</li> <li>Location data (if using the ACE Site App)</li> <li>Vehicle identifier (if using the ACE IQ App)</li> </ul>

From which sources will we collect your Personal Data? The data is collected when you use the installation code in conjunction to setting up the ACE™ solution.

**Who will have access to the Personal Data?** For this purpose, access will be given to suppliers of IT-systems and subsidiaries to the Company.

**Legal Grounds:** The processing is necessary for our as well as our customers, i.e. your employer's legitimate interest to provide the services we have agreed upon and we have assessed that our and our customer's interest is not overridden by your interests, rights, and freedoms.

**Automated decision-making, including profiling:** No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.

**Your right to oppose the processing:** We respect your integrity and will not process your Personal Data for other purposes. You may object to this processing, however, for this purpose we may demonstrate compelling legitimate grounds which overrides your interest, rights, and freedoms.

**Storage time**: The Personal Data will be processed up to three months from the termination of the agreement we have with our customer.

Purpose	Type of processing	Categories of
		Personal Data
To process sales orders made by customer and to communicate with current, previous, and	<ul> <li>Communication through e-mail and phone</li> <li>Storing Personal Data in CRM-</li> </ul>	<ul><li>Name</li><li>Title</li><li>Contact information</li></ul>
potential customer's contact persons.	system. • Processing sales orders	<ul><li>Employer information</li><li>Location data</li><li>Source of contact</li></ul>

**From which sources will we collect your Personal Data?** For this purpose we only process Personal Data that you provide us.

**Who will have access to the Personal Data?** For this purpose access will be given to suppliers of IT-systems and subsidiaries to the Company.

**Legal Grounds:** The processing is necessary for our legitimate interest to communicate with you who is a contact person to our current, previous, or potential customer.

**Automated decision-making, including profiling:** No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.

**Your right to oppose the processing:** We respect your integrity and will not process your Personal Data for any other purpose. You may object to this processing.

**Storage time**: If you are a contact person to our current customer we will process your data for as long as we have a relationship with your employer or up to three months from that we have received information that you are not our contact person or the relationship with our customer has ended. If you are a contact person to a potential customer we will process your Personal Data for up to 36 months from last entry and correspondence with you.

Purpose	Type of processing	Categories of
		Personal Data

To administer a recruitment and	Storing relevant documents,	Name
selection hiring process.	such as CVs and cover letters	Contact information
	Reviewing candidates	Employer information
	Interviewing candidates	Resume
	Conducting tests to identify	Merits and experience
	suitable candidates for the	Test results
	position	

From which sources will we collect your Personal Data? For this purpose, we process Personal Data that you provide us, publicly available Personal Data, and information provided to us by your referrers.

**Who will have access to the Personal Data?** For this purpose, access will be given to suppliers of IT-systems, subsidiaries to the Company, and service providers of tests.

**Legal Grounds:** For this purpose we will process your Personal Data with your consent, which you may revoke whenever you want.

**Automated decision-making, including profiling:** No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.

**Storage time**: The Personal Data will be stored and processed for the purposes mentioned here for up to two years from that you sent us your application containing your Personal Data.

Purpose	Type of processing	Categories of
		Personal Data
To fulfill legal obligations such as	Storing and maintaining records	Name
fulfilling the provisions of the		<ul> <li>Contact information</li> </ul>
bookkeeping act.		<ul> <li>Employer information</li> </ul>

**From which sources will we collect your Personal Data?** For this purpose, we only process Personal Data that you provide us.

Who will have access to the Personal Data? For this purpose, access will be given to suppliers of IT-systems and accounting services, subsidiaries to the Company and competent authorities.

**Legal Grounds:** The processing is necessary for compliance with legal obligations.

**Automated decision-making, including profiling:** No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.

**Storage time**: The Personal Data will be stored and processed for as long as there is a legal obligation, which in the case of the bookkeeping act is seven years from the time the information was recorded.

# Recipients of Personal Data and transfers to third countries outside the EU/EEA

As controller of your Personal Data, we may assign the processing listed above to our subsidiaries, competent authorities and a partner or supplier, i.e. an IT service provider. Such processing will not be made for other purposes than as described above. Some partners and suppliers may have parts of their businesses in countries outside of the EU/EEA. Transfer of

Personal Data will only be made to such countries, which offer an adequate level of data protection, as decided by the EU Commission, or if the supplier or subsidiary has a legally binding and enforceable instrument, which guarantees the safety of the Personal Data.

# Your rights as registered

You have the right to:

- Request information about which of your Personal Data we process and you can request a copy of these;
- Have incorrect Personal Data rectified and you can under certain circumstances have your Personal Data erased;
- Oppose against certain processing of your Personal Data and request that the processing is restricted;
- Have your Personal Data transferred to another controller (right to data portability),
   and
- If you are unsatisfied with our processing of your Personal Data, report our processing to the Swedish Data Protection Authority, who is the supervising authority.

You may at any time contact us via the contact information below obtain, erase or restrict the processing of your Personal Data. Please notice that if we restrict the processing of or erase your Personal Data we might not be able to fulfill the purposes stated herein. Moreover, we may even though you object have compelling reasons to still process your Personal Data for the purposes stated herein.

#### **Amendments to the Privacy Policy**

The Company retains the right to amend this Privacy Policy as the Company sees fit. The date for the latest amendment is indicated at the end of this Privacy Policy. If the Company amends this Privacy Policy the Company will notify you by e-mail.

#### **Contact information**

If you have any questions regarding the Privacy Policy or any other questions regarding our processing, please feel free to contact us:

SiteTel Sweden AB, 556654-4176 Haukadalsgatan 8A, 164 40 Kista privacy@nsb.email

The Privacy Policy was adopted on 21, August 2018.