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2014218	1.0	Management	J. Larsson			
Related process routine (Doc. N N/A	ated process routine (Doc. Number): A		Document type: PROCESS POLICY			
Document name:		Related to Group / Company:	Created date:			
Data Protection Policy		Group				
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#### PURPOSE

- Policy in line with GDPR.

#### RESPONSIBILITY

- DPO together with Management is responsible for the administration of this document

#### **RELATED DOCUMENTATION**

#### **EXECUTION/ DISTRIBUTION:**

- Document shall be published on homepage and original to be stored on Sharepoint.

#### **DEVIATIONS**

- Deviations to this document shall be reported to Management

#### VERSION/ REVISION HISTORY

Date:	Version:	Revision:	Changed By:	Describe change
2018-05-24	1	0	<u>JL</u>	Document Created and approved

## PCB Connect personal data protection policy

We respect your privacy and your rights to control your personal data. We like to be clear about the data we collect, why we collect it and how we protect it. We do not and will not sell your data to any third parties

This Privacy Statement (the 'Statement') explains the personal information we collect from you, either directly or indirectly, and how we will use it. Personal information is any information that can be used to identify you or that we can link to you. The Statement also elaborates on the choices you can make about the data we collect, and how you can control these decisions. It applies to all products and/or services offered by PCB Connect. It also applies to any PCB Connect controlled websites, as well as other offline interactions, or attending a PCB Connect event (collectively referred to as, 'Services'). Please read this Statement carefully to understand how PCB Connect may collect, use and share your personal information. The terms 'we', 'us', or 'PCBC' are each intended as reference to PCB Connect.

## **The Types of Personal Information We Collect**

#### Information you provide to us

We collect information you voluntarily provide to us, such as your name, phone number and email address; for instance, when you purchase from, want to learn more about PCBC Products and Services, or when you contact us in any other way.

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#### Information obtained from other sources

We may receive information about you from other sources, including third parties. We may also receive information about you from social media platforms, for instance, when you interact with us on those platforms. We protect data obtained from third parties according to the practices described in this Statement and we also apply any additional restrictions imposed by the source of data.

### **Customer Interactions with PCB Connect**

To make the information in this Statement easy to understand, we have highlighted different occasions when PCBC could potentially collect personal information from customers. The customer interactions with PCBC are broken down into the following segments:

#### Learning about PCB Connect

As you gather more information about PCBC, you may virtually or physically visit a site that we own. Examples include browsing our website, calling any of our support functions, or attending PCBC-sponsored events. To learn more about PCBC Products, you may voluntarily provide personal information, such as your name and email address during these interactions.

#### We collect: name and email address

Why: We use this information to share news about events and products offered by PCBC.

#### **Buying PCB Connect Products**

When you buy from us, you may be asked to provide information so that we can complete your purchase.

We collect: your name, phone number, email address, delivery/shipping address, and payment information and similar information.

**Why:** We use this information to complete your transaction, carry out any follow up with you about your purchase, help with any delivery issues, handle returns, and other issues related to the purchase of PCBC Products. Processing your personal data for this purpose is necessary for the performance of the agreement we have with you.

# How We Use Personal Information

PCBC uses the data we collect to provide you with the Products and Services we offer. We also use the data to communicate with you, for example, informing you about products or services available, security and other types of updates.

PCBC uses the data for the following purposes:

- <u>Customer Support</u>
- Product Improvement
- Security, Safety, and Dispute Resolution
- <u>Business Operations</u>
- <u>Communication, Marketing and Advertising</u>

## **Customer Support**

We use data to respond to customer enquiries, analyze Product problems, provide other customer support services. This processing is necessary for the performance of the agreement we have with you, as well as to serve our legitimate interest.

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#### **Product Improvement**

We continually use data for research purposes and to develop and improve our Products and Services, including maintaining and improving the performance of our PCBC Products and Services, developing and adding new services or capabilities, in order to fulfill agreements.

## Security, Safety and Dispute Resolution

We use data to protect the security and safety of our PCBC Products and our customers, to detect and prevent fraud, to resolve disputes and enforce our agreements. This processing is necessary to serve our legitimate interest.

## **Business Operations**

We use data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business. This processing is necessary to serve our legitimate interest.

## **Communication, Marketing and Advertising**

We use the data we collect to deliver and personalize our communications with you. For example, we may contact you by email or other means of electronic communication to inform you about new Products or Services, security or software updates, update you on a support issue, invite you to take part in a survey. This processing is necessary to serve our legitimate interest.

To give you a better understanding of the personal information we collect and use in different occasions you may interact with PCBC, please see the sections below.

# How We May Share Personal Information

PCBC does not and will not sell personal information about our customers. We only disclose your data as described in this Statement. We may share information with the following types of third parties.

# **Third Party Vendors**

PCBC uses a variety of third-party vendors to carry out services like PCB Production, website management and hosting, online product purchases and shipping, credit card processing and email communications. We only share your personal data as necessary. To complete a transaction, provide a Product or Service you have requested or authorised and only with vendors or agents working on our behalf for the purposes described in this Statement. In this case, your personal information will be shared with these agents or contractors but only for the purpose of performing services on behalf of PCBC and in accordance with this Statement. It is our legitimate interest to process your personal data for these purposes.

## PCBC-controlled affiliates and subsidiaries

We share information with PCBCs-controlled affiliates and subsidiaries for business purposes, such as, internal administration, providing customers with our PCBC Products and Services. It is our legitimate interest to process your personal data for these purposes.

# **Compelled Disclosure**

When legally required, strictly necessary for the performance of the services or to protect our rights, or the rights of our affiliates or users, we disclose your personal information to law enforcement authorities, investigative organisations, our affiliates or in legal proceedings.

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# Sharing and Disclosure of Aggregate Data

We share data in aggregate form and/or in a form which does not enable the recipient of such data to identify you, with third parties, for example, for industry analysis.

When sharing data with third parties, your personal information may be transferred to countries where data protection laws may provide a lower standard of protection for your personal information than your country. We take great care in protecting your personal information and have put in place adequate mechanisms to protect it when it is transferred internationally. We will transfer your personal information in compliance with applicable data protection laws and will implement suitable safeguards to ensure that your personal information is adequately secured by any third party that will access your information.

# The Legal Bases for Using Personal Information

There are different legal bases that we rely on to use your personal information, namely:

### **Performance of a contract**

The use of your personal information may be necessary to perform the agreement you have with us. For example, to complete your purchase of your PCBC Product, to register and maintain your account, to help with delivery issues, to handle returns in a secure way or to respond to your requests.

## **Security and Retention of Personal Information We Collect**

#### Security

PCBC is committed to protecting the security of your personal information. However, while we take reasonable precautions to guard the personal information we collect, no security system is impenetrable.

While no Service is completely secure, PCBC takes precautionary measures to help prevent information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. For example, we store the personal data you provide on computer systems that have limited access and that are in controlled facilities.

#### Retention

PCBC will retain your personal information for as long as we deem it necessary to provide services to you, to comply with applicable laws (including those regarding document retention), resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. All personal information we retain will be subject to this Privacy Statement and our internal retention guidelines.

# Your Rights and Choices

### **Your Rights**

We want you to be in control of how your personal information is used by us. Subject to local law, you can do this in the following ways:

- you can ask us for a copy of the personal information we hold about you;
- you can inform us of any changes to your personal information, or if you want us to correct any of the personal information we hold about you;
- in certain situations, you can ask us to erase, block or restrict the personal information we hold about you, or object to particular ways in which we are using your personal information; and

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• in certain situations, you can also ask us to send the personal information you have given us to a third party.

Where we are using your personal information on the basis of your consent, you are entitled to withdraw that consent at any time. Moreover, where we process your personal information based on legitimate interest or the public interest, you have the right to object at any time to that use of your personal information.

We rely on you to ensure that your personal information is complete, accurate and up to date.

We will respond to your request as soon as possible but certainly within 30 days.

We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal information. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to file a complaint with the data protection authority in your country (if one exists in your country) or supervisory authority.

#### **Your Choices**

#### Your Communication, Marketing and Advertising Preferences

You can opt out of receiving direct marketing communications from PCBC by following the instructions included in every email sent to you via the "Unsubscribe" tab. We respect your choice, and we will stop sending you promotional emails once you unsubscribe.

Please note, regardless of your communication settings, we will continue to communicate with you regarding changes to terms and conditions, policy updates, PCBC Product updates, routine customer service messages such as information about current or past purchase, delivery of products, service interruptions, data breaches or other significant information about a Product you own, such as discontinuation of support or safety issues.

## **How to Contact Us**

If you have any questions about the use of your personal information, please email dpo@pcbconnect.net

## **Changes to Our Privacy Statement**

PCBC may modify or update this Statement when necessary, to reflect customer feedback and changes in our PCBC Products and Services. Please review it regularly. When we update this Statement, we will revise the version or revision for the document and it will be available on our homepage.