

## PRIVACY POLICY FOR WEB AND ONLINE TRADING PLATFORM

### Why does CellMark have a privacy policy?

CellMark AB (“CellMark” or “we”) cares about your privacy. Therefore, we always strive to protect your personal data in the best possible way and to comply with all applicable laws and regulations for the protection of personal data.

In this privacy policy, CellMark wants to inform you who communicate with us through our web, you who has signed up to CellMark’s newsletters and/or you who have an account at our trading platform about how CellMark processes your personal data. We therefore inform you about, for example, the legal basis and purpose of the processing and how you can affect our processing of your personal data.

### Who is responsible for your personal data?

CellMark AB, Swedish corporate identity number 556244-2433, with address P O Box 11927, SE-404 39 Gothenburg, Sweden, telephone number [+46(0)31-100 300] is responsible for the processing of your personal data (the controller).

You are welcome to contact our Data Protection Coordinator by calling telephone number +46(0)31-100 300 or sending an e-mail to [dataprotection@cellmark.se](mailto:dataprotection@cellmark.se) if you have any questions or queries regarding CellMark’s processing of your personal data.

### How and why do we process your personal data?

We conduct all our processing of your personal data for the following overall purposes:

- Communicate with you on your request;
- Send marketing to you on your request; and/or
- Administrate your account on our online trading platform and send you relevant offers as a registered member on the online trading platform.

Our aim is to be as transparent as possible regarding how and why we process your personal data. In the table below, we inform you about why we process your personal data (the purposes of processing), what personal data we process, our legal basis for processing your personal data and how long we process your personal data for each purpose. If any of the information stated change, we will inform you and share our revised privacy policy with you.

For purposes of communicating on your request			
For what purposes do we process your personal data?	What personal data do we process?	What is our legal basis for processing your personal data?	How long do we process your personal data for the specific purpose?
To communicate with you and answer your	Your name, e-mail address, company	Processing is necessary to fulfill our contract, i.e. in order for us to be	Your account and associated information will be

questions on your request (i.e. when you fill out our contact form on the web and thereto related communication).	belonging and IP address. We also process any other personal data that you provide to us when contacting us.	able to answer your questions as requested.	erased in case your account has been inactive for a period of one (1) year or sooner if you chose to delete your account.
To send news and updates to you in the role of your profession for marketing purposes on your request.	Your name, e-mail address and company belonging.	Your consent.	Until you unsubscribe to our newsletter.

Information that we process in order to communicate with you and answer your questions is necessary for you to provide to us in order to fulfil our part of the contract. If you do not provide the information, we will not be able to communicate with you and answer your questions.

<b>To administrate your account on our online trading platform</b>			
<b>For what purposes do we process your personal data?</b>	<b>What personal data do we process?</b>	<b>What is our legal basis for processing your personal data?</b>	<b>How long do we process your personal data for the specific purpose?</b>
To create and administer your account on our online trading platform.	In order to set up an account we need some obligatory information about you, this is your name, email address, telephone number and company belonging.  In addition to this obligatory information we also process personal data about that you voluntarily provide us with such as your company position.  Once your account has been set up we also process your account information consisting of your user name and password.	Our legitimate interest to create and administer your account in order to give you access to the online trading platform at your request.	Your account and associated information will be erased in case your account has been inactive for a period of one (1) year or sooner if you chose to delete your account.

<p>To contact you as a member of the online trading platform regarding relevant offers from the online trading platform. This is made to you in the role of your profession for marketing purposes.</p>	<p>Your name, e-mail address, telephone number and company belonging.</p>	<p>Our legitimate interest to contact you in your profession in order to inform you about current offers on the online trading platform.</p>	<p>During the time under which you use the online trading platform. We will erase your information if we receive notice that you no longer are a representative of the company or until you notify us that you do not want to receive information about offers.</p>
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### **How have we assessed the balancing of interests when the legal basis for processing of your personal data is our legitimate interest?**

For some purposes, CellMark processes your personal data relying on our legitimate interest as legal basis for the processing. When assessing the legal basis we rely on a balance of interests, through which we have determined that our legitimate interest for the processing outweighs your interest and your fundamental right not to have your personal data processed. We have stated what our legitimate interest is in the tables above. You are welcome to contact us if you want to read more about how we have done this assessment. Our contact details are as stated in the beginning of this privacy policy.

### **From who or where do we collect your personal data?**

We collect the personal data that we process about you from you or from the company you represent.

### **Who can gain access to your personal data?**

In order to communicate with you or to administrate your account on our online trading platform, we may share your personal data to other CellMark companies. We will also share your personal data with our selected external IT suppliers processing data on our behalf, however limited to the extent necessary to fulfill their obligations towards CellMark. If you want to know more in detail how we process your information, you may contact us at our contact information stated in the beginning of the privacy policy.

### **Do we transfer your personal data outside of the EU/EEA?**

We will transfer your personal data outside of the EU/EEA if it is necessary for us to be able to communicate with you or to administrate your account on our online trading platform. That is the case if you work in a country outside of the EU/EEA, which means that we will

transfer your personal data to the country that you work in. That is also the case when we may transfer your information to the country or countries, which you as a representative of one of our partners sell to or buy from as part of the agreement. The same will apply when you, as a part of the agreement, communicate with one of our offices that is located outside of the EU/EEA.

We may also transfer your personal data outside of EU/EEA to our IT suppliers that are processing the personal data on behalf of us as processors. The transfer is done in order for us to receive assistance with the IT-suppliers that provide cloud services and perform IT-support and maintenance for us. Depending on which country you work in and which country or countries, which you as a representative of one of our partners sell to or buy from as part of the agreement the suppliers that gains access to your personal data may vary.

Furthermore, CellMark may transfer your personal data to the USA and our Privacy Shield certified IT-supplier as part of our process for sending you your newsletter. According to a decision adopted by the European Commission, personal data may be transferred to a recipient in the USA if the recipient is Privacy Shield certified. Privacy Shield is an agreement between the EU and the USA, which rationale is to protect the fundamental rights of Europeans and to ensure legal certainty for businesses transferring personal data to the USA. American companies are able to sign up to be Privacy Shield certified with the U.S. Department of Commerce who will then verify that their privacy policies comply with the high data protection standards required by the Privacy Shield.

If we transfer your personal data to a recipient in a third country CellMark will always take suitable and appropriate safeguards to protect the personal data being processed. This means we will only transfer your personal data outside of the EU/EEA where there is a legal basis for doing this

For detailed information about which companies that will gain access to your personal data, you can contact us at the contact information stated in the beginning of this privacy policy.

## **How can you affect our processing of your personal data?**

According to the data protection legislation, you are entitled to a variety of rights regarding our processing of your personal data. You have the right of access, right to rectification and erasure of personal data. You also have the right to require restriction of processing as well as the right to object to the processing. You are also entitled to data portability and the right to submit a complaint to a supervisory authority. For a more detailed description of the data protection rights, please see below.

### *Right of access*

In accordance with applicable data protection legislation you are entitled to have the right of access. This means that you have the right to obtain confirmation as to whether or not personal data concerning you is being processed by CellMark and, where that is the case, access to the personal data in accordance with the applicable data protection legislation. You also have the right to obtain a copy of the personal data that we process.

### *Right to rectification*

If you believe the information CellMark processes about you is incorrect, you can request that CellMark corrects it. You have, without undue delay, the right to obtain the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### *Right to erasure ('right to be forgotten')*

If you believe that the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, you may ask us to erase your information. You may also ask us to erase your personal data if:

- the processing of the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based and where there is no other legal ground for the processing;
- you object to the processing where the legal basis is our legitimate interest, and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which CellMark is subject.

CellMark will erase your personal data upon such request unless CellMark has the right to keep the personal data in accordance with the general data protection regulation.

### *Right to restriction of processing*

You also have the right to ask us to restrict our processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling CellMark to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- CellMark no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or

- you have objected to processing pending the verification whether the legitimate grounds of CellMark overrides your legitimate grounds.

#### *Right to object*

You have the right to object to the processing of your personal data when the processing is necessary for the purposes of our legitimate interest.

You also have the right to object to our processing of your personal data for marketing purposes. That is the case for example when we send marketing to you in the role of your profession. If you object to marketing from us, your personal data will no longer be processed for marketing purposes.

#### *Right to withdraw consent*

At any given time, you have the right to withdraw all or part of a given consent on the processing of personal data when the legal basis for the processing is your consent. Withdrawal of consent may however have no effect on our processing of your personal data for the period prior to the recall took place. You can withdraw your consent by contacting us on the contact information stated in the beginning of the privacy policy.

#### *Right to lodge a complaint to a supervisory authority*

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the EU/EEA member state of your habitual residence, place of work or place of the alleged infringement of the General Data Protection Regulation. In Sweden, the supervisory authority is The Swedish Data Protection Authority.

#### *Right to data portability*

You are also entitled to receive personal data concerning you that you have provided to us in a structured, commonly used, machine-readable and interoperable format, and to transmit it to another controller (data-portability). This right will apply when:

- the processing is based on consent or on a contract; and
- the processing is carried out by automated means.

In exercising your right to data portability you have the right to have personal data transmitted directly from CellMark to another controller, where technically feasible.