

## **Privacy Directive**

### **Beijer Ref Group**

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#### **Purpose & Scope**

Beijer Ref is committed to protecting your privacy. We understand that your privacy is important, and we take it seriously. This directive outlines how we collect, use, and protect your personal information when you interact with us, whether it be through our website, social media channels, or any other means.

We are committed to being transparent about our data practices, and we want to provide you with the information you need to make informed decisions about sharing your personal information with us. This directive will explain what types of information we collect, how we use it, and who we share it with.

#### **Who is responsible for your personal data?**

Beijer Ref group is responsible for your personal data. Beijer Ref comprises of Beijer Ref AB (publ) and its respective subsidiaries and affiliates (the "Beijer Entities"). Specifically, your data will be controlled by the Beijer Entity that you have instructed or that is providing services or communication to you in your region.

#### **Data Collection**

The personal data we collect may include:

- Contact information, such as your name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address;
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information;
- Further business information necessarily processed in a business transaction, project or client contractual relationship with Beijer Ref or voluntarily provided by you, e.g. in a recruitment process such as instructions given, payments made, requests and projects;
- Your password for the Beijer Ref website or other password protected platforms or services, where you have one;
- Information collected from publicly available resources, integrity databases and credit agencies;
- If legally required for compliance purposes, information about relevant and significant litigation or other legal proceedings against you or a third party related to you and interaction with you which may be relevant for antitrust purposes;
- Special categories of personal data. In connection with the registration for and provision of access to an event or seminar, we may ask for information about your health for the purpose of identifying and being considerate of any disabilities or special dietary requirements you may have. Any use of such information is based on your consent. If you do not provide any such information about disabilities or special dietary requirements, we will not be able to take any respective precautions;

- Other personal data regarding your preferences where it is relevant to sales and services that we provide; and/or
- Details of your visits to our premises.

Personal data of employees will be collected through appropriate channels such as HR forms, email communication, attendance records, performance evaluations, and training records. From time to time, it may include personal data about your membership of a professional or trade association or union, health personal data, details of dietary preferences when relevant to events to which we invite you.

## **How do we collect your personal data?**

We may collect personal data about you in a number of circumstances, including

- When you or your organisation seek information or advice from us or use any online services;
- When you or your organisation browse, make an enquiry or otherwise interact on our websites;
- When you apply for a job or open position within any of our entities;
- When you or your organisation offer to provide or provide services to us.
- When you attend a seminar or another Beijer Ref event or sign up to receive personal data from us, including training; or

In some circumstances, we collect personal data about you from a third party source. For example, we may collect personal data from your organisation, other organisations with whom you have dealings, government agencies, a credit reporting agency, an information or service provider or from a publicly available record.

## **Are you required to provide personal data?**

As a general principle, you will provide us with your personal data entirely voluntarily; there are generally no detrimental effects for you if you choose not to consent or to provide personal data. However, there are circumstances in which Beijer Ref cannot take action without certain of your personal data, for example because this personal data is required to process your instructions or orders and deliveries, provide you with access to a web offering or newsletter or process your information in a recruitment process or to carry out a legally required compliance screening. In these cases, it will unfortunately not be possible for us to provide you with what you request without the relevant personal data and we will notify you accordingly.

## **For which purposes will we use your data?**

We may use your personal data for the following purposes (Permitted Purposes):

- Providing sales of goods or other services or things you may have requested, including online services or solutions as instructed or requested by you or your organisation;
- To ensure people processes needed to demonstrate compliance or support competence development.  
Managing and administering your or your organisation's business relationship with Beijer Ref, including processing payments, accounting, auditing, billing and collection, support services;

- Compliance with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (e.g. export laws, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes;
- To analyse and improve our services and communications to you;
- Protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- For insurance purposes;
- For monitoring and assessing each with our policies and standards;
- To comply with our legal and regulatory obligations and requests, including reporting to and/or being audited by national and international regulatory bodies;
- To comply with court orders and exercises and/or defend our legal rights; and
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

The personal data collected from employees will only be used for purposes related to managing their employment, including but not limited to payroll processing, performance evaluations, training and development, employee benefits, and compliance with legal and regulatory requirements.

Where you have expressly given us your consent, we may process your personal data also for the following purposes:

- Communicating with you through the channels you have approved to keep you up to date on the latest industry developments, announcements, and other information about Beijer Ref products, technologies and services (including, newsletters and other information) as well as Beijer Ref trainings, events and projects;
- Customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events; or
- Collecting information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

With regard to marketing-related communication, we will - where legally required - only provide you with such information after you have opted in and provide you the opportunity to opt out anytime if you do not want to receive further marketing-related communication from us. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than described above.

Depending on for which of the above Permitted Purposes we use your personal data, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a customer or supplier instruction(s) or other contract with you or your organisation;
- To comply with our legal obligations (e.g. to keep pension records or records for tax purposes); or
- Because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your fundamental rights and freedoms.

In addition, the processing may be based on your consent where you have expressly given that to us.

## **Data Protection**

Beijer Ref is committed to protecting and respecting the personal data and privacy of its employees, customers, and third parties. In accordance with applicable national privacy laws and regional legal instruments, Beijer Ref collects, processes, and handles personal data with due regard to data protection and privacy issues.

To ensure compliance with data protection laws and regulations, Beijer Ref has established internal directives and processes that all employees must follow in their daily work. Additionally, every user must comply with data protection laws and the Beijer Ref's policies and procedures when using Beijer Ref's information assets.

To safeguard its information assets, Beijer Ref reserves the right to log and monitor IT user behavior. In cases where a privacy or security breach is suspected or presumed, an investigation may be initiated by appointed IT administrators or a third party acting on Beijer Ref's behalf. To stop a security breach, access to or content from a compromised device may be restricted or deleted. Beijer Ref will only do so for reasonable cause, but such actions may result in the loss of private content (photos, emails, documents, etc.). Beijer Ref shall have no liability for such loss.

In addition, Beijer Ref takes appropriate technical and organizational measures to keep personal data confidential and secure in accordance with internal procedures that cover the storage, disclosure of, and access to personal data. Personal data may be stored on our technology systems, those of our contractors, or in paper files.

To ensure the effectiveness of its data protection measures, Beijer Ref regularly reviews and updates them. All employees receive training on data protection and must comply with the Beijer Ref's policies and procedures. Any breaches of data protection will be promptly reported and investigated, and appropriate remedial action will be taken to mitigate the impact of the breach and prevent similar incidents from occurring in the future.

## **Marketing**

We may share your personal data in the following circumstances:

- We may share your personal data between the Beijer Ref Entities on a confidential basis where required for the purpose of providing legal advice or other products or services and for administrative, billing and other business purposes;
- We may disclose your personal data to external partners to perform tasks on our behalf such as providing IT services or helping with marketing and recruitment, administration of press releases, data analytics or statistics;
- We may disclose your contact details on a confidential basis to third parties for the purposes of collecting your feedback on the Beijer Ref's service provision, to help us measure our performance and to improve and promote our services;
- We may share your personal data with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared;
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations;

- We may share your personal data with third parties, for instance courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;
- We may also instruct service providers within or outside of Beijer Ref, domestically or abroad, e.g. shared service centers, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. Beijer Ref will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers;
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your personal data when you direct us or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

### **Personal data about other people which you provide to us**

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this directive. In particular, you must ensure the individual concerned is aware of the various matters detailed in this directive, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

### **Cookie Policy**

Our website may use cookies or similar technologies to collect and process personal data for the purposes of improving website functionality, personalising user experience, and analysing website traffic. Our cookie policy will be easily accessible on the website, and you will be informed about the use of cookies when they visit the website. The cookie policy will provide information on the types of cookies used, their purpose, and the duration of their retention. We will obtain consent from website users before collecting any personal data through cookies, unless the cookies are strictly necessary for the functioning of the website. We will also ensure that any third-party cookies used on the website comply with applicable data protection laws and Beijer Ref's data protection policies and directives.

### **Cross Border Data Transfers**

Beijer Ref is a part of a globally active business group, the Beijer Ref group. We may transfer your personal data abroad if required for the Permitted Purposes as described above. This may include countries which do not provide the same level of protection as the laws of your home country (for example, the laws within the European Economic Area or Australia). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other relevant laws. This includes entering into the EU Standard Contractual Clauses which are available here. If personal data is transferred to a country outside of the European Economic Area (EEA) or any other country that is not deemed to have an adequate level of data protection by the European Commission, we will ensure that appropriate safeguards are in place to protect the personal data. These safeguards may include obtaining consent from employees, entering into standard contractual clauses with the data recipient, or relying on

other recognized data transfer mechanisms. We will ensure that any cross-border transfers of personal data comply with applicable data protection laws and the Beijer Ref's data protection policies and directives. Employees will be informed about any cross-border transfers of their personal data and the safeguards in place to protect their personal data.

## **Data subject Rights**

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to your region's Beijer Ref office. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us. You have the right to exercise your data subject rights under applicable data protection laws. This includes the right to access, rectify, erase, restrict or object to the processing of your personal data, as well as the right to data portability and the right to lodge a complaint with a supervisory authority. You can exercise these rights by submitting a request to your Beijer Ref region's Data Protection Officer. That Beijer Entity will respond to such requests in accordance with applicable data protection laws and within a reasonable timeframe. We will also ensure that any third-party processors who process personal data on our behalf comply with the data subject's rights.

## **Data Retention**

We will retain personal data only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required by law or regulatory requirements. Personal data will be securely disposed of or deleted when it is no longer needed, in accordance with our data retention policies and procedures.

We will regularly review our data retention policies to ensure that personal data is not retained for longer than necessary. In cases where personal data is required to be retained for legal or regulatory reasons, we will ensure that appropriate measures are taken to protect the personal data during the retention period and securely dispose of it at the end of the retention period.

## **Compliance**

We are committed to complying with all applicable data protection laws and regulations. We will regularly review our data protection policies and procedures to ensure that they remain compliant with applicable laws and regulations. We will also ensure that our employees and any third-party processors who process personal data on our behalf are aware of and comply with our data protection policies and procedures. Any breaches of data protection or non-compliance with applicable laws and regulations will be promptly reported and addressed, and appropriate remedial action will be taken to prevent similar incidents from occurring in the future. Each legal entity within Beijer Ref must have internal procedures to ensure that this directive as well as applicable legislation are complied with.

## **Updates to this Directive**

This directive is subject to change from time to time as our business needs or legal and regulatory requirements change. Any changes made will be updated in this directive accordingly. We will inform you of any changes by way of publishing an updated directive on our official website [www.beijerref.com](http://www.beijerref.com), effective from the date of publication. We will also notify employees of any changes to this directive in a timely manner and ensure that the updated directive is easily accessible to all employees. It is the responsibility of all employees to review and understand the directive and to comply with the updated directive. Failure to comply with this directive may result in disciplinary action, up to and including termination of employment.

## **How to get in touch with us**

If you have any questions or concerns about this directive or our handling of your personal data, you can contact your regional Beijer Ref Data Protection Officer. The contact details of the Data Protection Officer will be provided upon request. We will promptly investigate and respond to any questions or concerns raised in relation to this directive or your personal data.

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