

HULTAFORS GROUP

Privacy notice

This Privacy Notice describes how Hultafors Group collects and uses personal data in the course of our business activities. This privacy notice applies to Hultafors Group AB and associated companies, which includes subsidiaries and affiliates (hereinafter collectively referred to as “Hultafors Group”, “we”, “us” or “our”). Please see our [website](#) and click on “our brands” to see all companies included in the scope of this Privacy Notice.

Data Controller

The controller of the personal data is Hultafors Group AB, 556365-0752, with registered office at J A WETTERGRENS GATA 7, 421 30 Västra Frölunda, Västra Götalands län, Sweden.

As the controller, Hultafors Group is responsible for your personal data under relevant data protection law. If any questions arise in relation to this privacy notice, don't hesitate to get in touch with Hultafors Group at dpo@hultaforsgroup.com.

1. About personal data

Personal data means any information that could identify an individual. It includes, but is not limited to, names, email addresses, phone numbers, payment information, location data, physical addresses, etc. It does not include data where the identity has been removed (anonymous data). Furthermore, “special categories” of more sensitive personal data require a higher level of protection.

Hultafors Group respects your privacy and works continuously to comply with applicable privacy legislation to ensure that your data is processed safely and securely. Below, in section II-V, you will find information about what personal data Hultafors Group processes and for which purposes, the lawful basis for processing personal data, how long we retain personal data, and your rights. Moreover, Hultafors Group has implemented organizational and technical security measures, and we are constantly working to strengthen these. This notice helps you understand what kind of information Hultafors Group collect, the usage of personal data, and your rights.

2. Data processing

The processing of personal data is limited to information required to operate a functional website and for providing content, services, recruiting processes, and marketing activities. The processing of personal data is based on the purposes agreed upon or on a legal basis (GDPR). Hultafors Group only collects personal data needed to implement and process our tasks and services or if you provide data voluntarily.

Hultafors Group may process personal data when you undertake the following activities:

2.1 When you visit Hultafors Group's website

Hultafors Group system records data and information about the computer used by the user automatically and with every visit on our website.

The following data are collected:

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- Information regarding the type and version of internet browser used to access the website
- Operating system
- Internet service provider
- IP address
- Date and time of each access
- Web page from which the user was redirected to our page

2.1.1 How Hultafors Group analyze web presence

Hultafors Group does analyze the usage of our web presence with the following tool(s): [Facebook pixel](#), [Google Analytics](#), [Google Tag Manager](#) and [Hotjar](#). Please follow the links to read more about the tools used. This analysis is exclusively for the purpose of optimizing the website with regards to usability and the provision of useful information about our services. A merger of data with other personal data sources or disclosure to third parties is precluded.

The legal grounds to process your personal data are consent, which you may or may not give us when visiting our website, through the cookie module.

For more information about data processing that takes place when you visit Hultafors Group's website, please read Hultafors Group's cookie policy.

2.2 When you purchase at Hultafors Group

Hultafors Group may collect and process the following data:

Email address, Full name, Phone number, Billing address, Shipping address, and payment information details.

Hultafors Group uses the above data for the following purposes:

- So you can purchase and receive your order
- So Hultafors Group can prevent and detect fraud
- So you can receive updates about your order via email or SMS
- So we can send you NPS surveys and contact you to know what you think about Hultafors Group' services
- So Hultafors Group can notify you about changes to our services
- So you can receive your refund, and Hultafors Group can manage the whole return process

The legal grounds to process your personal data are:

- The processing of your personal data is necessary for the contract between you and Hultafors Group:
 - to fulfill and deliver your purchases,
 - for adherence to Hultafors Group' legal obligations and
 - legitimate interests.

2.3 When you create an account on Hultafors Group's website

Hultafors Group may collect and process the following data:

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Email address, Full name, Phone number, Billing address, Shipping address, Visited products, and Order history.

Hultafors Group uses the above data for the following purposes:

- So you can create your account
- So you can pre-register information that is asked for at the checkout
- So you can manage your account, facilitate the purchasing process
- So you can check out your orders history
- To provide you with products you might like

The legal grounds to process your personal data is:

- The processing for your account is based on our legitimate interests so we can give you access, for instance, to your order history or facilitate the purchase process at the checkout.

2.4 When you contact Hultafors Group

If you fill out a contact form, send us an email or another form of electronic message, your data will only be used to process your inquiry and possible further questions you might have.

Legal basis for the processing of your inquiry is legitimate interest, because there is a legitimate interest from both sides to communicate.

We will delete your email address after completing your inquiry.

2.5 Applying for a job at Hultafors Group

When applying for a job, Hultafors Group will collect, store, and use personal data to make a recruitment decision and contact you. This information will generally include:

- Full name, email, telephone number, information in the CV, and personal letter.

Hultafors Group uses the above information for the following purposes:

- So to be able to include you in a recruitment process
- So to be able to offer you a job at Hultafors Group
- So Hultafors Group can contact you in the future for other positions.

The legal grounds to process your personal data is:

- The processing of your personal data is based on contract – in order to go into an employment contract with you, we need to process the data. All other contact is based on consent.

2.6 When you supply Hultafors Group

When applying for a job, Hultafors Group will collect, store, and use personal data to make a recruitment decision and contact you. This information will generally include:

Hultafors Group may collect and process the following information:

Full name, email, telephone number, information in the CV, and personal letter.

Hultafors Group uses the above information for the following purposes:

- So to be able to include you in a recruitment process

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- So to be able to offer you a job at Hultafors Group
- So Hultafors Group can contact you in the future for other positions.

The legal grounds to process your personal data is:

- The processing of your personal data is based on contract – Hultafors Group needs to process the data to enter an employment contract with you. All other contact is based on consent.

2.7 When you subscribe to newsletters from Hultafors Group

You can subscribe to Hultafors Group' newsletters by entering your email address if you are interested in our newsletters. You can, of course, unsubscribe from newsletters at any time.

By subscribing, you give Hultafors Group your consent to save your email address, including the date and time of signing up and your IP address. Hultafors Group only use your personal data to manage and send the selected newsletter. Hultafors Group' newsletters do not contain visible or hidden counters, third-party ads, or links to external websites that are not directly connected to the content in the newsletter.

How do you unsubscribe from marketing communications?

- By clicking on the unsubscribe link at the end of the newsletter. Each newsletter contains a reference on how to unsubscribe from the newsletter.
- By contacting our Customer Service.

3. Your rights

Hultafors Group complies with relevant data protection laws, including Regulation (EU) 2016/679 (General Data Protection Regulation), which means that your data will be:

- used lawfully, fairly, and transparently;
- gathered solely for proper purposes that we have explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes Hultafors Group have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes Hultafors Group has informed you about; and
- kept securely.

You have rights regarding access, correction, erasure, and restriction. These rights mean that you can:

- Right to request access to your personal information. This right enables you to receive a copy of the personal data Hultafors Group holds about you and to check that we are lawfully processing it.
- Right to request correction of the personal information that Hultafors Group holds about you. This right lets you correct any incomplete or inaccurate information Hultafors Group holds about you.
- Right to request the erasure of your personal information. This right enables you to ask Hultafors Group to delete or remove personal data.
- You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

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- Right to object to the processing of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object if Hultafors Group processes your personal information for direct marketing purposes.
- Right to request the restriction of processing of personal data. This right enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- Right to request the transfer of your personal information to another party.
- Right to review, verify, correct, or request erasure of personal data, object to the processing personal data, or request that Hultafors Group transfers a copy of your personal information to another party.
- Right to revoke a previously granted consent to use your personal. You can exercise this right at any time.

For more information regarding your rights set out in relevant data privacy laws, please visit www.imy.se.

4. Sharing information

Hultafors Group will never trade your personal data with any third party. However, Hultafors Group may share your personal information with companies who are experts in their field and assist us in operating the website, conducting our business, or servicing you. Hultafors Group selects service providers to provide the particular services needed, including their capacity to handle your personal information. In addition, all service providers guarantee to implement the technical and organizational measures necessary to meet the requirements of the relevant data protection laws and Hultafors Group's requirements.

Hultafors Group share your personal information in the following cases:

- Hultafors Group may transfer data to Hultafors **Group's** sub-contractors in connection with deliveries (for example, your address which is necessary to our suppliers and shipping agents to deliver your order). Data transferred to a third party is solely used to fulfill Hultafors Group's obligations to you as a customer.
- If Hultafors Group is under a duty to disclose or share your data to comply with legal obligations or agreements; or to protect the rights, property, or safety of Hultafors Group, our customers, or others. Hultafors Group could exchange information with other companies and organizations for fraud protection and credit risk reduction;
- To other professional services companies such as website hosts, advertising/marketing agencies, and analytics or search engine providers.

5. Transfers of information

In cases where a third-party provider is located outside the European Economic Area, Hultafors Group will ensure that third parties apply standard data protection clauses adopted or approved by the European Commission.

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Hultafors Group closely monitors the situation regarding transfers outside of EEA, especially transatlantic transfers to the US, and we will always strive to use appropriate contractual, organizational and technical measures to secure the integrity of your personal data.

6. Brand specific private data regulations (e.g Solid Gear Footwear's private data regulations)

Hultafors Group consists of several brands which may have their own brand specific functions or strategies that differs from the overall group. In that case, these alterations are listed below.

6.1 E.g) Solid Gear Footwear's specific settings in Google Analytics 4 or Facebook Pixel

7. Changes to our privacy policy

Hultafors Group keeps this Privacy notice under regular review. We will post any updates on this webpage. If the privacy notice changes significantly, Hultafors Group will contact you by email, so that you can review the modifications.

The Privacy Notice was last updated on August 1st, 2023.

8. Contacts

The operational data protection officer of Hultafors Group is available at

DPO@hultaforsgroup.com.