

<b>Astor</b>	Document name: <b>Privacy policy</b>			Document #:	Page #: 1
	Document revision: <b>A</b>	Document state: Released	Updated date/by: 2025-11-14	Approved date/by: 2025-11-XX	Document classification: External

# Astor Group Aktiebolag

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## Privacy policy

**2025-11-14**

**Version A**

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### Document version

Version	Changes	Changes made by	Date
A	Document created	Fredrik Börjesson / Louise Åberg	2025-11-14
B			
C			

# 1. Introduction

## 1.1 Background and purpose

The Privacy policy applies to Scandinavian Astor Group AB (publ) (559353-9322), or other businesses within the same corporation group as previous named (henceforth “**Astor Group**”, “**we**”, “**our**”, “**us**”).

The policy is approved by the management and is updated at a needs basis. The policy constitutes general information, about how the company processes internal and external personal data.

This policy constitutes the common Privacy Policy of **Astor Group** and serves as the minimum standard for all entities within the group. Where necessary, individual subsidiaries may introduce additional requirements to reflect local practices or regulatory obligations.

We value your privacy and are committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard personal information when you interact with us. It is structured as follows:

1. INTRODUCTION
2. BASIC PRINCIPLES OF ASTOR GROUP PERSONAL DATA PROCESSING
3. WHEN THE PROCESSING OF PERSONAL DATA IS LEGAL
4. RIGHTS OF THE DATA SUBJECT
5. STORAGE AND DELETION OF PERSONAL DATA
6. SECURITY IN THE PROCESSING OF PERSONAL DATA
7. TRANSFER OF PERSONAL DATA
8. REPORTING
9. CONTACT INFORMATION

According to applicable data protection legislation, personal data may only be collected for *specific, explicit, and legitimate purposes*, and may not be processed in a manner incompatible with those purposes. Furthermore, any processing of personal data must be supported by a lawful basis.

## 1.2 Definitions and dictionary

**Processing (personal data)** is any measure of series of measures taken in respect of personal data, whether automatic or not, such as collection, registration, organization, storage, processing, alteration, restriction, adjustment, erasure or destruction, disclosure by transmission, dissemination or other provision of data, compilation or interconnection.

**Processing register** refers to the register Astor Group is obliged to keep of personal data processing in accordance with Article 30 of the GDPR. We use the service “GDPR Hero” to keep our processing register.

**Data protection legislation** refers to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April on the protection of physical persons with regard to the processing of person data and on the free movement of such data (“GDPR”) and any other national or European law, regulation or directive applicable from time to time to the company’s processing of personal data.

**Personal data** is any information relating to and identified or identifiable physical person who is alive. Identifiable physical person means a person who can be identified directly or indirectly by reference to an identifier as a name, identification number, location data or online identifiers or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of the physical person.

**The personal data controller** is the legal person who alone or together with others determines the purposes and means of the processing of personal data.

**The personal data processor** is a legal entity that processes personal data on behalf of the controller, e.g. Astor Group IT-providers.

**The Privacy Protection Agency (IMY)** conducts checks in response to complaints from individuals, information in the media or on its own initiative. Measures include field inspections and inspections by questionnaires or other verification by e-mail, telephone or letter.

## 2. Basic principles of Astor Group personal data processing

We shall comply with applicable Data Protection Legislation when processing personal data at any time.

We shall only process personal data in a lawful, correct and transparent manner in relation to the data subject and the controller. This means, among other things, that our personal data processing must follow these basic principles:

- **Documented personal data liability:** For each processing of personal data, where we determine the purpose and means, there shall be one or more companies within the company that have been deemed to be the data controller. Responsibility for processing where companies within the company are data controller must be documented in the Processing Register.
- **Legal basis:** Any processing of personal data shall be carried out on the basis of a documented legal basis.
- **Purpose limitation:** The data shall be collected for specified, expressly stated purposes and shall not subsequently be processed in an incompatible manner.
- **Purpose limitation:** Only personal data that is adequate, relevant and not too comprehensive in relation to the purpose shall be collected.
- **Accuracy:** The data shall be accurate and up-to-date and it shall be possible to trace changes.
- **Storage minimization:** The data may not be kept for longer than is necessary in relation to the purpose, see further paragraph 5.
- **Confidentiality:** Personal data shall be protected by appropriate technical and organizational security measures to prevent unauthorized processing and loss, destruction or corruption of the data. See further, paragraph 6.

## 3. When the processing of personal data is legal

### 3.1 General legal basis

The processing of personal data is only legal if at least one of the following conditions is met:

- The data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes.
- The processing is necessary for the performance of a contract in which the data subject is a party or to take action at the request of the data subject before such contract is concluded.
- The processing is necessary in order to fulfil a legal obligation where the responsibility lies with the controller.
- The processing is necessary to protect interests of fundamental importance to the data subject or to another physical person.
- The processing is necessary for the performance of a task of general interest or as a part of the controller's exercise of authority.
- The processing is necessary for the purposes relating to the legitimate interests of the controller or a third party unless the interests or fundamental rights and freedoms of the data subject outweigh and require the protection of personal data.

The legal basis for our processing of your personal data is described below. In case of uncertainty or if you have any questions please contact us, see contact information below.

## 4 Data collection and use

We only process your personal data to the extent necessary for the purposes described above and will not store the data longer than needed.

### When Do We Need to Process Your Personal Data?

We may process your personal data in several situations, depending on your relationship with us and how you interact with us.

#### 1. When You Are a Customer

If you have purchased products or services from a company within Astor Group, we need to process your personal data in order to:

- Identify you as a customer
- Deliver products and services
- Manage invoicing, support matters, and complaints
- Exercise our rights and fulfil our obligations under the agreement

#### Personal data processed:

Name, address, e-mail address, telephone number, purchase history, and usage data.

**Legal basis:** Performance of contract.

**Retention:** We store your data for as long as you are a customer and as long time thereafter as there is a legitimate purpose for Astor to continue the processing and/or in accordance with the time period required by applicable law.

## 2. When You Have Shown Interest in Our Products or Services

We may process your personal data when you:

- Request a quote or information
- Leave your details at an event, seminar, or training

### **Personal data processed:**

Name, address, e-mail address, telephone number, and other details you voluntarily provide.

**Purpose:** To communicate with you and follow up on your request.

**Legal basis:** Legitimate interest (our interest in offering and marketing our services outweighs the intrusion on your privacy).

**Retention:** Astor applies different retention periods for different categories of personal data that is related to business contacts. Your personal data will be saved as long as there is a legitimate purpose for Astor to continue the processing and/or in accordance with the time period required by applicable law.

## 3. Customer Support and Service Matters

If you contact customer support, we may need to verify your identity and review data about your use of our products or services.

### **Personal data processed:**

Name, contact information, case notes, product/service usage details.

### **Legal basis:**

- Performance of contract, and/or
- Legal obligation (e.g., consumer rights laws)

**Retention:** Astor applies different retention periods for different categories of personal data that is related to business contacts. Your personal data will be saved as long as there is a legitimate purpose for Astor to continue the processing and/or in accordance with the time period required by applicable law.

## 4. Security and Misuse Prevention

We process data to maintain security, prevent fraud, and ensure that services are used in accordance with applicable terms.

### **Personal data processed:**

IP address, device information, login or usage activity.

**Legal basis:** Performance of contract (to provide secure services).

**Retention:** Up to 12 months.

## 5. Communication About Products and Services

We may contact you regarding updates, service notifications, or customer satisfaction surveys.

### **Personal data processed:**

Name, contact information, product/service usage details.

**Legal basis:** Legitimate interest (keeping customers informed and developing our services).

**Retention:** Astor applies different retention periods for different categories of personal data that is related to business contacts. Your personal data will be saved as long as there is a legitimate purpose for Astor to continue the processing and/or in accordance with the time period required by applicable law.

## **6. Product and Service Development**

We may compile statistics and perform analysis to improve and develop our products and services.

**Personal data processed:**

Contact details, device information, usage patterns.

**Legal basis:** Legitimate interest (our interest in improving and developing our offering).

**Retention:** Astor applies different retention periods for different categories of personal data that is related to business contacts. Your personal data will be saved as long as there is a legitimate purpose for Astor to continue the processing and/or in accordance with the time period required by applicable law.

## **7. Marketing**

We may use your contact information to send marketing communications about our products and services.

You may opt out at any time by following the instructions in each communication.

**Personal data processed:**

Name, address, e-mail address, telephone number, and information about your use of our services.

**Legal basis:** Legitimate interest (direct marketing).

**Retention:** Astor applies different retention periods for different categories of personal data that is related to business contacts. Your personal data will be saved as long as there is a legitimate purpose for Astor to continue the processing and/or in accordance with the time period required by applicable law.

## **8. Recruitment Processes**

If you apply for a job with us, we process your application data to:

- Evaluate your qualifications
- Contact you during the recruitment process
- Fulfil legal obligations in the recruitment process

**Personal data processed:**

Name, contact details, CV, education, work history, references, and additional materials you submit.

If you consent to future contact, we may store your data for future recruitment opportunities.

**Legal basis:**

- Legitimate interest (recruitment)
- Legal obligation
- Consent (optional, for storing your application for future opportunities)

**Retention:**

See Careersite [Privacy Policy - Scandinavian Astor Group](#)

**9. Cookies and Similar Technologies**

Our website uses cookies and similar technologies to enhance your experience, analyze traffic, and enable certain features.

You can change your cookie preferences at any time via your browser settings. For more information about the cookies we use and their purposes, please see our cookie policy.

**4. Rights of the data subject**

A fundamental aspect of the GDPR is that it contains certain statutory and mandatory rights for data subjects whose personal data are processed. As a data controller, Astor Group has an obligation to facilitate those who wish to exercise their rights under the GDPR. The data subject also has the right to withdraw any consent given. The withdrawal of consent shall not affect the legality of processing based on consent before it is revoked.

Data subjects have the following rights, among others:

- Right to access your personal data, which means that the data subject have the right to receive confirmation of whether personal data relating to the data subject is being processed and, if also access the personal data and certain additional information about the processing.
- Right to data portability, which means that the data subject has the right to access personal data under certain circumstances, in order to transfer the personal data to another controller.
- Right to rectification, erasure or restriction of their personal data and the right to object to the processing.
- Right to complain to the national data protection agency (in Sweden IMY) if the processing of their personal data does not meet the requirements of EU/EEA data protection legislation.
- Right to withdraw their consent if and to the extent that specific consent was given for certain processing.
- Right to object to the balancing of interests when processing is based on the so-called balancing of interests according to nature 6.1 (f) of GDPR.
- Right to object to direct marketing when processing their personal data. In that case, the personal data shall no longer be processed for such purposes.

To exercise your rights, please contact us by email or by post, see below information

We will process your request without undue delay and no later than 30 days from receipt. If we are unable to fulfill your request, we will explain the reason for this.

**5. Storage and deletion of personal data**

According to data protection law, personal data may not be stored for longer than permitted by law, or otherwise necessary for the purposes for which the data is processed. Data that may no longer be stored shall be permanently deleted and destroyed (thinning). Under special conditions thinning can be carried out by anonymizing personal data instead of being destroyed. Anonymization means that any information that makes it possible to trace the data to a data subject is irrevocably deleted.

If there are certain laws or regulations that require the storage of personal data for a certain period of time, such as in tax-, accounting- or money laundering legislation, such provisions apply before the GDPR. For example, the Accounting Act states that accounting information must be kept for seven years from the year in which the financial year ended.

The main rule within the company is that personal data that is not subject to certain laws or regulations (in addition to data protection legislation) should be deleted when we no longer need the data to fulfil the purposes of the processing.

## **6. Security in the processing of personal data**

### **6.1 General**

Astor Group shall take appropriate technical and organizational measures to prevent that destruction, altering or distortion of personal data. This means that a security assessment needs to be made on a case-by-case basis and that different processing/systems require different levels of security measures depending on the sensitivity of the information, the risk of intrusion (and other risks) and vulnerability.

### **6.2 Risk analysis**

Before we start processing personal data, an initial risk analysis must be carried out to take a position on:

- The technical and organizational security measures appropriate for the processing in question, based on an assessment of information sensitivity, relevant risks and vulnerabilities.
- If the processing is adapted from the outside and meets our requirements regarding privacy by design and information security.
- Where the processing is likely to pose a high risk to the rights and freedoms of the data subject, for example through the use of new technologies or by the fact that data subjects cannot be expected to know that they are subjects to the processing. If such high risk is identified our Data Controller shall be informed and determine whether further analysis in the form of a Data Protection Impact Assessment is necessary.

## **7. Transfer of personal data**

Personal data may be transferred to external parties with or without a personal data assistant agreement, depending on whether the recipient processes the data on Astor Group's behalf or on his own account. In all cases, there must be a legal basis for the transfer and only the data that needs to be transferred. The transfer shall be documented in an appropriate manner.

Astor Group may transfer personal data to external parties that processes personal data on our behalf and according to our instructions. Such external parties is a data processor assistant to us and shall always sign a personal data assistant agreement with Astor Group. Our Personal data controller is responsible to keep such templates updated and accordingly to applicable Data Protection Legislation from time to time.

### **7.1 Where do we store your data**

As a general rule, we store and process personal data within the European Union (EU) and the European Economic Area (EEA). This means that your information is protected by the data protection standards set out in the GDPR.

If we need to transfer personal data to a country outside the EU/EEA, such transfers will only take place where appropriate safeguards are in place to ensure an adequate level of protection for your personal data. Such safeguards may include the use of Standard Contractual Clauses approved by the European Commission or other lawful transfer mechanisms.

## **7.2 Request by the authority for information**

Astor Group are obliged to provide information about our personal data processing and related circumstances if requested by the Privacy Protection Authority. Other authorities may also have the right to receive information that contains personal data from us, such as the Enforcement Authority, The Swedish Tax Agency or the Swedish Economic Crime Authority. There may also be an obligation to disclose information to the police or prosecutors in the event of a criminal investigation, information being disclosed only at the written request of the lead investigator and prosecutor.

Our Data Controller is responsible for contact with the Privacy Protection Authority. All contacts with the Privacy Protection Authority, or other authorities regarding personal data processing issues, on behalf of Astor Group shall be referred to our Data Controller.

## **8. Reporting**

Our Data Controller shall report annually or if necessary to management about our processing of personal data and, in addition, immediately report to management if serious flaws, privacy risks or problems arise.

The report shall contain the results of the follow-up and verification of personal data carried out in accordance with this Privacy Policy, including:

- If the processing as adapted from the outside and meets our privacy by design and information security requirements.
- Number of personal data breaches
- Our compliance of the applicable Data Protection Legislation and this Privacy Policy.
- Any contact with the Privacy Protection Authority; and
- Changes in applicable Data Protection Legislation and supervisory practices regarding the processing of personal data.

## **9. Contact information**

If you have any questions about the processing of your personal data or about cookies, or if you want to exercise your rights specified above you are welcome to contact us according to below.

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