

## Data Privacy Notice

### 1. Who we are - introduction

This Data Privacy Notice (this "**Notice**") applies to all personal information processing activities carried out by Nordisk Renting AB, with corporate ID number 556066-2578 and Nordisk Renting Oy, with corporate ID number 1537953-5, ("**Nordisk Renting**", "**us**" or "**we**").

This Notice includes the following sections:

1. Who we are - introduction
2. Personal Data processed by Nordisk Renting
3. How we obtain information
4. To what categories of third parties will Personal Data be disclosed?
5. To what countries outside EU/EEA will your Personal Data be transferred?
6. What are your rights as a registered person?
7. How do you make use of your rights?
8. How will Nordisk Renting handle your request?
9. What should you do if you have any complaints?
10. Updates to this Notice
11. Marketing information
12. Identity verification
13. Contact details
14. Personal Data Processing Table
15. Table over Categories of Recipients
16. Third Country Transfer Table

If you are a potential or existing customer representative or a representative of any supplier or business partner to any of our Nordisk Renting subsidiaries, then Nordisk Renting AB is the responsible data controller in terms of the processing of personal data about you. Our principal address is Nordisk Renting AB, Box 14044, SE-104 40 Stockholm and our contact details can be located at [www.nordiskrenting.se](http://www.nordiskrenting.se).

Nordisk Renting is part of a company group and is a subsidiary to National Westminster Bank PLC, which is a member of NatWest Group plc. More information about the NatWest group can be found at [NatWestGroup.com](http://NatWestGroup.com) by clicking on 'About Us'.



**"Personal Data"** as used herein means any information that directly or indirectly can identify a person and any other information that qualify as Personal Data under applicable data protection legislation, including the General Data Protection Regulation 2016/679 (the **"GDPR"**). Nordisk Renting processes Personal Data in accordance with applicable legislation, including the GDPR and other applicable national data protection legislation. The Personal Data under this Notice is only processed if we have a legal ground to do so and to the extent necessary for Nordisk Renting to be able to fulfil the purposes set out in this Notice.

We may update our Privacy Notice from time to time. When we do, we will communicate any changes to you and publish the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

**We must ask you to never provide any data to us that could be considered sensitive. Also, if you send us job applications, you shall always ask any referees or other third parties to provide their consent before you send us any Personal Data about such persons.**

Nordisk Renting will transfer your Personal Data to third parties under certain lawful circumstances, as stated in this Notice, and in some instances to a different country to the country in which you live or work. Such country may be located outside the EEA. Please see [Sections 4](#) and [5](#) for further information.

You have certain rights relating to how Nordisk Renting process your Personal Data. In relation to your Personal Data, you have the right to:

- object to the processing;
- access and rectification;
- restrict the processing;
- request erasure; and
- data portability.

Please see [Section 6](#) for further information. You always have a right to lodge a complaint with the data protection authority if you are dissatisfied with how we process your Personal Data. If you have any questions about your rights, or how we process your Personal Data, please see how you can contact us and enforce your rights further below.

## **2. Personal Data processed by Nordisk Renting**

We collect and process various categories of personal information at the start of, and for the duration of, your relationship with us. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal information may include:

- basic personal information, including name and address, date of birth and contact details;
- information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details);
- information about your financial circumstances, including personal wealth, assets and liabilities,
- education and employment information;



- goods and services provided;
- visual images and personal appearance (such as copies of passports or CCTV images); and
- online profile and social media information and activity based on your interaction with us and our websites and applications.

The purpose with processing your Personal Data is disclosed in the **Personal Data Processing Table** below. We have taken appropriate technical and organizational measures for the protection of the Personal Data. Access to Personal Data is limited and only authorized Nordisk Renting personnel are given access to the Personal Data on a "need-to-know" basis and have committed themselves to necessary confidentiality undertakings. In case we receive Personal Data from you and that we need to process for another purpose, we will inform you accordingly.

### **3. How we obtain information**

Your information is made up of all the financial and personal information we collect and hold about you/your business and the proprietors, officers and beneficial owners of that business and your transactions. It includes:

- information you give to us;
- information that we receive from third parties – including other NatWest group companies, third parties who provide services to you or us, credit reference, fraud prevention or government agencies, and other banks (where permitted by law);
- information that we learn about you through our relationship with you;
- information that we gather through cookies or similar tracking tools (e.g. pixels) when you use our website; and
- information that we gather from publicly available sources, such as the press, company registers and online

### **4. To what categories of third parties will Personal Data be disclosed?**

Please see the **Personal Data Processing Table**, Table over Categories of Recipients and the Third Country Transfer Table below for further information about the processing in this section.

#### ***NatWest Group, NatWest and other group companies***

Since Nordisk Renting is part of the NatWest Group and has several affiliates that carry out business activities, the Personal Data set out herein, depending on the purpose of the processing, will be transferred to such affiliates and parent companies in order to fulfil our purposes with the processing described herein. Please see further below how Personal Data is shared with the NatWest Group.

More information about the NatWest Group can be found at **NatWestGroup.com** by clicking on "About us".

We will not share your information with anyone outside NatWest except:

- where we have your permission;
- where required for your product or service;



- where we are required by law and by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
- with third parties providing services to us, such as market analysis and benchmarking, correspondent banking, and agents and sub-contractors acting on our behalf;
- where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
- in anonymised form as part of statistics or other aggregated data shared with third parties; or
- where permitted by law, it is necessary for our legitimate interests or those of a third party, and it is not inconsistent with the purposes listed above.

### ***Service providers***

We use third party service providers ("**Service Providers**"), which perform certain services as requested by us that involve the processing of Personal Data. Such services include provision of IT systems and support thereof (e.g. access set up), our CRM system provider, our website service provider and website design provider, document management solutions, providers of security services, provider of visiting system at our offices, event planners, accounting and invoicing system providers, email services, and professional services related to legal advice and accounting services.

Only Personal Data that is necessary to fulfil the relevant purposes will be provided to the respective Service Providers. Our Service Providers will provide us services both in the capacity as data controllers or data processors. A Service Provider must only process Personal Data to enable the Service Provider to perform the services requested by us and comply with applicable data protection law. Service Providers as data processors will always be obliged, under a written agreement, to act in accordance with our instructions, to follow applicable law and to implement appropriate technical and organizational measures for the protection of the Personal Data.

If we sell any or all of our business or assets or if we are acquired by a third party, or if we are acquiring another business or assets thereof, we may need to disclose your Personal Data to the prospective buyer and its professional advisors (e.g. legal and financial), or the seller, for due diligence purposes.

### ***Marketing***

Nordisk Renting will not share your information with third parties for their own marketing purposes without your permission.

### ***Authorities***

Personal Data may also be disclosed to relevant authorities (e.g. the police, courts and the tax authority) to fulfil legal obligations.

## 5. To what countries outside EU/EEA will your Personal Data be transferred?

Personal Data may be transferred to our Service providers, which may be established in other countries that offers a lower level of protection for Personal Data than the country where you live. However, only if it is ensured that the Personal Data is adequately protected by the receiving parties in such countries and the transfer can be made under applicable law. Adequate protection may typically be to impose on the receiving party contractual obligations, stipulating that such party maintains the same high level of privacy and data security as practiced by Nordisk Renting, according to applicable legislation and the NatWest Group's companies' standards and policies. Such safeguards are e.g. the EU Commissions Standard Contractual Clauses (available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)) and/or the EU-U.S. Privacy Shield (for transfers to the U.S., please see here: <https://www.privacyshield.gov/list>).

Further information regarding transfer of Personal Data to third countries, and the safeguards that are in place to ensure lawful transfer of the Personal Data, is set out in the Third Country Transfer Table below.

## 6. What are your rights as a registered person?

You have several rights when it comes to our use of your Personal Data. A summary of these rights is set out below.

### ***Right to object***

You have the right to object at any time, on grounds relating to your particular situation, to the processing of Personal Data relating to you where processing is based on the legal ground of public interest or when we base the processing on a legitimate interest. You also have the right to object to processing for direct marketing purposes, including profiling.

If you lodge an objection, we will no longer process the Personal Data related to you that we process based on a legitimate interest, unless we can demonstrate compelling and legitimate reasons for such processing that overrides your privacy interest or for the establishment, exercise or defence of legal claims. If you object to processing for direct marketing purposes, including profiling, we will immediately stop processing Personal Data for this purpose.

Even if you object to certain processing, we may still continue such processing if permitted or obligated to do so under applicable legislation, for example to be able to fulfil legal requirements or to fulfil contractual obligations in relation to the registered person.

### ***Right to access and rectification***

You always have the right to request access to the Personal Data relating to you. This includes the right to:

- be informed whether or not Personal Data about you is being processed;
- the type of Personal Data that is being processed; and
- the purpose of such processing.



You also have the right, upon request, to access information about any legitimate interest assessment test we are required to conduct, when we process Personal Data about you based on our legitimate interest.

Furthermore, you have the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete. As soon as we become aware of any inaccurate Personal Data being processed, we will always rectify such Personal Data without undue delay and notify you accordingly.

If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to file a complaint, please contact us at: +46 (0)8 506 198 00.

Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

### ***Right to restriction***

You have the right to request restriction of the processing of Personal Data concerning you, if:

- you contest the accuracy of the Personal Data, and we must restrict the processing for a certain period to enable us to verify the accuracy of relevant data;
- the processing is unlawful, and you oppose the erasure of the Personal Data but instead requests restriction of the use;
- the processing is no longer necessary for the purposes it was collected or otherwise processed as stipulated in **Personal Data Processing Table** in this Notice, but the Personal Data is required by you for the establishment, exercise or defence of a legal claim; or
- you have objected to processing pursuant to what is set out under the Section "right to object" above, and our verification of the legitimate grounds is pending.

### ***Right to erasure***

You may also request us to erase your Personal Data if, for example:

- the Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you object to the processing of your Personal Data, in accordance with the "right to object" as set out above, and we do not have an overriding legitimate interest;
- the processing is unlawful; or
- the Personal Data has to be erased to enable us to comply with a legal requirement.

If you have any questions about your right to erasure, please use the contact details stated above. However, please note that even if you request erasure of your data, we may still continue to process it if we have a legal ground to do so.



### ***Right to data portability***

If you request access to your Personal Data that you have provided to us yourself, and (i) the Personal Data is being processed automatically and (ii) in accordance with a contract between you and us, or you have provided your consent to the processing, you may request that the data is provided in a structured, commonly used and machine-readable format, and you may also request that the Personal Data is transmitted to another controller, if this is technically feasible. Please note that we are not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.

### ***Right to withdraw your consent***

You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing. You may at any time withdraw your consent, if we have asked you to give your consent for certain processing purposes as stated in **Personal Data Processing Table** below. Please see how you can make use of this right in Section 7 below.

## **7. How do you make use of your rights?**

Please send an email to the relevant contact person, as specified below, if you want to make a request in relation to the processing of your Personal Data. Please note that Nordisk Renting may contact you and ask you to confirm your identity to ensure that Nordisk Renting does not disclose your Personal Data to any unauthorized person. Nordisk Renting may ask you to specify your request before Nordisk Renting performs any actions.

## **8. How will Nordisk Renting handle your request?**

Once Nordisk Renting has confirmed your identity, Nordisk Renting will handle your request in accordance with applicable law. Please note that even if you object to certain processing of Personal Data, Nordisk Renting may still continue this processing if permitted or required to do so by law, for example to enable us to fulfil legal requirements or to exercise, enforce or defend our business from legal claims.

## **9. What should you do if you have any complaints?**

You always have the right to lodge a complaint with the relevant authority in particular where you live, work or where an alleged infringement of the GDPR has occurred. The relevant data protection authority in each country can be found at [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

The competent data protection authority in Sweden is Datainspektionen ([www.datainspektionen.se](http://www.datainspektionen.se)) and the Finnish Data Protection Ombudsman ([www.tietosuojafi.fi](http://www.tietosuojafi.fi)) in Finland.

## **10. Updates to this Notice**

In order to ensure that Nordisk Renting complies with data protection law, we may update



our Privacy Notice from time to time. When we do, we will communicate any changes to you and publish the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it. Please notify Nordisk Renting of any changes to the Personal Data relating to you to enable us to process Personal Data accurately and securely (see contact details below).

## 11. Marketing information

Unless you have told us that you do not want to hear from us, we will send you relevant marketing information (including details of other products or services provided by us or other NatWest group companies which we believe may be of interest to you), by mail, phone, email, text and other forms of electronic communication. If you change your mind about how you would like us to contact you or you no longer wish to receive this information, you can tell us at any time by contacting us at [reception.stockholm@natwest.com](mailto:reception.stockholm@natwest.com) , +46 (0)8 506 198 00, Nordisk Renting AB, Box 14044, SE-104 40 Stockholm.

## 12. Identity verification

We may access and use information about you when you enter into an agreement with us in order to:

- prevent criminal activity, fraud and money laundering;
- check your identity and verify the accuracy of the information you provide to us.

## 13. Contact details

If you have any questions about our processing of your Personal Data, or want to enforce your data subject rights as stated above, please contact us at the below contact details: [reception.stockholm@natwest.com](mailto:reception.stockholm@natwest.com) , +46 (0)8 506 198 00, Nordisk Renting AB, Box 14044, SE-104 40 Stockholm.

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Latest update: 3 November 2020



### Personal Data Processing Table

Personal Data type and source	Purpose	Legal ground	Retention time or criteria
<p><b>Basic personal information</b> – e.g. contact information (name, work related address, email address and telephone number, company position/title).</p> <p><b>Source:</b> Directly from you, or from a supplier/business partner representative (collected in meetings, seminars, events, affairs, email conversations, telephone conversations and similar), from our CRM and invoicing system, or from publicly available sources (e.g. social media platforms).</p>	To market our services to existing as well as potential customer representatives (e.g. send out newsletters, invite you to events, and inform about our services).	Legitimate interest	<p>The Personal Data is stored until the purpose is fulfilled with the processing, or until you have opted out from the processing, and will thereafter be deleted unless we have another legal ground and purpose to process the Personal Data (which we will inform you about, in such case).</p> <p>During the supplier/business partner relationship and thereafter as required under applicable legislation such as e.g. bookkeeping legislation (in Sweden <i>Bokföringslag (1999:1078)</i>).</p>
	To follow up after events with information on whether you attended the event or not, to enable us to market our services better.		
	To ensure security of our office premises and maintain records of visitors in our premises and ensure that no unauthorized person is accessing the office premises or network.		
	To communicate with you and to respond to your questions or in terms of need for support related to the services provided by a supplier/business partner.		
	In order for Nordisk Renting to fulfil the contractual rights and obligations with our suppliers and business partners (incl. management of property portfolios).		
	To monitor e-mails for business and operational purposes, as part of Nordisk Renting's subsidiary role to the NatWest Group.		
	In order to market our projects on our website e.g. to publish your name and position/title as a customer representative (for customer cases on our website or from events).		
To ensure proper reporting and management of Nordisk Renting within the NatWest Group.	Legal obligation	During the supplier/business partner relationship and thereafter as required under applicable legislation.	
<p><b>Pictures of you</b> – to be used in articles published articles related to customer cases on our website.</p> <p><b>Source:</b> Directly from you, or from a supplier/business partner or their Representative.</p>	In order to market our projects on our website e.g. to publish pictures of you as a customer representative ((for customer cases on our website or from events).	Your informed and voluntarily given consent	The Personal Data is stored until the purpose is fulfilled with the processing, or you have withdrawn your consent (which may be withdrawn at any time).
<p><b>Identity data</b> – personal identification number and/or passport number, driving license details and national identity card information.</p> <p><b>Source:</b> Directly from you, from a supplier/business partner or their Representative.</p>	To maintain records of Representatives of security management services in Nordisk Renting's premises and ensure that no unauthorized person is accessing premises or network.	Legitimate interest	During the supplier/business partner relationship, but no later than 10 years in order to defend ourselves in or from legal claims.

<p><b>Agreement details</b> - i.e. supply or business partner agreement details, such as signature</p> <p><b>Source:</b> Directly from you, from a supplier/business partner or their Representative.</p>	<p>To ensure management and administration of the supplier/business partner relationship (incl. management of property portfolios).</p>	Legitimate interest	<p>During the supplier/business partner relationship and thereafter as required under applicable legislation (in Sweden <i>Bokföringslag (1999:1078)</i>).</p>
	<p>To ensure reporting in accordance with mandatory bookkeeping legislation.</p>	Legal obligation	
<p><b>Communications data</b> – communications to and from us and thereto related information stored or processed on our IT systems, email provider service, key access codes to facilities, information in our office visiting system, information in databases, and document management systems, by cookies on our website.</p> <p><b>Source:</b> Obtained from you, our communication systems or directly from a supplier/business partner or their Representative.</p>	<p>To market our services to existing as well as potential customer representatives (e.g. send out newsletters, invite you to events, publish information on our website, and inform about our services).</p>	Legitimate interest	<p>The Personal Data is stored until the purpose is fulfilled with the processing, or until you have opted out from the processing, and will thereafter be deleted, unless we have another legal ground and purpose to process the Personal Data (which we will inform you about, in such case).</p> <p>During a supplier/business partner relationship and thereafter as required under applicable legislation such as e.g. bookkeeping legislation (in Sweden <i>Bokföringslag (1999:1078)</i>).</p>
	<p>To ensure security of our network and our office premises and maintain records of visitors and Representatives in Nordisk Renting's premises (to ensure that no unauthorized person is accessing premises or network).</p>		
	<p>To communicate with you and to respond to your questions or in terms of need for support related to the services provided by a supplier/business partner.</p>		
	<p>To monitor e-mails for business and operational purposes, as part of Nordisk Renting's subsidiary contractual role to the NatWest Group.</p>		
<p><b>Information about vulnerable political positions for events</b> – your previous business positions and activities (e.g. role, title and business ownership), prior to inviting you as a potential or existing customer representative to events, in order to ensure you are not in a vulnerable position (for e.g. anti-bribery purposes).</p> <p><b>Source:</b> Directly from you, a supplier/business partner or their Representative, from our CRM system, or from publicly available sources (e.g. social media platforms or public registers of business ownership details).</p>	<p>To ensure that you are not in a vulnerable position (for e.g. anti-bribery purposes) when we invite you to our events.</p>	Legitimate interest	<p>The Personal Data is stored until the purpose is fulfilled with the processing, or until you have opted out from the processing, and will thereafter be deleted, unless we have another legal ground and purpose to process the Personal Data (which we will inform you about, in such case).</p>
<p><b>Job application details</b> – e.g. resume, cover letter, picture, experience, skills, educational background, interests, referees (if consent is provided from such person(s)) and other information you disclose in a job application that you send us.</p> <p><b>Source:</b> Directly from you, a supplier/business partner or their Representative.</p>	<p>In order to administer your application and to contact you for interviews and similar pre-employment administration.</p>	Legitimate interest	<p>The Personal Data is stored until the purpose is fulfilled with the processing, i.e. you have been employed by Nordisk Renting, and will in such case be moved to our employee register (which we inform of in a separate Employee Privacy Notice). If you are not successful with the application and unless you</p>



			have opted out from our processing of your job application details, we will delete your application after 5 years.
<p><b>Camera footage</b> – if you visit our office premises.</p> <p><b>Source:</b> Our camera system provider</p>	To ensure security of our office premises and ensure that no unauthorized person is accessing the office premises.	Legitimate interest	A retention time of 31 days is used for CCTV applications, whereafter footage is deleted.
<p><b>Legal claims and Personal Data</b></p> <p>In terms of legal claims related to the above purposes, we will store the information in the table above (except from camera footage) in order to defend ourselves in or from claims and to be compliant with mandatory law for a period of maximum ten (10) years in terms of any claims. However, we will minimize such information and only store the information necessary to fulfil this purpose. The Personal Data will, after this purpose has been fulfilled, be deleted.</p>			

### Table over Categories of Recipients

Personal Data type that will be transferred	The applicable recipients of the Personal Data	Use of the Personal Data	Location of recipients
All Personal Data types as set out in Personal Data Processing Table, except from camera footage.	NatWest Group companies (e.g. NatWest Bank Plc., incl. legal, audit and other professional advisors of NatWest Group).	Servers of Nordisk Renting's IT systems are hosted with the NatWest Group. Marketing material is accessed on group-level. Furthermore, management and monitoring of Nordisk Renting or its subsidiaries.	United Kingdom, Sweden and Finland
Basic personal information, agreement details.	Authorities (e.g. the Swedish Building and Planning Authority and the tax authority).	Regulatory and tax compliance	Sweden and Finland
All Personal Data types as set out in Personal Data Processing Table, except from camera footage.	Courts, authorities, Counterpart's advisors and Nordisk Renting's advisors.	Enforcing/Arguing legal claims.	Sweden and Finland
All Personal Data types as set out in Personal Data Processing Table, except from camera footage.	Service Providers (please see Section 3 above).	To fulfil our purposes stated in the Personal Data Processing Table.	India, United Kingdom, Sweden, Finland and Poland.
Basic personal information	Companies interested in acquiring parts or all of Nordisk Renting's or its subsidiaries' business.	Evaluation of Nordisk Renting's or its subsidiaries business.	Depending on the location of the third party
Basic personal information, pictures of you	Journalists	For the purpose of publishing customer cases in articles.	Sweden and Finland



**Third Country Transfer Table**

<b>Personal Data type that will be transferred</b>	<b>The applicable countries involved in the transfer of Personal Data</b>	<b>Safety measure(s) taken to ensure that the transfer of Personal Data complies with applicable law</b>
All categories of Personal Data disclosed in the Personal Data Processing Table above, except from camera footage	India	EU Commissions Standard Model Contractual Clauses
All categories of Personal Data disclosed in Personal Data Processing Table above, except from camera footage	United Kingdom	EU Commissions Standard Model Contractual Clauses (intra-group agreement in place)