

Data Privacy Notice

Business Partner Due Diligence Process

This privacy notice explains how Partsnord Europe AB ("we," "us," or "Partsnord") collects, uses, discloses, transfers, and stores Personal Data relating to you when a third-party company (or individual acting in a business capacity) is subject to Partsnord's Business Partner Due Diligence Process (the "DD-Process"). This DD-Process is undertaken when Partsnord is considering entering into, or is maintaining, a business relationship with a potential or existing business partner (e.g., suppliers, service providers, distributors, agents, consultants, joint venture partners, or other counterparties) ("Business Partner"). This notice applies to you if you are an employee, director, officer, owner, beneficial owner, or other representative of a Business Partner.

1. Data Controller

Partsnord Europe AB is the data controller responsible for the processing of your Personal Data in the context of the DD-Process.

2. Data Protection Officer

Partsnord Europe AB's Data Protection Officer can be contacted at:
dpo@partsnord.com

3. Purpose and Legal Basis for Processing Personal Data

Why we process your Personal Data: Partsnord is committed to conducting its business ethically and in compliance with all applicable laws and regulations. The DD-Process is a critical component of our compliance framework, designed to help us understand the integrity, background, and potential risks associated with prospective and current Business Partners. This helps us to adhere to national and international anti-bribery and anti-corruption legislation, sanctions regulations, anti-money laundering laws, and other legal and regulatory obligations (collectively "Applicable Laws"). The purpose of processing your Personal Data is strictly limited to conducting and concluding the DD-Process in adherence with these Applicable Laws and Partsnord's internal ethical standards.

Legal Basis for Processing: Our processing of your Personal Data for the DD-Process is based on the following legal grounds:

Legitimate Interests: Partsnord has a legitimate interest in protecting its reputation, assets, and business operations by ensuring it only engages with reputable and compliant Business Partners. We also have a legitimate interest in complying with the expectations of regulatory bodies and stakeholders regarding ethical business conduct. We have balanced these interests against your rights and freedoms

and have concluded that our legitimate interests are not overridden by your interests or fundamental rights and freedoms, particularly given the importance of preventing illicit activities and the measures we take to protect your data.

Legal Obligations: In some instances, the processing of your Personal Data may be necessary for Partsnord to comply with a legal obligation to which it is subject, such as specific due diligence requirements under anti-money laundering or sanctions laws.

4. Categories of Personal Data Processed

The Personal Data collected and processed by Partsnord during the DD-Process may include, but is not limited to:

Identification Data: Name, date of birth, nationality, citizenship, government-issued identification numbers (where legally permissible and relevant).

Contact Details: Business address, business email address, business telephone number.

Professional Information: Position or role in relation to the Business Partner, shareholdings or ownership details, professional background, employment history.

Compliance-Related Information: Information regarding connections to government officials or politically exposed persons (PEPs), involvement in legal or regulatory proceedings, listings on sanctions lists or watchlists, information concerning convictions, charges, investigations, or allegations relevant to Applicable Laws (e.g., bribery, corruption, fraud, money laundering, terrorism financing).

Financial Information: In certain limited circumstances, information related to financial standing or source of funds, where relevant to assess specific risks.

5. Sources of Personal Data

Partsnord collects Personal Data for the DD-Process from various sources, including:

Directly from you or the Business Partner you represent (e.g., through questionnaires, interviews, or provided documentation).

Publicly available sources (e.g., company registers, official gazettes, internet searches, media reports).

Third-party due diligence service providers and databases that specialize in compliance screening and risk assessment.

Regulatory bodies or law enforcement agencies, where legally permitted.

6. Recipients of Personal Data

Your Personal Data may be shared with the following categories of recipients, strictly on a need-to-know basis and for the purposes outlined in this notice:

Internal Departments: Relevant personnel within Partsnord involved in the DD-Process, such as Legal, Compliance, Procurement, Finance, and relevant business units.

Group Companies: Other companies within the Partsnord group, if necessary for the DD-Process and where such sharing is compliant with data protection laws.

Third-Party Service Providers: External due diligence specialists, screening service providers, legal advisors, or auditors engaged by Partsnord to assist with the DD-Process. We ensure that such providers are bound by appropriate contractual obligations to protect your Personal Data.

Regulatory and Law Enforcement Authorities: If required by Applicable Laws, or in response to a valid legal request.

7. International Transfers of Personal Data

Due to the global nature of our business and the location of some of our service providers, your Personal Data may be transferred to, and processed in, countries outside the European Union/European Economic Area (EU/EEA). When we transfer your Personal Data outside the EU/EEA, we will ensure that appropriate safeguards are in place to protect your Personal Data in accordance with applicable data protection laws. These safeguards may include adequacy decisions by the European Commission, or the use of Standard Contractual Clauses (SCCs) approved by the European Commission. You can request more information about these safeguards by contacting our Data Protection Officer.

8. Data Retention

Partsnord will retain your Personal Data collected during the DD-Process for as long as necessary to fulfill the purposes for which it was collected, including for the duration of the business relationship with the Business Partner and for a subsequent period as required or permitted by Applicable Laws (e.g., to comply with legal, accounting, or reporting requirements, or to defend against legal claims). Typically, this means data related to a successful business partnership will be retained for the duration of the agreement and for a period of up to ten (10) years after its termination, unless specific legal or regulatory requirements mandate a longer or shorter period. If a potential business relationship does not proceed, data will be retained for a shorter period in line with our internal policies and legal obligations.

After the applicable retention period, your Personal Data will be securely deleted or anonymized.

9. Your Rights

Under applicable data protection laws, you have certain rights regarding your Personal Data. These may include:

Right of Access: To request a copy of the Personal Data we hold about you.

Right to Rectification: To request correction of inaccurate or incomplete Personal Data.

Right to Erasure ('Right to be Forgotten'): To request deletion of your Personal Data under certain circumstances.

Right to Restriction of Processing: To request that we limit the processing of your Personal Data under certain circumstances.

Right to Data Portability: To receive your Personal Data in a structured, commonly used, and machine-readable format, and to have it transmitted to another controller, under certain circumstances.

Right to Object: To object to the processing of your Personal Data based on our legitimate interests, under certain circumstances.

Right to Withdraw Consent: If processing is based on consent (though typically not the primary basis for DD-Process data), you have the right to withdraw consent at any time.

Please note that these rights are not absolute and may be subject to legal limitations.

10. How to Exercise Your Rights and Contact Information

If you wish to exercise any of your rights, or if you have any questions or concerns regarding the processing of your Personal Data by Partsnord in the context of the DD-Process, please contact our Data Protection Officer:

Email: dpo@partsnord.com

Or write to us at: Partsnord Europe AB, Torshamnsgatan 27 SE-164 40 Kista Sweden

11. Right to Lodge a Complaint

You have the right to lodge a complaint with a supervisory authority if you believe that Partsnord's processing of your Personal Data infringes applicable data protection laws. The lead supervisory authority for Partsnord Europe AB is the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten - IMY). You can find their contact details on their website (www.imy.se). You may also lodge a complaint with the supervisory authority in your country of residence or place of work.



12. Updates to this Privacy Notice

Partsnord may update this privacy notice from time to time to reflect changes in our practices or legal requirements. We will post any changes on our website or provide them to you as appropriate. We encourage you to review this notice periodically.

This notice was last updated: May 14, 2025.