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# **EXTERNAL INTEGRITY POLICY**

## 1. GENERAL

In this Integrity Policy ("Integrity Policy"), we provide more detailed information on how Noxon AB, reg. no. 556828-0670, Box 53, SE-439 03 Fjärås, Sweden ("Noxon" or "the Company"), processes personal data relating to you in your capacity as a visitor to our website, www.noxon.com/.se/.fi, in the event that you apply for employment with the Company (recruitment), to anyone who has chosen to receive our newsletters/press releases and to anyone who has ordered material from our website. The Integrity Policy is also aimed at anyone who represents a company or organization that has any type of professional relationship with Noxon (company representatives).

#### 2. PERSONAL DATA CONTROLLER

- 2.1 Noxon is the personal data controller for Noxon processing of your personal data and is responsible for ensuring that processing is conducted in accordance with applicable legislation.
- 2.2 The person responsible for personal data issues at Noxon is Anders Petersson, whose tasks include monitoring that Noxon's processing of personal data is conducted in accordance with applicable legislation. Anders Petersson can be contacted at ap@noxon.com or +46 704 20 21 93.

## 3. WHAT PERSONAL DATA IS COLLECTED?

#### 3.1 Visitors to the website:

Noxon collects information about you that we need to be able to improve, enhance the efficiency of, simplify and develop our website, such as IP address, MAC address, cookies and similar data (unit information).

## 3.2 Recruitment:

Noxon collects information about you that we need to be able to recruit the right people for employment at Noxon. The personal data collected for recruitment purposes are your name, address, e-mail address and telephone number, CV and other personal data that you choose to provide us with.

# 4. OUR PROCESSING OF YOUR PERSONAL DATA





## 4.1 For visitors to our website

Personal data relating to you is collected in conjunction with you visiting our website, www.noxon.com/.se/.fi. The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

Categories of personal data	Purpose	Lawful basis
Unit information (IP	To be able to improve,	Processing is necessary for
address, MAC address,	enhance the efficiency of,	the Company's legitimate
cookies or similar data)	simplify and develop the	interest in improving,
	website.	enhancing the efficiency of,
		simplifying and developing
		its website.

# 4.2 For applicants for employment with the Company (recruitment)

Personal data relating to you is collected in conjunction with you applying for employment with the Company. Your personal data can be submitted to us directly by you or by the recruitment firm we retain for recruitment purposes. The data we collect about you, the purposes for which we intend to process your personal data and the lawful basis we have for each case of processing are presented in the table below.

Categories of personal data	Purpose	Lawful basis
Name,	To enable us, in	Processing is necessary for
Postal address,	conjunction with	the Company's legitimate
Telephone number,	recruitment, to determine	interest in employing the
E-mail address,	who is best suited for a	right personnel and ensuring
CV, and	position and to ensure	that competent people work
Other personal data that	that the person in	for the Company.
you choose to provide to	question has the	
us.	necessary competence.	
Name,	For the purpose of	The Company's legitimate
Postal address,	establishing, exercising or	interest in establishing,
Telephone number,	defending legal claims	exercising or defending
E-mail address,	that may result from a	legal claims.



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CV, and	recruitment process.	
Other personal data that		
you choose to provide to		
us.		

## 5. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data is stored as long as there is a need to store said data in order to fulfill the purposes for which the data was gathered or for as long as Noxon is obligated by law to store your personal data. The Company also stores the data it requires to be able to establish, exercise or defend any legal claims that could arise. Your personal data will subsequently be erased.

Noxon saves your personal data collected for recruitment purposes to evaluate your possibility of gaining employment with the Company until the vacancy for which you applied has been filled. If you have applied for a position without it being advertised, your application will be held until we have managed to assess whether you will be considered for employment with the Company within a reasonable period of time. We also store the data required to establish, exercise or defend legal claims that could arise as a result of your application.

# 6. TRANSFER OF DATA TO THIRD PARITES AND THIRD COUNTRIES?

#### 6.1 We provide your personal data to third parties as outlined in the table below

Third party	Reason for providing personal data to a third party	
Provider of cloud services	The Company stores its information in a cloud service,	
	which is why your personal data may be provided to the	
	current supplier of the cloud service.	
Suppliers and other partners	The Company may provide your personal data to various suppliers and other partners to our operations. This will occur in the event that the suppliers and partners require your personal data to be able to complete their assignments for the Company.	

**6.2** The Company will not provide personal data to third parties except in situations when it is a requirement resulting from a legal obligation or to meet the Company's obligation to



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- you. Your personal data will not be transferred or sold to a third party for commercial purposes.
- **6.3** The Company endeavors to process your personal data within the EU/EEA. The Company will not transfer your personal data to countries outside the EU/EEA other than what is stated below. If personal data is transferred to any country outside the EU/EEA, the Company will take measures to ensure that the personal data remains protected and also take any action required to legally transfer personal data to countries outside the EU/EEA.
- 6.4 The Company uses Ballou Internet Services for the storage of data. Through the Company's use of Ballou Internet Services, your personal data may be transferred to the US. The personal data relating to you that the Company collects through your use of the Company's website may be transferred to Google in the US by way of Google Analytics. The Company has ensured that your rights are guaranteed on transfer to the US through participation in the EU-US Privacy Shield. Further information is available at www.privacyshield.gov.

#### 7. YOUR RIGHTS

- 7.1 Provided that Noxon is the personal data controller for your personal data, you are entitled, at any time, to receive a register extract free of charge containing information about what personal data relating to you is registered, the purposes of the processing of this personal data and information regarding where this personal data was obtained or to whom it is to be provided. You are also entitled to receive, in the register extract, information regarding the envisaged period for which the personal data will be stored, or the criteria used to determine that period. Requests to receive such information must be made in writing and sent to Noxon at the address provided below under the section "Contact."
- 7.2 You are entitled to data portability, meaning the right to obtain and transfer your personal data under certain conditions in a structured, generally applied and machine-readable format to another personal data controller.
- 7.3 At your request or on its own initiative, Noxon will erase, correct, anonymize, supplement or erase data that is discovered to be incorrect, incomplete or misleading. In certain instances, Noxon is obligated to process your personal data although you have requested that it be removed.
- 7.4 Under certain circumstances, you may request the restriction of continued processing of



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your personal data (for example, if you question whether your personal data is correct or if the processing is lawful) as well as having the right to object to processing under conditions prescribed by applicable personal data legislation. You can, at any time, inform Noxon that you no longer wish to receive marketing materials or newsletters/press releases from the Company, and Noxon will then immediately cease to process your personal data for this purpose.

- **7.5** If you want to exercise any of the above rights or if you have any questions regarding personal data held by Noxon, or questions about this Integrity Policy, do not hesitate to contact Noxon (for contact information, see the section "Contact" below.
- **7.6** Please contact Noxon if you are not satisfied with the Company's processing of your personal data and Noxon will do its best to address your complaints.

#### 8. PROTECTION OF YOUR PERSONAL DATA

You should always feel secure when you provide us with your personal data. Accordingly, Noxon has taken the security measures required to protect your personal data against unauthorized access, alteration and erasure. We will not give your data to any other party, other than what is explicitly in line with this Integrity Policy.

#### 9. COOKIES

The Company uses cookies-like technology to provide certain functions on the website, www.noxon.com/.se/.fi, and to improve our website and provide better and more personal service. The information is stored in the form of a file containing encrypted login data.

## 10. ARE YOU OBLIGED TO PROVIDE DATA?

You are not obliged, in relation to the Company, to provide any data to the Company.

# 11. AMENDMENTS

The Company is entitled to amend the Integrity Policy at any time. If the Company implements significant changes to the Integrity Policy, the Company will inform you by email, provided the Company has your e-mail address, or, if possible, in another way.

#### 12. CONTACT

Do not hesitate to contact the Company if you have any questions regarding this Integrity Policy, the processing of your personal data or if you wish to exercise any of your rights



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according to this Integrity Policy.

The Company's contact information:

Corporate Registration Number: 556828-0670 Address: Box 53, SE-439 03 Fjärås, Sweden

Telephone number: +46 300 554 40 E-mail address: info@noxon.com

Contact information for the person responsible for personal data issues at the Company:

Name: Anders Petersson E-mail: ap@noxon.com

Telephone number: +46 704 20 21 93

