



# PRIVACY AND MARKETING POLICY

## 1. In general

This policy governing privacy and marketing ("the **Privacy Policy**") describes how Best Transport AB, Byängsgränd 5, 120 40 Årsta, email: [dataprivacy@besttransport.se](mailto:dataprivacy@besttransport.se), ("**Best**", "**we**") collects, uses, discloses and stores your personal data.

1.1 The Privacy Policy is in force when Best provides products and services and in other forms of contact with Best such as visits to its website. The Privacy Policy also applies to the processing of personal data performed in connection with having an online customer account ("**Best account**") with Best ("**Account holder**")

1.2 You should always feel safe when you submit personal data for yourself, your customers, your receivers and your senders to us. We want to use this Privacy Policy to show how we ensure that personal data are processed in accordance with applicable personal data legislation.

## 2. Controller

Best is the controller for its processing of your personal data, and is responsible for ensuring that such processing is performed in accordance with applicable legislation. Best is also the controller for the processing of personal data associated with holding a Best account.

## 3. When do we process your personal data?

3.1 We need to collect and process personal data about you so that you can purchase our products and services or contact us for information and follow-up.

3.2 Best collects and processes the personal data that are necessary to perform our services when you complete a purchase via our website, when you order any of our services via our customer service department or when you transmit electronic orders for our services. The information collected from you during reservations

and purchases is required for you to enter into agreements with Best, and for Best to provide its products and services.

3.3 If you are an Account Holder, Best collects personal data about you, which you submit when you register an account. Best also collects data about you while you are an Account Holder, as part of your holding the account, such as your purchase history. As an Account Holder, you may update your data at any time by going to "My pages".

3.4 We also collect and update yours/your company's address information via third-party address update services.

## 4. What personal data do we process?

Since we have a variety of different products and services, not all of the data below needs to apply to all of the services performed.

### 4.1 For Best customers

The personal data that Best may collect and process about you as a customer making purchases or using our services are:

- Name (and personal, national or corporate ID number where appropriate)
- Address
- Telephone number and email address
- Invoicing information
- Customer number
- Purchasing statistics

### 4.2 For senders or receivers

The personal data that Best may collect and process about you as a sender/reciver of a delivery are:

- Name (and personal, national or corporate ID number where appropriate)
- Address
- Telephone number and email address

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## 5. Why do we process information about you?

### 5.1 For Best customers

Best process your personal data for various purposes. Best primarily processes your personal data in order to:

- Fulfil our obligations to you as a customer, such as shipments, invoicing and providing support;
- Enable general customer care and customer service, such as answering questions and correcting incorrect information;
- Provide information and market Best's services by mail, email, SMS/MMS and the telephone;
- Manage the customer relationship and provide our services;
- Provide you with relevant information and customised offers in newsletters and on the internet;
- Assess which payment terms we can offer you, such as credit assessments;
- Improve our customer offering, by enhancing our services, products and functions;
- Prevent fraud and manage risk; and
- Comply with applicable legislation, such as bookkeeping legislation.

The data may also be used as a basis for market and customer analyses, market surveys, statistics, business monitoring and business and methodological developing related to the purchase of services.

### 5.2 For Account Holders

In addition to the list above, Best also processes Account Holders' data in order to:

- Manage accounts;
- Give you the opportunity to use the advantages of being an Account Holder, such as the ability to save favourites, information that is already filled in and the ability to manage multiple addresses.

### 5.3 For senders or receivers

- Fulfil our obligations to you as a sender/receiver such as shipments, invoicing and providing support;
- Enable general customer service, such as answering questions, changing a delivery date and correcting incorrect information.

## 6. The legal ground for our processing of your personal data

6.1 We process your personal data in order to fulfil our contract with you as a customer of Account Holder, by performing activities such as completing reservations and purchases, and in order to fulfil our commitments to you as an Account Holder, such as streamlined administration and order histories. On the basis of these legal grounds, we also process data about you as an Account Holder, your purchases and your interest in our offers and products, in order to fulfil our commitment and provide you with the best possible products and services.

6.2 One part of the personal data processing that we perform is based on a "balancing of interests". This applies to things such as the processing we perform in order to send you offers about our products and services, and to segment our customers on criteria such as their total purchases. Best does not process sensitive personal data based on a balancing of interests, and does not perform any processing that constitutes profiling on the basis of a balancing of interests.

6.3 In certain cases, Best may have a legal obligation to process your personal data. This applies, for example, to the personal data processing that we perform in order to comply with the requirements of the Swedish Accounting Act, or to fulfil our obligations according to the terms applicable for shipments of goods.

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## 7. Summary of our personal data processing

Purposes	Legal grounds	Categories of personal data	Storage period
In order to administer, develop and supply our goods and services, and to provide support to you as a customer	Fulfilment of purchase agreements (sales terms)	<ul style="list-style-type: none"><li>• Name, address, telephone number and email address</li><li>• Geographical information</li><li>• IP address, device information, log information</li></ul>	24 months after your last activity with Best, for example making a purchase from us or contacting our customer service department
In order to fulfil our commitments to our customers (data about senders and receivers)	Fulfilment of purchase agreements (sales terms)	<ul style="list-style-type: none"><li>• Name, address, telephone number and email address</li><li>• Geographical information</li><li>• Log information</li></ul>	12 months after a completed delivery, unless a shorter period was agreed with the customer.
In order to ensure compliance with legal requirements, such as the Swedish Accounting Act	Legal obligation	<ul style="list-style-type: none"><li>• Name, address, telephone number and email address</li><li>• Geographical information</li><li>• IP address, device information, log information</li></ul>	As long as we are obligated to store the data according to applicable law
In order to market the goods and services of Best or other Group companies, by mail, email, telephone or SMS/MMS	Balancing of interests	<ul style="list-style-type: none"><li>• Name, address, telephone number and email address</li><li>• Geographical information</li><li>• IP address, device information, log information</li></ul>	24 months after your last activity with Best, for example making a purchase from us or contacting our customer service department
In order to administer your account, give you the opportunity to receive customised offers and enable targeted communications by mail, email, telephone or SMS/MMS	Fulfilment of Best account agreements	<ul style="list-style-type: none"><li>• Name, address, telephone number and email address</li><li>• Geographical information</li><li>• IP address, device information, log information</li><li>• Payment information</li><li>• Customer number</li><li>• Information about how you use our web site, which of our offers you have been interest in, which of our newsletters you have interacted with and which of our events you have signed up for</li><li>• Data about your purchases</li><li>• Information about your account</li></ul>	As long as you have a Best account

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## 8. Profiling

8.1 Best may process your personal data through profiling if you are a customer/account holder. If you are a customer/account holder, we analyse information about how you use our customer service website, which of our goods, services and offerings you have been interested in, which of our newsletters you have interacted with and which of our events you have signed up for, data about your purchases and information about your account in order to provide you with offers that we believe are appropriate for you and to invite you to events we believe you would like to attend.

8.2 You may object to the processing of personal data through profiling at any time. To do so, please contact [dataprivacy@besttransport.se](mailto:dataprivacy@besttransport.se). When Best has received your notification, Best will cease to process your personal data for this purpose.

## 9. How long do we save information about you?

9.1 Your personal data are saved only as long as this is necessary and there is a need to save them in order to fulfil the purposes for which they were collected, in accordance with this Privacy Policy. Best may save the data longer if this is needed to comply with legal requirements or to look after Best's legal interests, for example in the event of litigation.

9.2 Best saves data about customers for a maximum of 24 months after the last time the customer completed a purchase or otherwise interacted with Best.

9.3 Best saves data about Account Holders as long as the Account Holder has a Best account.

9.4 Best saves personal data about completed deliveries for a maximum of 12 months after the delivery was completed, unless otherwise agreed with the customer.

## 10. To whom do we disclose personal data?

10.1 Best may disclose your personal data to third parties, such as Best group member companies, haulage contractors and other partners,

as well as suppliers of card and communication services in order to perform the service you ordered with the best possible level of service.

10.2 Third parties to whom Best discloses information or otherwise provides information about a customer or Account Holder may only use the information for the purpose of completing the service purchased.

10.3 Personal data may further be disclosed by Best if this is necessary to comply with applicable legal or regulatory requirements, to look after Best's legal interests or to detect, prevent or report fraud and other security or technical problems.

10.4 Best may transfer your personal data to countries outside the EU/EEA, if any of Best's suppliers or partners are located there. If personal data are transferred to a country outside the EU/EEA Best will take measures to ensure that the personal data continue to be protected. Best will also take the measures necessary to transfer personal data to countries outside the EU/EEA legally.

10.5 We will not sell your personal data to a third party.

## 11. Amendments to the Privacy Policy

Best has the right to amend its Privacy Policy at any time, in response to changes to legislation or practice in the area.

## 12. Protection of your personal data

You should always feel safe when you submit your personal data to us. Therefore Best has taken the security measures needed to protect your personal data from unauthorised access, alteration and deletion. For example, all data about customer, account holders, senders and receivers are saved in a database that is protected through authorisation management and firewalls.

# Best



### 13. Your rights

13.1 Best is responsible for ensuring that your personal data are processed in accordance with applicable legislation.

13.2 Best will correct, depersonalise, delete or supplement data discovered to be inaccurate, incomplete or misleading, at your request or upon Best's initiative.

13.3 You have the right to request:

- a. Access to your personal data. This means that you have the right to request a register export concerning that processing that we perform on your personal data. You also have the right to receive a copy of the personal data processed. You have the right to receive a register export concerning which personal data about you are recorded, the purposes of the processing and the recipients to whom the data have been or will be disclosed, free of cost, once per calendar year, through a signed written request. You also have the right to receive information in the register export concerning the source of the data if the personal data were not collected from you, automated decision-making (including profiling), and the envisaged period for which the personal data will be stored or the criteria used to determine that period. You furthermore have the right to receive information about your other rights stated in this item in the register export.
- b. Rectification of your personal data. At your request, we will rectify incorrect or incomplete data that we process about you as quickly as possible.
- c. Deletion of your personal data. This means that you have the right to request the removal of your personal data if they are no longer necessary for the purpose for which they were collected. However there may be legal requirements that prohibit us from immediately deleting your personal data, for example in accounting or tax legislation. In that case we will cease the processing done for purposes other than compliance with the legislation.
- d. Limitation on processing. This means that your personal data is marked so that they may only be processed for certain limited purposes. You may request limitation in cases including when you consider your data to be incorrect and

you have requested a correction according to item 12.3 b). Processing of the data will be limited during the time that the accuracy of the data is being investigated.

13.4 Best will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, according to item 10 above.

13.5 You have the right to data portability. This means a right under certain circumstances to receive your personal data in a structured, commonly used and machine-readable format and to transfer those data to another controller.

13.6 You have the right to object to personal data processing performed with the support of a balancing of interests. If you object to such processing, we will only continue the processing if there are legitimate grounds for the processing that outweigh your interests.

13.7 If you don't want us to process your personal data for direct marketing, you always have the right to object to such processing by sending an email to [dataprivacy@besttransport.se](mailto:dataprivacy@besttransport.se). Once we receive your objection, we will cease processing the personal data for such marketing purposes.

13.8 You have the right to submit any complaints regarding processing of your personal data till the Swedish Data Protection Authority.

### 14. Cookies

We use cookies when you visit our website. You will find more information about how we processes cookies in our cookie policy on our website(s).

### 15. Contact information

Don't hesitate to contact us if you have any questions about this Privacy Policy, the processing of your personal data or if you wish to request a register extract. You can find our contact information below.

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