

# Privacy Policy



Processing of personal data, adopted by Recap Energy AB (publ)  
[2022-08-15]

# Privacy Policy

We take care of your privacy. You should be able to feel secure when entrusting your personal data to us. For this reason, we have drawn up this policy. It is based on current data protection legislation applicable within the EU/EES and clarifies how we work to safeguard your rights and privacy.

When various people, e.g. business partners, customers and consultants have contact with us, this means that personal data will be provided to us or obtained by us. We also collect and process personal data regarding contact persons of suppliers and other external parties. Furthermore, anyone who applies to work for us, visits our offices, or communicates with us will provide us with personal data.

The purpose of this policy is to make you aware of how we process your personal data, what we use it for, who may get access to it and under what conditions, and how you can safeguard your rights.

## We are personal data controller

Recap Energy AB (publ), 556919-6503 (the "Company", "we" or "us"), is responsible for the personal data processed about you. Recap Energy AB (publ) is therefore the data controller for your personal data.

## What personal data do we process?

We strive to process as little personal data about you as possible. This means that we do not collect any more personal data than necessary for our purposes.

We collect and process personal data when we receive inquiries regarding business engagements and when we obtain, perform, and administer such engagements. The same applies in relation to our customers, business partners, suppliers, and other collaboration partners. We mainly collect personal data directly from the individuals concerned, but in business engagements we sometimes receive information about individuals involved that does not come directly from them. In some cases, we may also supplement the personal data by obtaining information from other sources, e.g. search results using publicly available search engines and records.

Our support organisation collects and processes personal data in connection to/regards to customers, suppliers, and other external parties.

The personal data we process may consist of contact details ( e.g. name, title, employer, postal address, telephone number and email address), identification details ( e.g. date of birth), and invoicing information (such as account number and tax details).

Much of our communication takes place via telephone, video calls and email, which essentially always entails processing of personal data. As a rule, those who call, take part in video calls or send emails to us provide personal data that can be attributed to individuals.

## Why do we process your personal data?

We process your personal data to be able to perform and administer business engagements and contractual obligations, and to safeguard customers, suppliers, and other collaboration partners' interests as well as for accounting and invoicing purposes. The personal data is also processed in order to maintain contacts with our customers, suppliers and collaboration partners, for business and method development, client and market analyses, statistical purposes, risk management, sending newsletters, invitations to seminars and similar, and for marketing purposes.

## How do we protect your personal data?

Your security is important to us. Therefore, we have taken appropriate technical, organisational and administrative security measures to protect your personal data from unauthorised access and other unauthorised processing. We regularly analyse and evaluate the measures in order to ensure that protection of your data is as safe as possible.

## Who do we disclose your data to?

We do not disclose your data to other companies or organisations unless required by law or necessary to perform our statutory or contractual obligations towards you.

When required by law, we may need to disclose your data to public authorities and other organisations. We may also need to disclose your data if it is necessary to exercise, establish or monitor our legal claims.

We may disclose your personal data to our partners, suppliers or subcontractors, but only if that is necessary for us to meet our obligations in relation to you as a customer. We never provide more personal data than necessary.

We never disclose your personal data to other companies or businesses for marketing purposes.

## On what legal basis do we process your personal data?

In relation to customers, suppliers, consultants, and business partners, our processing of personal data is normally based on our legitimate interest in conducting our business and performing our engagements.

In relation to contractual commitments, we may have additional lawful grounds for the processing, such as legal obligations. Other lawful grounds may apply due to national laws and regulations governing the operations of our non-Swedish offices.

Processing of personal data relating to suppliers, or their representatives and other external parties is based on our legitimate interest in administering the relationship and performing our contractual obligations.

When we process personal data in order to analyse and develop our business, processing is based on our legitimate interest in improving our business.

The processing of personal data that takes place for marketing and communication purposes is based on our legitimate interest in maintaining our business contacts, communicating with business contacts about our business and our events, and to arrange and administer those events.

## How long do we process your personal data?

We do not save personal data longer than necessary given the purpose of the processing unless applicable law stipulates that data may or must be saved for a longer period.

We retain data about you as a customer, business partner, supplier, or collaboration partner, for the period that is necessary so we can administer the contractual or business relationship, exercise our rights and perform our obligations, and for a reasonable time thereafter, or for as long as is required or permitted under applicable law.

Contact information is saved for a period deemed necessary in order to maintain a business relationship with you or the company or the organisation you represent.

# Your rights

When we process personal data about you, you as data subject have a number of rights. You have the right to contact us at any time with respect to these, and if you wish to exercise any of the rights described below, you can reach us most easily at [info@recap.se](mailto:info@recap.se).

We reserve the right to take appropriate protection and security measures in order to ensure that you are the person you claim to be when you contact us. If you cannot satisfactorily demonstrate your identity, we may not be able to respond to your request.

## ***Access to personal data***

You have the right to know what personal data we process about you. If you wish to know, you can get a compiled register extract from us that contains all the personal data we process about you.

## ***Correction and deletion***

If we process your personal data incorrectly or if we no longer need the data, you are entitled to have it deleted. If the data is incomplete, you have the right to have it supplemented. Please keep in mind that we may not be able to provide you with our services if you request to have your personal data deleted.

## ***Data portability***

In certain circumstances you have the right to receive the data that we process about you in a general, written, machine-readable and structured format. You have the right to do so for the personal data that you have provided to us and which we process with your consent or when the personal data is required to enter into or complete an agreement.

## ***Restrictions to processing***

Under certain conditions, you have the right to request that we restrict the processing of your data. This means that we mark the data so that we only process it for certain specific purposes in the future. We may not be able to provide you with our services if you restrict us processing your personal data.

## ***Right to make objections***

You have the right to object to the processing of personal data that is carried out to perform a task in the public interest, as part of an exercise by a public authority or after a balance of interests. We do not process your personal information for any of these purposes or on any of these grounds. Therefore, you cannot direct any objections towards our processing on this basis.

## ***Right to lodge a complaint***

You have the right to lodge a complaint with the Swedish Data Protection Authority or the supervisory authority in your European country (where you live or work) if you believe that we are processing your personal data in an inappropriate manner. You can read more about this on the Swedish Data Protection Authority's website [www.integritetsskyddsmyndigheten.se](http://www.integritetsskyddsmyndigheten.se).

## Cookies

Our website uses cookies. A cookie is a small text file that is stored on your computer when you visit a website. Cookies are used for certain functions, to improve our website for users or to provide us with website usage statistics. We do not store any personal data through cookies. Statistics are not personal. Information about visitors cannot be tracked through cookies.

You can choose whether to allow cookies. If you do not want to accept cookies, you can do so in your browser settings. Most browsers automatically accept all cookies by default.

Most browsers allow you to block all cookies. For more information on how to change cookie settings in other browsers, please refer to your browser's help menu. If you do not wish to receive cookies, the functionality of the website cannot be guaranteed.

## Contact

You can contact us at any time by writing to [info@recap.se](mailto:info@recap.se) or by calling us on phone number +46707885394 if you wish to learn more about how we process your personal data. You can also read more about us on our website [www.recapenergy.com](http://www.recapenergy.com).