

PRIVACY POLICY STATEMENT

MODUL-SYSTEM LIMITED

ABOUT MODUL-SYSTEM LIMITED AND THIS PRIVACY POLICY

PROCESSING OF YOUR PERSONAL DATA

Modul-System Limited is part of the Modul-System group which constitutes the vehicle racking division within Lifco AB, a Swedish Company partially listed on the Swedish stock exchange. Modul-System Limited takes all necessary measures to make sure that personal data concerning our external parties is being processed by us in a lawful, fair and transparent manner.

When you use our various services, we collect your personal data. The Company is consequently the data controller of your personal data and processes it in accordance with this privacy policy. This privacy policy explains and clarifies your rights in relation to the Company regarding the processing of your personal data and how you can exercise those rights.

The Company is committed to protecting your personal data and it is important to the Company to ensure that your personal data is being processed in a secure way. We comply with all applicable laws and rules that exist to protect the privacy of individuals, including General Data Protection Regulation 2016/679 (GDPR) and any changes to, amendments to or regulations that replace such laws and regulations. We use appropriate technical and organisational measures with respect to the amount and sensitivity of personal data.

It is important that you read and understand this privacy policy before you use any of the Company's services. You should not use any of our services if you do not approve of this privacy policy.

Some pages on our website contain links to third party websites. These websites have their own privacy policies and the Company is not responsible for their operations or their information policies. Any user who sends information to or through these third parties websites should hence review the privacy policies posted on those websites before any personal data is transferred to them.

For information on the collection, handling and storage of information obtained through cookies, see the "Cookies" section below.

WHAT PERSONAL DATA DO WE COLLECT AND WHERE FROM?

If you use our services (quotations, customer service, order goods and services, invoices, newsletters, training, events, exhibitions, social media, website, marketing material and customer surveys) you may provide information to us that is considered personal data under applicable data protection laws.

The types of personal data that we collect may, depending on the context, include:

- name and contact information including address, mobile number and e-mail address;
- company registration number or personal identity number;
- delivery and billing information, payment information and other information that you provide in connection with the purchase or delivery of a product or service;
- different kinds of demographic information;
- information about preferences and interests based on the use of the Company's websites, including Modul-Fleet;
- user name and password for our services;
- other information that is relevant for customer surveys, advertisement/marketing or offers.
- for customers using the company product Modul-Fleet, information concerning the vehicle whereabouts during the day are stored;
- other user-generated information that you actively choose to share through our websites including Modul-Fleet.

We may collect your personal data from the following sources:

- External database information concerning vehicle registration data
- Financial and related information concerning credit appraisal analysis
- Contact data information related to customers, suppliers, social media and press

WHY DO WE PROCESS YOUR PERSONAL DATA?

If you use our services or products, you have entered into an agreement with the Company. As a result, we process your personal data for the purpose of managing your purchase order, and in order to deliver the service or product that you have ordered.

In addition to processing your personal data to complete your purchase of products or services, the Company may use your personal data for other purposes, based on other legal grounds, as set out below.

- Performance of a contract: For the handling and administration of purchases, deliveries of products, to make payments as well as to give you access to the Company's websites and the services (*inter alia* customer support) provided there.
- Consent: Direct marketing (by regular mail and e-mail), customer surveys, customer support and newsletters.
- Compliance with a legal obligation: We save invoice documentation in accordance with applicable accounting laws and regulations.
- Legitimate interest: In order to be able to provide, carry out and improve our commitments, products and services, it is necessary for us to process personal data in some other cases as well, e.g. by analysing our customers' buying patterns in order to provide them with relevant information and marketing, as well as for statistical purposes.
- Profiling (Not currently done by Modul-System Limited)

In the event that a service that we provide requires your consent, we will always explicitly ask you to give your consent to such a service and to the processing of your personal data in such a case. For example, we will ask for your consent if you would like to subscribe to any of the Company's newsletters or if you would like to create an account on any of the Company's websites.

In connection with your giving of consent, you will have to confirm that you have read this privacy policy and that you consent to the processing of your personal data as described herein.

RETENTION OF PERSONAL DATA

The Company takes all reasonable steps to ensure that your personal data is processed and stored securely. Your personal data will never be stored longer than permitted by applicable law or longer than necessary to fulfil the above stated purposes. Your personal data will be processed by us during the following time periods.

- Performance of a contract: Personal data (name, personal identity number, address, telephone number, e-mail, billing and delivery information) which is submitted to the Company in connection with the order of products or services is stored for as long as necessary in order for the Company's performance of the agreement with you. This includes, *inter alia*, fulfilling delivery or warranty commitments.
- Legal obligation: The Company saves any documentation that constitutes accounting information in accordance with applicable accounting legislation.
- Consent: In cases where we process your personal data based on your consent, we will only save your personal data for as long as we still have your consent.
- Direct marketing: We may process your personal data for direct marketing purposes, unless you object to your personal data being used for direct marketing purposes.

TRANSFER OF PERSONAL DATA

Personal data regarding our customers is an important part of the Company's operations and we do not sell the personal data to anyone else. We only transfer personal data as described below. We always observe great caution when transferring your personal data and your personal data is only transferred in accordance with this privacy policy and after taking appropriate security measures.

- Partners outside the group of companies that the Company belongs to: Our partners, i.e. companies outside the group of companies that the Company belongs to and which are approved by the Company, may get access to your personal data for the purpose of giving you access to targeted information and offers about products and services.
- Matching with private and public records: The Company may update your personal data with further information through collection of information from other private and public records. In this way, your personal data will be accurate and up to date.

- Business transactions: If all or part of the Company's operations are sold or integrated with any other business, operation or company, your personal data may be disclosed to our advisors, potential buyers and their advisors, and be transferred to the new owners of the operation.
- Legal obligations: Your personal data may also be disclosed for the purpose of the Company's compliance with certain legal obligations and it may be transferred to the Police and other relevant public authorities when permitted and required by law.

The type of transfers mentioned above may only be carried out to companies within the EU or EEA (i.e. all EU member states and Iceland, Norway and Lichtenstein).

WITHDRAWAL OF CONSENT

In the event that we process your personal data based on your consent, e.g. regarding subscription to newsletters, you may withdraw your consent at any time by contacting the Privacy Team using the e-mail detailed at the end of this policy. Such withdrawal may be made in whole or in part. If you do not wish to receive marketing and special offers from us you may withdraw your consent by contacting the Privacy Team using the e-mail detailed at the end of this policy

If you withdraw your consent with respect to the use or disclosure of your personal data for other purposes stated in this privacy policy, we may no longer be able to continue to give you access to our websites or provide customer service or other services being offered to our users and permitted under this privacy policy.

YOUR RIGHTS

You have the right to access the personal data we hold and process on you by contacting us in writing (see contact details below). You can change your personal details at any time by contacting the Privacy Team (contact details below). You are also entitled to request the amendment of incorrect, incomplete or ambiguous personal data concerning you by contacting the Privacy Team. For the protection of your privacy and your personal data, you will be required to provide identification in order to fulfil this request

In accordance with applicable data protection laws, you also have the right to request that your personal data be erased or that the processing of your personal data be restricted. In certain situations, you also have the right to object to the processing of your personal data and request that your personal data be transmitted in an electronic format.

You may file a complaint with the Information Commissioner office (ICO) if you believe that the Company's processing of your personal data is not carried out in accordance with applicable laws.

COOKIES

The Company uses so-called cookies on our websites. A cookie is a small text file sent from a website to your web browser. The cookie cannot identify you personally, but only the web browser that is installed on your computer and the web browser you use when visiting the webpage. Consequently, different cookies are saved on different computers, should you use different computers when visiting our websites. Cookies do not carry viruses and cannot destroy any other information stored on your computer.

Cookies are usually categorised based on their origin and based on whether they are stored in your web browser or not. Cookies can either be sent to you from the website you visit (i.e. *first-party* cookie) or from another organisation that delivers services to the current website, such as an analytical company (i.e. *third-party* cookies). Cookies can also be divided into *session* cookies and *permanent* cookies. A session cookie is sent to your computer so that the webpages can function properly during your visit but is not stored on your computer, it is erased when you close down your web browser. The function of a session cookie is for example that it is activated when you return to a previously visited part of the website and thus facilitates your navigation on the website. A permanent cookie, on the other hand, is stored in your web browser and thus allows a web page to recognise your computer's IP address even if you turn off your computer or log out between visits. The cookie is stored for three days and is then deleted.

The Company uses both session cookies and permanent cookies on our website. Both types of cookies are needed primarily for the functionality of our services, to help us improve our delivery of products and services, to provide you with additional functionality and to help us provide you with relevant and customised advertising and marketing. Furthermore,

the Company could use third-party cookies from Google Analytics to investigate how to adapt and develop the information on the Company's website in the best possible way.

Most web browsers have a default setting that accepts the use of cookies. You can easily refrain from allowing the Company's websites to store cookies on your computer with a setting in your web browser, including blocking cookies or erasing any cookies stored on your computer. Please note that if you choose to not allow cookies, some functionality on our websites may cease to function securely and properly and some services may not be provided. For example, you cannot log in to, or use the e-commerce. How you erase or change the settings for cookies is stated in the instructions on your web browser or in the utility function that usually is available in the web browser.

CHANGES TO THE PRIVACY POLICY

Please note that the terms of the privacy policy may be changed or amended. Any new version will be published on the Company's website. Consequently, you should review these terms on a regular basis to make sure that you are satisfied with the changes. In case of any material changes we will, however, e-mail you, if you have given us your e-mail address, to make you aware of any changes made.

If the changes concern processing of personal data that we carry out based on your consent, we will give you the opportunity to once again give your consent to the processing on the new terms presented.

CONTACT US

If you have any questions relating to this privacy policy, you suspect that a breach of this privacy policy has occurred, or if you would like to contact us for any reason stated in this privacy policy, please contact our Privacy Team on the contact details provided below.

Modul-System Limited, Maddison House, Thomas Road, Wooburn Industrial Park, Wooburn Green, High Wycombe, Buckinghamshire, HP10 0PE

GDPR@modul-system.co.uk