



Modul-System Ltd PRIVACY POLICY STATEMENT

1. Introduction

Modul-System Limited (“the Company”, “we”, “us”, “our”) 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 is committed to protecting the privacy and security of personal data. We take all necessary measures to ensure that personal data relating to our customers, suppliers, and other external parties is processed lawfully, fairly, and transparently, in accordance with applicable data protection legislation.

This Privacy Policy explains:

- What personal data we collect and where it comes from
- Why and how we process personal data
- How long we retain personal data
- When and how personal data may be shared
- Your rights in relation to your personal data
- How to contact us

By using our services or websites, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with the terms of this policy, you should not use our services.

2. Legal Framework and Data Controller

For the purposes of the UK General Data Protection Regulation (UK GDPR), the EU General Data Protection Regulation (GDPR), and the Data Protection Act 2018, Modul-System Limited is the **data controller** of your personal data.

We comply with all applicable data protection laws and regulations and implement appropriate technical and organisational measures to protect personal data, taking into account the nature, scope, context, and purposes of processing.

3. Third-Party Websites

Our websites may contain links to third-party websites. These websites operate independently and have their own privacy policies. Modul-System Limited is not responsible for the content, security, or privacy practices of third-party websites. We recommend that you review their privacy policies before providing any personal data.



4. Personal Data We Collect

When you use our services (including quotations, customer support, ordering goods or services, invoicing, newsletters, training, events, exhibitions, websites, social media, marketing activities, and customer surveys), you may provide personal data.

Depending on the context, the personal data we collect may include:

- Name and contact details (address, telephone number, email address)
- Company name, company registration number, or personal identity number
- Billing and delivery details and payment-related information
- Demographic information
- Preferences and interests based on interaction with our websites and services, including Modul-Fleet
- Login credentials (username and password)
- Information relevant to customer surveys, marketing, and promotional offers
- For users of Modul-Fleet, vehicle location data during operational use
- Any other information you voluntarily provide via our websites or services

5. Sources of Personal Data

We may collect personal data from:

- You directly
- External databases containing vehicle registration data
- Credit reference agencies for credit assessments
- Publicly available sources
- Customers, suppliers, social media platforms, and press contacts

6. Purposes and Legal Bases for Processing

We process personal data only where there is a lawful basis to do so. The purposes and legal grounds include:

- **Performance of a contract**
To manage orders, deliveries, payments, warranties, customer accounts, and access to our services and websites.
- **Consent**
For direct marketing communications, newsletters, customer surveys, and certain customer support activities.
- **Legal obligation**
To comply with accounting, tax, and other statutory requirements.
- **Legitimate interests**
To operate, maintain, improve, and develop our products and services, including analysing purchasing patterns, generating statistics, and delivering relevant communications—provided such interests are not overridden by your rights.



- **Profiling**

Modul-System Limited does not currently carry out profiling within the meaning of data protection legislation.

Where processing is based on consent, you will be asked to provide explicit consent, and you may withdraw it at any time.

7. Retention of Personal Data

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal requirements.

Retention periods include:

- **Contractual data**
Stored for the duration of the contractual relationship and as required to fulfil delivery, warranty, and after-sales obligations.
- **Legal obligations**
Accounting and financial records are retained in accordance with applicable accounting laws.
- **Consent-based processing**
Retained only for as long as your consent remains valid.
- **Marketing data**
Retained until you object or withdraw consent.

8. Sharing and Transfer of Personal Data

We do not sell personal data. Personal data may be shared only as described below and subject to appropriate safeguards:

- **Approved partners and service providers**
Where necessary to deliver services, provide targeted information, or support our operations.
- **Public and private records**
To ensure personal data remains accurate and up to date.
- **Business transactions**
In connection with mergers, acquisitions, or sale of all or part of the business.
- **Legal and regulatory authorities**
Where required by law or permitted under applicable regulations.

All transfers are limited to organisations within the UK, EU, or EEA.

9. Withdrawal of Consent

Where processing is based on your consent, you may withdraw that consent at any time by contacting our Privacy Team using the details below.

Please note that withdrawal of consent may affect our ability to provide certain services or access to parts of our websites.



10. Your Rights

Under applicable data protection laws, you have the right to:

- Access your personal data
- Request correction of inaccurate or incomplete data
- Request erasure of personal data (where applicable)
- Restrict processing
- Object to processing, including direct marketing
- Request data portability in a structured, commonly used electronic format

To protect your privacy, we may request proof of identity before responding to requests.

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** if you believe your data has been processed unlawfully.

11. Cookies

We use cookies to improve website functionality and user experience. Cookies are small text files stored on your device and do not contain viruses or personally identifiable information.

We use:

- **Session cookies**, which expire when you close your browser
- **Persistent cookies**, which remain for a limited period (typically three days)

Cookies may also be provided by third parties, such as Google Analytics, to help us analyse and improve website performance.

You can manage or disable cookies via your browser settings. Please note that disabling cookies may limit website functionality, including access to secure areas and e-commerce features.

12. Changes to This Policy

We may update this Privacy Policy from time to time. Any changes will be published on our website. Where changes are significant, we will notify you by email if we hold your contact details.

If changes affect processing based on consent, we will request renewed consent where required.

13. Contact Details

If you have any questions, concerns, or requests relating to this Privacy Policy or the processing of your personal data, please contact: Modul-System Limited Privacy Team.

Email: GDPR@modul-system.co.uk