

# Privacy Policy

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## 1. GENERAL

Focus Nordic Danmark Filial af Focus Nordic AB and Focus Nordic Denmark AS (hereafter; "Focus Nordic", "we", "us" or "our") consider the integrity and privacy of all individuals in the highest regard of seriousness, ensuring our customers and visitors to safely and securely use our platforms. This privacy policy lists all information regarding how we collect, handle and store your personal data, as well as highlighting your personal rights and in what ways you may use these rights. The policy is established in accordance with the new EU/EEA data regulation GDPR (General Data Protection Regulation), and aimed towards our customers, both present and future, work applicants as well as visitors on any of our platforms. For questions regarding our handling of personal data, please contact our data protection officer via [GDPR@focusnordic.com](mailto:GDPR@focusnordic.com).

## 2. PROCESSING PERSONAL DATA

We handle all personal data that is collected in a responsible, secure and correct way in order for you to feel safe when visiting our platforms and purchasing our merchandise. Focus Nordic as a data controller is responsible, in regards to current laws and regulations, to ensure this handling by securing the data processed.

Personal data includes all types of information that can be identified, either separately or in combination, with a specific human being. For instance, this can be personal data such as name, personal identification number, email address or residential address. Regardless of what data we collect and process we make sure that the data is securely handled, structured and stored in any of our databases. We may transfer data between several different databases, although still handled in the same responsible, secure and correct way regardless of the location.

### 2.1 CUSTOMER ACCOUNTS AND ORDER MANAGEMENT

Focus Nordic is obliged to handle and store a variety of personal data when selling merchandise, in order to finalize orders and shipments, as well as to ensure warranties for the goods sold. If we do not get consent from our customer to collect, store and process their personal data, we will not be able to fulfil our obligations and finalize the order. Therefore, our customers have to agree upon our terms in order to make a purchase. The purchase will be denied if consent is not given to us for handling the personal data needed.

In order to communicate information regarding an order placed to us, we have to store some contact details. The type of order information shared can be in form of quotes, order responses, delivery advices and all documentation connected to invoicing. The type of personal data that may be stored for an order are the following:

- Name
- Billing address
- Delivery address
- Phone number
- Email address
- IP address

An order is active in our databases until all products have been shipped from our warehouse, and will after that be archived. Focus Nordic stores archived orders to secure that the delivery have been successful and finalized, as well as to handle any potential returns, complaints or warranty claims.

## 2.2 CLAIMS AND SERVICE ISSUES

When Focus Nordic receive complaints, claims and service issues we need to collect, store and process some personal data in order to fulfil our services. If consent is not given for us to store this personal data, it will be removed from our databases when the issue is closed. However, if consent is given we will store the personal data until further notice or until the warranty has expired for the issued product. The type of personal data that may be stored for complaints, claims and service issues are the following:

- Personal identification number
- Name
- Billing address
- Delivery address
- Phone number
- Email address
- IP address

## 2.3 CAMPAIGNS AND PRIZE DRAWS

Focus Nordic offer different campaigns and prize draws for our customers, their customers and/or other consumers. To take part of a campaign or prize draw we need to collect and store certain personal data until the offer is completely finalized on our behalf. Parts of the personal data will be removed from our databases, apart from information included in our business transactions. Read more about our legal obligations in chapter 2.6. Therefore, we need your consent to handle your personal data during this period, in order for you to take part of the offer. The type of personal data that may be stored for campaigns and prize draws are the following:

- Personal identification number
- Name
- Billing address
- Delivery address
- Phone number
- Email address
- Bank account details

## 2.4 WORK APPLICANTS

When we receive work applications, we store these during the period where the matter is ongoing. If the application is rejected, we will remove the information received and store nothing in any of our databases, neither physically nor digitally, unless the applicant gives their consent for us to store the information for future needs. If the application is approved and the applicant starts working for us, we will move the personal data to our databases, where it is stored out of legal basis, as long as the employment continues. After the employment is terminated, we remove all information unnecessary for us to store, saving only data connected to legal obligations. The type of personal data that may be stored for work applications are the following:

- Personal identification number
- Name
- Residential address
- Phone number
- Email address

## 2.5 COMMUNICATIONS AND SENDINGS

Focus Nordic holds a registry over contact details, used to communicate general information, advertisement, campaigns, etc. In this registry, we store personal data for individuals, both consumers and company representatives. Beyond that, we also store if the person want to receive information from us, which controls our communication between them and us. If consent is given to store personal data and communicate information via email, we will do so until further notice. The type of personal data that may be stored in our contact registry are the following:

- Name
- Delivery address
- Phone number
- Email address

## 2.6 LEGAL OBLIGATIONS

Focus Nordic is obliged by law like all other companies to store business transactions between our customers and us, based on current laws and regulations. If the necessary details are not given to us, we cannot fulfil our legal obligations and therefore not carry out any business transaction between our customers and us. The type of personal data that may be stored in our business transactions are the following:

- Personal identification number
- Name
- Billing address
- Delivery address
- Phone number
- Email address

## 3. SHARING PERSONAL DATA

Focus Nordic have several business relations with external partners, whom have controlled access to our databases. We have agreements between them and us, where they follow the same regulations both them and us are obliged to uphold. Focus Nordic controls who has access to personal data at our partners and can therefore be handled in the same responsible, secure and correct way. We give our partners access to our databases out of the following reasons:

- Support & troubleshooting
- Development
- Maintenance
- Upgrades and implementations
- Integration between databases
- Backup services
- Finalizing shipments

## 4. YOUR PERSONAL RIGHTS

You may as a customer or visitor on our platforms at any time use your personal rights and receive any of your personal data that may be stored in our databases. Upon your request, we will gather all personal data stored just for you, where you have the right to delete parts or all of the data, or complement with further information that we may miss.

When requesting your personal data from us you also have the right to take part of further information, such as why we store the information, who we have shared it with, or from where we have received the information, if it origins from some other party then yourself.

You may at any time contact us and use your personal rights by sending us an email to our data protection officer at [GDPR@focusnordic.com](mailto:GDPR@focusnordic.com).

## 5. CHANGES IN THE PRIVACY POLICY

Focus Nordic reserve the right to update our privacy policy at any time with any frequency. The latest version will always be available at our website <http://focusnordic.dk>. For larger changes in the privacy policy we will communicate these through email, including what date the new version takes place from.