

ECKERÖ LINJEN'S PRIVACY POLICY

CONDENSED INFORMATION

General

We take your personal integrity seriously. We aim to ensure that you feel confident about how we process your personal data. As data controller, we ensure compliance with applicable legislation concerning protection of your data.

Scope

This Integrity Policy governs all processing made by Eckerö Linjen of personal data within the framework of our activities with respect to you as a private customer.

Personal data collected

You will mainly provide the information we collect on you in connection with your entering into an agreement with us and your use of our services. Such information may include your contact details, date of birth, demographic data, order and payment details, and information about how you use our services.

To improve our web services, we use cookies that may contain personal data. To find out more about how we use cookies, please read our comprehensive cookie policy.

Our use and sharing of your data

We at Eckerö Linjen use your personal data to best provide you with the products and services we offer. Your personal data is used for the following purposes:

- Administration and implementation of agreements,
- Marketing, including targeted advertising, of our services, and those of our partners
- Method and business development,
- Administration in connection with acquisitions, restructuring etc.,
- Safeguarding of our legal interests in case of a dispute.

We do not use your personal data for any other purpose and we store it for as long as it is necessary.

Under certain circumstances, we may provide your personal data to other affiliated companies, IT suppliers or companies with which we collaborate in order to supply our products and services. We will not sell your personal data to anybody.

Your rights

You have the right to receive information concerning which of your personal data we use, what we do with it, and to otherwise check your data in the manner stated here. Therefore, in some cases, you are entitled to receive your data or to request that it be rectified, erased, blocked, or moved. You are also entitled to object to certain types of use of your data or to withdraw your consent to its use. If you believe that we have used your data in an unauthorised manner, you are always entitled to contact the Swedish Data Protection Authority (Datainspektionen). To learn more about your rights, please read our full Privacy Policy.

Contact details

Should you have any questions about this Privacy Policy, our use of your personal data, or should you wish to exercise your rights, you can contact us as follows:

Postal address: Box 158, AX-22101 Mariehamn

Visitors' address: Torggatan 2, AX22100 Mariehamn

Email: dataskydd@eckerolinjen.se

Telephone: +358 18 28 000

Website: <https://www.eckerolinjen.se/kontaktuppgifter/>

AN OVERVIEW	OF THE FULL PRIVACY POLICY
<p data-bbox="327 312 589 341">1. GENERAL</p> <p data-bbox="327 368 864 509">We care about your privacy and security. In this privacy policy, we wish to explain how we ensure that your personal data is managed properly.</p> <p data-bbox="327 533 864 600">This Privacy Policy applies to you as our private customer.</p>	<p data-bbox="887 312 1149 341">1. GENERAL</p> <p data-bbox="887 368 2056 547">1.1 Eckerö Linjen AB (Eckerö Linjen Ltd), CRN 1974073-8 ("Eckerö Linjen") respects and protects your privacy. We want you to feel confident about how we process your personal data. In this Privacy Policy ("the Privacy Policy"), we wish to explain how we ensure that your personal data is processed in compliance with applicable legislation.</p> <p data-bbox="887 571 2056 671">1.2 In order for us to be able to provide our products and services to you, we need to use personal data about you. This Privacy Policy applies to you as our private customer.</p>
<p data-bbox="327 722 736 751">2. DATA CONTROLLER</p> <p data-bbox="327 778 864 845">The Eckerö Linjen is the data controller for the processing of your personal data.</p>	<p data-bbox="887 722 1296 751">2. DATA CONTROLLER</p> <p data-bbox="887 778 2056 919">2.1 The Eckerö Linjen is the data controller with respect to the processing of your personal data and is responsible for ensuring that it is used in accordance with applicable legislation. You will find our contact details at the bottom of this Privacy Policy.</p>

3. OUR USE OF YOUR PERSONAL DATA

We at the Eckerö Linjen use your personal data to administer and implement contracts, to reach customers with our marketing, including customised direct mail advertising, and to work towards method and business development.

We use your personal data to provide our services, offer you customer support, accept payments from you, and to enable you to log in to our web services.

3. OUR USE OF YOUR PERSONAL DATA

3.1 We at the Eckerö Linjen use your personal data to best provide you with the products and services we offer. Therefore, we use your personal data for the following purposes:

- The administration and implementation of contracts,
- The marketing, including customised direct mail advertising, of our services, and those of our partners,
- Method and business development,
- Administration in connection with acquisitions, restructuring etc.,
- The safeguarding of our legal interests in case of a dispute.

The tables below provide further information about why we use your personal data, what personal data we store to achieve those ends, and how long we store your personal data.

Purpose: The administration and implementation of contracts		
Personal data:		
<u>Contact details</u> such as name, social security number, telephone number, and email address.		
<u>Order and payment details</u> such as order history and payment information.		
<u>Login details</u> such as e-mail address and password.		
<u>Sensitive personal data</u> such as health data.		
What we do: We use your data to provide, manage, and customise	Legal basis: Implementation of contracts.	Retention period: Your data is stored for up to 12

<p>our services and products, as well as to enable login to our web services and provide customer support to you as the user.</p>	<p>Sensitive personal data is processed based on your explicit consent.</p>	<p>months from your most recent activity.</p>
<p>Your rights: You are entitled to object to the use by us of your personal data based on our assessment of legitimate interests. See Section 9 to find out more about your rights.</p>		

We market our services, and those of our partners, and create customised advertisements for you.

<p>Purpose: The marketing, including customised direct mail advertising, of our services and those of our partners</p>		
<p style="text-align: center;">Personal data:</p> <p style="text-align: center;"><u>Contact details</u> such as name, phone number, and email address.</p> <p style="text-align: center;"><u>Browsing habits and visit history</u> such as pages you visit on our website and how long the visit lasted.</p> <p style="text-align: center;"><u>Order and payment details</u> such as order history and payment information.</p> <p style="text-align: center;"><u>Demographic data</u> such as age, sex, and postal number.</p>		
<p>What we do: We use your personal data in the context of our marketing and market segmentation efforts. By market segmentation we mean that we categorise our customer base based on demographic selection criteria, such as age, sex, and postal code, in order to send direct mail and non-customised</p>	<p>Legal basis:</p> <p>The assessment of legitimate interests, as we consider that our interests in sending general and segmented marketing to you outweigh your interests in protecting your personal information (for marketing via post, telephone and social media – and for marketing via email, text</p>	<p>Retention period: For you, our customer: Your data is stored and used throughout the contractual relationship and up to 12 months thereafter. This, of course, presupposes that you are not opposed to receiving direct marketing during that time.</p>

<p>information about offers, services, news, and competitions to you.</p> <p>Your personal data is also used for marketing that includes our partners' services and products, which takes place via email, text messages, MMS, and other automatic systems.</p>	<p>messages, MMS, and other automatic systems provided the requirements of the Swedish Marketing Act are met).</p> <p>Consent.</p>	<p>For those of you who are not yet our customers: We are entitled to retain your data for the purpose of sending you marketing within three months of receiving your contact details. This, of course, presupposes that you are not opposed to receiving direct marketing.</p>
<p>If you wish to receive customised offers and information about news and competitions specifically aimed at you, such as offers on particularly favourable service packages, we need your consent. In that case, we will analyse during which months of the year you use our various services and the frequency with which you choose to use the services. We will also analyse your browsing habits on our website as well as your purchase and transaction history, but also your name, age, sex, and postal code, to provide you with relevant information.</p>	<p>Consent.</p>	

Your rights: You are entitled at any time to demand that we stop using your personal data for direct marketing. You are also entitled to withdraw your consent at any time where we need your consent to use your personal data. If you withdraw your consent, you will no longer be able to receive information or offers tailored to you. See Section 9 to find out more about your rights.

We analyse statistics and surveys to develop and improve our services and products.

Purpose: Method and business development

Personal data: Contact details such as name, phone number, and email address.

Purchase history such as information about how you use our services (e.g. during which months you normally use our services).

Order and payment details such as order history and payment information.

Demographic data such as age, sex, and postal number.

Browsing habits and visit history such as pages you visit on our (and others') websites and how long the visit lasted.

What we do: We use your personal data in the context of our market and customer analyses, which mainly consist of statistics, data from market segments implemented, and customer satisfaction surveys. We then use the results of our analysis as a basis for improving, replacing, or developing new services, processes, or working methods, in order to meet your and other customers' demands and expectations. For example, we may use personal details to improve our

Legal basis: The assessment of legitimate interests, as we consider that our interests in analysing the use of our products and services in order to improve, replace, or develop new ones, outweigh your interests in protecting your personal information.

Retention period:

We store and use your personal data for this purpose during the contractual relationship and up to 12 months thereafter.

customer support, offer new package solutions, or customise our website to suit your and other customers' demands. However, we wish to make it clear that we always try, as far as possible, to anonymise or pseudonymise your personal data to achieve this purpose.		
Your rights: You are entitled to object to the use of your personal data where we rely on an assessment of legitimate interests. If you object to such use, we will only continue to use your personal data if there are compelling reasons for continued use that override your interests. For more details, see Section 9 about your rights.		

We use your personal data in case of business acquisitions or restructuring.

Purpose: Administration in connection with acquisitions, restructuring etc.		
Personal data: Contact details <u>such as name, phone number and email address.</u> Order and payment details <u>such as purchase and transaction history.</u>		
<p>What we do:</p> <p>Should our company be restructured, e.g. split up into several different operations, or should a third party wish to acquire our company or our customer database, we will disclose your and other customers' personal data to the acquiring company. In such cases, that company will continue to use your personal data for the same purposes as those stated in this Privacy Policy, unless you</p>	<p>Legal basis: The assessment of legitimate interests, as we consider that our interests of enabling an acquisition or restructuring process override your interests of protecting your personal data. However, this presupposes that the acquiring company conducts similar operations to us.</p>	<p>Retention period:</p> <p>Should our company cease to exist, e.g. through a merger, liquidation, or bankruptcy, or should our customer database be transferred to an acquiring company, we will erase your personal data provided we do not need to store it to meet legal requirements.</p>

<p>receive any other information in connection with the transfer.</p>		<p>If we are acquired by an acquiring company or split up in connection with a restructuring, we will continue to store and use your personal data under the terms of this Privacy Policy, unless you receive any other information in connection with the transfer.</p>
<p>Your rights: See Section 9 to find out about your rights.</p>		

We will use your personal data if a dispute arises, e.g. over payment, in order to determine, defend, or assert our legal claim.

<p>Purpose: The safeguarding our legal interests in case of a dispute.</p>
<p>Personal data:</p> <p><u>Contact details</u> such as name, social security number, telephone number, and email address.</p> <p><u>Order and payment details</u> such as order history and payment information.</p> <p><u>Sensitive personal data</u> such as health data.</p>

<p>What we do: If a dispute arises, e.g. over payment, we are entitled to use your data in order to determine, defend, or assert our legal claim.</p>	<p>Legal basis: If a dispute arises, we are entitled to use your personal data based on an assessment of legitimate interests, as we consider that our interests of determining, defending, or asserting our legal claim override your interests of protecting your personal data.</p> <p>Sensitive personal data is processed because such processing is necessary to determine, assert, or defend legal claims.</p>	<p>Retention period: Your data is stored as long as necessary for us to determine, defend, or assert a legal claim, such as in case of a dispute over payment.</p>
<p>Your rights: You are entitled to object to the use by us of your personal data based on our assessment of legitimate interests. See Section 9 to find out more about your rights.</p>		

4. WHERE DOES YOUR PERSONAL DATA COME FROM?

The personal data we use about you is derived from various sources other than just you, such as public registers and partners.

You must provide us with some personal data to enter into an agreement with us.

4. WHERE DOES YOUR PERSONAL DATA COME FROM?

4.1 The personal data we use about you is derived from various sources. You provided us with information such as your contact details, date of birth, demographics, browsing history, order and payment details, and information about how you use our services, when you ordered products and services, and when you used our website or services. We also collect personal data, such as contact details, from public registers and partners.

4.2 In order for you to enter into an agreement with us at the Eckerö Linjen, and in order for us to provide you with our products and services, you are required to provide us with some of your personal data. If you fail to provide the information we need to conduct our operations, we regret that we will not be able to enter into an agreement with you or provide our products or services to you.

5. AUTOMATED DECISION-MAKING

5. AUTOMATED DECISION-MAKING

5.1 We do not use automated processes to make decisions that have a significant effect on you.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We store your personal data only for as long as is necessary, and we then remove it from our system.

In some special cases, we may need to store your data for a longer period of time.

6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

6.1 We store your personal data only for as long as is necessary, for the purposes for which we originally collected them in accordance with this Privacy Policy. When we no longer need to store your data, we will remove them from our systems. In the tables in Section 3 above, you can see how long we store your personal data for various purposes.

6.2 We may also need to store your personal data for other reasons, e.g. to comply with legal requirements or to safeguard our legal interests, or other important public interest.

7. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

We may disclose your personal data to other group companies, IT suppliers, and partners, among other parties.

We will not sell your personal data to anyone else.

7. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

7.1 The Eckerö Linjen may disclose your personal data to a third party, such as another group company, and to IT providers and companies with which we collaborate for the purpose of providing our services. In some cases, we may also need to provide information at the request of authorities or other parties within the framework of court or corporate acquisition processes or equivalent.

7.2 We will not sell your personal data to anyone else.

8. WHERE DO WE USE YOUR PERSONAL DATA?

The Eckerö Linjen endeavours at all times to process your personal data within the EU/EEA. In some cases, we may transmit your personal data to non-EU/EEA countries. All such transmission is lawful.

8. WHERE DO WE USE YOUR PERSONAL DATA?

8.1 The Eckerö Linjen endeavours at all times to process your personal data within the EU/EEA. In some cases, we may transfer your personal data to non-EU/EEA countries. Should your personal data be transmitted to such a country, we will ensure that it remains protected and that it is transmitted lawfully.

8.2 For transmissions to United States recipients covered by the EU-U.S. Privacy Shield, we transmit personal data on this legal basis. You can find the legal basis here: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.207.01.0001.01.ENG

9. YOUR RIGHTS

You may contact us at any time to exercise your rights.

You are entitled to request that the Eckerö Linjen allows you to access, rectify, or erase your personal data. You may also request that we limit the extent of the data we process on you.

9. YOUR RIGHTS

9.1 Our responsibility for your rights

9.1.1 The Eckerö Linjen is responsible, in its capacity as data controller, for ensuring that your personal data is used in accordance with law and that your rights are effective. You may contact us at any time if you wish to exercise your rights. Our contact details can be found at the bottom of this Privacy Policy.

9.1.2 The Eckerö Linjen is required to respond to your request to exercise your rights within one month of receipt of your request. If your request is complicated or if a large number has been received, we are entitled to extend the time by two months. If we feel that we cannot resolve your enquiry, we are required, within one month of receiving your request, to inform you of the reasons why and to inform you that you are entitled to lodge a complaint with the supervisory authority.

9.1.3 You will not be charged for any information, communication or measures that we implement. However, if your request is manifestly unfounded or excessive, we may charge an administrative fee for providing the information or taking the action requested, or refuse to act on your request altogether.

9.2 Your rights to access, rectify and erase data and restrict processing

9.2.1 You are entitled to request that the Eckerö Linjen grants you

- a) Access to your personal data. This means that you are entitled to request access to personal data that we hold about you. You are also entitled to be provided, at no cost to yourself, with a copy of the personal data that we are using. We are entitled to charge an administration fee for any additional copies. If you make a request in electronic form, e.g. via email, we will provide you with the information in a commonly-used electronic format.
- b) Rectification of your personal data. At your request or on our own initiative, we will rectify, anonymise, erase, or complete data that we know to be inaccurate,

incomplete, or misleading. You are also entitled to complete any incomplete personal data if something relevant is missing.

- c) Erasure of your personal data. You are entitled to request that we erase your personal data if there is no compelling reason for us to continue to use it. Personal data should therefore be erased if:
- (i) it is no longer needed for the purpose for which we collected it,
 - (ii) we use your data on the basis of consent provided by you and you withdraw your consent,
 - (iii) you object to us using your data after an assessment of legitimate interests and we have no compelling interest that overrides your interests and rights,
 - (iv) we have used the personal data in an unauthorised manner,
 - (v) we are legally required to erase your personal data, or
 - (vi) you are a child and we have collected your personal data in connection with the provision of information society services.

However, there may be legal requirements or other compelling reasons that prevent us from immediately erasing your personal data. We will then stop using your personal data for purposes other than compliance with the law or where there are no compelling legitimate grounds for doing so.

- d) Restriction of use. This means that we temporarily restrict the use of your data. You are entitled to request restriction when:
- (i) you consider your data to be inaccurate and you have requested rectification as defined in paragraph 9.2.1 b), while we establish the accuracy of the data,
 - (ii) the use is unlawful and you do not wish the data to be erased,

- (iii) we, as data controllers, no longer need your personal data for our purposes, but you need it to determine, assert, or defend a legal claim, or
- (iv) you have objected to use as defined in paragraph 9.3.1, while waiting for us to consider whether our legitimate interests override yours.

9.2.2 At the Eckerö Linjen, we will take all reasonable measures possible to notify everyone who has received personal data as stated in Section 7 above if we have rectified, erased, or restricted access to your personal data after you have requested us to do so. We will inform you, at your request, about the recipients of your personal data.

9.3 **Your right to object to processing**

You are entitled to object to using by us of your personal data where such use is based on our assessment of legitimate interests or our direct marketing.

9.3.1 You are entitled to object to the use of your personal data if our use is based on an assessment of legitimate interests or the public interest (see Section 3 above). If you object to such use, we will only continue to use your data if we have compelling reasons for doing so that override your interests.

9.3.2 If you do not wish for the Eckerö Linjen to use your personal data for direct marketing, you are entitled at any time to object to such use by contacting us. Once we have received your objection, we will discontinue using your personal information for the purpose of such marketing.

9.4 **Your right to withdraw consent**

For any use based on your consent, you may withdraw your consent at any time and we will stop using your data.

9.4.1 Where we use your consent as a legal basis (see Section 3 above), you may withdraw your consent at any time by contacting us. Our contact details can be found at the bottom of this Privacy Policy. If you withdraw your consent, you may not be able to use our services as intended.

You are entitled to receive or transfer part of your personal data in a structured, commonly used, and machine-readable format.

9.5

Your right to data portability

9.6

You have the right to data portability. This means the right to receive your personal data in a structured, commonly used, and machine-readable format, and to request that such data is transferred to another data controller. The right to data portability only applies when the use of your personal data is automated and our lawful basis for using your data is your consent or a contract between you and us. This means, for example, that you are entitled to obtain and transfer any personal data you entered to create your user account with us, such as your contact details and demographics.

You are entitled to lodge complaints with the Swedish Data Protection Authority.

9.7

Your right to complain to a supervisory authority

9.8

You are entitled to lodge a complaint with the Swedish Data Protection Authority regarding the use of your personal data.

10. WE PROTECT YOUR PERSONAL DATA

We protect your personal data from unauthorised access, change, and erasure.

10. WE PROTECT YOUR PERSONAL DATA

We want you to feel confident at all times about providing us with your personal data. The Eckerö Linjen has therefore taken appropriate security steps to protect your personal data against unauthorised access, change, and erasure. Should a security breach occur that may materially impact you or your personal data, e.g. risk of fraud or identity theft, we will contact you to explain what action you can take to mitigate potential adverse effects of the breach.

11. COOKIES

We use cookies to enhance your experience.

11. COOKIES

At Eckerö Linjen, we use cookies on our website and in our services to enhance your experience with us. We use cookies to simplify and customise our web services, among other purposes. In our cookie policy, we explain in more detail how we use cookies and what choices you can make for our cookies. You will find the policy here.

12. CHANGE OF THIS PRIVACY POLICY

We are entitled to change this Privacy Policy and will notify you if we do.

12. CHANGE OF THIS PRIVACY POLICY

The Eckerö Linjen is entitled to make changes to this Privacy Policy at any time. When we make changes that are not purely linguistic or editorial, you will receive clear information about the changes and what they mean for you before they become effective. If we need your consent to fulfil our obligations to you and you do not agree to the changed terms, you may terminate the agreement with us before the terms come into force.

13. CONTACT INFORMATION

Please do not hesitate to contact us at the Eckerö Linjen should you have any questions.

13. CONTACT INFORMATION

Please do not hesitate to contact us at the Eckerö Linjen should you have any questions about this Privacy Policy, our use of your personal data, or should you wish to exercise your rights.

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