

## Privacy Policy (Integritetspolicy)

### 1. Introduction

Thank you for interacting with Comforta BLP AB, Swedish registration number 556594-0607 or BLP I Älmhult AB, Swedish registration number 556726-5425 with office at Fornahässlevägen 16 283 96 Killeberg, Sweden (“Comforta” or “we” or “us”) and/or visiting our Website(s). In this privacy policy (“Privacy Policy”), we describe what Personal Data we collect, as well as how and why we do so, when potential and existing Customers, Suppliers, Partners or other stakeholders visit our Website(s) and/or purchase/use our products/services. Our Privacy Policy also explains how we use and publish your Personal Data.

We process and protect Personal Data with the utmost care and attention. Whenever we process Personal Data, we are committed to comply with applicable data protection legislation, including the General data protection regulation (2016/679/EU), the “GDPR”, entering into force on the 25 May 2018. It will replace the current Personal Data Protection Act.

### 2. General information

#### 2.1 Definitions

The following definitions will be used in our Privacy Policy.

When the term “Customer” is used in this Privacy Policy, we mean an employee of an organization which has bought any of Comforta’s products, services or solutions, or has requested an offer attributable to our products, services or solutions.

The term “Supplier” refers to an employee of an organization that supply Comforta with products or services.

The term “Subscriber” refers to someone who has subscribed to one of our newsletters through a subscription form on one of our Websites, or has consented to receive newsletter via any other form used for downloading or further accessing content or via request forms.

The term “Partners” refers to a person or organization hires by Comforta to provide services.

The term “Personal Data” refer to information which can, directly or indirectly, be used to identify a living physical person: for an example, your first and last name, telephone number, email address and gender.

The term “Website/s” refers to the Websites listed below, web pages, interactive features, applications, widgets, blogs, social media, social media tabs or other online or mobile content that links to this Privacy Policy. This online content can be displayed on a computer, smartphone or other type of device or in a different manner.

We collect the majority of the collected Personal Data on our Websites listed below.

[www.comforta.se](http://www.comforta.se)

#### 2.2 Changes in the Privacy Policy

We may modify the content of this Privacy Policy at any time. The most recent version is indicated by the version number and the date found at the bottom of this Privacy Policy. All updates and changes enter into force immediately. We will publish a revised version of the Privacy Policy on our Websites whenever a new modification has been made and include a link to the latest version of the Privacy Policy in the footer of our newsletters or communicate the changes in some other manner.

Since this Privacy Policy is subject to a continuous modification in accordance with above, we recommend that you regularly consult this Privacy Policy to stay up to date on any changes that may be relevant for you. Our copies of this Privacy Policy – saved electronically or otherwise – are the real, complete, valid, authentic and enforceable copies of the version of the policy that was in force on the date on which we acquired your Personal Data.

### 2.3 Scope

This Privacy Policy takes precedence and pertains to – and respects – all information that we collected or will collect about and/or from you. If applicable, we employ separate terms of use for which we will always ask separate, deliberate permission.

### 2.4 How to contact us

Comforta is the data controller responsible for processing your Personal Data in accordance with applicable data protection legislation. If you have any questions, remarks and/or complaints regarding the processing of your Personal Data or regarding matters pertaining to privacy or if you want to update, delete or modify your Personal Data, you can contact us at:

Comforta BLP AB

Attention: GDPR

Box 137

343 22 Älmhult

Sweden

[bjorn@comforta.se](mailto:bjorn@comforta.se)

## 3. The type of Personal Data that we process

### 3.1 The Personal Data that you voluntarily provide to us

When you purchase our products and/or services, send us an email, integrate our services with a different website or service or communicate with us in any other way, you provide us with information containing Personal Data, which we collect.

Depending on where and for what purpose you enter this information, it contains: your name, address, personal information, general information pertaining to your organisation and position, user data, payment information, IP number, address, phone number and information pertaining to your interests in business. By providing this information to us, you agree to let us gather, use and store this information for the purpose in question.

If you are a Customer to us, when you purchase our products and/or services, if you signed up for one of our newsletters, events or other services or visit our Websites, we collect information containing Personal Data from you when you contact or interact with us. This includes when you contact us via telephone or email as well as when you meet us in person. Depending on how you contact or interact with us, this information contains your IP address, your operating system, your browser ID, your browser activity and other information pertaining to your visit to our Website(s). We collect this information as part of our log files, but also through the use of cookies or other tracking technologies. Information about how we store and use cookies is described in our cookie policy, available at <https://www.comforta.se>. Comforta further collects Personal Data if you purchase one of our products and/or services.

It is always voluntarily to provide us with any additional information about yourself and we will respect and honor your decision to not provide us with such information.

### 3.2 Personal Data that we collect in order to provide third parties with information

The services "forward a link to a friend" and "share this article" requires the email of the person to whom the Subscriber/Website visitor wants to send a link/article. We permit the Subscriber/Website visitor to share our Website content with the person whose Personal Data the Subscriber/Website visitor entered. We will only use the Personal Data entered by the Subscriber/Website visitor once in order to send the link or article to requested person. After such usage, we have no longer access to the Personal Data entered by the Subscriber/Website visitor.

### 3.3 Personal Data which Comforta collects from other sources

We may receive information about you, e.g. your operating system, your browser ID, demographical information, IP addresses, location, your organisation and your website history, by performing a search on the internet or using (third-party) tools.

## 4. Why we process your Personal Data

Comforta collects Personal Data relating to you for the following reasons:

- i. to send newsletters that you have requested and to respond to communications you have sent us;
- ii. to provide products and services you have requested;
- iii. to market ourselves and our products and services to both new and existing Customers through for an example campaigns and sending you invitations to events we believe might be of interest to you;
- iv. to develop and improve our products and services through for an example questionnaires;
- v. to fulfil requirements by law;

## 5. The legal grounds for processing Personal Data

We process Personal Data for the following purposes:

### 5.1 Legal obligation

Comforta may process your Personal Data for the purpose of complying with safety standards and other applicable statutory requirements, based on the legal ground that this is necessary for compliance with a legal obligation to which Comforta is subject.

#### 5.2 Performance of a contract

We record which organisations use our products and services, along with their relevant contact persons. We process the Personal Data of these contact persons in order to meet our contractual obligations.

#### 5.3 Legitimate interest

The legal basis for processing Personal Data such as technical data when you browse the Websites listed under section 1.1 above is that the processing is necessary for the purpose of the legitimate interest of Comforta. The legitimate interest of Comforta may also constitute the legal basis for processing in situations where you provide us with your contact information or otherwise has expressed an interest in our products or services.

#### 5.4 Consent

Comforta's processing of your Personal Data is in some cases based on your consent where you provide us with your name, email address, company and interest by signing up to our newsletter or our subscription service on our Websites or in cases where you provide us with additional voluntarily information about yourself. You can at any time withdraw your consent to such processing either by clicking the unsubscribe link at the bottom of our newsletter or by contacting us on the following e-mail address: [bjorn@comforta.se](mailto:bjorn@comforta.se). As soon as you withdraw your consent, we will delete all of your Personal Data processed on the legal ground consent.

#### 6. For how long do we store your Personal Data?

Your Personal Data is only stored for as long as there is a need to keep the data in order to fulfil the purposes for which the data was collected in accordance with this Privacy Policy. Personal Data will be deleted if:

- i. The purpose of the collection and use of Personal Data has been achieved; or
- ii. You withdraw your consent (if applicable) to the collection of Personal Data by contacting us (for contact information, please see section 1.4 [and 5.4] above).

#### 7. How may the data be shared?

Comforta takes your right to privacy very seriously and will not sell trade or lease your Personal Data to third parties unless you give us unequivocal permission to do so. However, Comforta may share Personal Data with our trusted subcontractors in order to provide you with our services. We may also use your profile/interests to find similar profiles.

#### 8. The protection of your Personal Data

You should always feel secure when you provide your Personal Data to us. We have employed appropriate technical and organisational security measures to help protect your Personal Data

against undue access, modification, deletion and any other unlawful form of processing. The security measures taken are appropriate to the risk. These measures include for example new password policies, firewalls, automatic timeouts etc.

## 9. Your rights

Under the GDPR, you have a number of rights. Your integrity is very important to us and we always strive to protect and secure your Personal Data in the best possible way. Nevertheless, should we, in your opinion fail in this ambition please note that you are also entitled to lodge a complaint with the Data Protection Agency in your country, or such other authority as may be determined in the future.

### 9.1 Information

It goes without saying that you are entitled to gain insight into which Personal Data of yours we process for viewing.

### 9.2 Rectification and objection

If you believe the Personal Data in our possession relating to you is incorrect, you have the right to have such Personal Data updated, corrected and/or complemented. You may also object to the processing. Such request shall be provided to Comforta in writing (via email or regular post, please see contact information in section 1.4 above). We will treat your request with care and get back to you as soon as possible.

### 9.3 Right to be forgotten

You have the right to, under certain circumstances, have your Personal Data deleted if such Personal Data is no longer necessary for fulfilling the purpose of which they were collected and if Comforta haven't got any other obligation to process the Personal Data.

### 9.4 Restriction of use and data portability

If you believe we are carrying out unlawful or incorrect processing of your Personal Data, you can request restriction of our processing of your Personal Data. The restriction of the processing will be applicable during the period of time it takes for Comforta to investigate whether or not the processing is unlawful or incorrect.

The right to data portability is a new right given to you under the GDPR, meaning that you may, under certain circumstances, have your Personal Data resubmitted to you in a structured and accessible format, for transfer to another user/processor.

## 10. Requests and complaints

If you wish to exercise any of the above mentioned rights or if you have any questions regarding the Personal Data held by us or this Privacy Policy, please do not hesitate to contact us (for contact information, please see section 1.4 above).

We do our best to meet the requirements assignable to applicable data protection legislation. Should you be dissatisfied with our processing of your Personal Data, please let us know, and we will do our best to meet your complaints.

Enforcement date: May 25th, 2018

Latest update: May 1st, 2018