

ZUAVE PRIVACY POLICY

Scandinavian Good Business AB (hereinafter **SGB** or **us**) considers it important that customers (hereinafter also **you**) understand when we collect their personal data and how we use it. The purpose of these privacy terms is to explain to you the conditions of use of personal data.

These privacy terms apply to natural persons who visit our website <https://zuaverazor.com>, make a purchase in [Zuaverazor.com](https://zuaverazor.com) e-shop or are in contact with us by e-mail, telephone or via social media for purchasing of Zuave products.

SGB has the right to unilaterally change these privacy terms in the event of a changes in personal data protection legislation or our own data processing practices. We will notify you of any changes 1 month before the changes take effect on our website. The latest version of the privacy terms is always available on our website <https://zuaverazor.com>.

Definitions

In order for you to understand these privacy terms better we hereby explain the main data protection terms used herein.

GDPR means the General Data Protection Regulation (EU) 2016/679), implementation of which started on 25 May 2018 and which directly applicable in all European Union member states.

Personal data means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, by a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller means the entity that decides why and how the personal data is processed.

Processor means the entity which processes personal data on behalf of the controller.

1. Controller of your personal data:

The controller of your personal data:
Scandinavian Good Business AB (hereinafter **SGB**)
Registry code: 556991-0127
Address: Gotlandsgatan 46, 1TRN, 116 65 Stockholm, Sweden
E-mail: info@sgbab.se

2. What type of personal data do we collect and process?

When buying from the e-shop - first and last name, personal identification code, e-mail address, telephone number and postal address for delivery of goods.

When contacting us - personal information contained in the request (e.g. name, e-mail address, telephone, etc.).

When ordering via phone – first and last name, personal identification code, e-mail address, telephone number and postal address for delivery of goods. We also record accepting of orders in outbound calls and inbound calls resulting in order, for verification of orders.

When visiting our website – our website use cookies in accordance with your preferences and as indicated in the cookie notice popping up when you enter our website.

When running credit and background checks – we may run credit and background check analysis in consultation with our invoicing partner to make sure that both parties are able to fulfil the agreement.

When sending direct marketing messages / offers – first and last name, e-mail address and/or telephone number (depending on which channel you have chosen for direct e-marketing). This is only if you have consented to direct e-marketing. In case of other type of direct marketing (e.g. telemarketing, postal marketing) we may also rely on our legitimate interest.

Generally, you provide us with your information yourself when you order our products or when you inquire about products. When running background and credit checks we also obtain information from credit and public registers.

3. What are the purposes and legal basis for processing your personal data?

We process your personal data for various purposes. Irrespective of the purpose of the processing, there must be a legal basis for the use of the data for any purpose. In assessing our data processing, we have established that we process your personal data on the four legal bases described below.

✓ Data processing required for performance of contract

We process data relying on this legal basis if it is necessary for performance of the contract concluded with you or for taking measures required prior to signing the contract at your request.

✓ Data processing needed for performance of our legal obligations

In some cases, we need to process your personal data because we are obliged to do so under applicable laws. If the data processing is required by law, neither we nor you can influence the processing of such data.

✓ Data processing based on our legitimate interest

A legitimate interest means that we do not directly need to process your data to fulfil contractual obligations nor our legal obligations, but the processing is still necessary. For example, to develop our products and services - by doing profile analysis; to make the right business decisions - by making statistics, etc.

Based on our legitimate interest we may also send you our marketing materials by regular mail or call you to introduce new products. We do this based on your former orders and with the assumption that you may be interested in similar products. You may always ask us to stop such marketing if you are not interested. If you cancel your subscription, we may, based on our legitimate interest, continue to use your data for the purposes of marketing for up to three years.

As under the legitimate interest we are not obligated to process your data by law or for performance of our contractual obligations and we also do not ask for your permission for the processing, according to GDPR you have the right to ask for explanations as well as to present objections, if you consider that the processing of your data on the basis of a legitimate interest overly hurts your privacy and rights.

✓ Data processing based on your consent

If you consent to this, we will send you our newsletters and offers on our products and services. We may also allow our selected business partners to contact you for direct marketing purposes if you have consented to this.

You always have the right to withdraw you consent (each separately and all jointly) granted to us by contacting us at the e-mail address provided in section 1 of these privacy terms or in case of direct e-marketing by using the unsubscribe link at the bottom of every subsequent marketing message. If you withdraw your consent, we will stop processing your data for the purposes for which the consent was

granted. However, withdrawal of the consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Examples of our data processing purposes and legal basis.

Purpose of processing	Data concerned	Legal basis
Pre-contractual relations (offer requests and responses thereto)	Name, e-mail address, telephone number	Performance of contract
Credit and background checks	Name, personal ID code, payment default information	Legitimate interest
Receiving and fulfilling orders, forwarding information related to orders	Name, e-mail address, telephone number, delivery address	Performance of contract
Invoicing (compiling and sending invoices)	Name, e-mail address, address	Performance of contract
Customer service (informing, correcting incorrect information, resolving complaints, notifying of changes in sales conditions)	Name, e-mail address, telephone number, delivery address	Performance of contract
Recording customer orders made via phone	Name, e-mail address, telephone number, delivery address, SSN	Performance of contract
Accounting (incl. retaining of accounting base documents)	Name, e-mail address, order information	Legal obligation
Responding to information requirements of public authorities and state agencies to the extent provided by law	All required data	Legal obligation
Compilation of sales statistics, general product development	Using aggregated (not identifying data)	Legitimate interest
Recording incoming customer calls for assessing and development of our customer service	Name, e-mail address, telephone number, delivery address	Legitimate interest
Profiling, segmentation (product development, targeted and general offers, discounts)	Name, e-mail address, e-shop purchase data	Legitimate interest
Processing of legal claims	Name, e-mail address, order information, communication information	Legitimate interest

Direct marketing by phone and regular mail (SGB products)	Name, phone number, address	Consent Legitimate interest
Direct marketing by e-mail/SMS (SGB product offers, newsletters)	e-mail address and / or telephone number (depending on the chosen marketing channel)	Consent

4. Who else processes your data?

All our customer data and sales activities are handled by SGB. Your personal data is accessible only to those employees of SGB who need the data to perform their work duties (on so-called need-to-know basis). Outside the SGB, the following persons will have access to your data in the situations described below, if this is necessary to achieve the purposes of the processing:

- ✓ **Persons providing services to us:** Your data is accessible to persons providing services to us (data processors) and processing your data on our behalf and to the extent needed to perform such services:
 - E-store software provider
 - Website cookie manager
 - Mail server provider
 - Data analysis software provider
 - Fulfilment service provider
 - Postal and courier service providers
 - Invoicing and payment collection service provider
 - Sales and customer service provider
- ✓ **Public authorities and state institutions (e.g. police, courts, alarm centre, Data Protection Inspectorate):** we will only disclose your data when and to the extent we are legally obliged to do it.
- ✓ **Third parties in connection with corporate transactions:** We may share your information with third parties in the context of a corporate transaction, such as the sale of a company or its business/assets to another company. Also, in the context of the creation of a joint venture, merger or other reorganization.

As a general rule, your personal data is processed in the European Economic Area (EEA). However, if there is a need to transfer the data out of EEA, we follow GDPR requirements regulating such transfers.

5. How long do we retain your personal data?

Your personal data is retained for as long as required by applicable law or as long needed to fulfil the data processing purposes described in these privacy terms.

You can obtain more specific information on retention of your personal data by making a corresponding query to the e-mail address provided in section 1 of these privacy terms.

6. Your rights concerning your personal data

Right to access – You have the right to know which data we hold about you, for what purposes we process your data; to whom we disclose the data, how long the data is retained; what are your rights concerning restricting, correcting, deleting and processing data. In order to respond to your inquiry, we must first authenticate you to avoid granting information to unauthorised persons. We have the right to respond to your inquiry within 30 days.

Right to rectification – You have the right to demand correction of your personal data in case it is inaccurate or incomplete.

Right to deletion of personal data – You have the right under certain circumstances to request the deletion of your personal data, foremost if the basis for processing your data originates from our legitimate interest or your consent (e.g. if we no longer need the data, you withdraw your consent granted for processing of your personal data).

Right to restrict processing – You have the right under certain circumstances to forbid or restrict the processing of your personal data for a certain period (e.g. if you have submitted an objection concerning data processing).

Right to present objections – You have the right to present objections concerning such data processing which is based on our legitimate interest incl. profiling based on our legitimate interest. We shall stop processing your personal data when you present an objection, unless your personal data is processed for material legal reasons (which is decided case by case).

Right to data portability – In case processing the personal data is based on your consent or on a contract between us and data is processed automatically, you have the right to access data concerning you which you have given to us in a structured, generally usable and in machine readable form. You also have the right to ask us to send such data directly to another service provider if that is technically possible (that means the other service provider is capable of receiving the data in the forwarded format).

If you want to exercise any of the abovementioned rights, please contact us at the e-mail address provided in section 1 of these privacy terms.

7. The right to submit a complaint to the Data Protection Inspectorate and the court

Should you need further information about processing your personal data or exercising your rights, please contact us at the e-mail address provided in section 1 of these privacy terms.

We will treat your personal data and your privacy with great care and respect by following all applicable laws and regulations. However, if you think that the processing of your personal data breaches the legal requirements, you have the right to turn to the Data Protection Inspectorate and the courts to protect your rights and interests.