

## Information about Fluicell AB's compliance with the EU's General Data Protection Regulation (GDPR)

The following provides a brief description of what Fluicell AB, organization number 556889-3282, is doing to comply with GDPR.

### Introduction

Fluicell AB (herein referred to as Fluicell) continuously strives to protect individual rights to privacy by ensuring that all personal data is handled in accordance with applicable laws and regulations.

Fluicell has taken several measures, both organizational and technical, to protect personal data from unauthorized access. As such, personal data are accessible, secure, and cannot be altered unintentionally or by unauthorized parties. We adapt our policies, routines and security in compliance with changes in the business and technological advances.

### Background

Sweden's Personal data Act (*Sw. Personuppgiftslag (1998:204)*) has been into force since 1998 and is based on the EU's Data Protection Directive 95/46/EC. According to Section 1, "*The purpose of this Act is to protect people against the violation of their personal integrity by processing of personal data*".

The EU General Data Protection Regulation 2016/679 (GDPR) replaces the Data Protection Directive and is designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organizations across the region approach data privacy. It regulates the processing by an individual, a company or an organisation of personal data relating to individuals in the EU. GDPR became fully enforceable throughout the European Union on the 25th of May 2018.

### Definition

**Personal data:** is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

**Data processing:** Processing covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

### **Purpose**

The purpose of the privacy policy is to outline how Fluicell is processing and protecting personal data.

Fluicell makes sure that all personal data is treated carefully and in compliance with applicable laws and regulations.

### **Communication**

Fluicell is processing your personal data to be able to fulfill commitments towards you as customers and/or shareholders. We also collect information regarding those you want to be contacted by us. We may use your personal information to communicate relevant information about Fluicell that may be of interest to you. If you do not want to receive such communication, you are welcome to contact us or unsubscribe from our mailing list.

### **IT security**

Fluicell works continuously to improve its IT security, to better protect personal data, through the use of offline storage where appropriate. Only professional grade media is used to store or transfer personal information.

### **Storage and deletion of personal data**

Fluicell does not store personal data any longer than is necessary to fulfil the purpose for which it was originally obtained. Personal data which is inaccurate having regard to the purpose for which it was originally obtained is erased, archived and encrypted offline, or rectified without undue delay.

Personal data from those who are subscribers to our newsletter, will be stored as long as the subscription is active.

### **Right to access, rectification and deletion**

At any time, it is your right, free of charge, to request a copy of your personal information retained by us.

You are entitled to modify any incorrect or incomplete personal information and to withdraw your consent which was given at the time of the collection.

You have the right to have your personal data deleted under the following conditions:

- The information is no longer needed for the purpose for which it was collected;
- Your consent is being revoked;
- Your personal data has been processed illegally;
- You don't agree with the treatment for direct marketing purposes.

However, the above-mentioned right to deletion doesn't apply when keeping the data is obliged by law.

### **Countries in which personal data is stored and processed**

Personal data received by Fluicell is processed and stored in the EU or the EEA, *i.e.* they are not transferred to or processed in third countries.



### **Employees**

Employees who come in contact with personal data have received comprehensive information about GDPR, and how personal data shall be processed.

### **Customers/Shareholders**

Shareholders' personal data is handled by Euroclear Sweden (Euroclear Sweden AB, reg: 556112-8074 with headquarter at Klarabergsviadukten 63, Po Box 191, SE - 101 23 Stockholm). Under Swedish law, as the Swedish Central Securities Depository, Euroclear Sweden is the controller of the personal data and is therefore responsible for processing it in accordance with the law.

Customers personal data is handled through a CRM system acting as data processor, providing a secure platform to protect our customer's data.

Webinars Participants personal data' are being stored onto a secured platform which is using encryption technologies to protect data in transit and at rest with regular security testing.

### **Who is responsible for the personal data collected?**

Fluicell AB, organization number: 556889-3282

Flöjelbergsgatan 8C

431 37 Mölndal Sweden

Is personally responsible for the personal data collected and processed by the company. We ensure that such treatment is done in compliance with applicable legislation.

For further information related to the management of personal data, please contact us at:

Info@fluicell.com

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