

# PRIVACY POLICY

Svea Solar is concerned about your privacy and committed to give you information about how we collect, use, transfer and store your personal data. When you contact us, buy, use our products, services, and technologies, or interact with us as a business partner, we handle your data as described in this policy.

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## WHAT THIS PRIVACY POLICY COVERS

This privacy policy concerns the processing of personal data carried out by Svea Renewable Solar AB with organizational number 556955–1350. The company, hereinafter referred to as “Svea Solar”, is the data controller of the processing of your personal data concerning your dealings and contacts with Svea Solar. As a data controller, Svea Solar cares about your privacy. We are responsible for ensuring that your data is handled correctly and securely in accordance with applicable law. If you have any questions regarding our processing of personal data, you are welcome to contact us:

E-mail: [dataskydd@sveasolar.com](mailto:dataskydd@sveasolar.com)

Phone: +46 10 171 26 40.

Postal address: Svea Renewable Solar AB, St Eriksgatan 117, 113 43 Stockholm, Sverige

If you want to exercise your rights under the General Data Protection Regulation 2016/679 (GDPR) please contact us via <https://form.idkollen.se/sveasolar/begaran>. Your rights are further described in this policy and you can read more about the regulation on the website of the Swedish Authority for Privacy Protection.

## PERSONAL DATA COLLECTED AND PROCESSED

Svea Solar is collecting both directly identifiable information and indirectly identifiable information about you. Directly identifiable information is any information that can identify you without any additional data, such as your name, home address, postal address, phone number, bank details etc. Indirectly identifiable information is information that does not identify you directly but may be linkable to you, such as some technical information from the products you have installed.

**The different types of personal data Svea Solar may process are:**

- **Personal- and contact details**, such as name, social security number, home address, email address, phone number, demographics such as gender, language.
- **Information about your interest in our products and services**, such as specifics about when you wish to purchase and install our products and services, location and specifics about your property and your electricity consumption.
- **Agreement and transactional data**, such as information about inquires, orders and purchases, payment status, invoices, subscriptions and opt-outs, recordings of customer service calls and support interactions.
- **Specifics about your real estate and usage of your solar solution**, such as real estate number, grid meter, pictures and videos of the property and technical and usage data of the solar cell system or other products and services.
- **Payment and credit data**, such as your credit card details, and bank account details needed to verify purchases or make repayments and creditworthiness.
- **Online data and identifiers**, such as data collected by cookies or similar technologies about your use of our services, eg. your IP-address, device identifiers, how you interact with our digital channels such as websites, app and e-mail.
- **Customer survey data**, such as your answers to surveys about your experience as a customer.
- **Role and other details about profession or company**, such as professional title and other information that we may collect when interacting with you as a business partner/customer.





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## HOW PERSONAL DATA IS COLLECTED

***The personal data Svea Solar collects and processes come from different sources:***

- ***You***, when you show interest in, buy, or use our products and services, call our customer service, interact with our installation team or other employees, subscribe to a newsletter, participate in a survey, contact us as a supplier or business partner, visits our website or interacts with us in other ways.
- ***Third party***, such as address registry, credit or debt collector agencies, installation partners, marketing agencies, other entities within the energy industry and other types of partners.

## PURPOSES AND LEGAL BASES FOR AND RETENTION OF PERSONAL DATA

Svea Solar processes your personal data for specific purposes based on agreement, consent, legal obligations, or legitimate interest. Here you can read about what data we use for what purpose and on what legal basis. We also describe data retention, which is connected to the purposes set out in this policy and/or to meet legal and regulatory requirements. After this period, we will securely erase personal data. If data is needed after this period for analytical, historical, or other legitimate business purposes, we will take appropriate measures to anonymize this data.

## TO PROVIDE NEWSLETTERS WITH THE LATEST ABOUT SOLAR POWER

### **Examples of what we do and why:**

At Svea Solar, we want to provide inspiration and news about product, services and solutions that support the journey towards a fossil free future. We may therefore offer the opportunity to subscribe to such send-outs to those who are interested, i.e., not only consumers with a purchase intent or our existing customers. If you are not a customer nor have shown purchase intent but subscribes to our newsletter, we will ask for consent to use your contact data for this specific purpose.

### **Types of personal data:**

- *Personal- and contact details*
- *Online data and identifiers*

### **Legal basis for processing this personal data:**

- *Consent*

For the use of Online data and identifiers the legal basis is your *Consent*. You can opt-out from our send-outs and thereby withdraw your consent at any time, we will then stop using your data for this specific purpose.

### **Data retention for this personal data:**

*The data retention described below is valid for all types of personal data, if not stated otherwise.*

*We will keep your data until you withdraw your consent.*

*Specifics for Online data and identifiers:* Depending on the purpose of the cookie, different types of cookies will be stored for different periods of time. You can read more about the retention periods for cookies in our [cookie policy](#).




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## TO DECIDE AND SEND OFFERS, SALES, AND MARKETING COMMUNICATION

### **Examples of what we do and why:**

We collect and use personal data about you to create cost estimations and manage our dialogue. We provide offers and marketing communication adapted to your specific preferences, behavior, needs and lifestyle. We may send you news and offers related to your current products and services, and we may also market additional products and services that may suit your needs. Furthermore, we provide information and inspiration on the journey towards a fossil free future, e.g., newsletters, primarily via e-mail.

### **Types of personal data:**

- *Personal- and contact details*
- *Information about your interest in our products and services*
- *Agreement and transactional data*
- *Specifics about your real estate and usage of your solar solution*
- *Payment and credit data*
- *Online data and identifiers*
- *Customer survey data*
- *Role and other details about profession or company*

### **Legal basis for processing this personal data:**

- *Legitimate interest*

For the use of Online data and identifiers the legal basis is your *Consent*. You can opt-out from our sales, marketing and offers send-outs by clicking on the link provided in the send outs or by disabling push messages in our applications. We will then stop using your data for this purpose.

### **Data retention for this personal data:**

*The data retention described below is valid for all types of personal data, if not stated otherwise.*

Your personal information will be stored as long as the agreement is operative.

*If you have contacted us without becoming a customer and does no longer have a dialogue with us:* The personal data you have provided will be deleted after you have been inactive for two years. We need your information during this time since the process for purchasing solar cells can be relatively long, for example in new construction and replacing of roofs, and we need to be able to see the history of previous interaction with you.

*Specifics for Payment and credit data:* Information about your creditworthiness may be processed until we have assessed your credibility. The information will be deleted one month after assessment.

*Specifics for Online data and identifiers:* Depending on the purpose of the cookie, different types of cookies will be stored for different periods of time. You can read more about the retention periods for cookies in our [cookie policy](#).





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## TO ADMINISTER OUR CUSTOMER RELATIONSHIP

### **Examples of what we do and why:**

We collect and use personal data about you to create cost estimations, process orders, deliver and install products and services, provide customer service, and manage payments, agreements, and transactions. The data needed to deliver our services varies depending on the product or service in question. For example, online and app services may require the user to authenticate, while solar cell installation require us to take drone photos. Administering our customer relationship includes sending information and updates to you related to your products and service.

### **Types of personal data:**

- *Personal- and contact details*
- *Information about your interest in our products and services*
- *Agreement and transactional data*
- *Specifics about your real estate and usage of your solar solution*
- *Payment and credit data*
- *Online data and identifiers*
- *Customer survey data*
- *Role and other details about profession or company*

### **Legal basis for processing this personal data:**

- *Contractual performance*

For the use of Online data and identifiers the legal basis is your *Consent*.

### **Data retention for this personal data:**

*The data retention described below is valid for all types of personal data, if not stated otherwise.*

Your personal information will be stored as long as the agreement is operative.

*Specifics for Payment and credit data:* Information about your payment and transactions are stored until the seventh year following the end of the calendar year which the financial year ended.

*Specifics for Online data and identifiers:* Depending on the purpose of the cookie, different types of cookies will be stored for different periods of time. You can read more about the retention periods for cookies in our [cookie policy](#).

*If the agreement is terminated:* Our warranty commitments stretch over long periods of time, often at least 20 years. We need to be able to handle your information during this time. If there is a change of property ownership, we can upon your request delete your personal information. *Specifics if you are leasing your solar panels:* When the leasing agreement has terminated, your personal information is stored for a maximum of 24 months.





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## TO IMPROVE AND DEVELOP PRODUCTS, SERVICES, AND CUSTOMER EXPERIENCE

### **Examples of what we do and why:**

We process personal data to develop and improve our products and services, to support decision-making within the business and to consider our customers' feedback and needs. This is done, for example, by collecting feedback directly from users through NPS surveys and other forms of market research, by using recorded or transcribed telephone calls for training and service quality improvement and by using installed product performance data.

Data processing for our product and service development is done with de-identified data to the extent possible. In analysis, we do not process identifying data, but aggregate large amounts of service usage data to create statistical models, reports, forecasts, and trend analyzes to support business decision-making.

### **Types of personal data:**

- *Personal- and contact details*
- *Information about your interest in our products and services*
- *Agreement and transactional data*
- *Specifics about your real estate and usage of your solar solution*
- *Payment and credit data*
- *Online data and identifiers*
- *Customer survey data*
- *Role and other details about profession or company*

### **Legal basis for processing this personal data:**

- *Legitimate interest*

For the use of Online data and identifiers the legal basis is your *Consent*.

### **Data retention for this personal data:**

*The data retention described below is valid for all types of personal data, if not stated otherwise.*

Your personal information will be processed as long as an agreement is operative or as long a non-customer have an active dialogue with us.

*Specifics for Payment and credit data:* Information about your payment and transactions are stored until the seventh year following the end of the calendar year which the financial year ended.

*If you have contacted us without becoming a customer and does no longer have a dialogue with us:* The personal data you have provided will be deleted after you have been inactive for two years. We need your information during this time since the process for purchasing solar cells can be relatively long, for example in new construction and replacing of roofs, and we need to be able to see the history of previous interaction with you.

*Specifics for Online data and identifiers:* Depending on the purpose of the cookie, different types of cookies will be stored for different periods of time. You can read more about the retention periods for cookies in our [cookie policy](#).





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## TO HANDLE GREEN TECHNIQUE SUBSIDY

### **Examples of what we do and why:**

For subsidy reasons, we also collect and use personal data about other individuals provided by you, primarily people who co-own your property.

### **Types of personal data:**

- Personal- and contact details
- Specifics about your real estate and usage of your solar solution
- Agreement and transactional data

### **Legal basis for processing this personal data:**

- Legal obligation

### **Data retention for this personal data:**

This personal information will be stored as long as the agreement is operative.

## TO ADMINISTER RELATIONSHIPS WITH SUPPLIERS AND OTHER PARTNERS

### **Examples of what we do and why:**

We process personal data when we are in contact with an individual at a supplier or a business partner. We may also process personal data to fulfil our part of the contract with your company or organization and to manage our warranty commitments and other commitments regarding purchased products and services.

### **Types of personal data:**

- Personal- and contact details
- Online data and identifiers
- Role and other details about profession or company

### **Legal basis for processing this personal data:**

- Contractual performance

For the use of Online data and identifiers the legal basis is your *Consent*

*During business dialogues and negotiations we will process personal data based on legitimate interest.*

### **Data retention for this personal data:**

*The data retention described below is valid for all types of personal data, if not stated otherwise.*

Your personal information will be stored as long as the agreement is operative or as long as needed according to warranty commitments.

*If you have contacted us/we have contacted you without you becoming a business partner and does no longer have a dialogue with us:* The personal data you have provided will be deleted after you have been inactive for two years.

*Specifics for Online data and identifiers:* Depending on the purpose of the cookie, different types of cookies will be stored for different periods of time. You can read more about the retention periods for cookies in our [cookie policy](#).





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## SHARING PERSONAL DATA WITH THIRD PARTIES

For Svea Solar to be able to provide our products and services, it becomes necessary to hire services from external parties such as suppliers, partners, and regulatory authorities, for example to manufacture solar panels or to provide IT systems maintenance and support, that may handle your personal data. We may also engage external parties to handle sales, marketing and communication, e.g. to sell our products and services or to conduct a customer survey. When we hire an external party for the processing of personal data on behalf of Svea Solar, we enter a data sharing agreement ensuring that the processor will only process the personal data according to the instructions given by Svea Solar, and that the processor will take the necessary technical and organizational measures to protect the data.

Svea Solar may share personal data required by authorities to apply for specific subsidies that individuals are entitled to connected to a solar energy installation. In certain cases, Svea Solar could also be required by law to disclose personal data to governmental authorities and law enforcement, such as the police or tax authority if this is necessary to comply with laws, regulations, or a government decision, or to enable Svea Solar to institute, exercise or substantiate legal claims.

Our websites may contain links to third-party websites. Any access to and use of such linked websites is not governed by this policy, but instead governed by the privacy policies of those third-party websites.

## ABOUT ONLINE DATA AND IDENTIFIERS - COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop, or mobile device. Cookies help us to provide important features and functionality on our websites and mobile apps, and we use them to improve your customer experience. Please see our separate [cookie policy](#).





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## PROTECTING YOUR PERSONAL DATA

Svea Solar uses appropriate security measures to protect your personal information from unauthorized access and use. We limit access to personal data only to the employees that will need it to perform their tasks. The computers and servers we use to store personal data are in a secure environment. We regularly test our safety and educate our staff. We also use encryption and take back-ups of the data in most of the IT-systems we use.

We primarily process your data within the EU/EEA. If your personal data is transferred to a country outside the EU/EEA, Svea Solar will take the necessary measures to lawfully transfer the data by ensuring that your personal data is processed securely with an adequate level of protection, comparable to the protection provided within the EU/EEA.

The legal basis for transfers to third countries is using the standard contractual clauses adopted by the European Commission in a data processing agreement with the third country recipient, eventually with supplementary measures complementing the standard contractual clauses to ensure an equivalent level of protection as if your personal data was only processed within the EU/EEA.

## YOUR RIGHTS – ACCESSING AND UPDATING YOUR PERSONAL DATA AND COMPLAINTS

This part of the policy describes your rights in relation to our processing of your personal data. If you wish to exercise a right, please contact us via <https://form.idkollen.se/sveasolar/begaran> or use the contact details provided at the top of the policy.

**Right to access** If you want to know what data we process about you, you can ask to get access to a copy of the data. To protect our customers' personal data, we may have to verify your identity before we can act on your request.

**Right to rectification** You can ask to have your personal data corrected if it is inaccurate or incorrect. In addition, you have the right to supplement any incomplete personal data.

**Right to erasure** You have the right to request Svea Solar to delete your personal data. Exceptions to this right is when there is a legal obligation for us to store the data. These obligations may come from accounting and tax legislation, banking or money laundering legislation or from consumer legislation. Our processing could also be necessary for Svea Solar to establish, assert or defend legal claims. If we are prevented from fulfilling a request to delete your data, we will make sure that we prevent your personal data from being used for other purposes than the purposes which prevents the requested erasure.

**Right to data portability** You have the right to data portability, which means you have the right to transfer your data to another controller, if technically possible. This applies to the data you have provided to Svea Solar yourself.

**Right to restrict processing** You have the right to request restriction of our processing of your personal data. If you have found that the data about you is incorrect, you can request a limited processing during the time we check the accuracy of the





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data. If you have objected to our legitimate interest as the legal basis for the processing, you can request limited processing during the time we assess whether our legitimate interest outweighs your interest of having the data deleted.

**Right to object** You have the right to object to certain processing based on our legitimate interest, such as marketing. You have the possibility to unsubscribe from marketing communications in each direct marketing e-mail we send to you. If you object to direct marketing, we will no longer process your personal data for that purpose. Regarding personal data processed for another purpose than marketing, we will assess whether our legitimate interest of the processing overrides your interests, rights, and freedoms, or whether your personal data is necessary for the establishment, exercise, or defense of legal claims.

**Rights in relation to automated decision-making and profiling** You have the right to receive meaningful information about the logic involved and the consequences of any automated decision-making by us, such as automated refusal of a credit application. Profiling means any form of automated processing of personal data to assess certain personal aspects, such as a person's work financial situation, personal preferences, interests etc.

**The right to lodge a complaint to Supervisory Authority** If you believe that we have not processed your information in accordance with our obligations, you have the right to complain about this to the national Supervisory Authority

## CHANGES TO OUR PRIVACY POLICY

This policy is updated on 2023-01-03. Svea Solar reserves the right to make changes to this privacy policy at any time to the extent necessary to meet new legal or technical requirements. We always have the most recent version of our privacy policy on our website. If we make changes that affect our practices regarding the personal information, we have previously collected from you, we will aim to notify you of such change by highlighting it on our website.





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