

PRIVACY POLICY FOR THE eBVD SYSTEM

This privacy policy is intended to inform about the processing of personal data that occurs when using the eBVD application and database (hereafter the "eBVD system"), provided by eBVD i Norden AB (hereafter "eBVD").

1. INTRODUCTION

- 1.1. We defend your privacy and endeavor to offer digital services that do not compromise the privacy of our visitors, customers and users.
- 1.2. Through this privacy policy from eBVD, we explain how our proactive work with privacy protection has been integrated into the online services offered through the eBVD system, irrespective of whether we act as the data controller or the data processor in relation to the personal data that we collect for administering the eBVD system and the personal data our customers and users process when using the eBVD system to make information available such as in construction product declarations.
- 1.3. When a company joins the eBVD system, the future user is given the opportunity to create a user account, which means that the user registers personal data such as name, company name, e-mail address, title and username in the eBVD system.

2. PERSONAL DATA

- 2.1. In the eBVD system, the user can i.a. create, handle, store and make available digital construction product declarations according to the format established under applicable legislation and industry standards. At eBVD we distinguish between information related to the user's user accounts and information which users and customers upload, organise, modify, process, distribute or store in the eBVD system.
- 2.2. Concerning information in the user account, such as e-mail address, name, mail address, telephone number, purchase and payment details, account details etc., these are collected either via the eBVD interface, correspondence with our customer service or via other collection routes such as via our partner's website www.byggmaterialindustrierna.se.
- 2.3. Regarding information which has been organised, modified, processed, distributed or stored in the eBVD system by users, it is the users that are responsible for such information. For such information eBVD is solely the administrator the eBVD system's technical services to enable the user's access to construction material information such as construction product declarations. It is therefore only our support personnel who are entitled to access the users' accounts with respect to this kind of information.
- 2.4. We encourage you as a user to exercise due care when submitting information to us, in particular as regards information that a user stores and makes available to other users or when using free text boxes that may be found on websites or in the eBVD system. Some of our services are automated and thus not capable of recognizing that users have inadvertently submitted incorrect or sensitive personal data.
- 2.5. Users may at any time be required to submit personal data to eBVD when being in contact with us or using our services. For instance:
 - a) When the users create a user profile and account in the eBVD system, when they license our services, register for news and product information or download

information, updates and other materials, eBVD may request the user to submit different types of personal data such as name, billing address, e-mail address, mobile or other phone number, employer, purchase and payment information, username, password etc.

- b) When you file a complaint or otherwise contact our customer service or support personnel for various matters, we may request personal data such as customer information, contact information, product information, bank and payment details, employer, IT equipment and hardware used, IP addresses, geographic information about where you are, language skills, and the reason for contacting us as well as information which we provide the user in connection with its contact with eBVD.
- c) When the user contacts us or provide its personal data in order to participate in our activities, to receive marketing materials and advertisements, information about our services, we may ask the user to provide personal data such as name, mailing address, e-mail address, mobile or other telephone number.

2.6. Some of our online activated services collect and provide eBVD with information about our visitors, such as:

- a) Details concerning the online content which is displayed or integrated with eBVD, for instance information on your web browser, which web sites you visit and choice of objects and which objects the user “clicks”.
- b) Services or server logs, storage information about your use of the services or webpages, such as IP address, web browser information (including http user agent strings), HTTP-client request information as well as time and place for your activities, domains, units and program settings, default and hardware activity.
- c) Information about your hardware’s physical location, geo localization services and applications, browser settings or other internet activation services or other information which our support administration needs in order to assist customers and users in connection with detection of defects.

2.7. Such online information is generally collected by digital identifiers, such as web browser cookies, plugins or the customer’s or users’ IP address. These identifiers are used in order to distinguish information provided by the hardware or web browser used. We may however coordinate the collected information with the user’s and customer’s account, for instance when they are logged in to the services.

2.8. Our services are dynamic and we continually launch new functions which may result in collection of new information concerning users. When we collect new personal data or use the user’s personal data for other purposes, eBVD will notify the user and, when relevant, update this Privacy Policy.

2.9. When using the eBVD system, our users will on a regular basis upload/download, organize, modify, process, distribute and store information from the eBVD system. eBVD is the data processor in relation to such information and material, and process personal data in accordance with eBVD’s Privacy Policy and Terms of Use applicable from time to time.

- 2.10. For more information about data from the material that is published by users of the eBVD system, please contact the construction product supplier in charge.

3. THE PROCESSING

- 3.1. eBVD cares about the user's integrity and information security. It is therefore important for eBVD that all processing in the eBVD system is made in accordance with applicable laws and our terms and instructions in a manner that ensures a safe and appropriate processing and environment for our users. All processing made by eBVD in the eBVD system in its capacity as data controller are solely made for the purposes stated either in this Privacy Policy or at the time of the collection of the personal data, unless the user receives any other clear information, and when applicable when the user is asked to approve certain processing.
- 3.2. How eBVD uses the user's personal data depends on which eBVD services the users utilize and how they use these services. We use the user's personal data primarily to provide, maintain and adapt the eBVD system and to make it available in a relevant and user-friendly manner for the users.
- 3.3. Specifically, eBVD uses collected personal data for the following purposes:
- a) We use the users' log in details in order to verify their identity and to provide access to the eBVD system.
 - b) We use the personal data for the purpose to process the user licenses and activities to upload/download, organise, modify, process, distribute and store information in the eBVD system.
 - c) We may communicate with you for instance about the available services, security and other similar communication with respect to the eBVD system and your use of our services. This may relate to how the users may utilize the eBVD system, updates and reminders. In some cases you may change the communication settings, but users may not opt out from our service messages, including messages involving information on security, technical operations or legal or regulatory issues.
 - d) We use personal data concerning users in order to send out invitations and to communicate our services with the purpose of supporting them. Information about the available e services or new content of the eBVD system which the user access, will be sent when relevant for the user's utilization of our services.
 - e) We use data (which may include your communication with us) which is necessary in order to investigate, respond to and handle complaints, notices for default and service problems (e.g. defects).
 - f) Our services are continuously under development in order to offer sustainable solutions for our users. Consequently, we may from time to time conduct various user surveys. We, or companies engaged by us, may therefore use personal data in order to communicate with users and perform various surveys with respect to our services and products.

- g) If customers or users complete a web contact form with name, e-mail address, telephone number, preferences, etc., we will use this data to respond to questions, send information or perform other tasks which we are asked to do.
 - h) We may use user personal data to produce aggregated data sets where it is no longer possible to identify the user. We may for instance use information to generate statistical information about our users, marketing materials or to make a demographic allocation of visitors on one of our websites.
- 3.4. We use data (including communication with us) when we consider it necessary for security reasons or to investigate potential fraud or other violations of our license agreements, terms of use as well as our instructions, policies, guidelines and standards (this Privacy Policy included) applicable from time to time.

4. ON WHAT GROUNDS DO WE COLLECT DATA FROM YOU?

- 4.1. Our collection and processing of users' personal data is a pre-requisite for us being able to provide, market, inform about and develop the eBVD system or to enable the users to participate and access the information they need in order to make available or access digital construction product declarations under the format established by applicable legislation and industry standards.
- 4.2. We have deemed that processing of personal data according to this Privacy Policy is necessary in order for:
- a) eBVD to fulfil our contractual obligations with the users (e.g. the license agreement and the Terms of Use) – Article 6.1(b) in the EU general data protection regulation (EU) 2016/679).
 - b) eBVD to fulfil its legal obligations according to law, regulation or any decision rendered by virtue of law (e.g. the Swedish Accounting Act etc.) – Article 6.1(c) in the EU general data protection regulation (EU) 2016/679.
 - c) eBVD has a legitimate interest to process visitors' and users' personal data in connection with providing and making available the eBVD system, supplying product information, handling of customer service tasks and general inquiries concerning eBVD and the eBVD system, marketing campaigns, IT- and information security etc. We assess that our interests to process your personal data are under these circumstances not overridden by the interests from licensees and users for non-processing of their personal data – Article 6(1)(f) in the EU general data protection regulation (EU) 2016/679.
- 4.3. For more specific information regarding performed interest balance assessments and risk and consequence analyses regarding our processing of customers' and users' personal data, please contact us at the address set out in this Privacy Policy.

5. WHO HAS ACCESS TO THE PERSONAL DATA?

- 5.1. The users' contact information in the eBVD system are partly searchable, available and visible for our business partners Byggmaterialindustrierna Service AB and IVL Svenska Miljöinstitutet AB, for instance the user's name and contact details. Given the fact that the service concerns a system for information handling, it is inherent that users may access

the data in the material, e.g. the digital construction product declarations, the users upload and store in the eBVD system.

- 5.2. We will not forward, sell or exchange your personal data to third parties for marketing purposes or any purpose which is inconsistent with the intended use of the eBVD system. Data which is forwarded to our partners will only be used in order for us to provide the eBVD system or to enable users to utilize the functions of the eBVD system.
- 5.3. It is possible that we may need to share personal data when required under applicable law, court proceedings or other legal proceedings or if we deem it necessary to disclose the information in order to (1) investigate, prevent or take measures upon suspicion or detection of illegal activities or in order to assist public authorities; (2) fulfil our agreements with users; or (3) protect the security of services and/or integrity thereof. We will notify our users with respect to the obligation for sharing such data to the extent that we are not legally prohibited from doing so.
- 5.4. We use suppliers in order to maintain our systems, data analyses, accounting, payments, fraud prevention, marketing and development. These suppliers may be given access to users' personal data insofar as necessary for them to perform their assignments on our behalf and they are obliged not to disclose or use the information for any other purpose.

6. HOW LONG AND WHERE DO WE STORE YOUR PERSONAL DATA?

- 6.1. We will only store your personal data for as long as it is necessary in order to be able to provide the eBVD system and associated services on digital product declarations or otherwise fulfil our obligations to or users. We will however not keep the users' personal data for a longer period than necessary for the purposes for which they were collected. The personal data we collect are stored in a cloud service in the Netherlands.
- 6.2. We keep users' personal data after they have closed their accounts if it is necessary to fulfil our legal obligations (including requests from authorities), comply with laws and regulations, to establish, invoke or defend legal claims, maintain security, prevent fraud and abuse, fulfil our license agreements or, as per their request, to continue communication with them.

7. WHAT ARE YOUR RIGHTS?

- 7.1. With respect to personal data for which eBVD is data controller, the users shall be aware of the following rights:
 - a) Right to access of its personal data, which means that they are entitled to confirmation on whether personal data concerning them is processed and, if so, also have access to this personal data (so-called extract from register) and certain additional information regarding the processing.
 - b) In certain cases, a right to access its personal data in a structured, generally available and machine-readable format and without hindrance be able to order the data to be transferred from eBVD to another data controller (so-called data portability).
 - c) Right to correction of its personal data in the event that it is erroneous or incomplete. In certain cases, they are entitled to object to eBVD's processing of the personal data and to request correction or deletion of the personal data.

- d) As the case may be, if they have given consent to certain processing of personal data, they are always entitled to withdraw such consent.
- e) When processing is made pursuant to and based upon a balance of interest (please see section 4.2 (c), above), they are entitled to make objections regarding the processing at any time.
- f) Right to object to processing of personal data for direct marketing purposes at any time. The personal data will then no longer be used for such purposes.
- g) Right to have its data limited if they, among other things, object to the correctness of the data or if they have objected to the processing as per the above, in both cases during the time for eBVD's review of their request and investigation of the matter.
- h) Right to file a complaint at any time regarding eBVD's processing of personal data or utilization of their rights to the relevant supervisory authority (i.e. Sw.: Datainspektionen).

8. SECURITY INFORMATION

- 8.1. We have implemented technical and organizational security measures which are aimed to protect personal data from unintentional or unlawful destruction, loss or deterioration. These measures also protect the customers' and users' personal data from unauthorized distribution, disclosure, abuse or other processing which contravenes applicable law.
- 8.2. We regularly monitor our systems in order to identify possible vulnerability and potential attacks. We can however not guarantee the security for information which customers and users submit to us or information which is uploaded, organized, modified, processed, distributed and stored within a project. There is no guarantee for the protection from unauthorized access or disclosure, change or destruction of personal data despite our physical, technical and administrative security measures.

9. CONTACT DETAILS TO US

- 10. In the event of questions, comments or complaints regarding this Privacy Policy or regarding our work with data protection or our IT- and information security, please contact us at:

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