

PRIVACY POLICY – LOGTRADE TECHNOLOGY AB

About Logtrade Technology AB and this privacy policy

Processing of your personal data

Logtrade Technology AB, Reg. No. 556659-9410 (“**Logtrade**” or “**we**”) takes all necessary measures to ensure that personal data concerning our customers is being processed by us in a lawful, fair and transparent manner.

This privacy policy explains and clarifies your rights in relation to Logtrade regarding the processing of your personal data, of which Logtrade is the data controller, and how you can exercise those rights.

Logtrade is the data controller in respect of the personal data you provide to us, *inter alia*, when you register for any of Logtrade’s services, if you contact Logtrade on our website, as well as in relation to personal data that are included in certain machine-learning activities carried out by Logtrade. Please note that Logtrade is the data *processor* in relation to other types of processing, such as in relation to personal data that is collected as part of your use of our services (e.g. Ship and Move). Please note that this privacy policy only covers the aspects for which Logtrade is the data controller. For information about the processing of your personal data in relation to our services, please see the privacy policy of the respective data controller.

Logtrade is committed to protecting your personal data and it is important to us to ensure that your personal data is being processed in a secure way. We are responsible for ensuring that the processing of personal data is carried out in accordance with applicable law and this privacy policy. We use appropriate technical and organisational measures with respect to the amount and sensitivity of personal data.

It is important that you read and understand this privacy policy before you use any of Logtrade’s services. You should not use any of our services if you do not approve of this privacy policy.

Some pages on our website contain links to third party websites. These websites have their own privacy policies and the Company is not responsible for their operations or their information policies. Any user who sends information to or through these third-party websites should hence review the privacy policies posted on those websites before any personal data is transferred to them.

For information on the collection, handling and storage of information obtained through cookies, see the “Cookies” section below.

What personal data do we collect and where from?

If you register to use Logtrade’s services (such as Ship, Move, Internet of Logistics, the TA System, or as described from time to time in our [Terms and Conditions](#)) or website, or if you contact Logtrade through different communication channels, you may provide information to us that is considered personal data under applicable data protection laws.

The types of personal data that we collect may vary depending on the context.

For setting up an account and providing support relating to the services, we will process the following information:

- name and contact information, including address, mobile number and email address;
- username and password for our services;
- personal identity number;

- delivery and billing information, payment information and other information that you provide in connection with the purchase or delivery of a product or service; and/or
- information about your Internet connection, the equipment you use to access our website, and usage details.

For the purposes of improving our services, we may also, from time to time, process certain personal data provided during the services where our partner companies are data controllers. Such personal data can include:

- name and contact information, including address, mobile number and email address;
- delivery information; and/or
- different kinds of demographic information.

When you visit our website, we may process the following information:

- information about preferences and interests based on the use of the Company's websites;
- other information that is relevant for customer surveys, advertisement/marketing or offers; and/or
- other user-generated information that you actively choose to share through our website.

We may collect your personal data from the following sources:

- Logtrade's website, e.g. when you register to use Logtrade's services, download a PDF document or contact us using our contact form;
- personal data generated from Logtrade's internal machine-learning activities; and/or
- from third parties in the form of partner companies which Logtrade engages to provide its services.

Why do we process your personal data?

If you have connected to Logtrade's services, you have entered into an agreement with the Company. As a result, we process your personal data for the purpose of managing your purchase or order, and in order to deliver the service that you have ordered.

In addition to processing your personal data to complete Logtrade's services, Logtrade may use your personal data for other purposes, based on other legal grounds, as set out below.

- Performance of a contract
 - » For the handling and administration of purchases, deliveries of products, to make payments as well as to give you access to Logtrade's website and the services (including customer support) provided there.
 - » If you have subscribed to our newsletter we process your personal data (email) to be able to send you our latest newsletter.
- Consent
 - » Use of cookies on Logtrade's website.
 - » We also collect your consent in order to trace your activities and digital footprints on our website in order to tailor our information and marketing emails to you and to give you a better customer experience.
- Compliance with a legal obligation
 - » We save invoice documentation in accordance with applicable accounting laws and regulations.
- Legitimate interest
 - » Direct marketing (by regular mail and email) to current customers, customer surveys and customer support.
 - » In order to be able to provide, carry out and improve our commitments, products and services, it is necessary for us to process personal data in some other cases as well, e.g. by analysing our customers' buying patterns in order to provide them with relevant information and marketing, by analysing our customer's shipment information in order to improve our services and to provide our customers with the best experience possible and to optimise their transports, as well as for statistical purposes.

In connection with your giving of consent, you will have to confirm that you have read this privacy policy and that you consent to the processing of your personal data as described herein.

Retention of personal data

Logtrade takes all reasonable steps to ensure that your personal data is processed and stored securely. Your personal data will never be stored longer than permitted by applicable law or longer than necessary to fulfil the above stated purposes. Your personal data will be processed by us during the following time periods.

- **Customer:** If you have registered for any of Logtrade's services, your personal data is saved until you unsubscribe from our services, but no later than three years after your last purchase. This does not apply if we need to save your personal data for a longer period of time due to any of the reasons stated below.
- **Performance of a contract:** Personal data (name, personal identity number, address, telephone number, email address, billing and delivery information) which is submitted to Logtrade in connection with the order of Logtrade's services is stored for as long as necessary in order for Logtrade's performance of the agreement with you.
- **Legitimate interest:** Personal data (shipment information such as name, address, time of shipment and route information) which is submitted and created when Logtrade's services such as Ship and Move are used for shipment of products are processed and stored for as long as the customer is using our services in order for Logtrade to provide our customers with the best experience possible and to optimise your transports, for instance by machine-learning.
- **Legal obligation:** Logtrade saves any documentation that constitutes accounting information in accordance with applicable accounting legislation.
- **Consent:** In cases where we process your personal data based on your consent, we will only save your personal data for as long as we still have your consent.
- **Direct marketing:** We may process your personal data for direct marketing purposes for as long as three years after the customer relationship has ended, unless you object to your personal data being used for direct marketing purposes.

Transfer of personal data

Personal data regarding our customers is an important part of the Logtrade's operations and we do not sell the personal data to anyone else. We only transfer personal data as described below. We always observe great caution when transferring your personal data and your personal data is only transferred in accordance with this privacy policy and after taking appropriate security measures.

- **Partners outside the group of companies that Logtrade belongs to:** Our partners, i.e. companies outside the group of companies that the Logtrade belongs to, and which are approved by Logtrade, may get access to your personal data for the purpose of optimising the service .
- **Business transactions:** If all or part of the Logtrade's operations is sold or integrated with any other business, operation or company, your personal data may be disclosed to our advisors, potential buyers and their advisors, and be transferred to the new owners of the operation.
- **Legal obligations:** Your personal data may also be disclosed in order for Logtrade to comply with certain legal obligations and it may be transferred to the Police and other relevant public authorities when permitted and required by law.

Under certain circumstances, personal data may be transferred to countries outside of the EU/EEA. When such transfers are carried out, Logtrade takes all appropriate measures to ensure that your personal data are adequately protected and that all processing is performed in accordance with applicable data protection laws and this privacy policy. This may include, for instance, that:

- an agreement including certain standard contractual clauses issued by the European Commission (e.g. (EU) 2021/914) have been entered into between Logtrade and the recipient;

- the European Commission has decided that the receiving country ensures an adequate level of protection; or that
- Logtrade has collected your explicit consent prior to the transfer.

You have the right to obtain a copy of the safeguards that we use when transferring personal data to a country outside of the EU/EEA by contacting Logtrade.

In the event that our partner would transfer personal data to countries outside of the EU/EEA by using Logtrade's system, the customer is the data controller with respect to such transfers.

Withdrawal of consent

In the event that we process your personal data based on your consent, e.g. regarding marketing, you may withdraw your consent at any time. Such withdrawal may be made in whole or in part. If you do not wish to receive marketing and special offers from us you may withdraw your consent by contacting customer service or, if sent by email, through a link in that email. By clicking this link, you will be able to manage all your subscriptions to newsletters and other information and marketing sent by email from the Logtrade.

If you withdraw your consent with respect to the use or disclosure of your personal data for other purposes stated in this privacy policy, we may no longer be able to continue to give you access to our websites or provide customer service or other services being offered to our users and permitted under this privacy policy.

Your rights

You have the right to request information about what personal data concerning you that we are processing and how it is being used by contacting us in writing (see contact details below). You can change your personal details at any time in your account settings online, if you have an account on any of our websites, or by contacting customer service (contact details below). You are also entitled to request correction of incorrect, incomplete or ambiguous personal data concerning you by contacting customer service. For the protection of your privacy and your personal data, we may require that you identify yourself in connection with our assistance.

In accordance with applicable data protection laws, you also have the right to request that your personal data be erased or that the processing of your personal data be restricted. In certain situations, you also have the right to object to the processing of your personal data and request that your personal data be transmitted in an electronic format.

You may file a complaint with the Swedish Authority for Privacy Protection (Sw. *Integritetsmyndigheten*) if you believe that Logtrade's processing of your personal data is not carried out in accordance with applicable laws.

Cookies

Social functions

On our website, there are features for sharing posts on social media, such as Facebook's "like" button, and other widgets such as the "share" button or interactive mini programs. These features may register your IP address and what pages you visit on our website. Some features must use cookies in order to function properly. Hosting these features and widgets are either a third party or our own website. This privacy policy does not apply to the features provided by third parties. Instead, the use of such features is regulated by the privacy policy and other policies of the third party in question.

Navigation information

Cookies

We store personal data from two different sources on our websites: Personal data that you actively provide to us and personal data collected automatically through the use of cookies. When you use our website, we may collect personal data about your visit and we browsing We collect this data using cookies and technical features for the purpose of analysing trends, managing the website, seeing how visitors navigate on the website and to gather information about the users' demographic composition.

We use cookies to personalise your experience. A cookie is a text file that is planted by a web server on your hard drive. Cookies are not used for running programs or installing viruses on your computer. The cookie you are assigned is unique and can only be read by the web server on the domain that issued it. A cookie is used for convenience, as its main purpose is to save you time by telling the web server that you have come back to visit a particular page on the website. If you, for example, make personal settings on our website or choose to subscribe to updates, the cookie helps us to remember your settings when you revisit the website. The information you gave us the previous time is then reused so that you can easily use the features which have been tailored to your preferences.

You can choose to accept or reject the storage of cookies. Most browsers accept cookies automatically, but if you like, you can change the settings of your browser to reject the storage of cookies. If you choose to reject cookies, you may not be able to use all of the interactive features which are included when accepting cookies. Cookies keeps track of which websites and pages you visit for the purpose of seeing which part of the website or subscription service that is the most popular or used the most. The information is used to deliver customized content and advertising for users whose behavior indicates that they are interested in a particular matter.

Logged files

We may gather demographic information such as your zip code, age, gender, preferences and interests by using log files that are not associated with your name or other personal data. We also gather information about your computer's hardware and software. This type of information includes IP address, type of browser, domain name, Internet service provider, files you have viewed when you visited our website (such as HTML pages, pictures, etc.), operating system, click-stream data, access time, and reference linking. For these purposes, we will link the automatically gathered information to personal data such as name, email address, address and phone number.

Clear Gifs (Web Beacons/Web Bugs)

We use a software technology called *clear gifs* (also called web beacons or web bugs), which helps us to manage the website and the subscription service in a better way by informing us about what kind of content that is effective. Clear gifs are tiny pictures, all of which are unique and identifiable, much like a cookie, which are used to track user's activity online. Unlike a cookie stored on the computer's hard drive, these pictures are embedded on websites or in emails, and are completely invisible. They are not bigger than the period at the end of a sentence. We use clear gifs in our HTML-based emails to identify which emails have been opened by the recipient. This enables us to evaluate how effective certain communication is and how effective our marketing campaigns are. We link the information that these embedded pictures gather to our customers' personal data. If you like to unsubscribe from these emails, see "Unregister and unsubscribe".

Changes to the privacy policy

Please note that the terms of the privacy policy may be changed or amended. Any new version will be published on the Logtrade's website. Consequently, you should review these terms on a regular basis to make sure that you are satisfied with the changes. In case of any material changes we will, however, email you, if you have given us your email address, to make you aware of any changes made.

If the changes concern processing of personal data that we carry out based on your consent, we will give you the opportunity to once again give your consent to the processing on the new terms presented.

Contact us

If you have any questions related to this privacy policy, if you suspect that a breach of this privacy policy has occurred, or if you would like to contact us for any reason stated in this privacy policy, please contact our customer service on the contact details provided below.

Logtrade Technology AB

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