

26. Data Protection Policy

1. Introduction

Scandi Gruppen AB and its affiliates (Scandi) need to collect and use personal data (information) about its employees, customers, suppliers, business contacts and other individuals Scandi has a relationship with or may need to contact.

This policy describes how personal data must be collected, handled and stored to meet Scandi's data protection standards and to comply with legislation.

Also, this data protection policy ensures that Scandi:

- Complies with data protection legislation and follows good practice
- Protects the rights of its employees, customers, suppliers and partners
- Is open about it stores and processes data from individuals
- Protects itself from the risks of data breach

Data Protection law safeguards the privacy rights of individuals in relation to the processing of their personal data. The Data Protection Act 1988 and the Data Protection (Amendment) Act 2003 confer rights on individuals as well as responsibilities on those persons processing personal data. Personal data, both automated and manual, are data relating to a living individual who is or can be identified, either from the data or from the data in conjunction with other information. The Data Protection Act is based on eight important principles that personal data must:

2. Purpose of this policy

This policy is a statement of Scandi's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003.

3. Data Protection Principles

Scandi undertakes to perform its responsibilities under the legislation in accordance with the eight stated Data Protection principles outlined in the Acts as follows:

1. Obtain and process information fairly

Scandi obtains and processes personal data fairly and in accordance with its statutory and other legal obligations.

2. Keep it only for one or more specified, explicit and lawful purposes

Scandi keeps personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes.

3. Use and disclosure only in ways compatible with these purposes

Scandi only uses and discloses personal data in circumstances that are necessary for the purposes of for which it collects and keeps the data.

4. Keep it safe and secure

Scandi takes appropriate security measures against unauthorized access to, or alteration, disclosure or destruction of data and against accidental loss or destruction.

5. Keep it accurate, complete and up-to-date

Scandi operates procedures that ensure high levels of data accuracy, completeness and consistency.

6. Ensure it is adequate, relevant and not excessive

Personal data held by Scandi are adequate, relevant and not excessive in data retention terms.

7. Retain for no longer than is necessary

Scandi has a policy on retention periods for personal data.

8. Give a copy of his/ her personal data to that individual, on request

Scandi has procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation.

4. Responsibility

Scandi has overall responsibility for ensuring compliance with Data Protection legislation when it is the Data Controller of personal data. However, all employees who separately collect and/or control the content and use of personal data are individually responsible for compliance with the legislation. The IT Manager is the Data Protection Officer, and provides support, assistance, advice, and training to all employees to ensure that they are in a position to comply with the legislation.

5. Procedures and Guidelines

Scandi is firmly committed to ensuring personal privacy and compliance with the Data Protection legislation, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

6. Review

This Policy will be reviewed regularly in light of any legislative or other relevant developments.



Tryggve Erlandsson

CEO and authorized signatory



Policy approval date: *12/8 2015*