

# PREEM'S PRIVACY POLICY – PARTNERS AND OTHERS

This Privacy Policy explains how Preem AB ("Preem", "we" or "us") collects and uses your personal data when you, as a franchisee, insurance company, trade union, or other partner of Preem, use our products or services, collaborate with us, or otherwise interact with us. This Privacy Policy also applies, as relevant, to other individuals who are not private customers, corporate customers, suppliers, or partners of Preem. This Privacy Policy also describes the rights you have in relation to us and how you can exercise your rights. You can always contact us with questions regarding data and privacy protection by sending an email to [dpo@preem.se](mailto:dpo@preem.se).

**Preem is the data controller for your personal data** and we process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"). We therefore encourage you to read this Privacy Policy in its entirety to ensure that you fully understand how we process your personal data in connection with the provision of our services.

Personal data refers to any information relating to you as a data subject that can directly or indirectly identify you, such as name, date of birth, and personal identity number. Processing refers to any action regarding personal data, such as use, processing, collection, and organization of personal data.

## 1. DATA CONTROLLER'S CONTACT DETAILS

<b>Company name:</b>	Preem AB
<b>Organization number:</b>	556072-6977
<b>Postal address:</b>	Warfvinges väg 45, 112 51 Stockholm
<b>Email:</b>	<a href="mailto:dpo@preem.se">dpo@preem.se</a>
<b>Telephone:</b>	020-450 450

## 2. WHAT INFORMATION DO WE COLLECT?

### 2.1. PERSONAL DATA THAT YOU PROVIDE TO US

We process such personal data that you provide to us, as well as such personal data that is generated when you use our products and services. In cases where you have provided us with your personal data or when your personal data is generated as a result of your use of our products and services, these are marked with the number one (1) as exemplified below. You may directly or indirectly provide us with the following categories of personal data:

Category of personal data	Type of data point
Identification data <sup>1</sup>	For example, first and last name, personal identity number, and date of birth, etc.  Identification data may also include your image when you are captured by our surveillance cameras.
Contact details <sup>1</sup>	For example, email address, telephone number, postal address, etc.
Financial data <sup>1</sup>	For example, bank and credit information, billing information, etc.
Generated data <sup>1</sup>	For example, information about how you use our services and products, including, among other things, user ID, cookies, and other tracking technologies that indicate how you accessed the product/service as well as usage patterns on our website <a href="http://www.preem.se">www.preem.se</a> and <a href="http://www.preem.com">www.preem.com</a> , etc.  Generated data may also include information that you provide when you communicate with us, such as data you provide in your correspondence with us or other communication

	you have with us via any of our internal or external channels, as well as data that you yourself enter into our systems, for example data generated when you use our systems.
Device data and online identifiers <sup>1</sup>	For example, information about your device such as language settings, IP address, time zone, as well as your geographic information, etc.

## 2.2. PERSONAL DATA THAT WE COLLECT AND PROCESS FROM THIRD PARTIES

In certain cases, your personal data is collected from a third party or public registers to supplement or verify that your personal data is up to date, or to ensure that your personal data is correct, for example through a credit reference. In cases where we have obtained your personal data from a third party or public registers, these are marked with the number two (2) as exemplified below. The following categories of personal data are collected from third parties:

Category of personal data	Type of data point
Identification data <sup>2</sup>	For example, first and last name, date of birth, as well as necessary identifiers required when you log in with BankID, etc.  <i>We may receive your identification data from public sources, such as the Swedish Tax Agency's population register and government personal address registers.</i>
Contact details <sup>2</sup>	For example, email address, telephone number, postal address, etc.  <i>We may receive your contact details from public sources, such as the Swedish Tax Agency's population register and government personal address registers.</i>
Financial data <sup>2</sup>	For example, creditworthiness, etc.  <i>We may receive your financial data from a credit reference agency when we need to assess your creditworthiness or confirm your identity.</i>
Generated data <sup>2</sup>	For example, your CV and cover letter that you have provided to us and that we obtain from a recruitment agency, etc.

## 3. WHAT DO WE DO WITH YOUR PERSONAL DATA?

In the tables below, you will find information about:

1. the purposes for which we process your personal data, i.e. why the processing is necessary,
2. which types of personal data we use for each purpose,
3. the legal basis we have under the GDPR to process your personal data, as well as
4. the retention period we have for each processing activity, i.e., after how long Preem deletes the personal data for each purpose.

### 3.1. PERSONAL DATA PROCESSING FOR ALL PARTNERS

Regardless of your relationship with Preem, the following personal data may always be processed by us in order to administer and fulfill our cooperation.

Purpose	Personal data	Legal basis for the processing	Retention period
In order for us to enter into an agreement with you, it is necessary for us to process your personal data for this purpose.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> <li>• Generated data<sup>1,2</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (b) GDPR, that is, the performance of the agreement that you and we intend to enter into.	Preem stores your personal data for these purposes throughout the entire agreement period and for three (3) years thereafter.

In order for us to communicate with each other when you contact or interact with us, or vice versa, via telephone, email, or other internal or external means of communication, we may process your personal data to be able to communicate and interact with you in each individual case.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to communicate and interact with you.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we assess that the processing of your personal data is necessary in order to achieve the purposes of the relevant processing.</p>	Preem stores your personal data for these purposes for two (2) years. Thereafter, your personal data will be erased.
If you visit our refineries, depots, or other facilities, Preem may process your personal data in order to verify or grant you the necessary authorization and to provide you with access to the relevant facility.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to be able to verify or grant you the necessary authorization and to provide you with access to the relevant facility.</p> <p>We have conducted a balancing of interests and have determined that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	Preem stores your personal data for these purposes prior to each visit and for one (1) year thereafter.
To counteract and limit incidents in Preem's operations, as well as to minimize the consequences and prevent their recurrence, Preem offers an incident reporting system to	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to administer and manage your incident	Preem stores your personal data for these purposes throughout the entire incident process and for one (1) year thereafter.

its partners. If you use this system, Preem may process your personal data in order to handle your incident report.		<p>report for the purposes specified herein.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	
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### 3.2. PERSONAL DATA PROCESSING FOR OUR FRANCHISEES

If you have a franchisee relationship with Preem, Preem may process your personal data for several different purposes in order to enable, develop, and improve our franchise arrangement. Your personal data may therefore be processed in connection with, among other things, training, communication about operational disruptions that may affect your franchise company, and your purchases of products from Preem.

Purpose	Personal data	Legal basis for the processing	Retention period
When you purchase our products and/or services, we process your personal data in order to provide you with our products and/or services.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> </ul>	<p>We base our processing on Article 6.1 (b) GDPR. The processing is necessary in order to invoice, administer, and fulfill the purchase agreement to which you are a party.</p> <p>Furthermore, we have a statutory obligation to compile accounting records and reports and to retain this information in accordance with the Swedish Accounting Act (1999:1078), which is why we also base our processing on Article 6.1 (c) GDPR regarding our fulfillment of a legal obligation.</p>	<p>To fulfill the agreement to which you are a party, Preem will retain your personal data for three (3) years. Thereafter, the personal data will be erased.</p> <p>To the extent that the personal data is processed to fulfill our legal obligations under the Swedish Accounting Act (1999:1078), Preem will retain your personal data during the period in which the accounting is compiled and for seven (7) years after the end of the year in which the data was registered.</p>
As a franchisee, we offer you several mandatory as well as voluntary internal trainings within our industry, and may process your personal data in order to provide you with these trainings.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to provide you with our training	We process your personal data during the term of our franchise agreement and for three (3) years thereafter.

		<p>courses and to manage and administer them.</p> <p>We have conducted a balancing test in which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	
<p>In order for Preem to be able to inform you about our prices and keep them updated based on supply and demand, and for your franchise company in turn to be able to sell Preem's products and services to the end consumer at correct and updated prices, Preem may process your personal data when you report your franchise company's pricing, to administer our own pricing, and to communicate new pricing to you.</p>	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to manage and adjust the pricing of our products and services.</p> <p>We have conducted a balancing of interests and have determined that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	<p>We process your personal data during the term of our franchise agreement and for six (6) months thereafter.</p>
<p>In order for Preem to provide your franchise company with our services and products, Preem may, where applicable, process your personal data to be able to verify, administer, and manage deliveries and our inventory, reconcile delivery and inventory status and balance, analyze your franchise company's sales to manage demand, and ensure that only approved suppliers are used and that necessary</p>	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (b) GDPR, that is, the performance of the agreement to which you are a party.</p>	<p>Preem stores your personal data for these purposes throughout the duration of the agreement and for three (3) months thereafter.</p>

checks are performed solely by authorized personnel.			
Preem may process your personal data in order to inform you about current disruptions at our depots and refineries that may affect you.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to inform you about disruptions at our depots and refineries that may affect you and your business.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we assess that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	Preem stores your personal data for these purposes throughout the entire agreement period and for two (2) months thereafter.

### 3.3. PERSONAL DATA PROCESSING FOR OUR OTHER PARTNERS

If you represent any of our other partners, such as an insurance company or a trade union, Preem may process your personal data in order to maintain and safeguard our relationships.

Purpose	Personal data	Legal basis for the processing	Retention period
If you hold a position within an organization that is a partner of Preem (e.g., an insurance company) where your role involves contact with Preem when we make purchases and procurements, Preem may process your personal data for the purpose of administering such purchases and procurements.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (b) GDPR, that is, the performance of the agreement to which the company you represent is a party.	Preem stores your personal data for these purposes throughout the duration of the agreement and for three (3) years thereafter.
If you work for or represent a trade union, we may process your personal data in order to conduct dialogues and negotiations regarding, among other things, salary	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (b) GDPR, that is, the performance of the collective agreement in	Preem stores your personal data for these purposes throughout the duration of the agreement

reviews, overtime compensation, and other trade union-related matters and issues that may arise.		which the trade union you represent is a party.	and for three (3) years thereafter.
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### 3.4. PERSONAL DATA PROCESSING RELATING TO OTHER INDIVIDUALS

If you do not fall under any of the categories of data subjects specified by us, your personal data may be processed by Preem for a variety of purposes related to Preem's business operations. These are described in the following table.

Purpose	Personal data	Legal basis for the processing	Retention period
If you act as an authorized signatory or representative for one of our partners or franchisees within the scope of any of the purposes described in sections 3.1 – 3.2 herein, we may process your personal data in order to manage and administer our relationship with your principal and to verify your authority to represent them.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to manage and administer the relationship we have with the company you represent.</p> <p>We have conducted a balancing test in which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	Preem stores your personal data for these purposes for as long as we have an ongoing relationship with your principal or until you cease to act as a representative and/or authorized signatory for your principal.
If you rent a property or asset from Preem, Preem may process your personal data both for the purpose of entering into the lease agreement with you and for administering our lease relationship with you.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (b) GDPR, that is, the performance of the lease agreement to which you are a party.	Preem stores your personal data for these purposes throughout the entire agreement period and for one (1) year thereafter.
If you act as a guarantor for one of Preem's contracting parties, Preem may process your personal data in order to administer your guarantee commitment as well as to manage and register the type of security you have provided and the	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (b) GDPR, that is, the performance of the guarantee agreement to which you are a party.	Preem stores your personal data for these purposes throughout the entire agreement period and for three (3) years thereafter.

duration of your guarantee commitment.			
Preem's operations are by nature environmentally sensitive, and we therefore comply with applicable environmental legislation. In the event of an environmental disturbance, and if you choose to report such an environmental disturbance by contacting us, Preem may process your personal data for the purpose of handling your notification.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	We base our processing of your personal data on Article 6.1 (a) GDPR, that is, the consent you provide to us in your notification.	Preem processes your personal data for these purposes throughout the entire notification process and until we have handled your notification. Thereafter, your personal data is erased.
Preem occasionally organizes various arrangements and events, either independently or in sponsored collaboration with partners, and may, if you wish to participate in such events, process your personal data in order to administer and manage your participation.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	We base our processing on Article 6.1 (b) GDPR. The processing is necessary in order to administer and fulfill the agreement that you enter into with us prior to your participation in our events, as well as to enable us to administer and manage your participation in the same.	We process your personal data until the event you wish to attend has taken place, and for three (3) months thereafter.
If you have been listed as a next of kin to one of our employees, we may process your personal data in order to be able to contact you if necessary, for example in the event of a workplace accident involving your next of kin.	<ul style="list-style-type: none"> <li>• Identification data<sup>2</sup></li> <li>• Contact details<sup>2</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to be able to contact you when necessary and in emergencies concerning your next of kin.</p> <p>We have conducted a balancing of interests and have determined that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we assess that the processing of your personal data is necessary in order to achieve the purposes of the relevant processing.</p>	Preem stores your personal data for these purposes for as long as you are listed as our employee's next of kin, or until the employee who has designated you as next of kin ends their employment with Preem. Thereafter, your personal data will be erased.



### 3.5. WHEN YOU INTERACT WITH PREEM'S WEBSITE

When you visit and interact with our websites [www.preem.se](http://www.preem.se) and [www.preem.com](http://www.preem.com), we process your personal data in order to provide you with access to the websites and to analyze your use of them for our own business development purposes. The collection of your data through cookies is carried out in accordance with our cookie policy.

We use cookies and similar tracking technologies to enhance convenience and improve the user experience on our website and mobile application. You can find more information about how we use cookies in our cookie policy, which you can read by following this link: <https://www.preem.se/cookies/>.

Purpose	Personal data	Legal basis for the processing	Retention period
When you visit our websites, we process your personal data through necessary so-called functional session cookies to provide you access to features on our websites.	<ul style="list-style-type: none"><li>• Generated data<sup>1</sup></li><li>• Device data and online identifiers<sup>1</sup></li></ul>	<p>We base the processing on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to provide you with access to and use of necessary functions on our websites.</p> <p>We have conducted a balancing test in which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the relevant processing.</p>	We store your personal data only during the individual online session, after which your personal data is deleted.
When you visit our websites, we process your personal data through persistent cookies in order to customize them according to your preferences and choices.	<ul style="list-style-type: none"><li>• Generated data<sup>1</sup></li><li>• Device data and online identifiers<sup>1</sup></li></ul>	<p>We base the processing on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to accommodate your requests, choices, and customizations on our websites.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to</p>	<p>We store your personal data for the retention period specified in our cookie list, which you can find here:</p> <p><a href="https://www.preem.se/cookies/">https://www.preem.se/cookies/</a>.</p> <p>However, you may delete persistent cookies at any time in accordance with our cookie policy, after which our processing of your personal data will cease.</p>

		achieve the purposes of the relevant processing.	
When you visit our websites, we process your personal data through analytics cookies to analyze how you use them for the purpose of developing our business as well as improving and streamlining our marketing.	<ul style="list-style-type: none"> <li>• Generated data<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>We base the processing on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to develop our business and to improve and streamline our marketing.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	We store your personal data for three (3) months, after which your personal data is erased.
<p>For the purpose of marketing our products and services to you, sending you other relevant information, and developing and improving our business, we may process your personal data through cookies and similar tracking technologies for such marketing purposes.</p> <p>We may also combine such personal data with information that we obtain from third parties, which means that this processing may be considered profiling.</p>	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>We base the processing on Article 6.1 (a) GDPR, i.e., your consent, which you provide by making and accepting the applicable choices in our cookie banner.</p> <p>You may withdraw your consent at any time by adjusting your cookie settings in accordance with our cookie policy, or alternatively by contacting us via email at <a href="mailto:dpo@preem.se">dpo@preem.se</a>.</p>	<p>We retain your personal data for three (3) months, after which your personal data will be erased.</p> <p>You may withdraw your consent at any time, upon which we will immediately cease our processing of your personal data and erase it.</p>

### 3.6. WHEN YOU APPLY FOR EMPLOYMENT WITH PREEM, WHEN PREEM RECRUITS, AND WHEN YOU BECOME EMPLOYED

When you apply for employment with us, we need to process your personal data in order to administer your application. The processing of your personal data is carried out so that we can manage your application and offer you a job with us.

Purpose	Personal data	Legal basis for the processing	Retention period
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When you apply for employment with us, we process your personal data in order to administer and manage your job application.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to administer and manage your job application, as well as to arrange a possible job interview with you.</p> <p>We have conducted a balancing of interests and have determined that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	Preem stores your personal data for these purposes for six (6) months. Thereafter, your personal data is deleted.
We always strive to have the most competent employees and may therefore process your personal data for recruitment purposes. We may save this personal data from a previous recruitment process with you, or receive it from one of our cooperating recruitment agencies.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1,2</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to manage, administer, and carry out our recruitment process.</p> <p>We have carried out a balancing of interests based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we assess that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	Preem stores your personal data for these purposes for two (2) years. Thereafter, your personal data will be erased.
When you commence your employment with us, we process your personal data in order to enter into an employment agreement with you and to provide you with your work duties in	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	We base our processing on Article 6.1 (b) GDPR. The processing is necessary in order to administer and fulfill the employment agreement to which you are a party.	We store your personal data for the period during which your employment agreement is valid and for six (6) months thereafter.

accordance with the employment agreement.			
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### 3.7. WHEN PREEM NEEDS TO ESTABLISH, EXERCISE OR DEFEND LEGAL CLAIMS AND PREVENT CRIME

In order for Preem to be able to establish, exercise, or defend its legal claims, we may process your personal data for these purposes. This also includes preventive processing for evidentiary purposes, for example through ongoing video surveillance at Preem's facilities.

Purpose	Personal data	Legal basis for the processing	Retention period
In the event that Preem, for any reason, needs to establish, exercise, or defend its legal claims, Preem may process your personal data for these purposes.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to establish, exercise, or defend our legal claims.</p> <p>We have conducted a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the relevant processing.</p>	<p>We process your personal data for the period necessary in each individual case to establish, exercise, or defend our legal claims, for example in the event of a dispute.</p> <p>After our legal claims have been satisfied, we will erase your personal data.</p>
Preem has video surveillance at all facilities owned or leased and operated by Preem. We may therefore process your personal data for security and evidence collection purposes when you, for example, visit one of our offices, refineries, depots, or other facilities.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to ensure security at our facilities and, where applicable, to collect evidence in the event of a crime.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p>	<p>We process your personal data for thirty (30) days, after which your personal data is erased.</p> <p>In the event that a crime has occurred, we will process your personal data until Preem has been able to establish and assert its legal claims as stated above.</p>

		Furthermore, we consider that the processing of your personal data is necessary in order to achieve the purposes of the current processing.	
Preem has GPS tracking devices on its property that are used to track and protect such property. We may therefore process your personal data if you use or otherwise handle Preem's property.	<ul style="list-style-type: none"> <li>Device data and online identifiers<sup>1</sup></li> </ul>	<p>We base our processing of your personal data on Article 6.1 (f) GDPR. We have a legitimate interest in processing your personal data in order to exercise control over our property, and, where applicable, to collect evidence in the event of a crime.</p> <p>We have carried out a balancing test based on which we assess that Preem has a legitimate interest that outweighs your interest in not having your personal data processed.</p> <p>Furthermore, we assess that the processing of your personal data is necessary in order to achieve the purposes of the current processing.</p>	We process your personal data while you are using or otherwise handling Preem's property, after which your personal data is erased.

#### 4. YOUR RIGHTS REGARDING PREEM'S PROCESSING OF YOUR PERSONAL DATA

As a data subject, you have several rights in relation to your personal data under the GDPR. These rights are set out below. If you wish to exercise your rights, you can contact us using the contact details provided above in section 1 of this Privacy Policy.

##### 4.1. RIGHT TO INFORMATION

You have the right to receive information about how Preem processes your personal data. Such information is provided through this Privacy Policy when your personal data is collected and is always available at [www.preem.se](http://www.preem.se). You also have the right to receive specific information in the event of a personal data breach affecting your personal data and if there is a risk of, for example, fraud or identity theft. We will communicate such information directly to you via email.

##### 4.2. RIGHT OF ACCESS

You have the right to access a summary of your personal data that Preem processes (data extract). However, under certain conditions, Preem may deny your request for access, for example, if you request access many times within a short period.

##### 4.3. RIGHT TO RECTIFICATION

You have the right to have incorrect personal data rectified or supplemented with personal data that is missing. The right to rectification applies to both personal data collected from you or from a third party, as well as any profile that Preem has created about you through profiling. You can notify us by email at [dpo@preem.se](mailto:dpo@preem.se) if you wish for us to rectify or supplement your personal data.

#### 4.4. RIGHT TO ERASURE

You have the right to request the erasure of your personal data when it is no longer necessary to process it for the purpose for which it was collected. You can notify us via email at [dpo@preem.se](mailto:dpo@preem.se) if you wish for us to erase your personal data. However, there are legal requirements that prevent us from erasing certain information, such as the Swedish Accounting Act (1999:1078). In such cases, we ensure that such personal data is not processed except to the extent required for us to fulfill these obligations, and we restrict access to such personal data for Preem's employees.

You may also have the right to have certain personal data erased when you object to processing in accordance with section 4.6 below and Preem does not have an overriding legitimate basis for the processing.

#### 4.5. RIGHT TO RESTRICTION OF PROCESSING

You have the right, in certain cases, to request that our processing of your personal data be restricted. If you believe that the personal data we process about you is incorrect and you have requested rectification, you may request restricted processing of your personal data. In such cases, restricted processing will take place during the time we are working to verify whether the personal data is correct or not, if the processing is unlawful and you object to the erasure of the personal data and instead request restriction of its use, if we no longer need the personal data for the purposes of the processing but you need it to establish or if we need to assert or defend legal claims. You may also request that our processing of your personal data be restricted if you have objected to processing based on a balancing of interests (legitimate interest); in such cases, personal data processing will be restricted during the time we are working to determine whether our legitimate interests override your legitimate interests.

In the event that processing has been restricted in accordance with any of the situations above, we may, in addition to storage itself, only process the data to establish, exercise or defend legal claims, to protect someone else's rights, or if you have given your consent.

#### 4.6. RIGHT TO OBJECT TO CERTAIN PROCESSING

You have the right to object at any time to our processing of your personal data that is based on the balancing of interests as a legal basis (legitimate interest). Further processing of your personal data requires that we demonstrate a legitimate reason for the processing in question. Otherwise, we may only process the data to establish, exercise, or defend legal claims. For reasons related to your specific situation, you also have the right to object to profiling and other processing of personal data concerning you, when the processing of the information is based on the customer relationship between you and Preem. You may contact us at any time to access our balancing of interests by notifying us via email at [dpo@preem.se](mailto:dpo@preem.se).

You always have the right to object to direct marketing without any balancing of interests being carried out.

As a data subject, you also have the right not to be subject to decisions based solely on automated decision-making, if such decision-making has legal consequences or otherwise significantly affects you. You have the right to object to such processing, including profiling. However, this right does not apply if the decision-making is necessary for entering into or fulfilling an agreement with you or if you have given explicit consent.

#### 4.7. RIGHT TO DATA PORTABILITY

You have the right, in certain cases, to have your personal data transferred in a structured, commonly used, and machine-readable format to another data controller, known as data portability, provided that the transfer is technically possible and can be carried out automatically. This applies to data that you have provided to us and that we process based on an agreement or consent as the legal basis. You can notify us by email at [dpo@preem.se](mailto:dpo@preem.se) if you wish to receive a data extract regarding your personal data.

#### 4.8. RIGHT TO WITHDRAW YOUR CONSENT

In cases where you have given your consent, you have the right to withdraw your consent at any time. You can withdraw your consent by sending us a message regarding this using the contact details provided above in section 1.

#### 4.9. THE RIGHT TO LODGE A COMPLAINT

If you believe that we are processing your personal data in violation of the GDPR, you have the right to submit a complaint to the Swedish Authority for Privacy Protection (IMY) using the contact details provided below in section 8. Read more about how to submit a complaint on IMY's website <https://www.imy.se>.

### 5. WHO MAY WE SHARE YOUR INFORMATION WITH?

#### 5.1. TRANSFER OF YOUR PERSONAL DATA WITHIN THE EU/EEA

Preem does not sell information about you to third parties. However, in the course of conducting our business, it is necessary for us to share your personal data with certain third parties in order, among other things, to provide you with our services and products and to fulfill our agreement with you. In such cases, we take all necessary technical, legal, and organizational measures to ensure that your personal data is handled securely and with an adequate level of protection. The following categories of third parties may receive and process your personal data.

##### *Suppliers and subcontractors*

Suppliers and subcontractors are companies that provide Preem with the services and functionalities required for us to be able to offer you our services and products. In most cases, suppliers and/or subcontractors are companies that only have the right to process the personal data they receive from Preem on Preem's behalf, so-called data processors with whom we have entered into data processing agreements to guarantee the integrity of your personal data. Examples of suppliers and subcontractors include companies that provide Preem with (i) IT services and handle necessary operations, technical support, and maintenance of our IT solutions, (ii) security services and may perform surveillance of Preem's facilities and properties, (iii) access control systems and manage and administer your authorization to access our facilities, (iv) HR systems and assist Preem with the execution of HR-related matters, and (v) transport and logistics systems and contribute to enabling Preem's logistics, warehousing, and delivery. In certain cases, however, some of these suppliers and/or subcontractors process your personal data for their own purposes and are therefore separate data controllers for that part of the personal data processing. To read more about how these companies process your personal data, we refer you to their privacy policies.

Preem needs access to services and functionalities from other companies that Preem cannot provide itself. We may therefore share your personal data with suppliers or subcontractors in order to access these services and functionalities in the performance of our contractual obligations to you, or to fulfill our legitimate interest and for the other purposes set out in this Privacy Policy. We ensure that the processing this entails is necessary to pursue such an interest, and that our interest outweighs your right not to have your data processed for that purpose. You have the right to object to this processing if we base the transfer on legitimate interest, due to circumstances in your particular case. More information about your rights can be found in section 4.

##### *Debt collection agency*

In the event that Preem needs to collect an outstanding debt in order to establish, exercise, or defend its legal claims, your personal data may be transferred to a debt collection agency cooperating with us, based on our legitimate interest in collecting overdue debts. When the debt collection agency collects debts, it does so as an independent and separate data controller.

##### *Marketing agencies*

In order for Preem to create and carry out marketing and advertising strategies and/or campaigns, it is necessary for us to share your personal data with marketing agencies. We base such transfers of your personal data on our legitimate interest in marketing our products and our business to you and other potential customers. You have the right to object to transfers of your personal data that we base on our legitimate interests. Such objections will be assessed on a case-by-case basis. You can find more information about your rights in section 4 above.

##### *Audit firms*

In order for Preem to fulfill its statutory obligations under, among other things, the Swedish Companies Act (2005:551) and the Swedish Accounting Act (1999:1078), your personal data may be transferred to audit firms tasked with reviewing, among other things, Preem's accounting and financial reporting. The audit firm has a separate and independent data controller responsibility for their processing of your personal data.

##### *Insurance company*

Where applicable, if Preem has suffered damage, your personal data may be transferred to Preem's insurance company if required to settle the damage and thereby establish, exercise, or defend our legal claims. The transfer of your personal data is based on our legitimate interest in having the damage ultimately settled.

#### *Providers of recruitment services*

We always strive to have the most competent employees and will therefore initiate recruitment campaigns from time to time. Preem uses several providers of recruitment services for this purpose and will share your personal data with such providers of recruitment services as necessary to administer your job application. We base such transfers of your personal data on our legitimate interests in administering your and other candidates' job applications. You have the right to object to transfers of your personal data that we base on our legitimate interests. Such objections will be evaluated on a case-by-case basis. You can find more information about your rights in section 4 above.

#### *Providers of whistleblowing services*

In order for us to comply with whistleblowing legislation, we will share your personal data with the providers of our whistleblowing service in cases where you have submitted a whistleblowing report. We base such transfers of your personal data on our legal obligation to do so under, for example, the Act (2021:890) on the protection of persons who report misconduct.

#### *Authorities*

We are sometimes required to provide certain information as needed by law to various authorities, such as the Swedish Tax Agency, the Swedish Authority for Privacy Protection (IMY), and the Police. An example of when we have a legal obligation to disclose such information is to prevent money laundering and terrorist financing in accordance with the Act (2017:630) on Measures against Money Laundering and Terrorist Financing. We may also disclose your personal data to authorities if you have consented to us doing so. Furthermore, we may share your personal data with relevant authorities if we suspect that a crime has been committed, in which case the transfer is based on our legitimate interest in having the crime investigated. Authorities that receive personal data may then process your personal data as independent and separate data controllers.

## 5.2. TRANSFER OF YOUR PERSONAL DATA OUTSIDE THE EU/EEA

Where applicable, we may share your personal data with other parties in a country outside the EU/EEA, known as a "third country." In a third country, the GDPR does not apply, which may entail an increased risk from a privacy perspective, including, among other things, the possibility for authorities in a third country to access your personal data and for your ability to exercise control over the personal data. To protect your personal data and to maintain an adequate level of protection for your personal data, the transfer is based either on a decision from the European Commission regarding an adequate level of protection or through appropriate safeguards such as binding corporate rules approved by the competent supervisory authority, or the European Commission's standard contractual clauses in combination with organizational and technical protective measures.

You can read more about which countries are considered to have an adequate level of protection on the European Commission's website by following this link: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_sv).

You can read more about standard contractual clauses by following this link: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_sv).

We always intend to carry out a risk assessment before any transfer to a third country takes place, and we implement both technical and organizational safeguards to ensure an appropriate level of protection. We always strive to transfer as little personal data as possible to countries outside the EU/EEA, and, if possible, in anonymized form. For more information about the safeguards implemented by Preem, please see section 6 of this Privacy Policy.

In the tables below, you can see which recipients outside the EU/EEA may be relevant.

#### *Suppliers and subcontractors*

In certain cases, your personal data may be shared with suppliers and subcontractors outside the EU/EEA. This may involve providers of, for example, marketing services, IT services, and delivery services required to conduct our business, with headquarters or servers located in a country outside the EU/EEA.



Supplier/subcontractor	Personal data that may be shared	Description	Contact details
CGI Inc.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> </ul>	<p>CGI Inc., through its subsidiary CGI Sverige AB, provides Preem with its Raindance system. The customer database system CIMS CORE and the payment system PP360 are also provided by CGI Inc. The use of these systems is necessary for Preem's invoicing, payment tracking, and reporting of budget and accounting. The transfer of your personal data to CGI Inc. is therefore necessary for our use of these systems.</p> <p>CGI Inc. is headquartered in Canada, a third country with an adequate level of protection according to the European Commission regarding the transfer of personal data within the private sector, which is why CGI Inc. bases personal data transfers on the European Commission's adequacy decision. The CGI Group also has approved binding corporate rules that are applied when transferring personal data within the CGI Group.</p> <p>You can also read more about how CGI Inc. processes personal data in their Privacy Policy here:</p> <p><a href="https://www.cgi.com/en/privacy/privacy-policy">https://www.cgi.com/en/privacy/privacy-policy</a>.</p>	<p><i>CGI Inc.</i></p> <p>1350 René-Lévesque Blvd West, 15th floor, Montreal, Canada</p>
Microsoft Corporation	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Generated data<sup>1</sup></li> </ul>	<p>Microsoft Corporation provides Preem with several systems, including Active Directory, Azure Logic Apps, BizTalk, SharePoint, and Office 365, all of which are used by Preem and are necessary for the operation of Preem's business. The transfer of your personal data to Microsoft Corporation is therefore necessary for our use of these systems.</p> <p>Microsoft Corporation is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, Microsoft Corporation is affiliated with and certified under the EU-U.S. DPF, and all transfers to third countries are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Microsoft Corporation processes personal data in their privacy policy here:</p> <p><a href="https://privacy.microsoft.com/en-US/privacystatement">https://privacy.microsoft.com/en-US/privacystatement</a>.</p>	<p><i>Microsoft Corporation</i></p> <p>One Microsoft Way, Redmond, WA 98052, USA</p>

Check Point Software Technologies Ltd	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>Check Point Software Technologies Ltd provides Preem with our firewall system, which is necessary to maintain Preem's ambitions to uphold a high level of IT security. The transfer of your personal data to Check Point Software Technologies Ltd is therefore necessary for our use of this system.</p> <p>Check Point Software Technologies Ltd is based in Israel, a third country with an adequate level of protection according to the EU Commission, which is why all transfers to third countries are therefore based on the EU Commission's adequacy decision.</p> <p>You can also read more about how Microsoft Corporation processes personal data in their privacy policy here:  <a href="https://www.checkpoint.com/privacy/">https://www.checkpoint.com/privacy/</a>.</p>	<p><i>Check Point Software Technologies Ltd</i></p> <p>5 Shlomo Kaplan Street, Tel Aviv 6789159, Israel</p>
Coupa Software, Inc.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact details<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> </ul>	<p>Coupa Software, Inc. provides Preem with our procurement system, which is required to create structure and control over the supplier relationships we have. The transfer of your personal data to Coupa Software, Inc. is therefore necessary for our use of this system.</p> <p>Coupa Software, Inc. is based in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update of this Privacy Policy, Coupa Software, Inc. is affiliated with and certified under the EU-U.S. DPF, and all transfers to third countries are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Coupa Software, Inc. processes personal data in their privacy policy here:  <a href="https://www.coupa.com/privacy-policy">https://www.coupa.com/privacy-policy</a>.</p>	<p><i>Coupa Software, Inc.</i></p> <p>Liberty Town Center 201 S. Division St., Ste. 300. Ann Arbor, MI 48104, USA</p>
Open Text Corporation	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> </ul>	<p>Open Text Corporation provides Preem with its document management system StreamServe. The use of the system is necessary for Preem to manage its document handling, including for invoicing purposes. The transfer of your personal data to Open Text Corporation is therefore necessary for our use of this system.</p> <p>Open Text Corporation is headquartered in Canada, a third country with an adequate level of protection according to the European Commission regarding the transfer of personal data within the private sector. Therefore, Open Text Corporation bases personal data transfers on the European</p>	<p><i>Open Text Corporation</i></p> <p>275 Frank Tompa Drive Waterloo, ON N2L 0A1 Canada</p>

		<p>Commission's adequacy decision. Where applicable, Open Text Corporation also bases the transfer of your personal data on the European Commission's standard contractual clauses, which you can read more about on Open Text Corporation's website:</p> <p><a href="https://www.opentext.se/about/copyright-information/site-privacy">https://www.opentext.se/about/copyright-information/site-privacy</a>.</p> <p>You can also read more about how CGI Inc. processes personal data in their privacy policy here:</p> <p><a href="https://www.opentext.se/about/copyright-information/site-privacy">https://www.opentext.se/about/copyright-information/site-privacy</a>.</p>	
Diebold Nixdorf, Inc.	<ul style="list-style-type: none"> <li>Financial and payment data<sup>1,2</sup></li> </ul>	<p>Diebold Nixdorf, Inc. provides Preem with its payment system Vynamic. The use of this system is necessary for Preem to be able to provide you with our services and products. The transfer of your personal data to Diebold Nixdorf, Inc. is therefore necessary for our use of this system.</p> <p>Diebold Nixdorf, Inc. is based in the USA, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, Diebold Nixdorf, Inc. is not affiliated with or certified under the EU-U.S. DPF. Instead, the third country transfer is based on the European Commission's standard contractual clauses, which you can read more about on Diebold Nixdorf, Inc's website:</p> <p><a href="https://www.dieboldnixdorf.com/en-us/privacy-policy/global-privacy-notice/#international-transfers">https://www.dieboldnixdorf.com/en-us/privacy-policy/global-privacy-notice/#international-transfers</a>.</p> <p>The Diebold Nixdorf Group also has approved binding corporate rules that are applied when transferring personal data within the Diebold Nixdorf Group.</p> <p>You can also read more about how Diebold Nixdorf, Inc. processes personal data in their Privacy Policy here:</p> <p><a href="https://www.dieboldnixdorf.com/en-us/privacy-policy/global-privacy-notice/">https://www.dieboldnixdorf.com/en-us/privacy-policy/global-privacy-notice/</a>.</p>	<p><i>Diebold Nixdorf, Inc.</i></p> <p>North Canton. 350 Orchard Ave NE North Canton, OH 44720, USA</p>
Kalibrate Technologies Ltd	<ul style="list-style-type: none"> <li>Identification data<sup>1,2</sup></li> <li>Contact details<sup>1,2</sup></li> </ul>	<p>Kalibrate Technologies Ltd provides Preem with its pricing system Kalibrate. The use of the system is necessary for Preem to manage our pricing and to send relevant price information to our franchisees. The transfer of your personal data to</p>	<p><i>Kalibrate Technologies Ltd</i></p> <p>Suite 213, No.2 Circle Square, 1 Symphony Park,</p>

		<p>Kalibrate Technologies Ltd is therefore necessary for our use of this system.</p> <p>Kalibrate Technologies Ltd is based in the United Kingdom, a third country with an adequate level of protection according to the EU Commission, and all transfers are therefore based on the EU Commission's adequacy decision.</p> <p>You can read more about how Kalibrate Technologies Ltd processes your personal data in their Privacy Policy here:</p> <p><a href="https://kalibrate.com/privacy-policy/">https://kalibrate.com/privacy-policy/</a>.</p>	<p>Manchester, M1 7FS, United Kingdom</p>
ServiceNow, Inc.	<ul style="list-style-type: none"> <li>• Identification data<sup>1,2</sup></li> <li>• Contact detail<sup>1,2</sup></li> <li>• Financial data<sup>1,2</sup></li> </ul>	<p>ServiceNow, Inc. provides Preem with several systems, including Preem's customer service management system and HR systems. The use of these systems is necessary for Preem to be able to manage and offer you our customer service as well as handle HR matters. The transfer of your personal data to ServiceNow, Inc. is therefore necessary for our use of these systems.</p> <p>ServiceNow, Inc. is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update of this Privacy Policy, ServiceNow, Inc. is affiliated with and certified under the EU-U.S. DPF, and all transfers to third countries are therefore based on the European Commission's adequacy decision. Where applicable, ServiceNow, Inc. also bases the transfer of your personal data on the European Commission's standard contractual clauses, which you can read more about on ServiceNow, Inc's website:</p> <p><a href="https://www.servicenow.com/privacy-statement.html">https://www.servicenow.com/privacy-statement.html</a>.</p> <p>You can also read more about how ServiceNow, Inc. processes personal data in their Privacy Policy here:</p> <p><a href="https://www.servicenow.com/privacy-statement.html">https://www.servicenow.com/privacy-statement.html</a>.</p>	<p><i>ServiceNow, Inc.</i></p> <p>2225 Lawson Lane Santa Clara, CA 95054, USA</p>
Google LLC	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>Google LLC provides Preem with the analytics tool Google Analytics 4, the tag management system Google Tag Manager, and the marketing tool Google Ads. The use of these tools is necessary for Preem's business development and marketing. The transfer of your personal data to Google LLC is therefore necessary for our use of these tools.</p>	<p><i>Google LLC</i></p> <p>1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA</p>

		<p>Google LLC is headquartered in the USA, a third country with an adequate level of protection according to the European Commission, provided that the receiving company in the USA is affiliated with and certified under the transatlantic agreement EU-U.S. Data Protection Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, Google LLC is affiliated with and certified under the EU-U.S. DPF, and all third country transfers are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Google LLC processes personal data in their privacy policy here:</p> <p><a href="https://policies.google.com/privacy?hl=en-US/">https://policies.google.com/privacy?hl=en-US/</a>.</p>	
Meta Platforms, Inc.	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>Meta Platforms, Inc. provides Preem with the analytics tool Meta Pixel. The use of these tools is necessary for Preem's business development. The transfer of your personal data to Meta Platforms, Inc. is therefore necessary for our use of this tool.</p> <p>Meta Platforms, Inc. is based in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving company in the United States is affiliated with and certified under the transatlantic agreement EU-U.S. Data Protection Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update of this Privacy Policy, Meta Platforms, Inc. is affiliated with and certified under the EU-USA DPF, and all transfers to third countries are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Meta Platforms, Inc. processes personal data in their privacy policy here:</p> <p><a href="https://www.facebook.com/privacy/policy/">https://www.facebook.com/privacy/policy/</a>.</p>	<p><i>Meta Platforms, Inc.</i></p> <p>1601 Willow Road Menlo Park, CA 94025, USA</p>

### Social media

When you interact with us on social media such as Facebook, Instagram, LinkedIn, and Twitter, these companies will also collect and process your personal data. This means that a transfer of your personal data, for example your image and your name, will take place to a third country outside the EU/EEA area, specifically the USA. The transfer is necessary for you to be able to contact and interact with us on social media and is carried out by us or one of our appointed data processors responsible for our social media management and administration.

Social media	Personal data that may be shared	Description	Contact details
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Facebook and Instagram	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>By using the services to contact or interact with us, your personal data is processed by the company Meta Platforms Ireland Ltd, a subsidiary of Meta Platforms, Inc.</p> <p>Meta Platforms, Inc. is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, Meta Platforms, Inc. is affiliated with and certified under the EU-U.S. DPF, and all third country transfers are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Meta Platforms Ireland Ltd. processes personal data in their privacy policy here:</p> <p><a href="https://www.facebook.com/privacy/policy/">https://www.facebook.com/privacy/policy/</a>.</p>	<p><i>Meta Platforms Ireland Ltd.</i></p> <p>4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.</p>
X (formerly Twitter)	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>By using X to contact or interact with us, your personal data is processed by the company Twitter International Unlimited Company, a subsidiary of X Corp. (formerly Twitter, Inc.).</p> <p>X Corp. is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, X Corp. is not affiliated with or certified under the EU-U.S. DPF. Instead, the transfer to a third country is based on the European Commission's standard contractual clauses, which you can read more about on Twitter International Unlimited Company's website:</p> <p><a href="https://gdpr.twitter.com/en/faq.html">https://gdpr.twitter.com/en/faq.html</a>.</p> <p>You can also read more about how Twitter International Unlimited Company processes personal data in their privacy policy here:</p> <p><a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a>.</p>	<p><i>Twitter International Unlimited Company</i></p> <p>One Cumberland Place, Fenian Street</p> <p>Dublin 2, D02 AX07 Ireland</p>
YouTube	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> </ul>	<p>By using the service to contact or interact with us, your personal data is processed by the company Google Ireland Limited, a subsidiary of Google LLC.</p> <p>Google LLC is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving company in the United States is affiliated with and certified under the transatlantic agreement EU-U.S. Data Protection Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update of this Privacy Policy, Google LLC is affiliated with and certified under the EU-</p>	<p><i>Google Ireland Limited</i></p> <p>Gordon House, Barrow Street, Dublin 4, Ireland</p>

		<p>USA DPF, and all transfers to third countries are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Google Ireland Limited processes personal data in their privacy policy here:</p> <p><a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>.</p>	
LinkedIn	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>By using the service to contact or interact with us, your personal data is processed by the company LinkedIn Ireland Unlimited Company, a subsidiary of LinkedIn Corporation.</p> <p>LinkedIn Corporation is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving company in the United States is affiliated with and certified under the transatlantic agreement EU-U.S. Data Protection Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, LinkedIn Corporation is not certified under the EU-U.S. DPF, and therefore transfers to third countries cannot be based on the European Commission's adequacy decision. Instead, the transfer is carried out on the basis of the European Commission's standard contractual clauses, which you can read more about on LinkedIn's website: <a href="https://www.linkedin.com/help/linkedin/answer/62533">https://www.linkedin.com/help/linkedin/answer/62533</a>.</p> <p>You can also read more about how LinkedIn Ireland Unlimited Company processes personal data in their privacy policy here:</p> <p><a href="https://www.linkedin.com/legal/privacy-policy/">https://www.linkedin.com/legal/privacy-policy/</a>.</p>	<p><i>LinkedIn Ireland Unlimited Company</i></p> <p>Wilton Plaza, Wilton Place, Dublin 2, Ireland</p>
Snapchat	<ul style="list-style-type: none"> <li>• Identification data<sup>1</sup></li> <li>• Contact details<sup>1</sup></li> <li>• Generated data<sup>1</sup></li> <li>• Behavioral data<sup>1</sup></li> <li>• Device data and online identifiers<sup>1</sup></li> </ul>	<p>By using the service to contact or interact with us, your personal data is processed by the company Snap Inc., which within the EU is represented by the company Snap B.V.</p> <p>Snap Inc. is headquartered in the United States, a third country with an adequate level of protection according to the European Commission, provided that the receiving American company is affiliated with and certified under the EU-U.S. Data Privacy Framework ("EU-U.S. DPF").</p> <p>At the time of the latest update to this Privacy Policy, Snap Inc. is affiliated with and certified under the EU-U.S. DPF, and all third country transfers are therefore based on the European Commission's adequacy decision.</p> <p>You can also read more about how Snap Inc. processes personal data in their privacy policy here:</p> <p><a href="https://values.snap.com/en-GB/privacy/privacy-policy/eea-uk-privacy-notice">https://values.snap.com/en-GB/privacy/privacy-policy/eea-uk-privacy-notice</a>.</p>	<p><i>Snap B.V</i></p> <p>Keizersgracht 165, 1016 DP, Amsterdam, Netherlands</p>

## **6. HOW DO WE PROTECT YOUR PERSONAL DATA?**

Preem implements a range of technical and organizational measures to protect your personal data against loss, misuse, unauthorized access, unauthorized disclosure, alteration, or destruction. By combining organizational security measures such as access restrictions and procedures for personal data breaches with technical security measures such as firewalls and encryption, we have created a robust security solution for the protection of your personal data. Preem is committed to continuously developing our information security in order to protect your personal data.

For more information about the security measures we take and what these mean for you and your personal data, please send an email to [dpo@preem.se](mailto:dpo@preem.se).

## **7. UPDATING THIS DATA PROTECTION INFORMATION**

We continuously improve and develop our services, products, as well as our websites [www.preem.se](http://www.preem.se) and [www.preem.com](http://www.preem.com), and the content of this Privacy Policy changes over time. We encourage you to read this Privacy Policy each time you use our services and products, or when you enter into or intend to enter into a supplier relationship with us. If significant changes have been made to our services, products, or this Privacy Policy, we may notify you by email or in another way.

## **8. CONTACT DETAILS FOR PREEM AND THE SWEDISH AUTHORITY FOR PRIVACY PROTECTION**

Preem continuously works to ensure that we comply with data protection legislation in all markets where we offer our products and services. If you have any questions regarding the processing of your personal data or if you wish to exercise your rights as set out in section 4 above, you are welcome to contact us at [dpo@preem.se](mailto:dpo@preem.se).

If you are not satisfied with our handling of your case, you have the right to submit a complaint to the Swedish Authority for Privacy Protection (IMY) using the following contact details:

### **Swedish Authority for Privacy Protection**

Email: [imy@imy.se](mailto:imy@imy.se)

Website: [www.imy.se](http://www.imy.se) Postal address: Swedish Authority for Privacy Protection, Box 8114, 104 20 Stockholm

## **9. LINKS TO OTHER TERMS**

PREEM'S COOKIE POLICY:

<https://www.preem.se/cookies/>

This Privacy Policy was last updated on 2024-12-01.