

PRIVACY POLICY

1. Summary: How we process your personal data

SRS Security AB and its affiliated companies (“SRS”, “we”, “us”, or “our”) are committed to protecting your privacy and complying with applicable data protection and privacy laws. This privacy policy applies to personal data processed (i) when you visit our website, (ii) in connection with you being an existing or potential customer of ours, or (iii) when we communicate with you, or (iv) in connection with our fulfilment of legal obligations, or (v) when you apply for a position at SRS.

If you use our website, we process your personal data to:

- Tailor our website offerings to you
- Improve your browsing experience and customise our website to your preferences
- Develop and enhance our website, products, and services

If you or your company are existing or potential customers, we process your personal data to:

- Enter into agreements with you or your company and administer our relationship with you or your company
- Enable you or your company to use our products and services
- Market our products and services to you or your company
- Send invitations to our events and manage your participation
- Contact you for market research purposes and to generate statistical information

If you or your company communicate with us, in order to safeguard our legal interests and comply with legal obligations, we process your personal data:

- Contact you, communicate with you, and handle your enquiries
- Comply with marketing legislation
- Comply with accounting and bookkeeping legislation

If you apply for a position, we process your personal data to:

- Manage your job application

We are committed to being as transparent as possible regarding our processing of your personal data. Please do not hesitate to [contact us](#) if you have any questions about this privacy policy, including your rights.

Note: When we refer to “your company” in this policy, we mean your employer or the organisation you represent. In such cases, we only process personal data about you in your professional capacity, meaning we will only send marketing to your company and you in your professional role, never to you as a private individual.

When we process your personal data, you have certain rights (some are listed below). For more information about your rights and how to exercise them, please read our full privacy policy further below.

In brief, you have the following rights:

- | | |
|----------------------------------|--------------------------------|
| ✓ Right to complain | ✓ Right to rectification |
| ✓ Right to withdraw your consent | ✓ Right to erasure |
| ✓ Right of access | ✓ Right to restrict processing |
| ✓ Right to object | ✓ Right to data portability |

2. How we process your personal data – detailed description

Data Controller and contact details

SRS Security AB, registration number 556490-6328, is the data controller for most processing activities covered by this privacy policy. If you or the company you represent enter into an agreement with Scandinavian Risk Solutions AB, reg. no. 556666-9171, then Scandinavian Risk Solutions AB is the data controller. For simplicity, both companies are referred to as “SRS”, “we”, “us”, and “our” in this privacy policy.

If you have any questions or concerns regarding this privacy policy, how we process your personal data, or if you wish to exercise any of your rights under data protection law, you are welcome to contact us at any time at mail@srsgroup.se or PO Box 244, 101 24 Stockholm.

Sources of personal data?

We collect your personal data directly from you, for example, when you contact us. We may also collect your personal data from your company. Additionally, we may collect your personal data from other sources in the following situations:

- If you represent a potential customer, supplier, or partner (i.e., a potential business partner), we may collect your personal data from the internet or a third-party service.
- If you use our website, we use Google Analytics to collect information about your navigation on our website to analyse your usage.

Personal data you are required to provide

In general, you are not required to provide your personal data to us. You will find a description of when you need to provide your personal data in the tables below, where the legal basis is stated as “Legal obligation (Article 6.1(c) GDPR)”. If you do not provide certain personal data, we will not be able to enter into an agreement with you or your company.

Who may access your personal data

Your personal data is initially collected and processed by us. The data is only processed by employees who require such access to perform their duties. Certain personal data will be shared with third parties, such as IT service providers. Third parties will process data on our behalf and according to our instructions as our data processors. In some cases, your personal data will be shared with third parties that have independent responsibility as data controllers for the personal data they receive from us, for example when we share personal data with public authorities such as the Swedish Police Authority, or with our auditors and legal advisors. We only share personal data with third parties where it is necessary for them to fulfil their obligations to us under our agreement with them.

Where is your personal data processed?

As a rule, we and our data processors process your personal data within the EU/EEA. In some cases, data may be transferred outside the EU/EEA by our IT providers. Such transfers are only made in accordance with applicable data protection legislation, i.e., only if an adequate level of protection for your personal data can be ensured.

Description of processing of personal data per processing activity

In the tables below, we provide a detailed account of the purposes for which we process your personal data, the categories of personal data involved, the circumstances under which you are required to provide such data, the legal basis for processing according to GDPR, and the applicable retention periods.

If you visit our website

Most of the time, you can visit our website without telling us who you are. However, certain technical information is normally collected by default when you use our website, as described below. We collect personal data using cookies. Details are provided in our Cookie Policy.

To tailor our website offerings		
Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Provide recommendations and displaying customised content on our website based on, for example, which pages you visit or which content you view <p><i>We collect your data using cookies. You can read more in the SRS Cookie Policy. You can set your browser to refuse non-essential cookies.</i></p>	<ul style="list-style-type: none"> - IP address - Time of website visit - Referring website - Pages visited, links used, other content viewed on our website - Information about your devices, and other technical information provided by your browser 	<p>Consent (Article 6.1(a) GDPR).</p> <p><i>Your personal data will be processed based on your consent. You may withdraw such consent at any time by contacting us.</i></p>
<p>Retention period: We use your personal data during your website visit and will anonymise your personal data as soon as possible, and no later than after 2 years.</p>		
<p>Recipients: If you consent, we will share your personal data with Google Analytics, which provides the website analysis service. We will also share your personal data with our IT providers.</p>		
<p>Transfers outside the EU/EEA: Google Analytics.</p>		

To improve your browsing experience and customise our website

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none">- Saving your user information to avoid repeating your settings when visiting our website. <p><i>We collect your data using cookies. You can read more in the SRS Cookie Policy. You can set your browser to refuse non-essential cookies.</i></p>	<ul style="list-style-type: none">- User information- IP address- Time of website visit- Links used- Device information, and other technical information provided by your browser	Legitimate interest (Article 6.1(f) GDPR). <i>Processing is necessary for our legitimate interest in ensuring the website functions optimally.</i>
Retention period: Data is used during your website visit and anonymised as soon as possible, and no later than after 2 years.		
Recipients: If you consent, we will share your personal data with Google Analytics, which provides the website analysis service. We will also share your personal data with our IT providers.		
Transfers outside the EU/EEA: Google Analytics.		

To develop and improve our website, products, and services

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none">- Analysing your use of our website to improve our website and services <p><i>We collect your data using cookies. You can read more in the SRS Cookie Policy. You can set your browser to refuse non-essential cookies.</i></p>	<ul style="list-style-type: none">- IP address- Time of website visit- Referring website- Pages visited, links used, content viewed- Device information, and other technical information	Consent (Article 6.1(a) GDPR). <i>You may withdraw your consent at any time by contacting us.</i>
Retention period: Data is used during your website visit and anonymised as soon as possible, and no later than after 2 years.		
Recipients: If you consent, we will share your personal data with Google Analytics, which provides the website analysis service. We will also share your personal data with our IT providers.		
Transfers outside the EU/EEA: Google Analytics.		

If you or your company use our products or services

When you or your company use our products or services, we process your personal data to provide you or your company with the product or service in accordance with entered agreement and to administer the agreement.

If you or your company are a potential customer, we process your personal data to manage your enquiry, prepare a quotation and enter into an agreement with you or your company.

We obtain the data from you or your company. If you represent a potential customer, we may also collect your personal data from the internet, public registers or a third-party service.

Enter into agreement with you or your company and manage our relationship with you or your company		
Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none">- Entering into agreements- Manage the relationship with you or your company (e.g. communicate regarding ongoing assignments or negotiate extensions)	<ul style="list-style-type: none">- Name- Email address- Phone number- Title- Personal number- Other information needed to provide requested products/ services	<u>If you act as a private individual:</u> Performance of a contract (Article 6.1(b) GDPR). <i>The processing is necessary to fulfil contractual obligations relating to your use of our products and/or services. If you do not provide the requested personal data, we will be unable to deliver our products and services to you</i>
		<u>If you represent a company:</u> Legitimate interest (Article 6.1(f) GDPR). <i>The processing is necessary for our legitimate interest in entering into a contract with your company concerning your and your company's use of our products and services.</i>
		<i>Personal identity numbers are only processed where necessary to ensure secure identification of you.</i>
Retention period: Personal data is processed throughout the contractual relationship and in order to enter into an agreement with you. After the agreement has ended, we will retain your information in our records for up to 2 years to be able to respond to any questions you or your company may have.		
Recipients: Data is shared with our IT providers.		
Transfers outside the EU/EEA: None.		

To enable you or your company to use our products and services

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Fulfilling your or your company's request to use our products/services - Deliver requested products/services in accordance with the agreement - Provide you or your company with information relating to used products and/or services - Enable you to log in to our service portal (if applicable) - Invoicing 	<ul style="list-style-type: none"> - Name - Email address - Phone number - Title - Username - Passwords and other credentials used to authenticate you and validate your actions - Other information that may be required to deliver the products or services you have requested and to fulfil our obligations under the agreement 	<p><u>If you act as a private individual:</u></p> <p>Performance of a contract (Article 6.1(b) GDPR).</p> <p><i>The processing is necessary to fulfil contractual obligations relating to your use of our products and/or services. If you do not provide the requested personal data, we will be unable to deliver our products and services to you</i></p> <p><u>If you represent a company:</u></p> <p>Legitimate interest (Article 6.1(f) GDPR).</p> <p><i>Your personal data will be processed based on that such processing is necessary for our legitimate interest in entering into a contract with your company concerning your and your company's use of our products and services.</i></p>
Retention period: Data is stored during the contract period and up to 2 years after contract termination to respond to any enquiries.		
Recipients: Data is shared with our IT providers.		
Transfers outside the EU/EEA: None.		

To market our products and services to you or your company

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Sharing information about new products/services that may interest you or your company 	<ul style="list-style-type: none"> - Name - Email address - Company represented (if applicable) 	<p>Legitimate interest (Article 6.1(f) GDPR).</p> <p><i>Your personal data will be processed on the basis that such processing is necessary for our legitimate interest in contacting and</i></p>

To market our products and services to you or your company

		<i>marketing to customers whom we believe may be interested in our offers.</i>
Retention period: You may unsubscribe to newsletter or object to marketing at any time. If you object, we record this in our unsubscribe register to avoid further marketing.		
Recipients: Data is shared with our IT providers.		
Transfers outside the EU/EEA: None.		

To send invitations to our events and manage your participation

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none">- Sending event invitations- Managing event participation	<ul style="list-style-type: none">- Name- Email address- Phone number	Legitimate interest (Article 6.1(f) GDPR). <i>Your personal data will be processed on the basis that such processing is necessary for our legitimate interest in inviting you to events that we organise and that we believe may be of interest to you</i>
Retention period: Data is stored until the event is concluded.		
Recipients: Data is shared with our IT providers.		
Transfers outside the EU/EEA: None.		

To contact you for market research and create statistical information

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none">- Contacting you for customer satisfaction surveys or market research	<ul style="list-style-type: none">- Name- Email address- Phone number	Legitimate interest (Article 6.1(f) GDPR). <i>Your personal data will be processed on the basis that such processing is necessary for our legitimate interest in generating statistical information and improving our products and</i>

To contact you for market research and create statistical information

		<i>services.</i>
Retention period: Contact details are stored during the contract period and deleted within 2 years after contract termination.		
Recipients: Data is shared with our IT providers.		
Transfers outside the EU/EEA: None.		

If you or your company communicate with us, in order to safeguard our legal interests and comply with legal obligations, we process your personal data

If you communicate with us, we process your personal data as described below. We obtain the data from you or your company. We also process your personal data where necessary to defend against claims or to initiate claims. We may obtain the data from you or from third parties connected to your case or claim.

Finally, we need to process certain personal data to comply with the requirements of the Swedish Accounting Act. You must provide this personal data to us; otherwise, we cannot fulfil our legal obligations.

To communicate with you and to safeguard our legal interests

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Communication with you or your company - Handling questions, complaints, and requests - Defend ourselves against legal claims and, where necessary, initiate legal proceedings 	<ul style="list-style-type: none"> - Name - Email address - Phone number - Title - Username - Information regarding your or your company's complaints, questions or similar matters - Information regarding the claim in which you or your company is involved - Other information that you or your company chooses to provide to us 	<p>Legitimate interest (Article 6.1(f) GDPR).</p> <p><i>Your personal data will be processed on the basis that such processing is necessary for our legitimate interest in contacting and communicating with our customers and in handling enquiries, complaints and/or claims.</i></p>
<p>Retention period: Data is stored until the matter is resolved and, if relevant, during the contract period. After contract termination, data is deleted within 2 years or retained as required by law.</p> <p>In the event of a legal dispute, we will process your personal data for the duration of the dispute, but not after the dispute has been finally settled.</p>		
Recipients: Data is shared with our IT providers and, if legal assistance is needed, with our legal advisers.		
Transfers outside the EU/EEA: None.		

To comply with marketing legislation

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Storing your unsubscribe request in a register to ensure no further marketing is sent to you 	<ul style="list-style-type: none"> - Name - Email address 	<p>Legal obligation (Article 6.1(c) GDPR).</p> <p><i>The processing is necessary for compliance with our legal obligations under the Swedish Marketing Act (SFS 2008:486), which prohibits us from sending marketing communications to individuals who have objected to receiving such communications.</i></p> <p><i>You are required to provide us with your personal data; otherwise, we cannot ensure that you will not receive further marketing from us.</i></p>
Retention period: You will remain in our unsubscribe register indefinitely.		
Recipients: Data may be shared with our IT providers.		
Transfers outside the EU/EEA: None.		

To comply with accounting and bookkeeping legislation

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Storing information for accounting and bookkeeping purposes 	<ul style="list-style-type: none"> - Name - Phone number - Email address - Payment history and other accounting records 	<p>Legal obligation (Article 6.1(c) GDPR).</p> <p><i>The processing is necessary for compliance with our legal obligations under the Swedish Accounting Act (SFS 1999:1078) in relation to bookkeeping and accounting.</i></p> <p><i>You are required to provide us with your personal data; otherwise, we will be unable to fulfil our legal obligations.</i></p>
Retention period: We will retain documents constituting accounting records, together with any personal data contained therein, for a period of seven to eight years in accordance with the Swedish Accounting Act (SFS 1999:1078). This means that we will store accounting material until the end of the seventh year following the end of		

the calendar year for the financial year to which the personal data relates.

Recipients: Data is shared with our IT providers.

Transfers outside the EU/EEA: None.

If you apply for a position

Manage your job application, match your profile with future opportunities, and exercise and protect our legal rights

Processing performed	Personal data processed	Legal basis
<ul style="list-style-type: none"> - Administering and evaluating your application, communicating with you as a candidate - Matching your profile with future job opportunities - Exercising and protecting our legal rights under Swedish discrimination law 	<ul style="list-style-type: none"> - Name - Contact details - CV and cover letter, certificates or other documents provided, - Test results (if applicable) - Personal ID number (if provided) - Social media information (e.g., LinkedIn profile, if you have chosen to import data) - Information about referrals - Other information included in your application 	<p>Legitimate interest (Article 6.1(f) GDPR)</p> <p><i>The processing is necessary for our legitimate interest in administering and evaluating your job application and in communicating with you in connection with your application.</i></p> <p><i>We will only process your national identification number where it is clearly justified in relation to the purpose of the processing.</i></p> <p>Consent (Article 6(1)(a) GDPR)</p> <p><i>To retain your information and match your profile with future job opportunities, we require your consent. You may withdraw your consent at any time.</i></p> <p>Legitimate interest (Article 6.1(f) GDPR)</p> <p><i>Your personal data will be processed on the basis that such processing is necessary for our legitimate interest in safeguarding and protecting our legal rights if we are subject to claims under the Discrimination Act.</i></p>
<p>Retention period: Data is stored until the position is filled and for a reasonable period thereafter to defend against legal claims. If you consent, your information is stored for up to 2 years or until you withdraw your consent</p>		
<p>Recipients: Data is shared with our IT providers and, if legal assistance is needed, with our legal advisers.</p>		
<p>Transfers outside the EU/EEA: None.</p>		

Balancing of interests when processing personal data based on the lawful ground of “legitimate interest”

For certain purposes, we process your personal data based on our “legitimate interest”. We have assessed that our legitimate interest in processing your personal data outweighs your interests or rights requiring protection of your personal data.

Consent to processing

For certain purposes, we process your personal data based on your consent. More information about these situations is provided above. You may withdraw your consent at any time. If you withdraw your consent, we will cease processing your personal data for that purpose. Your withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

3. What are your rights when we process your personal data? Detailed description

You have certain rights that you can exercise to influence how we process your personal data. More detailed information about these rights and when they apply can be found at the Swedish Authority for Privacy Protection (IMY).

Right to complain - Article 77 GDPR

You have the right *to file a complaint* with the competent supervisory authority if you believe that the processing of your personal data violates the GDPR. In Sweden, the competent authority is the Swedish Authority for Privacy Protection (IMY).

Right to withdraw your consent - Article 7.3 GDPR

You have the right to *withdraw your consent* at any time by contacting us. If you consent on the website, you can always withdraw your consent directly on the website.

Right to access – Article 15 GDPR

You have the right to *receive confirmation* of whether we process your personal data. You can submit a request by contacting us. If we process your personal data, you also have the right to *receive a copy of the personal data* we process and *information about the processing*, such as the purposes and retention periods.

Right to object - Article 21 GDPR

You have the right to *object* at any time to the processing of your personal data for direct marketing (including profiling) and to processing based on a legitimate interest.

Right to rectification - Article 16 GDPR

You have the right to have inaccurate personal data rectified without undue delay. You also have the right to complete incomplete personal data.

Right to erasure ("right to be forgotten") - Article 17 GDPR

Under certain conditions, you have the right to have *your personal data erased* without undue delay, for example, if you withdraw your consent and there is no other legal basis for processing, or if the data is no longer necessary for the purposes for which it was collected or processed.

Right to restriction of processing – Article 18 GDPR

Under certain conditions, you have the right to require us to *restrict our processing* of your personal data, for example, if you contest the accuracy of the data, or if the processing is unlawful and you oppose erasure but request restriction instead.

Right to data portability – Article 20 GDPR

If we process your personal data based on your consent or to fulfil a contract, you have the right *to receive the personal data* you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to *transfer this data* to another data controller, where technically feasible.

This privacy policy is effective as of 2025-12-22.