

Privacy Policy for SAN Electro Heat A/S

This Privacy Policy describes the information SAN Electro Heat A/S collects about you and how we use and share that information. We respect your privacy and therefore want to inform you about how we process your personal data and what rights you have in relation to our processing of your personal data.

If you have any questions regarding our processing of your personal data or if you wish to assert any of rights, you are welcome to contact us. Please send these types of requests to us via or if not possible, use email address: sales@san-as.com.

How we process your data, in summary:

SAN Electro Heat's data processing activities includes the following:

- If you represent a customer, supplier or other third party, we process your personal data to enter into agreements and administrate our relationship.
- Log files and online activity: When you visit www.san-as.com, we follow a standard procedure of using log files. These log files record visitors to our website and collect information such as IP addresses, browser type, Internet Service Provider (ISP), date and time stamps, referring/exit pages, and the number of clicks (See Privacy Policy – Online Activities for details).

In some cases, your personal data can be transferred outside the EU/EEA by our suppliers and companies within the NIBE Group.

You can access more detailed descriptions regarding the specific processing of your personal data and your rights by reading the detailed sections below:

- Privacy Policy – Detailed Version
- Privacy Policy – Online Activities

Your rights, in summary:

- The right to lodge a complaint with a supervisory authority,
- The right to withdraw your consent,
- The right to access,
- The right to object,
- The right to erasure,
- The right to rectification,
- The right to restriction of processing, and
- The right to data portability

Privacy Policy – Detailed Version

Below you will find information on:

- Who is responsible for the processing of your personal data

- How we process your personal data.
- What are your rights when we process your personal data.

SAN Electro Heat A/S is responsible for the processing of your personal data.

SAN Electro Heat A/S, Gillelejevej 30B, 3230 Græsted (VAT number: DK-42165913) is responsible for the processing of your personal data as described in this privacy policy. SAN Electro Heat A/S is part of the NIBE group.

If you have any questions regarding our processing of your personal data or if you wish to assert any of your rights, you are welcome to contact us via sales@san-as.com.

HOW WE PROCESS YOUR PERSONAL DATA

CONTACT PERSONS FOR CUSTOMERS, SUPPLIERS AND OTHER THIRD PARTIES

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
We process your personal data in order to enter into an agreement with your company and administrate our business relationship.	The following categories of personal data that are collected during the processing: • Name • Address • Telephone number • Email	The legal basis for the data processing is based on Article 6 (1) of the GDPR. Your personal data will be processed based on our legitimate interest to negotiate and enter into an agreement with your company and to administer our business relationship with your company.

HOW LONG DO WE KEEP YOUR DATA?

Criteria used to determine the retention period:

- Your personal data will be deleted if we conclude that we will not enter into an agreement with your company and your company does not want to keep contact with us.
- If your company signs an agreement with us, we will retain your personal data during our business relationship to assess past and future business opportunities.
- If we receive information that you no longer represent the company, we will delete your data, except for agreements and similar documentation where your name is included.

WHO HAS ACCESS TO YOUR DATA?

We share your data with IT providers who will process these on our behalf and following our instructions to ensure good and secure IT operations.

We will also share your personal data within the NIBE group. If a company in the NIBE group is based outside the EU or the EEA, we will obtain a separate consent from you before disclosing your data.

FROM WHOM DO WE GET THE INFORMATION?

The personal data is obtained directly from the customers

HOW LONG DO WE KEEP YOUR DATA?

We store your data while you are subscribed to our newsletters. You can choose to unsubscribe from mailings at any time by following the instructions in each mailing.

WHO HAS ACCESS TO YOUR DATA?

We share your personal data with IT providers who will process these on our behalf and following our instructions to ensure good and secure IT operations.

FROM WHOM DO WE GET THE INFORMATION?

Directly from customers

Balancing of interests' assessments

For some purposes, we process your personal data based on our "legitimate interest". By carrying out a balancing of interests' assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data.

If you want more information in relation to our balancing of interests' assessments, please do not hesitate to contact us via sales@san-as.com.

YOUR RIGHTS – DETAILED DESCRIPTION

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

If you want to know more about your rights or if you want to exercise any of your rights, please contact us via email address: sales@san-as.com.

Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

You have the right to lodge a complaint with a supervisory authority.

The supervisory authority in Denmark is Datatilsynet (Danish Data Protection Agency), Email: dt@datatilsynet.dk.

In detail: Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority, in particular, in the EU/EEA member state of your habitual residence, place of work or place where the alleged infringement of applicable data protection laws has allegedly occurred.

The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.

Right to withdraw consent (Article 7.3 GDPR)

You have the right to withdraw your consent at any time.

In detail. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right of access (Article 15 GDPR)

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. If we process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

In detail. The information we provide includes the following:

- the purposes of the processing,
- the categories of personal data concerned,
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations,
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,
- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,
- the right to lodge a complaint with a supervisory authority,
- if the personal data are not collected from you, we provide you with available information about the source of the personal data;
- the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and
- where your personal data are transferred to a third country or to an international organization, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.

For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.

Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.

Right to object (Article 21 GDPR)

You have the right to object to our processing of your personal data at any time.

In detail: Your right to object applies as follows:

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 e or 6.1 f GDPR, including profiling based on those provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the

processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Right to erasure (“the right to be forgotten”) (Article 17 GDPR)

You have the right to ask us to erase your personal data.

In detail: We have the obligation to erase your personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.

Where we have made the personal data public and are obliged in accordance with the rights stated above to erase the personal data, we shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to contact us via email address: sales@san-as.com

Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law which applies to us; or
- for the establishment, exercise or defence of legal claims.

Right to rectification of processing (Article 16 GDPR)

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you.

In detail: Considering the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to contact us via

Onetrust form or if not possible, use email address: sales@san-as.com or gdpr@nibe.se.

Right to restriction of processing (Article 18 GDPR)

You have the right to obtain from us restriction of the processing of your personal data.

In detail: Your right applies if:

- the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,
- you have objected to processing pursuant to Article 21.1 GDPR pending the verification whether our legitimate grounds override yours,
- the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or
- you need the personal data for the establishment, exercise or defence of legal claims even though we no longer need the personal data for the purposes of the processing.

Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We will notify each recipient to whom the personal data has been provided about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to contact us via email address: sales@san-as.com.

Right to data portability (Article 20 GDPR)

You have the right to receive your personal data (that you have provided to us) from us in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transferred to another data controller ("data portability").

In detail: The right applies if:

- the processing is based on the lawful basis consent or on a contract, and
- the processing is carried out by automated means.
- The exercise of the right to data portability shall be without prejudice to the right to erasure, i.e. Article 17.
- Your right to data

Privacy Policy – Online Activities

This section on Privacy Policy – online activities apply only to SAN Electro Heats A/S webpage online activities and is valid for visitors to our website.

At www.san-as.com, accessible from <https://www.san-as.com/>, one of our main priorities are the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by www.san-as.com and how we use it. If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us.

This Privacy Policy – Online Activities applies only to our online activities and is valid for visitors to our website, with regards to the information that they shared and/or collect in www.san-as.com.

Consent

By using our website, you hereby consent to our Privacy Policy and agree to its terms.

Information we collect

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point where we ask you to provide your personal information.

If you contact us directly, we may receive additional information about you, such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide.

How we use your information

We use the information we collect in various ways, including to:

- Provide, operate, and maintain our website
- Improve, personalize, and expand our website
- Understand and analyze how you use our website
- Develop new products, services, features, and functionality
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- Find and prevent fraud

Log Files

www.san-as.com follows a standard procedure with respect to the issue of using log files. These files log visitors when they visit websites. All hosting companies do this, as well as a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

Cookies and Web Beacons

Like any other website, www.san-as.com uses 'cookies'. These cookies are used to store information including visitors' preferences, the pages on the website that the visitor

accessed or visited and your general navigation on the website. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

Advertising Partners Privacy Policies

You may consult this list to find the Privacy Policy for each of the advertising partners of www.san-as.com.

SAN Electro Heat uses the following web analytics services: Google Analytics, Google Ads, and Leadfeeder/Dealfront, to track user traffic based on IP addresses.

These apps use cookies and similar technologies to collect information about users who visit the SAN Electro Heat website and is only applied if accepted by the web visitor. These technologies are used to measure the effectiveness of advertising campaigns and/or to personalize the advertising content you receive.

Third Party Privacy Policies

www.san-as.com Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options. You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.