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Privacy policy

In the course of Alligo's operations, we process personal data about you. Your privacy is important to us, and we want to be transparent about what data we process about you and why. We have therefore drawn up this privacy policy, which describes our processing of your data.

The provision of your personal data is in some cases a statutory requirement or necessary to fulfil an agreement. To the extent that you do not provide your personal data to us, it may affect our ability to fulfil our commitments to you as well as our duty to meet the legal obligations we have to comply with in relation to you.

1. Data controller

Alligo AB, co. reg. no. 559072–1352 ("Alligo", "we", "us" and "our"), with the postal address Box 631, SE-135 26 Tyresö, is the data controller for the processing of your personal data.

2. How do we process your personal data?

2.1 General information

Marketing

- Purpose: We process your data in order to communicate with you and send marketing to you. This communication includes sending marketing and information about Alligo (such as sending press releases, financial reports, newsletters as well as invitations to events and presentations).
- Type of personal data: Name, address, email address and phone number.
- Lawful basis: Legitimate interest. Alligo's legitimate interest is to provide information that you have requested from us, maintain a business relationship with you or your employer and/or provide any material and/or communicate with you in your professional role with regard to information and events that we offer that we believe may be of interest to you.
- Storage time: The saved data is continuously revised and erased at your request.

Support

- Purpose: responding to questions from you (such as when you contact us or ask us a question using the form we provide on our website or by email).
- Type of personal data: Name, address, email address and phone number.

- Lawful basis: Legitimate interest. Alligo's legitimate interest is to answer questions from people who contact us.
- Storage time: The information is stored for 30 days after the case is closed.

Insider information

- Type of personal data: Name, address, phone number (private and work), workplace, workplace address, email address and personal identity number.
- Purpose: If you have access to insider information, we process your personal data for the purpose of maintaining a list (known as a logbook).
- Lawful basis: For the purpose of fulfilling our legal obligations under the EU Market Abuse Regulation (EU 596/2014) and the EU Market Abuse Regulation (Supplemental Provisions) Act (2016:1306).
- Storage time: The data is saved for five years.

Whistleblowing

- See our policy on whistleblowing (*ALLIGO-P705*) for information about how we process personal data for whistleblowing.

Camera surveillance

- Purpose: Prevention of burglary and vandalism in or adjacent to Alligo's premises, as well as asserting legal claims in connection with suspicion of crime.
- Type of personal data: Images from camera surveillance and incident reports of e.g. thefts.
- Lawful basis: Legitimate interest. Alligo's legitimate interest is to prevent crime and maintain security in its premises, as well as inspect Alligo's legal claims in connection with any crimes committed in or adjacent to Alligo's premises.
- Storage time: Alligo will normally only retain the recorded material for up to 60 days. After this period, the collected material will be destroyed, provided that there is no need to retain it for a longer period, for example, due to an ongoing investigation.

See our guidelines for Camera surveillance (*ALLIGO-P706* and *ALLIGO-P707*) for more information about how we use camera surveillance.

2.2 Specific information for shareholders and employees of shareholders (including the representatives of shareholders such as proxies, assistants and administrators)

In addition to the general information stated in section 2.1, we process your personal data as a shareholder or an employee of a shareholder (including the representatives of shareholders such as proxies, assistants, and administrators) as appropriate in the following manner.

What is stated below under this section must where applicable also apply to representatives of shareholders such as proxies, assistants and administrators.

Dividends

- Purpose: Pay dividends to you as a shareholder.
- Type of personal data: Name, address, phone number, email address.
- Lawful basis: Fulfil an agreement with you as a shareholder.
- Storage time: The data is stored until you are no longer a shareholder in Alligo.

General meetings

- Purpose: Fulfil our obligations as a listed company, including drawing up a register of shareholders, keeping minutes, convening general meetings, drawing up a register of voters and voting rights registration.
- Type of personal data: Name, address, phone number, email address.
- Lawful basis: The processing is necessary to fulfil legal obligations under the Accounting Act.
- Storage time: The data is processed as long as it is required by law or general limitation rules according to the Swedish Act on Limitation (1981:130).

Euroclear discloses personal data to Alligo in connection with general meetings. Euroclear's privacy policy is available here: Privacy policy regarding the processing of personal data in connection with the general meeting

Accounting

- Purpose: Accounting purposes
- Type of personal data: Name, e-mail address, address, title and telephone number of shareholders and employees of shareholders.
- Lawful basis: The processing is necessary to fulfil a legal obligation under the Accounting Act.
- Storage time: The data is deleted seven years after an invoice is issued.

Internal and external publication of names of shareholders

- Purpose: Internal and external publication of the names of certain shareholders in financial reports and in news articles or press releases.
- Type of personal data: Shareholder’s name, shareholding.
- Lawful basis: Legitimate interest. Alligo’s legitimate interest is to comply with regulations and guidelines for listed companies that are not binding under legislation or decisions that are based on legislation for the purpose of increasing insight and transparency in our business.
- Storage time: The data that is processed in financial reports is saved for ten years. Data that is processed in news articles or press releases is saved for five years.

Publication of shareholders on website

- Purpose: Publish the largest shareholders on the website.
- Type of personal data: Shareholder’s name, shareholding.
- Lawful basis: Legitimate interest. Alligo’s legitimate interest is to maintain transparency with regard to our largest shareholders.
- Storage time: As long as you are one of our largest shareholders.

Internal and external publication of the board of directors, management and members of the Nomination Committee.

- Purpose: Publication of information about board members, persons in senior positions and members of the Nomination Committee on the website.
- Type of personal data: Name, title.
- Lawful basis: Legitimate interest. Alligo's legitimate interest is to comply with regulations and guidelines for listed companies that are not binding under legislation or decisions that are based on legislation for the purpose of increasing insight and transparency in our business.
- Storage time: The data is saved for five years.

Swedish Financial Supervisory Authority's register

- Purpose: Publication on Alligo's website of information from the Swedish Financial Supervisory Authority's register for insider transactions.
- Type of personal data: Name, position.
- Lawful basis: Legitimate interest. Alligo's legitimate interest lies in being able to publish information about us in accordance with guidelines for listed companies which are not stipulated by law, for example in accordance with the Swedish Code of Corporate Governance. We also have a legitimate interest in being able to communicate internally and externally such information that relates to Alligo in order to provide good service, answer questions or facilitate external contact.
- Storage time: Five years.

2.3 Specific information for employees of suppliers

2.3.1 General information

In addition to the general information stated in section 2.1, we process your personal data as an employee of a supplier as appropriate in the following manner.

The supplier relationship

- Purpose: To manage the purchase of goods.
- Type of personal data: Name, email address, address, title, phone number and, where appropriate, personal identity number.
- Lawful basis: The processing is necessary to fulfil an agreement with you as an employee of a supplier. Personal identity numbers are processed, where appropriate, on the basis that it is clearly justified with regard to the importance of secure identification.
- Storage time: The data is stored during the supplier relationship and 12 months after the supplier relationship ends.

Accounting

- Purpose: Accounting purposes
- Type of personal data: Name, e-mail address, address, title and telephone number of contact persons at the supplier.
- Lawful basis: The processing is necessary to fulfil a legal obligation under the Accounting Act.
- Storage time: The data is erased seven years after an invoice is issued.

2.3.2 Specific information for employees of our audit firm

In addition to the general information stated in section 2.1, we process your personal data as an employee of our audit firm as appropriate in the following manner.

Obligations as a listed company

- Purpose: Processing of reminders, preparing annual reports, preparing auditor's reports with the authorities, keeping minutes or for other purposes stipulated by law, including the Swedish Companies Act (2005:551).
- Type of personal data: Name, title, contact details, employer.
- Lawful basis: The processing is necessary to fulfil legal obligations under the Accounting Act.
- Storage time: The data is processed as long as it is required by law or general limitation rules according to the Swedish Act on Limitation (1981:130).

Internal and external publication

- Purpose: Internal and external publication of the auditor's name.
- Type of personal data: Name, title.
- Lawful basis: Legitimate interest. Alligo's legitimate interest is to comply with regulations and guidelines for listed companies that are not binding under legislation or decisions that are based on legislation for the purpose of increasing insight and transparency in our business.
- Storage time: Five years

2.4 Specific information for analysts

In addition to the general information stated in section 2.1, we process your personal data as an analyst as appropriate in the following manner.

Internal and external publication of names of analysts.

- Type of personal data: Name, email address, workplace.
- Purpose: Publish information about the company on our website.
- Lawful basis: Legitimate interest. Our legitimate interest is to publish information about the company in accordance with guidelines for listed companies that do not follow the law, for example according to the Swedish Code of Corporate Governance and to offer transparency and insight into our operations, as well as to be able to provide information about the review that Alligo is under.
- Storage time: The data is erased after five years.

2.5 Our use of cookies

When you use our website, we process your personal data in the form of, for example, IP address through cookies. You can read more in our Cookie Policy (*ALLIGO-P702*).

3. Who can gain access to your personal data?

Your personal data is shared with third parties who process personal data on our behalf, known as data processors. Our data processors are:

- Cision Sverige AB (co. reg. no. 556317–1916) which provides press release services.
- Shibuya AB (co. reg. no. 556192–0025) which provides IT services.
- Yabie AB (co. reg. no. 559083-2092) which provides cash systems.
- Open text AB (co. reg. no. 556563-3111) which provides the Streamserve system for archiving business documents.
- Adobe which provides Adobe Commerce Cloud.
- Artist CRM that provides CRM systems for prospecting and tracking customer activities.
- Topdesk which provides systems for processing of internal support and service desk cases.
- Jeeves Information Systems AB (co. reg. no. 556343-4215) which provides the Jeeves ERP business system.
- Consafe Logistics AB (co. reg. no. 556264-2909) which provides Astro WMS for warehouse and logistics management.
- WhistleB Whistleblowing Centre AB (co. reg. no. 556873-2753) which provides the WhistleB for management of whistleblowing.
- nShift AB (co. reg. no. 556546-3717) which provides transport administration. The transport provider you have chosen in turn processes your personal data.

We also transfer your personal data to recipients who are not personal data processors, such as for example to certain authorities and debt collection companies. These recipients are those who are independently responsible for their personal data processing.

If necessary, for example to be able to assist with purchases or other necessary purposes, we disclose your personal data to other companies within Alligo.

4. Transfer of personal data to third countries

We and our suppliers and partners normally only process your personal data within the EU/EEA. In those cases where personal data is processed outside the EU/EEA, there is either a decision from the European Commission that the third country in question provides an adequate level of protection or there are appropriate safeguards, in the form of standard contractual clauses or binding internal company rules, which ensure that your rights are protected. Please contact us if you would like a copy of the safeguards that we have implemented or information about where we have made these available.

In the following cases, Alligo transfers personal data to third countries outside the EU/EEA:

- Through Adobe which provides Adobe Commerce Cloud. The transfer is based on a determination of adequate level of protection as Adobe is covered by the EU-US Data Privacy Framework. Transfers to other countries outside the EU/EEA may occur, provided Adobe deems them to meet a sufficient level of protection.

5. Your rights

Under applicable data protection legislation, you have the right of access to information about which personal data we process concerning you and also the right to request rectification of your personal data.

Right to withdraw your consent (Article 7.3 GDPR)

If you have given your consent to Alligo for a specific treatment, you can withdraw all or part of the consent you have given at any time, with effect from the withdrawal.

Right to access (Article 15 GDPR)

You have the right to request information about what personal data we process about you and how the data is processed (a so-called register extract). You also have the right to request a copy of the personal data processed by us. The right to receive a copy of your personal data does not mean that you always have the right to obtain the actual document in which your personal data appears.

Right to rectification (Article 16 GDPR)

You have the right to, without undue delay, have incorrect data rectified and ask us to complete incomplete data by submitting the correct data to us.

Right to erasure (right to be forgotten) and restriction (Articles 17 and 18 GDPR)

You have the right to at any time request erasure of your personal data, eg. if the processing is no longer relevant in relation to the purpose the data was collected for. The right to erasure does not apply if the processing is necessary for the following reasons:

- To exercise the right to freedom of expression and information
- To fulfil a legal obligation that requires processing
- In order to establish, assert or defend legal claims.

You can also request that certain processing of your data be restricted, e.g. if you object to the accuracy of the data.

Right to data portability (Article 20 GDPR)

If you have given your consent or if we base the processing on an agreement with you, you have the right to obtain the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and to transfer these to another personal data controller or to have our assistance in transferring the data to another personal data controller when this is technically possible.

Right to object (Article 21 GDPR)

You have the right to object to your data being processes based on the balance of interests. If we cannot demonstrate that there are compelling, legitimate reasons to continue processing the data, we must cease processing.

6. Right to lodge a complaint

If you have a complaint regarding Alligo's processing of your personal data, you have the right to lodge such a complaint with the Swedish Authority for Privacy Protection (www.imy.se).

You can also contact our data protection officer through gdpr@alligo.com.

7. Our contact details

If you wish to exercise your rights as outlined above or otherwise want to get in touch with us about our processing of your personal data, you can do so by contacting us at:

Alligo AB
Att: GDPR
Box 631
SE-135 26 Tyresö

gdpr@alligo.com

8. Updates

Alligo may make changes to this privacy policy. This privacy policy is valid from the date indicated at the top of this document. We will process your personal data in accordance with the privacy policy that applies at the time your personal data is obtained unless we have your consent to process it in another way.

9. Attachments

ALLIGO-P701 Privacy policy for customers

ALLIGO-P702 Cookie policy

ALLIGO-P703 Terms

ALLIGO-P704 Privacy policy for employees

ALLIGO-P705 Whistleblowing

ALLIGO-P706 Camera surveillance

ALLIGO-P707 Camera surveillance, internal