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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.

### 1. Data controller

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

### 2. Personal data that we process about you

When you are in contact with Alligo, you will provide us with certain information such as your name and contact details. Your personal data has been obtained either directly from you or from your employer in the course of the business relationship that exists between us and your employer.

We may also obtain your personal data from other sources. For example, we obtain the shareholder register from Euroclear Sweden AB (co reg. no. 556112–8074) in connection with General Meetings.

### 3. Purpose and legal basis for the processing of your personal data

#### 3.1 General information

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 and invitations to events and presentations) as well as responding to questions from you (such as when you contact us or ask a question using the form we provide on our website or by email). This processing takes place on the basis of a balancing of interests and our legitimate interest in providing information that you have requested from us, maintaining a business relationship with you or your employer and/or providing any material and/or communicating with you in your professional role with regard to information and events that we offer and which we believe may be of interest to you. If you would like to know more about how we carried out this balancing of interests, please feel free to contact us. If you have given us your consent, we instead process your data for the above purposes on the basis of your consent.

If you have access to inside information, we process your personal data for the purpose of maintaining a list (known as a logbook) in order to fulfil our legal obligations under the EU Market Abuse Regulation (EU 596/2014).

On our website, we provide a whistleblowing service in accordance with applicable legislation. This service provides an opportunity for people to report any suspicions of serious irregularities at companies in the Alligo Group. Whistleblowers can remain completely anonymous when using the service. If data is processed, this is done on the basis of a balancing of interests, where our legitimate interest is that the whistleblowing service provides an opportunity to report suspicions of serious irregularities and is an important channel for maintaining good corporate governance and ensuring that customers and the general public have confidence in us. Personal data relating to criminal offences is processed only for key personnel or persons discharging managerial responsibilities, in accordance with the guidelines of the Swedish Authority for Privacy Protection.

The provision of your personal data is in some cases a legal or contractual requirement. To the extent that you do not provide us with your personal data, this may affect our ability to fulfil our obligations to you as well as our responsibility to fulfil the legal obligations with which we must comply in relation to you.

### **3.2 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 3.1, 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.

We process your personal data for the following purposes for the performance of our contract or to implement measures that you request before a contract is entered into:

- In your contact with us as a shareholder and when you use our services and buy our products, we will process your personal data for the purposes of administration and the performance of our contract with you.
- Dividends.

We process your personal data for the following purposes in order to comply with a legal obligation:

- To fulfil our obligations as a listed company, including drawing up a register of shareholders, keeping minutes, convening general meetings, drawing up the register of voters and voting rights registration.
- To fulfil our bookkeeping obligations under the Swedish Bookkeeping Act (1999:1078).

We process your personal data for the following purposes on the basis of a balancing of interests:

- Publication of information in accordance 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.
- Internal and external publication of the names of certain shareholders, as well as information about these in news articles.
- Publication of information on the website about shareholdings.
- Publication of information about members of the Nomination Committee on the website.
- Your personal data as an employee of a shareholder is processed in accordance with the agreement with the shareholder for the purposes of administration and the performance of our contract with the shareholder (your employer). Alligo's legitimate interest lies in being able to administer the contract and fulfil our obligations to the shareholder (your employer).
- Publication on the website of information from the Swedish Financial Supervisory Authority's register for insider transactions.

Our 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.

The above provisions of this section also apply, where relevant, to the representatives of shareholders, such as proxies, assistants, or administrators.

### 3.3 Specific information for customers and employees of customers

In addition to the general information stated in section 3.1, we process your personal data as a customer or an employee of a customer as appropriate in the following manner.

We process your personal data for the following purposes for the performance of our contract or to implement measures that you request before a contract is entered into:

- In your contact with us as a customer and when you use our services and buy our products, we will process your personal data for the purposes of administration and the performance of our contract with you.

We process your personal data for the following purposes in order to comply with a legal obligation:

- To fulfil our bookkeeping obligations under the Swedish Bookkeeping Act (1999:1078).
- We also process certain data about your purchase in accordance with applicable purchasing or consumer purchasing legislation.

We process your personal data for the following purposes on the basis of a balancing of interests:

- Your personal data as an employee of our customer is processed in accordance with the agreement with the customer for the purposes of administration and the performance of our

contract with our customer (your employer). Alligo's legitimate interest lies in being able to administer the contract and fulfil our obligations to our customer (your employer).

## 3.4 Specific information for employees of suppliers

### 3.4.1 General information

In addition to the general information stated in section 3.1, we process your personal data as an employee of a supplier as appropriate in the following manner.

We process your personal data for the following purposes in order to comply with a legal obligation:

- To fulfil our bookkeeping obligations under the Swedish Bookkeeping Act (1999:1078).

We process your personal data for the following purposes on the basis of a balancing of interests:

- Your personal data as an employee of our supplier is processed in accordance with the agreement with the supplier for the purposes of administration and the performance of our contract. Our legitimate interest in the processing lies in being able to administer the contract and fulfil our obligations to our supplier (your employer).

### 3.4.2 Specific information for employees of our audit firm

In addition to the general information stated in sections 3.1 and 3.4.1, we process your personal data as an employee of our audit firm as appropriate in the following manner.

We process your personal data for the following purposes in order to comply with a legal obligation:

- To fulfil our other obligations as a listed company, including in relation to the processing of reminders, preparing annual reports, preparing auditor's reports, registering auditors with the authorities, keeping minutes or for other purposes stipulated by law, including the Swedish Companies Act (2005:551).

We process your personal data for the following purposes on the basis of a balancing of interests:

- Internal and external publication of the name of the auditor. Our legitimate interest lies in increasing the transparency of and insight into our business.

## 3.5 Specific information for analysts

In addition to the general information stated in section 3.1, we process your personal data as an analyst as appropriate in the following manner.

We process your personal data for the following purposes on the basis of a balancing of interests:

- Internal and external publication of the names of analysts. Our legitimate interest in processing your personal data lies in publishing information about the company in accordance with guidelines for listed companies which are not stipulated by law, for example in accordance with the Swedish Code of Corporate Governance, and in providing transparency and insight into our business, as well as being able to provide information about the audits performed on Alligo.

## 3.6 Our use of cookies

We process your personal data for the following purposes on the basis of a balancing of interests:

- When you use our website, we may process your personal data, in the form of your IP address for example, using Cookies. Our legitimate interest in processing your personal data lies in providing you with a good user experience of our website and our commercial interest in gathering information about the visitors to our website. You can read more in our Cookie policy (ALLIGO-P702).

## 4. Who may be given 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 include, for example, Cision Sverige AB (co reg. no. 556317–1916) and Shibuya AB (co reg. no. 556192–0025).

We also transfer your personal data to recipients who are not data processors, for example certain authorities, debt collection agencies and WhistleB Whistleblowing Centre AB (co reg. no. 556873–2753). These recipients are classed as independent data controllers responsible for their own processing.

Where necessary, we disclose your personal data to other companies within the Alligo Group.

## 5. 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, binding internal company rules or Privacy Shield, 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.

## 6. How long we store your personal data

### 6.1 General information

We never process your personal data for longer than is permitted under applicable law, regulation, good practice, or public authority decision. Personal data that we process for the purpose of the performance of our contract with you is processed in the first instance for the period necessary to enable us to administer the contractual relationship, exercise our rights and fulfil our obligations to you. We may nevertheless store your personal data for longer in order to fulfil legal requirements or if you have given us your consent or if we are entitled to do so on the basis of a balancing of interests, as follows.

- The processing of personal data in order to fulfil our obligations to maintain a list of persons who have access to insider information (called a logbook) is stored in accordance with the EU Market Abuse Regulation (EU) 596/2014.
- Your personal data which we process on the basis of consent is processed until you withdraw your consent.
- Your personal data which we process on the basis of a balancing of interests with the purpose of communicating with you in order to answer questions or to publish information about Alligo and our business is processed for as long as the matter is ongoing, or the purpose endures.
- Your personal data which we process on the basis of a balancing of interests with the purpose of marketing ourselves to you is processed in accordance with applicable national laws and good practice and varies depending on your relationship with us: a) if you subscribe to one of our mailings, we process your data until you notify us that you no longer wish to receive our mailings, b) if you have a customer relationship with us and do not subscribe to any of our mailings, we process your personal data for a maximum of one (1) year after your customer relationship has ended or until you notify us that you no longer wish to receive our mailings, c) if you are not an active customer of ours and you do not subscribe to any of our mailings, we process your personal data for a maximum of three (3) months or until you notify us that you no longer wish to receive our mailings.
- Information, images, and news articles that we publish on the website on the basis of our legitimate interest are stored for as long as there is news value in the information that is published, and the purpose endures. For example, such continued processing may be necessary in order to inform the general public and investors.

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

In addition to the general deletion periods stated in section 6.1, we store 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.

- Personal data that we process for the purpose of the performance of our contract with you/your employer is processed in the first instance for the period necessary to enable us to administer the contractual relationship, exercise our rights and fulfil our obligations to you/your employer. If your employment or your assignment for us ends, we stop our processing of your personal data as soon as we have been informed of this by you/the shareholder. Inactive contracts containing your personal data are saved for ten (10) years on the basis of general limitation rules under the Swedish Limitation Act (1981:130).
- Personal data that is processed for dividends or other purposes as required under the Swedish Bookkeeping Act (1999:1078) is processed in accordance with the Swedish Bookkeeping Act (1999:1078) for seven (7) years.

- Your personal data as an employee of one of our shareholders is processed for as long as you are employed by the shareholder and the purpose of the processing endures. If you cease to be a contact person or employee of the shareholder, processing will be stopped as soon as we are informed of this.

## 6.3 Specific information for customers and employees of customers

In addition to the general deletion periods stated in section 6.1, we store your personal data as a customer or an employee of a customer as appropriate in the following manner.

- Personal data that we process for the purpose of the performance of our contract with you/your employer is processed in the first instance for the period necessary to enable us to administer the contractual relationship, exercise our rights and fulfil our obligations to you/your employer. If your employment with the customer or your assignment for us ends, we stop our processing of your personal data as soon as we have been informed of this by you/the customer. Inactive contracts containing your personal data are saved for ten (10) years on the basis of general limitation rules under the Swedish Limitation Act (1981:130).
- Personal data that is processed for purposes as required under the Swedish Bookkeeping Act (1999:1078) is processed in accordance with the Swedish Bookkeeping Act (1999:1078) for seven (7) years.
- Your personal data as an employee of one of our customers is processed for as long as you are employed by the customer and the purpose of the processing endures. If you cease to be a contact person or employee of the customer, processing will be stopped as soon as we are informed of this.
- The data that we process about you and your purchases in accordance with applicable purchasing or consumer purchasing legislation is processed in accordance with applicable laws.

## 6.4 Specific information for employees of suppliers

### 6.4.1 General information

In addition to the general deletion periods stated in section 6.1, we store your personal data as an employee of a supplier as appropriate in the following manner.

- Personal data that we process for the purpose of the performance of our contract with you/your employer is processed in the first instance for the period necessary to enable us to administer the contractual relationship, exercise our rights and fulfil our obligations to you/your employer. If your employment with the supplier or your assignment for us ends, we stop our processing of your personal data as soon as we have been informed of this by you/the supplier. Inactive contracts containing your personal data are saved for ten (10) years on the basis of general limitation rules under the Swedish Limitation Act (1981:130).
- Personal data that is processed for purposes as required under the Swedish Bookkeeping Act (1999:1078) is processed in accordance with the Swedish Bookkeeping Act (1999:1078) for seven (7) years.

## 6.4.2 Specific information for audit firm employees

In addition to the general deletion periods stated in section 6.1 and section 6.4.1, we store your personal data as an employee of our audit firm as appropriate in the following manner.

- Processing of such information as is required in order for us to fulfil our other obligations as a listed company, including in relation to the processing of reminders, preparing annual reports, preparing auditor's reports, registering auditors with the authorities, keeping minutes or for other purposes stipulated by law, including the Swedish Companies Act (2005:551), takes place for as long as this is required by law or general limitation rules under the Swedish Limitation Act (1981:130).

## 6.5 Specific information for analysts

In addition to the general deletion periods stated in section 6.1, we store your personal data as an analyst as appropriate in the following manner.

- Your personal data as one of our analysts is processed for as long as you are one of our analysts and the purpose of the processing endures.

## 6.6 Cookies

- The deletion periods are stated in our Cookie policy (*ALLIGO-P702*).

## 7. Camera surveillance

The purpose of the surveillance is to prevent, detect, investigate crimes and accidents, and create security for our customers, our employees and for us as a company. See our Camera surveillance guideline (*ALLIGO-RB800*) for information about how we use camera surveillance.

### Legal basis:

Legitimate interest

## 8. 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.

In certain circumstances, you also have the right to request erasure or restriction of your personal data or to object to our processing. You also have the right, in certain circumstances, to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit this data to another data controller.

You have the right, at any time, to withdraw, in whole or in part, consent that you have given for the processing of personal data with immediate effect. You also have the right, at any time, to object to the processing of your personal data for direct marketing.



If you have any complaints about our processing of your personal data, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection or other competent supervisory authority that performs supervision of the company's handling of personal data.

## 9. Security measures in relation to your data

We strive to protect your personal data and maintain appropriate technical and organisational measures to prevent the unlawful or accidental disclosure, use, access, loss, alteration, or damage of your personal data. Access to your personal data is given only to those people who need to process it to enable us to fulfil our specified purposes.

Should such an infringement nevertheless occur, Alligo has procedures in place for reporting such a personal data breach to the Swedish Authority for Privacy Protection in accordance with applicable legislation.

## 10. 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  
135 26 Tyresö

[gdpr@alligo.com](mailto:gdpr@alligo.com)

## 11. Updates

We reserve the right to amend our privacy practices at our discretion and to update or amend this privacy notice at any time. We therefore encourage you to read through this privacy notice and our Privacy policy for customers on a regular basis in order to keep up to date with its content. This privacy notice is valid from the date indicated at the top of the document. We will process your personal data in accordance with the privacy notice that applies at the time your personal data is obtained unless we have your consent to process it in any other way.

## 12. Appendices

ALLIGO-P701	Privacy policy for customers
ALLIGO-P702	Cookie policy
ALLIGO-P703	Terms and Conditions
ALLIGO-P704	Privacy policy for employees
ALLIGO-P705	Whistleblowing
ALLIGO-RB800	Camera surveillance



ALLIGO-RB801 Camera surveillance internal