

PRIVACY POLICY FOR POLARN O. PYRET

We care about and prioritise your privacy. Therefore, we always aim to protect your personal data in the best possible way. In this Privacy Policy, we want to inform you about how we process your personal data, as well as the rights that you have.

When you shop with us, we primarily process your personal data for the purpose of completing your purchase and fulfilling the obligations that ensue from our contract with you as our customer. When you are a member of our loyalty club, we treat your personal information primarily with the purpose of fulfilling our obligations to you under the terms of the member, for example, to give you bonus on your purchases and to send custom offers and information to you.

Below we describe in more detail how and why we process your personal data, as well as how you can influence our processing of your personal data. We also describe whether you are obliged to provide us with the data, where the data comes from, and to whom and where we transfer your data.

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Who is the controller of your personal data?

Polarn O. Pyret AB, with Company Registration Number 556235–7383, is the personal data controller when we process your personal data for our own purposes.

If you have any questions concerning our processing of your personal data, or if you want to exercise any of your rights that we describe under the heading “What rights do you have to influence how we process your personal data?”, you are welcome to contact us via our email address dataskydd@polarnopyret.se or by calling +46(0)8 410 522 10. Our postal address is Drottninggatan 33, Box 161 42, SE-111 51 Stockholm, Sweden.

Please note that our purchase terms & conditions apply to your purchase.

Detailed description of how we process your personal data

Here you can read in more detail about why we process your personal data, which categories of personal data we process and what the lawful basis for processing is. You can also read about our retention periods for storing your personal data.

1. When you shop online

We need to process information about you in order to complete your purchase. If you do not specify your information, we will not be able to complete your purchase from us. We also need to process your information in order to comply with statutory or other requirements, such as the Swedish Bookkeeping Act's requirement to keep records.

Purpose: To be able to manage online purchasing		
<p>Processing that is carried out:</p> <ul style="list-style-type: none"> • To be able to deliver purchased items (including delivery notifications or other delivery-related communication), and to share your information with the selected carrier. • To manage any exercise of the right of withdrawal. 	<p>Personal data that is processed:</p> <ul style="list-style-type: none"> • Name • Member no (if PO.P+ member) • Contact details (e.g. postal address, email address and mobile number) • IP address 	<p>Lawful basis: <i>Fulfillment of purchase contract, legal obligation and balance of interests.</i></p> <p>The processing of personal data is necessary in order to enable us to fulfil our obligations under the purchase contract. If you do not specify your information, we will not be able to complete your purchase from us.</p> <p>Managing any exercise of the right of withdrawal is necessary in order to enable us to comply with consumer protection legislation and thus fulfil a legal obligation.</p>
<p>Retention period: The information is processed from the time that you make your purchase and is subsequently processed for three (3) months.</p>		
<p><i>In addition to the above, your personal data is also processed by the payment service supplier you choose to pay with - DIBS, Paypal or Ideal, in order to complete your payment. They are an independent personal data controller for your processing and informs you separately about how your data is processed.</i></p>		

Purpose: To manage product ratings, reviews and product questions online		
<p>Processing that is carried out:</p> <ul style="list-style-type: none"> • To be able to request and publish your product ratings and reviews online • To be able to publish product questions 	<p>Personal data that is processed:</p> <ul style="list-style-type: none"> • Name • Email address • IP address 	<p>Lawful basis: <i>Balance of interests.</i></p> <p>The processing is justified by our legitimate interest in being able to contact you with a request to review or rate the product or products that you have purchased.</p>
<p>Retention period: The personal data is processed for 90 days.</p>		

2. When you are a member of Polarn O. Pyrets loyalty club

In order to create and fulfill what follows from your membership in our loyalty club, we need to process your information. If you do not provide your personal information to us, we will not be able to create or manage your membership. Therefore, if you do not want to enter the information, you cannot be a member of us.

Based on your member profile, we will also market our products to you in your digital channels. If you do not want marketing from us, you are always entitled to refuse it. Read more about your rights below.

Purpose: To create and manage your membership and your member pages		
<p>Processing that is carried out:</p> <ul style="list-style-type: none"> • Create login to My Pages 	<p>Personal data that is processed:</p> <ul style="list-style-type: none"> • Name • E-mail address • Mobile number • Member number • Settings of your profile and your choices • Username and password 	<p>Lawful basis: Fulfilment of contract</p> <p>The processing is necessary to create and administer your member pages in accordance with the member terms and thereby to fulfill our agreement with you.</p>
<p>Retention period: The data is processed until you terminate your membership. If your membership has been inactive for 24 months, we will delete your membership and associated information, provided you have no liabilities to us. With inactivity, we mean that you have not registered a member purchase.</p>		

Purpose: To administer your bonus		
<p>Processing that is carried out:</p> <ul style="list-style-type: none"> • To register bonus-based purchases and use bonus payments, which means that we identify you as a member of the purchase • Calculate your bonus points and notify your current bonus balance 	<p>Personal data that is processed:</p> <ul style="list-style-type: none"> • Name • E-mail address • Member number 	<p>Lawful basis: Fulfilment of contract</p> <p>The processing is necessary to manage your bonus in accordance with our member terms and thereby to fulfill our agreement with you.</p>
<p>Retention period: Your earned points will be saved for 24 months or until your membership ends.</p>		

Purpose: To show current and previous purchases

Processing that is carried out:

- To enable you to see and track your current and previous purchases, we process your purchase and order history

Personal data that is processed:

- Purchase and order history

Lawful basis: *Fulfilment of contract*

The processing is necessary in order to administer your member pages in accordance with the membership terms & conditions and thus fulfil our contract with you.

Retention period: The data is processed for 36 months from the date of purchase.

Purpose: To manage and send marketing

Processing that is carried out:

- To manage and send marketing with special offers, rewards, discounts and information in newsletters and text messages
- To send personalised product recommendations and communication, so that you receive special offers and information about products and services that are likely to interest you

Personal data that is processed:

- Name
 - Email address
 - Mobile number
- For personalised communication, we also process:**
- Purchase and user data
 - Technical devices that you use
 - Geographic location

Lawful basis: *Fulfilment of contract*

The processing is necessary in order to fulfil our contract with you when you have chosen to join our customer club for the purpose of receiving personalised special offers and information about new arrivals, promotions and discounts. We clearly inform you about this when you choose to become a member.

Retention period: The data is processed from the time that you become a member and for as long as you remain a member (see the time limit above). But the processing ceases if you expressly opt out of marketing.

Purpose: To offer you personalised communication based on the age of your child(ren)

Processing that is carried out:

- To be able to provide personalised communication and special offers developed on the basis of the age(s) of your child(ren)

Personal data that is processed:

- The child's date of birth

Lawful basis: *Consent*

You give your consent by voluntarily providing the date of birth of your child(ren). No other information is retained about your child(ren).

Retention period: The data is processed until the child reaches the age of 13 years or until you expressly withdraw your consent.

Purpose: Providing personalised marketing in digital channels

Processing that is carried out:

- To provide personalised marketing in digital channels, e.g via Google or Facebook

Personal data that is processed:

- Email address

Lawful basis: *Balance of interests*

Our lawful basis for processing is our legitimate interest in being able to provide you with personalised marketing in digital channels.

Retention period: The data is processed until we have completed the marketing. The email address is encrypted and deleted as soon as it has been processed by the digital partner. Marketing continues until your membership ends (see above time limit), provided that you do not expressly opt out of marketing before that.

Purpose: To send customer satisfaction and marketing surveys

Processing that is carried out:

- To send customer satisfaction and marketing surveys via email
- So that you as a customer will have the opportunity to influence our customer offering in general

Personal data that is processed:

- Email address

Lawful basis: *Legitimate interest*

Our lawful basis for processing is our legitimate interest in being able to send customer satisfaction and marketing surveys to you.

Retention period: The data is processed for the duration of the process necessary to send and administer customer satisfaction or marketing surveys to you. You can opt out of future mailings by using the unsubscribe function in the email.

Purpose: To provide you with updated information

Processing that is carried out:

- To provide you as a member with updated information about our member terms & conditions and our Privacy Policy.

Personal data that is processed:

- Name
- Email address

Lawful basis: *Fulfilment of contract*

The processing is carried out in order to provide you with updated information about our member terms & conditions, which is necessary in order to fulfil our contract with you. The processing to provide information about our updated Privacy Policy is necessary to comply with the relevant statutory and regulatory requirements for data protection.

Retention period: The data is processed for as long as you remain a member with us (see time limit above).

Purpose: Information about product safety or product liability

Processing that is carried out:

- To be able to contact you if it emerges that a purchased item breaches product safety requirements or if we have a product liability.

Personal data that is processed:

- Name
- Email address
- Transactions, e.g. which product you have purchased

Lawful basis: *Balance of interests*

The processing is justified by our legitimate interest in being able to contact you in order to make sure that you receive information about an unsafe product after we have discovered such a product, especially since we sell products for children.

Retention period: The data is processed for as long as you remain a member with us (see time limit above).

3. To communicate with you, and to provide you with information and personalised special offers

To be able to communicate with you, we must process certain information about you. If you do not want to provide us with this information, it will not be possible for us to manage your case and answer your questions.

Purpose: To be able to manage and complete competitions

Processing that is carried out:

- Communication before and after the competition
- Choosing winners and forwarding prizes

Personal data that is processed:

- Name
- Contact details (email address, mobile number)
- Other information provided in competition entries.

Lawful basis: *Fulfilment of contract*

Our lawful basis is that the processing is necessary in order for us to be able to administer your participation in the competition, i.e. our contract about taking part in the competition.

Retention period: Your personal data is stored until the competition is over.

Purpose: To be able to administer social channels

Processing that is carried out:

- To be able to administer social channels (Facebook and Instagram)
- To respond to comments and answer questions
- To display the company's product range and services

Personal data that is processed:

- Name/profile name
- Photo/profile photo

Lawful basis: *Balance of interests*

The processing is based on our legitimate interest in being able to administer social media and being able to satisfy your interest in interacting with us.

Retention period: The personal data remains in the flow on social media.

Purpose: To be able to market our products in social channels and on our website

Processing that is carried out:

- To administer and regram customer images on Instagram
- To be able to market our products on our website, we may use images that you have published on Instagram

When you post images with #polarnopyret on Instagram, in certain cases we request your permission to post (regram) the image in our flow on Instagram or display it on our website. We do this for the purpose of displaying our customers' own images featuring our clothes.

Personal data that is processed:

- Name/profile name
- Photo/profile photo that may contain images of children
- IP address

Lawful basis: Consent

We always request your consent via www.polarnopyret.se/yespolarn.

Retention period: The personal data remains in the social media flow. If we no longer display your image on our website, it will not be retained by us for longer than 60 days. The image will also be removed if you withdraw your consent or if anyone reports your image or until we sell out of the item or items shown in the image on the website. But we only process your IP address in a non-anonymised form until we have saved your image.

Purpose: To be able to manage customer service cases

Processing that is carried out:

- To be able to manage your customer service case when we communicate with you via email, telephone, live chat or in our social channels.
- We may record your call for security reasons when you contact our Customer Service by phone

Personal data that is processed:

- Name
- Email address
- Mobile number
- The information you provide about e.g. your purchase and order, or the questions that you ask about an item or a purchase.

Lawful basis: Legitimate interest

Our lawful basis for processing is our legitimate interest in being able to help you with your case, as well as to maintain a high level of security for our employees.

Retention period: The data is processed for six months from the date on which you have contacted our customer service. Any recorded telephone calls are only processed during the period in which the case is under investigation.

4. To fulfil legal obligations and prevent crime

We process certain personal data so that you as a customer feel an enhanced sense of security when you shop with us on both our e-commerce sites and in our stores. We also do this in order to fulfil our legal obligations and manage claims, as well as prevent crimes against our customers, our employees and our company.

Purpose: To fulfil legal obligations

Processing that is carried out:

- To comply with bookkeeping legislation
- To comply with money laundering legislation

Personal data that is processed:

- Name
- Postal address
- Email address

Lawful basis: *Legal obligation*

The processing is necessary in order to comply with mandatory legislation, i.e. the Swedish Bookkeeping Act and money laundering legislation.

We are required by law to carry out this personal data collection. If the information is not provided, we will be unable to fulfil our legal obligation and we will have no choice but to refuse your purchase

Retention period: The personal data is processed for seven (7) years in accordance with the Swedish Bookkeeping Act and money laundering legislation.

Purpose: To be able to manage complaints and other claims

Processing that is carried out:

- To manage any complaint cases or other claims

Personal data that is processed:

- Name
- Mobile number
- Information from our communication with you in connection with your claim (e.g. time of purchase and your reason for making a complaint)

Lawful basis: *Legal obligation and balance of interests*

Processing is necessary to enable us to act in accordance with consumer protection legislation. We also have a legitimate interest in being able to defend ourselves against any legal claims.

Retention period: The personal data is processed from the time that you complain and is processed for as long as the claim is in progress.

Purpose: To avert, prevent and investigate official misconduct or crimes against a customer, employee and/or company

Processing that is carried out:

- To prevent any frauds and other offences
- To be able to safeguard our legal claims after a possible crime has been committed
- To protect our IT environment against attack and intrusion

Personal data that is processed:

- Purchase and user-generated data (e.g. click and visitor history)
- Data concerning devices that are used, e.g. language settings, IP address, web browser settings, time zone, operating system, screen resolution and platform
- Monitoring and analysis of how our digital services are being used

Lawful basis: *Legitimate interest*

We have a legitimate interest in protecting our IT environment against attack and intrusion.

Retention period: The personal data is processed for up to 36 months.

From whom do we collect personal data about you?

- The personal data that we process about you is primarily information that you yourself have chosen to provide to us.
- Our payment service supplier assesses which payment alternative will be offered to you when you buy online, based on personal data previously provided to our payment service supplier.

Who has access to your personal data?

Your personal data is processed primarily by us at Polarn O. Pyret, as well as our parent company RNB Retail and Brands AB (RNB). We share your personal data with RNB because RNB helps us to manage delivery of ordered items, IT and security. We make sure that your personal data will never be sold or shared with other personal data controllers for marketing purposes.

We also share your personal data with our external IT suppliers, so that we are able to manage our obligations to you and run our business. RNB and our IT suppliers only process your personal data on our behalf and only have access to the data in order to fulfil their obligations towards us.

In addition to this, we share your personal data with certain categories of receivers in order to fulfil our obligations towards you in a good and effective way, read more below. If you would like more detailed information about with whom we share your data, you are welcome to contact us.

When you shop online

- For the purpose of managing your purchase, we will share your personal data with the payment service supplier we use in order to manage the payment;
- For payment by invoice (credit), the payment service supplier may run a credit check;
- To be able to deliver your items to your home or to a collection point, as well as to be able to manage any returns, we will share your personal data with the carrier that you have selected at the checkout.

When you are a member of Polarn O. Pyret's loyalty club

- In order to market our products and services to you on your digital channels, we share your information with the digital marketers who provide the marketing services;

Do we share your personal data outside the EU/EES?

Polarn O. Pyret uses IT suppliers who, on our behalf and according to our instructions, process and therefore transfer your personal data outside the EU/EES. We only transfer your personal data outside the EU/EES if we have support for this transfer under the EU's General Data Protection Regulation (GDPR).

When we transfer your personal data outside the EU/EES, we will make sure that this is done in compliance with the relevant statutory and regulatory requirements for data protection. This means that the transfer can be based on e.g. EU Commission decisions, standard contract clauses or Privacy Shield.

If you have any questions about how we share your personal data or if you would like a copy of the appropriate safety precautions that we have taken, you are welcome to contact us.

What rights do you have to influence how we process your personal data?

You have certain rights in connection with the processing of your personal data. See below for a more detailed description of your rights. In order to exercise your rights, you are welcome to contact us via the contact details specified in the introduction to this Privacy Policy.

Withdrawing your consent

If you have consented to allow us to process your personal data, you have the right at any time to withdraw all or part of the consent that you have given. The withdrawal of your consent, however, will have no effect on our processing of your personal data for the period before the withdrawal occurred.

Right of access

You have the right to receive confirmation that personal data relating to you is being processed by us, as well as access to information about how the personal data is processed, e.g. the purposes of the processing and the categories of personal data to which the processing applies. You also have a right to receive a copy of the personal data that is being processed by us. You will receive these details as soon as possible and no later than within one month. Depending on how complicated the request is and the number of requests received, the period can be extended by an additional two months as necessary. If the period is extended, you will be informed of this. You make a request by contacting us via the contact details specified in the introduction to this Privacy Policy.

Right to rectification

You also have the right to have inaccurate personal data rectified without unnecessary delay, as well as to have incomplete personal data completed by providing that information. If you have a Polarn O. Pyret membership, you also have the option of changing your personal data by logging in to My Pages.

Right to erasure (the right to be forgotten)

In certain circumstances, you have the right to request erasure of your personal data. These circumstances exist if:

- the personal data is no longer necessary for the purpose for which you originally collected or processed it;
- if you withdraw your consent on which the processing is based and there is no other lawful basis for the processing;
- if you object to processing and there is no legitimate reason to continue the processing that overrides your legitimate reason to not continue;
- when personal data has been processed unlawfully; or
- if the personal data must be erased in order to fulfil a legal obligation with which Polarn O. Pyret must comply.

Polarn O. Pyret erases your personal data on your request, on condition that Polarn O. Pyret is under no legal obligation to store the personal data to comply with relevant statutory and regulatory requirements.

If you are a member of our customer club, we will erase your personal data without your request if you have not made a club purchase for 24 months.

Right to restrict processing

In certain circumstances, you have the right to request that the processing of your personal data be restricted. These circumstances exist if:

- you contest the accuracy of the data (but only during a period that gives us a chance to verify the data);
- if the processing is unlawful and you oppose erasure and request a restriction on the use of the data instead;
- you need the personal data in order to exercise or defend a legal claim, despite the fact that we no longer need the personal data for our processing purposes; or
- if you have objected to our processing and we have not yet verified whether our legitimate interest in processing your personal data overrides your legitimate reason for restricting the processing of your personal data.

Right to object to processing

You have the right to object to the processing of your personal data at any time, based on a balance of interests. But this will not apply if we can show compelling legitimate reasons for processing that override your interests, rights and freedoms, or if processing is carried out in order to establish, exercise or defend legal claims.

You also have the right to object to processing of your personal data for marketing purposes. This means that you have the right to say no to newsletters and other marketing mailing from us. If you object to marketing, your personal data will no longer be processed for such purposes.

Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority (without prejudice to any other administrative or judicial remedy). A complaint of this kind is best made to the supervisory authority in the EU/EES Member State where you have your habitual residence, where you work or where the infringement of the relevant statutory and regulatory requirements for data protection is alleged to have occurred. The supervisory authority in Sweden is the Swedish Data Protection Authority.

Right to data portability

In certain circumstances, you have the right to receive the personal data that you have provided to us in a structured, commonly used and machine readable format; you also have the right to transfer these to another personal data controller (data portability). The right to data portability exists when:

- processing is based on your consent or on a contract; and
- the processing is carried out by automated means.

You have the right to transfer personal data directly from us to another personal data controller when this is technically possible.

How do we balance interests when the lawful basis is our legitimate interest?

For certain purposes, Polarn O. Pyret processes your personal data based on a balance of interests as lawful basis for processing. In this balancing of interests, we have assessed that our legitimate interest in carrying out the processing overrides your interests and your basic rights to not have your personal data processed. What counts as our legitimate interest is shown in the tables above. If you would like to find out more about how we have made this assessment, you are welcome to contact us. You will find our contact details in the introduction to this Privacy Policy.

This Privacy Policy was finalised by Polarn O. Pyret AB on May 25th 2018.