



ACO Nordic Group Privacy Policy



We respect your right to privacy. This privacy statement explains our policy regarding the collection, use, disclosure and protection of Personal Data. This privacy statement follows the regulations in GDPR and applies to the collection and use of Personal Data about you by ACO Nordic Group and group member companies (“ACO”, “we” or “us”).

In certain circumstances, we may provide you with additional information about our use of your Personal Data, for example as part of a special offer or specific services. Since we regularly review our policies and practices, your comments are always welcome. We reserve the right to change this Privacy Policy at any time. The date of the latest version of the Privacy Policy can be found on bottom of the page. Any new modified or amended Privacy Policy will apply as per the revision date.

Contents

- A. What is Personal Data?..... 1
- B. Collection of Personal Data 2
- C. Use of Personal Data by ACO Nordic Group..... 2
- D. Sharing of Personal Data 3
 - Order Fulfilment..... 3
 - Service Providers and Contractors..... 3
 - Third Party Services..... 4
- E. Protection of Personal Information 4
- F. Choice; Updating Your Account Data 4
- G. Apps and Online Specifics 5
 - Links to Other Sites..... 5
- H. Questions or Concerns..... 5
- I. Cookie Policy 5

A. What is Personal Data?

Personal Data is information relating to an identified or identifiable individual, such as a name, address, telephone number, e-mail address, Internet (IP) address and information about purchases. This Data is created when you as a customer or vendor disclose information about e.g. purchase and sales representatives engaging in transactions with us.

Personal Data does not include "aggregate" information. Aggregate information is data we collect about a group or category of products, services or customers, from which individual customers cannot be identified. In other words, information about what you purchase may be collected and combined with information about how others purchase, but no Personal Data will be included in the resulting data. Likewise, information about the products you purchase may be collected and combined with information about the products purchased by others. Aggregate data helps us understand trends and customer needs so that we can better consider new products and services, and tailor existing products and services to future demands.

B. Collection of Personal Data

We collect Personal Data when you:

- Place an order or purchase products or services as part of a retailer purchase department, or return or exchange items;
- Contact us for any reason including questions, inquiries, comments, complaints or requests; such as by replying to enquiries by mail, or by telephone through customer service or in person at one of our locations;
- Participate in any of our trainings and courses;
- Sign up for or participate in our various Services provided by third party suppliers and
- Enter into a contest or sweepstakes or respond to one of our surveys.

We may also take video footage on our properties to protect the rights, property or safety of ACO Nordic Group, its customers, employees, or the public.

In addition, we automatically collect some information when you visit our website, such as your computer's IP address or your device ID and operating system, the site from which you linked to us, your site activity, the time and date of your visit, and your purchases. This information may be collected by "cookies" and web beacons. Please see our Cookie Policy for more details.

We also receive information from third parties who help us correct our records, prevent fraud, and provide Third Party Services (see Third Party Services below) or special promotions or products.

We may combine any of this information with the other Personal Data we maintain about you, including for the purposes of better tailoring any promotional or marketing materials that we send you.

C. Use of Personal Data by ACO Nordic Group

The Personal Data we collect is generally used to process your requests or transactions, provide you with high-quality service, tell you about opportunities we think will be of interest and

administer your account, including distribution of our own surveys and publications. For example, we may use your telephone number, your e-mail or your postal address to:

- Alert you about product recalls or safety issues;
- Managing the provision of goods, services and privileges to you, processing exchanges or returns, for fraud detection and identification purposes;
- Managing invoicing, accounting and information security services related to our transactions with your company;
- Protecting against harm to the rights, property or safety of ACO Nordic Group, its customers, employees, or the public;
- Internal management purposes, including planning, resource allocation, policy development, quality improvement, monitoring, audit, evaluation and reporting;
- Send notifications (via email or SMS/text message) related to your purchases, such as purchase confirmations or delivery schedules;
- Provide you with news, promotional information, coupons, offers, other information from ACO Nordic Group and selected partners and product recommendations ("Promotional Information"). You may contact us at any time to decline Promotional Information (see Choice below).

We do not collect any sensitive Personal Data unless required by law, or consent has been given.

D. Sharing of Personal Data

We share information in these circumstances:

Order Fulfilment

We may provide to a third party information necessary to process a transaction or fulfil an order you have placed with us. However, we give suppliers, and others involved in the distribution chain only the information needed to provide you the products or services you order, such as shipping and/or billing address, e-mail address, telephone number and product orders. We are not responsible for any information you provide directly to these parties, and we encourage you to become familiar with their practices before disclosing information directly to them.

Service Providers and Contractors

From time to time we engage unaffiliated third parties and their affiliates, agents and subcontractors ("Service Providers") to perform certain technological or administrative services on our behalf. For example, ship goods, distribute emails, process rebates or analyze and correct or update our data. We also may use a Service Provider to host and administer one or more of our Sites, process and store data, and fulfil similar technology-related functions on our behalf. In these circumstances, the Personal Data that the Service Provider receives is limited

to only the Personal Data held by us that they need in order to render their service to us. We have engaged Service Providers to provide us with cloud computing services. Cloud computing is the provision of network-based services, located on remote computers, that allow individuals and businesses to use software and hardware operated by third parties. Examples of these services include online file storage, webmail and online business applications, or CRM tools. Service Providers have policies and processes in place to ensure that the confidentiality of information in their care is properly safeguarded at all times. As of the date of this policy, our cloud computing Service Provider processes and stores information mainly in the European Union (ACO Data Centre in Rendsburg, Germany), however this is subject to future change.

You acknowledge that if Service Providers provide services from other countries, your Personal Data may be processed and stored in these countries and the governments, courts or law enforcement or regulatory agencies of these jurisdictions may be able to obtain disclosure of your Personal Data through a lawful order.

If any of these service providers need access to your Personal Data, we require them to use it only to perform the services for us. We also require that they maintain the confidentiality of the information and/or return the information to us when they no longer need it.

Except as set out above, we do not sell, rent, share or disclose the Personal Data without your consent.

Third Party Services

You may purchase products and services offered by us through third parties, such as retail stores. ("Third Party Services"). If you purchase, apply for or request Third Party Services, information you provide will be shared with the third party offering the Third Party Service.

We may share your name, postal address, and email address with these third parties so they may notify you of their offerings or services, and to evaluate new and existing products, offerings or services. If you prefer that we do not share Information with these third parties, you can contact us at any time (see Choice below).

These third parties' use of your information is subject to their own privacy practices and policies, and we encourage you to become familiar with their privacy practices and policies as made available to you.

E. Protection of Personal Information

We have physical, administrative and technical security measures in place to protect Personal Data from loss, misuse or alteration while it is under our control.

F. Choice; Updating Your Account Data

We give you choices related to use of your Personal Data to send you Promotional Information.

If you wish to update your marketing preferences, or if you have questions concerning our information practices, you can contact your local Customer Care Centre and/or [ACO Nordic Group IT](#).

If you choose not to receive promotional materials from us, we will also no longer share your information with our providers of Third Party Services to use for marketing purposes.

G. Apps and Online Specifics

Links to Other Sites

From our website, you can link to websites of third parties who we allow to offer goods, information and/or Third Party Services. If it is not clear from the context that you are being directed to a third party site, we endeavor to notify you that you are visiting a site where a different privacy policy applies. In general, any Personal Data you provide on the linked pages is provided directly to that third party and is subject to that third party's privacy policy. We are not responsible for the content or privacy and security practices and policies of websites to which we link. We encourage you to learn about their privacy and security practices and policies before providing them with Personal Data.

H. Questions or Concerns

If you have any questions or concerns about this privacy statement or would like to contact us for any reason, you can contact [ACO Nordic Group IT](#).

I. Cookie Policy

We may collect cookies and Web beacon information when you browse to any of the ACO Nordic group sites. Cookies are small files that are stored on your computer and Web beacons are electronic images that allow us to count visitors visiting certain Web pages, to access cookies, and to analyze whether advertising banners on our site or other sites were effective. They enable us to monitor online activity. When you first access the website, you will be asked if you consent to our use of cookies. If you do not consent, the website will not load properly.

Like most websites, we use cookies to log your IP address, identify your browser type, and log the date and time of your activities. We use this information for system administration, troubleshooting, fraud investigation, communications from ACO Nordic (only) and optimizing your experience. For example, we may customize our home page for you, better display pages according to your browser type, and/or deliver customized product recommendations and email. Cookies are not spyware, and ACO does not collect multi-site data or, with the exception of Google Analytics, share information with others that we gather through cookies. Cookies help us to customize our home page for you and to better display pages according to your browser type. (In order to control the ability of website providers to place cookies on your computer, you

should consult your browser's "Options" and "Help" pages to learn how to adjust your settings to suit your privacy preferences.)

We share your IP address, but no other Personal Data, with Google Analytics in order to obtain data about how our website is accessed and used. If you do not wish your IP address to be tracked for this purpose, you may opt-out of Google Analytics by following the steps found at <https://tools.google.com/dlpage/gaoptout>.

Finally, we use web beacons to determine when and how many times a page has been viewed. Again, we use this information for our own marketing purposes.

If you would like help clearing cookies, please contact [ACO Nordic Group IT](#). If you clear cookies you will need to accept our cookie policy upon your next visit to our website.