

PERSONAL DATA POLICY Westpack A/S

1. GENERAL

- 1.1 This policy on the processing of personal data ('Personal data policy') describes how Westpack, CVR no. 26211425 (WP), collects and processes data about you.
- 1.2 The personal data policy applies to personal data that you provide to us or that we collect through WP's websites at www.westpack.com and www.b2b.westpack.com (the Website).
- 1.3 WP is the controller for your personal data. Please communicate with WP using the contact details in section 8.

2. THE PERSONAL DATA WE COLLECT, THE PURPOSE OF SUCH COLLECTION AND THE LEGAL BASIS FOR THE PROCESSING

- 2.1 When you visit the Website, we automatically collect data about you and your use of the Website, for example the type of browser you use and the search terms you use on the Website, your IP address, including your network location, and information about your computer.
 - 2.1.1 The purpose of the data collection is to optimise the user experience and operation of the Website, and to perform targeted marketing, including remarketing and retargeting via Facebook and Google. This processing of information is necessary so that we can look after our interests in improving the Website, to collect statistics for optimisation of the Website and to show you relevant offers.
 - 2.1.2 The purpose is also to be able to identify you as a customer and supply the services you have purchased from us.
 - 2.1.3 The legal basis for the processing is the EU General Data Protection Regulation, article 6, paragraph 1, letter f.
 - 2.1.4 The legal basis for the processing is the California Consumer Privacy Act of 2018 (CCPA).
- 2.2 When you purchase a product or communicate with us on the Website, we collect the data you provide yourself, for example name, address, email address, telephone number, payment method, data about the products you are purchasing and possibly have returned, delivery requirements and information about the IP address from which you placed an order.
 - 2.2.1 The purpose is for us to be able to deliver the products you have ordered and perform our contract with you, including administering your rights to return goods and lodge a complaint. We may also process data about your purchases to meet statutory requirements, including for bookkeeping and accounting. When you make a purchase via our Webshop, the IP address is collected in order to prevent fraud.
 - 2.2.2 The legal basis for the processing is the EU General Data Protection Regulation, article 6, paragraph 1, letters b, c and f.
 - 2.2.3 The legal basis for the processing is the California Consumer Privacy Act of 2018 (CCPA).
- 2.3 When you subscribe to our newsletter, we collect data about your email address.
 - 2.3.1 The purpose is to look after our interest in being able to deliver newsletters to you.

- 2.3.2 The legal basis for the processing is the EU General Data Protection Regulation, article 6, paragraph 1, letter f.
- 2.3.3 The legal basis for the processing is the California Consumer Privacy Act of 2018 (CCPA).
- 2.4 On the Website, you have the option of actively subscribing to receive newsletters and other offers via direct marketing. When you subscribe to our Newsletter, you are asked to provide an email address and accept direct marketing from Westpack. When you subscribe to the Newsletter, WP collects data about the IP address from which the subscription was made to determine the language version for the Newsletter and direct marketing.
 - 2.4.1 The purpose is to look after our interest in being able to send newsletters and undertake targeted marketing via direct marketing.
 - 2.4.2 The legal basis for the processing is the EU General Data Protection Regulation, article 6, paragraph 1, letters b and f.
 - 2.4.3 The legal basis for the processing is the California Consumer Privacy Act of 2018 (CCPA).
 - 2.4.4 You can unsubscribe from these newsletters at any time. You can do this in your account on the Website or ask WP to unsubscribe you.

3. HOW LONG WE STORE PERSONAL DATA

- 3.1 Storage of personal data depends on the purpose of the personal data.
- 3.2 When you visit the Website, your data will be available for use for retargeting and remarketing. This data is not erased unless you actively ask to be erased from these databases. However, see subsections 3.4 and 3.5.
- 3.3 When you purchase a service from WP, we need your personal data as documentation until the service has been paid for and supplied, any cooling-off period has ended and the deadline for payments has passed.

During the term of a contract, the data we have collected about you is stored in our IT system, after which personal data is archived.

This data is archived under your user data and will be visible to you when you log in to your personal account. This data can be used to see what you ordered from WP in the past and you can also reorder directly in the webshop based on this archive.

- 3.4 Your data about previous purchases is erased from the webshop when it is more than 5 years old.

Under existing rules, your personal data will generally be stored by WP for a period of 5 years after the end of the financial year to which the material relates. For example, if the contract with you is terminated in November 2017, and the financial year runs until the end of April 2018, under existing rules we are obliged to store the data until at least the end of the 2023 financial year.

- 3.5 When personal data is no longer relevant and we are not obliged to store it, all personal data concerning you will be erased. Your personal data will be erased if you have not purchased anything from WP for 5 years.

4. RECIPIENTS OF PERSONAL DATA

- 4.1 The personal data that we collect about you in connection with fulfilment of a purchase from WP or a visit to the Website will primarily be used for general customer administration. This

includes, for example, performance of the contract of sale you have made with WP, and invoice data will, in principle, not be disclosed to a third party.

4.2 However, data may be transferred to external partners that process data on our behalf. We use external partners for, among other things, technical operation of and improvements to the Website, targeted marketing, including remarketing and retargeting, and your assessment of our business and products. Some of these partners are controllers and some are processors. All partners must comply with statutory requirements for processing personal data.

4.3 Two of these processors, Google Analytics, represented by Google LLC, and Facebook Inc. are based in the USA. The necessary guarantees for transfer of data to the USA are secured through the processor's certification under the EU-U.S. Privacy Shield, cf. article 45 of the EU General Data Protection Regulation.

4.3.1 A copy of Google LLC's certification can be found here: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>

4.3.2 A copy of Facebook Inc.'s certification can be found here: <https://www.privacyshield.gov/participant?id=a2zt00000000GnywAAC&status=Active>.

5. YOUR RIGHTS

5.1 As controller, we must inform you about your rights in order to create openness about the processing of your data.

5.2 Right of access

5.2.1 At any time, you have the right to request information from us about the data we have registered about you, the purpose the registration serves, the categories of personal data and any recipients of data, and information about where the data comes from.

5.2.2 You have the right to have a copy of the personal data we process about you delivered to you. If you wish to have a copy of your personal data, you should send a written request to sales@west-pack.com. You may be asked to document that you are the person you claim to be.

5.3 Right to rectification

5.3.1 You have the right to have incorrect personal data about you rectified by us. As soon as you notice that there is an error in the data that we have registered about you, you should contact us in writing so that the data can be rectified.

5.3.2 You may rectify approval of receipt of newsletters yourself by logging in to your user profile, cf. subsection 2.4.3.

5.4 Right to erasure

5.4.1 In certain cases, you have the right to have some or all of your personal data erased by us, for example if you withdraw your consent, and we have no other legal basis to continue the processing. Where continued processing of your data is necessary, for example so that we can meet our legal obligations, or to establish, assert or defend a legal claim, we are not obliged to erase your personal data.

5.5 The right to restriction of processing to storage

5.5.1 You have a right to have the processing of your personal data restricted in certain cases, so that it only consists of storage, for example if you think the information we process about you is not correct.

5.6 The right to data portability

- 5.6.1 In certain cases, you have a right to have personal data that you have given us yourself delivered in a structured, generally usable and machine readable format, and you have a right to transfer this data to another controller.

5.7 Right to object

- 5.7.1 At any time, you have a right to object to our processing of your personal data with respect to direct marketing, including the profiling that is performed to be able to target our direct marketing.
- 5.7.2 In addition, for reasons relating to your personal situation, you have a right at any time to object to the processing of your personal data that we perform on the basis of our legitimate interests, cf. subsections 2.1 and 2.3.

5.8 The right to withdraw consent

- 5.8.1 At any time, you have a right to withdraw consent you have given us for certain processing of personal data, including consent for the receipt of newsletters and direct marketing, cf. subsection 2.3. If you wish to withdraw your consent, you can do this automatically in your account at the webshop, or you can contact us at sales@westpack.com.

5.9 Right to complain

- 5.9.1 At any time, you have a right to submit a complaint to the Danish Data Protection Agency, Børggade 28, 5, 1300 København K, Denmark, about our processing of your personal data. A complaint may also be submitted by email to dt@datatilsynet.dk or by telephone on +45 33 19 32 00.

6. ERASURE OF PERSONAL DATA

- 6.1 Data collected about your use of the Website, cf. subsection 2.1, is erased after 5 years, cf. subsection 3.
- 6.2 Data collected in connection with your subscription to our newsletter is erased when your consent to the newsletter is withdrawn, unless we have another basis for processing the data.
- 6.3 Data collected in connection with a purchase you have made on the Website, cf. subsection 2.2, will be erased after 5 years. Accounting records are stored for 5 years to the end of a financial year to meet the requirements of the Danish Bookkeeping Act, cf. subsection 3.4.

7. SECURITY

- 7.1 We have implemented appropriate technical and organisational security measures to prevent accidental or illegal destruction, loss, change or corruption of personal data, to prevent personal data from being disclosed to unauthorised persons and to prevent personal data from being misused.
- 7.2 Only employees who have a real need to have access to your personal data to perform their work have access to it.

8. CONTACT DETAILS

- 8.1 Westpack A/S is the controller of the personal data that is collected via the Website.
- 8.2 If you have questions or comments about this Personal Data Policy or want to exercise one or more of your rights, please contact:

Westpack A/S
Sletten 21
7500 Holstebro
Denmark

Telephone: +45 7080 9333
Email: sales@westpack.com

9. CHANGES TO THE PERSONAL DATA POLICY

- 9.1 WP reserves the right to update and change the current guidelines for processing personal data. If the guidelines are changed, the date of the 'last update' is changed at the bottom of the page. These guidelines will be evaluated and, if necessary, revised once a year.

10. VERSIONS

- 10.1 This is version 1 of WP's Personal Data Policy