

# PRIVACY POLICY

Pages in this website with sub-sites (below named “the website”) and those websites specified in the end of this document are published by companies in the Rudholm Group (i.e. companies that are directly or indirectly owned by Rudholm Group Holding AB.) These companies will be mentioned in this document as Rudholm Group “us” or “we.”

## 1 INFORMATION ABOUT THE COLLECTION OF PERSONAL DATA

1.1 The following information concerns the collection of personal data while using this website. Personal data is all data that can be personally related to you, e.g. name, address, email addresses, user behaviour.

1.2 The responsible officer pursuant to Article 4 (7) EU General Data Protection Regulation (GDPR) is listed in the end of this document with connecting website, below called the “Company.” You can contact the Company’s data protection manager at [privacy@rudholmgroup.com](mailto:privacy@rudholmgroup.com) or at our postal address listed to each company in the end with the addition “Data protection manager.”

1.3 When you contact us by email or using a contact form, the data you give us (your email address, name and phone number if applicable) is stored by us in order to answer your question/s. When storage is no longer necessary, we will delete the applicable data or restrict the processing of it if legal retention requirements apply.

1.4 If we use contracted service providers for individual functions of our web-based services, or if we wish to use your data for advertising purposes, we will inform you below in detail about the respective processes, naming the defined criteria for storage duration.

## 2 YOUR RIGHTS

2.1 You have the following rights towards us with regard to your personal data:

- Right to information,
- Right to correction or deletion,
- Right to restriction of processing,
- Right to refusal of processing,
- Right to data portability.

2.2 You also have the right to lodge a complaint about our processing of your personal data with a data protection regulatory body.

## 3 COLLECTION OF PERSONAL DATA WHEN YOU VISIT OUR WEBSITE

3.1 If you are only using the website for information and do not register or transmit information to us in any other way, we only collect the personal data which your browser transmits to our server. If you wish to view our website, we collect the following data that are technically necessary for us to display our website to you and guarantee its stability and security (the legal basis is Article 6 (1) sentence 1 lit. f GDPR):

- IP address
- Date and time of the enquiry
- Time zone difference from Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status / HTTP status code

- Quantity of data transferred in each case
- The website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

3.2 In addition to the data mentioned above, cookies are stored on your PC when you use our website. Cookies are small text files that are saved on your hard drive in association with the browser you use and through which particular information is transmitted to the location setting the cookie (in this case by us.) Cookies cannot run programmes or transmit viruses to your computer. They serve to make the internet presence more user-friendly and effective in general

#### **4 USE OF COOKEIS AND PIXELS**

4.1 We use cookies in this website to gather statistics about people visiting our website, for commercial purposes and to improve your experience of our website. We may update our information about cookies from time to time. We therefore recommend that you visit this webpage on a regular basis to learn more about how cookies are used on our website.

We use cookies in order to be able to identify you for subsequent visits if you have an account with us. This is to simplify your log in every time you visit the site.

A cookie is a small file with letters and numbers placed on your local unit when you visit our website. If you have not adjusted your browser settings to not accept cookies, a cookie will be placed on your local unit when you visit our website. There are two types of cookies, which type of cookie is decided by the time the cookie is stored on your local unit. The types of cookies are: Persistent cookies and transient cookies. In addition, cookies from a first party (our domain) is different from cookies from a third party.

Persistent cookies are deleted automatically after a set period, which can vary according to the cookie. You can delete the cookies at any time in the security settings of your browser.

Transient cookies are automatically deleted when you close the browser. These include session cookies in particular. They save a so-called session ID that links different enquiries from your browser to a common session. This means that your computer can be recognised when you return to our website. The session cookies are deleted when you log out or close the browser.

Cookies from a first party (first party cookies) is placed by the website you are visiting (e.g. cookies placed by our domain to optimize the website usage).

Cookies from a third party (third party cookies) are cookies placed on your computer by another domain than the website you are visiting. If you visit a website and cookie from another domain is placed on your computer, it is a third party cookie.

Our website uses multiple services from third parties, who, from time to time, use cookies (third party cookies). The purpose of the services is to supply targeted advertising based on your interests, previous purchases and visits to our website. We use these services to evaluate campaigns and to receive visitor and buyer statistics from our website. The data obtained this way is handled in a pseudonymized form, which means that the de-identified information about you is not stored in these cookies and pixels.

Information from third party cookies and pixels may be shared with other companies within the Rudholm Group for analysis and statistical purposes, but may also be used to show you advertisements from other companies within the Rudholm Group, which we believe might be of interest to you. For more information about the companies within the Rudholm Group, please see list in the end of this document.

#### 4.2 Your consent

By accepting cookies in your browser and visit our website you consent to our and our service providers' usage of cookies on our website.

#### 4.3 Can I withdraw my consent?

Yes. If you wish to withdraw your consent you have to remove the cookies stored on your local unit in your browser settings. If you want to prevent cookies from being stored on your local unit, you need to change your browser settings to not accept cookies. Please be advised, if you choose to not accept cookies you may not be able to use all the functions of this website or the website may not function at all

### 5 OTHER FUNCTIONS AND OFFERS ON OUR WEBSITE

5.1 As well as the purely informational use of our website, we offer various services that you may use if they interest you. To do so, you must generally provide further personal data, which we use in order to provide the respective service and to which the above-mentioned principles of data processing apply.

5.2 We sometimes use external service providers to process your data. They have been carefully selected and commissioned by us, are bound to our instructions and are regularly monitored.

5.3 If our service providers or partners are located in a country outside the European Economic Area (EEA), we will inform you about the consequences of this in the description of the offer.

### 6 USE OF OUR WEBSHOP

6.1 If you wish to order from our webshop, it is necessary for the conclusion of the contract that you provide personal data that we require in order to process your order. Mandatory fields for the conclusion of contracts are specially marked; other information is voluntary. We process the data you provide in order to complete your order. For this purpose, we can pass your payment details on to our company bank or integrated payment partner. The legal basis for this is Article 6 (1) sentence 1 lit. b GDPR.

You can voluntarily set up a customer account through which we can save your data for other subsequent purchases. When setting up an account under "My account," the data you provide is revocably stored. You can delete all further data, including your user account, at any time in the customer area. We can also process the data provided by you in order to inform you about other interesting products in our portfolio or to send you emails with technical information.

6.2 Due to commercial and tax law requirements, we are obliged to save your address, payment and order data for the duration of seven years. However, after three years we restrict processing, i.e. your data is only used to comply with legal requirements.

6.3 To prevent unauthorised access by third parties to your personal data, especially financial data, the order process is encrypted by TLS technology.

## **7 NEWSLETTERS**

7.1 With your consent, you can subscribe to our newsletter, with which we inform you about our current offers about our goods and services.

7.2 The only obligatory information for transmission of the newsletter is your email address. After your confirmation, we store your email address for the purpose of sending the newsletter. The legal basis is Article 6 (1) sentence 1 lit. a GDPR.

7.3 You can revoke your consent to transmission of the newsletter and unsubscribe to the newsletter at any time. You can revoke it by clicking on the link provided in every newsletter email or by sending a message to the contact point given in the legal notice.

## **8 REVOCATION OR WITHDRAWAL OF CONSENT TO THE PROCESSING OF YOUR DATA**

8.1 If you have agreed to the processing of your data, you can revoke this at any time. After you have informed us, the revocation influences the permissibility of processing your personal data.

8.2 If we base the processing of your personal information on consideration of interests, you can revoke your consent to processing. This is the case, in particular, if processing is not necessary for fulfilment of a contract with you, which is always outlined by us in the subsequent description of the functions. When exercising the right of revocation, we ask you to cite the reasons why we should not process your personal information as we have previously done. In the case of a justified revocation, we will examine the situation and either stop or adjust the data processing or convey to you our protection-worthy and necessary reasons for continuing the processing.

8.3 Of course, you can revoke consent to the processing of your personal data for advertising and data analysis purposes at any time. You can inform us of your advertising revocation by sending a message to the contact information given in the legal notice.

## **9 WEB ANALYTICS**

### Use of Google Analytics

9.1 This website uses Google Analytics, a web analysis service by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are stored on your computer and which enable an analysis of your use of the website. The information about your use of this website generated by the cookie is generally transmitted to a Google server in the USA and stored there. However, if IP anonymisation is activated on this website, your IP address will first be shortened by Google within member states of the European Union or other contracting member states of the European Economic Area. Only in exceptional cases will the complete IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information in order to evaluate your use of the website, to compile reports about website activities and to provide further services connected with website use and internet use for the website operator.

9.2 The IP address transmitted from your browser within Google Analytics is not connected with other data from Google.

9.3 You can prevent the storage of cookies by configuring your browser software; accordingly, please note, however, that in this case you may not be able to use all the functions of this website to their full extent. In addition, you can prevent the capture of data generated by the cookie and related

to your use of the website (incl. your IP address) for Google and the processing of these data by Google by downloading and installing the browser plug-in available at the following link:  
<http://tools.google.com/dlpage/gaoptout?hl=de>.

9.4 We use Google Analytics in order to analyse use of our website and regularly improve it. We use the statistics obtained to improve our products and make them more interesting to you as a user. For the exceptional cases in which personal data are transmitted to the USA, Google has committed itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for the use of Google Analytics is Article 6 (1) sentence 1 lit. f GDPR.

9.5 Information about the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. Terms of use: <http://www.google.com/analytics/terms/de.html>; overview of data protection: <http://www.google.com/intl/de/analytics/learn/privacy.html>, and the Data Protection Statement: <http://www.google.de/intl/de/policies/privacy>.

9.6 This website also uses Google Analytics for a cross-device analysis of visitor flows which is carried out by means of a user ID. You can deactivate the cross-device analysis of your use if you click on the link Opt out from Google tracking, which also can be found at the bottom of the website.

9.7 We use cookies for remarketing, which is a form of interest-based advertising, i.e. your behaviour on our website can be used for targeted advertising on other websites. For this purpose, data from third party cookies are used, currently:

- Doubleclick by Google
- Google Adwords
- Facebook
- Google analytics.

## 10 SOCIAL MEDIA

Use of social media plug-ins

10.1 We currently use the following social media plug-ins: Facebook, Google+, Twitter. We use the so-called two-click solution for this. This means that when you visit our site, fundamentally no personal data will be initially transmitted to the providers of the plug-ins. You can recognise the provider of the plug-in via the label on the box above its initial letters or the logo. We offer you the possibility of communicating with the provider of the plug-in directly via the button. The plug-in provider only receives the information that you have called up the corresponding page of our online presence if you click on the demarcated field to activate it. The data named under § 3 of this statement are also transmitted. In the case of Facebook the IP address is anonymised immediately after collection. When the plug-in is activated, your personal data is therefore transmitted to the respective plug-in provider and stored there (in the USA in the case of US providers). Since the plug-in provider carries out data capture using cookies in particular, we recommend that you delete all cookies before clicking on the greyed-out box above the security settings of your browser.

10.2 We have no influence on the data captured or the data processing procedures, nor do we know the entire scope of data collection, the purpose of processing or the retention periods. We also have no information about the deletion of the collected data by the plug-in provider.

10.3 The plug-in provider stores the data collected about you as user profiles and uses them for the purposes of advertising, market research and/or the needs-based design of their website. Such an evaluation takes place, in particular (even for users who are not logged in) to provide needs-based

advertising and in order to inform other users in the social network about your activities on our web-site. You have the right to revoke the creation of these user profiles, although you must contact the respective plug-in provider to exercise this right. Via the plug-ins, we offer you the opportunity to interact with social networks and other users so that we can improve our website presence and make it more interesting for you as a user. The legal basis for the use of plug-ins is Article 6 (1) sentence 1 lit. f GDPR.

10.4 Data transmission takes place regardless whether you have an account with the plug-in provider and are logged on there. If you are logged on to a plug-in provider, your data collected by us is directly associated with the account you have with the plug-in provider. If you click on the activated button and, for example, link the page, the plug-in provider also stores this information in your user account and communicates it publicly to your contacts. We recommend that after using a social network, you regularly log out, but in particular before activating the button, since this enables you to avoid association with your profile by the plug-in provider.

10.5 You can find more information about the purpose and scope of data collection and processing by the plug-in provider in their data protection statements, which are given below. You can also find further information there on your rights in this regard and the setting options to protect your privacy.

10.6 Addresses of the respective plug-in providers and URLs with their data protection notices: (information can be updated and changed over time and updated information can be found at related plug-in provider)

a) [Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA; <http://www.facebook.com/policy.php>; further information on data collection: <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> and <http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

b) Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA; <https://www.google.com/policies/privacy/partners/?hl=de>. Google has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

c) Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA; <https://twitter.com/privacy>. Twitter has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

## 11 RUDHOLM GROUP

11.1 Rudholm Group have companies working with both direct sales to final consumer and companies only working B2B. The big majority of companies and volume of website traffic is coming from the B2B companies.

11.3 This policy is valid for below companies, where you can also see the main website and general contact information.

**Rudholm Group International**

Box 1103  
501 11 Borås

[www.rudholmgroup.com](http://www.rudholmgroup.com) \*

[www.rh-shop.com](http://www.rh-shop.com)

[info@rudholm-hk.se](mailto:info@rudholm-hk.se)

Subsidiaries:	Rudholm & HK AB	Sverige
	Rudholm & Haak (HK) Ltd	Hong Kong
	Rudholm & Haak (Shanghai) Ltd	Kina
	Rudholm Bangladesh Ltd	Bangladesh
	Rudholm & Haak India Private Ltd	Indien
	Rudholm Tekstil Aksesuar Ltd	Turkiet
	Rudholm Printing & Packaging Ltd	Vietnam
	Rudholm UK Ltd	UK

**Bamatex AB**

Box 1103  
501 11 Borås

[www.bamatex.se](http://www.bamatex.se) \*  
[www.shop.bamatex.se](http://www.shop.bamatex.se)  
[info@bamatex.se](mailto:info@bamatex.se)

**Månsing AB**

c/o Marketplace, Box 8080  
501 18 Borås

[www.mansing.se](http://www.mansing.se) \*  
[info@mansing.se](mailto:info@mansing.se)

**Bonum Figura AB**

c/o Rudholm, Box 1103  
501 11 Borås

[www.designgrossisten.se](http://www.designgrossisten.se) \*  
[info@designgrossisten.se](mailto:info@designgrossisten.se)

**Leech Int AB**

c/o Bamatex, Box 1103  
501 11 Borås

[www.leechstore.com](http://www.leechstore.com) \*  
[info@leecheyewear.com](mailto:info@leecheyewear.com)

**Svensk Knallehandel AB**

c/o Rudholm, Box 1103  
501 11 Borås

[www.knallen.se](http://www.knallen.se)  
[info@knallen.se](mailto:info@knallen.se)

- Using remarketing on the website