

# PRIVACY POLICY

Royal Design Group AB (“Royal Design” or “we”) care about your privacy. In this privacy policy, we would like to inform you about how we process your personal data and what rights you have.

In summary, we process your personal data for the following purposes:

- Administer your purchase or order
- Communicate with you in connection with the purchase, for example, send order confirmation and reviews about your purchase
- Send marketing and customised information about products, your shopping cart, competitions and events via email and text messages
- Provide you with customised marketing in digital channels
- Help you with customer service matters
- Performing legal obligations such as right to withdrawal, complaints and compliance with the Accounting Act

Below you can read more about how and why we process your personal data. You can also read about how you can influence our processing of your personal data, such as the right to object to certain processing. For example, you may at any time object to marketing from us.

We also describe what legal basis we have for the processing and how long we store your personal data.

## Summary of contents

Summary of contents	1
Who is responsible for the processing of your personal data?	1
Who can gain access to your personal data?	2
Do we transfer your personal data outside of the EU/EEA?	2
How can you affect our processing of your personal data?	2
Detailed information about how we process your personal data	4
Balancing of interests	7

## Who is responsible for the processing of your personal data?

Royal Design Group AB, Swedish company registration number 556573-2426, is responsible, (as controller) for the processing of your personal data when we process your data for our own purposes.

If you have any questions regarding our processing of your personal data – or if you want to exercise any of your rights, please contact us at [info@royaldesign.se](mailto:info@royaldesign.se) or give us a call on 010-510 70 70. Our postal address is Svensknabbevägen 17, 393 51 Kalmar.

### **Who can gain access to your personal data?**

Your personal data is mainly only processed by Royal Design. However, your personal data will be shared with others according to below.

- In order to have a functioning IT system and conduct our business efficiently we share your personal data with our IT-suppliers. Your personal data is only shared to the extent necessary for the suppliers to perform their contractual obligations in relation to us.
- In order to administer your payment, we will share your personal data with the supplier providing the payment solution that we use. If you choose to pay via invoice, the payment service provider may share your personal data with a credit agency to assess your financial situation.
- In order for us to deliver your goods to you, and to handle any returns, we will share your personal data with the carrier that you choose in the check-out.
- In order to handle customer service matters, we share your personal data with the company providing our customer service.
- In order to give you and other potential customers customised marketing in digital channels, we will share your personal data with third party providing the digital channel.
- We will share your personal data with the franchisees who operate in our physical stores.
- We share your personal data with external partners that help us manage our marketing through digital channels.

### **Do we transfer your personal data outside of the EU/EEA?**

We may transfer your personal data outside of EU/EEA to our IT suppliers that are processing the personal data on behalf of us as processors in accordance with our instructions. When we transfer your data outside of the EU/EEA, this will only be done if we have support for the transfer under applicable data protection legislation. This means that the transfer is based on either an adequacy decision by the Commission, on standard contractual clauses or the Privacy Shield.

If you have any questions regarding how we share your personal data or if you want a copy of the appropriate safeguards we have taken, please feel free to contact us.

### **How can you affect our processing of your personal data?**

According to data protection legislation, you are entitled to a variety of rights to affect our processing of your personal data. Read more below.

### **Right to withdraw consent and to object to processing**

You have a right to, wholly or partly, *withdraw a given consent* for the processing of your personal data. Your withdrawal will have effect from the time of your withdrawal.

You have always *a right to object to marketing* and profiling, such as newsletters and customised marketing.

You have a right to object when the processing is based on a *balance of legitimate interests*. Read more about what this means below. In some other cases, the right to object does not exist (e.g. since we must store your personal data). If we can show compelling legitimate reasons for the processing that weigh heavier than your interests and fundamental rights or if it is for the purpose of determining, practicing or defending legal claims you do never have a right to object to the processing.

### **Right to access**

You have the right to *obtain confirmation* as to whether or not we are processing personal data concerning you and information about the processing, such as the purposes and for how long we store your personal data. You can *gain access* to the personal data and *obtain a copy* of the personal data processed by us.

### **Right to rectification**

You have a right to *obtain rectification* of any inaccurate personal data concerning you and to ask us to *have incomplete personal data completed*.

### **Right to erasure (“the right to be forgotten”) and restriction of processing**

Under certain circumstances, you have a right to request *erasure of your personal data*. This is the case for example where the personal data is no longer necessary for the purposes for which they were collected or otherwise processed, or you withdraw your consent on which the processing is based on and where there is no other legal ground for continuance of the processing.

You also have a right to request that we *restrict its processing* of your personal data. That is the case for example when the accuracy of the personal data is contested by you, or the processing is unlawful and you oppose the erasure of the personal data and instead requests restriction of its use.

### **Right to lodge a complaint to a supervisory authority**

You always have the right to *lodge a complaint with a supervisory authority*.

You may do this in particular in the EU/EEA member state of your habitual residence, place of work or of an alleged infringement of the applicable data protection laws. In Sweden, the supervisory authority is the Swedish Data Protection Authority. This right is without prejudice to any other administrative or judicial remedy.

### **Right to data portability**

You have a right to ask us to *transfer certain of your personal data* we have about you to another company (data portability).

This right applies to personal data that you have provided us in a structured commonly used, machine-readable and interoperable format if the processing is based on consent or on a contract and the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have personal data transmitted directly from us to another controller, where technically feasible.

## Detailed information about how we process your personal data

Here you can read more about why we process your personal data, which categories of personal data we process and our legal basis for processing. You can also read for how long we process your personal data for each purpose.

<b>Purpose: To administer your purchase</b>		
<b>Processing performed:</b>	<b>Personal data we process:</b>	<b>Legal basis:</b>
<ul style="list-style-type: none"> <li>• Deliver your products</li> <li>• Carry out payment</li> <li>• Send order and delivery confirmation</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details (postal address, email address and telephone number)</li> <li>• Order information (e.g. what product you have ordered)</li> <li>• Payment Information</li> </ul>	Performance of contract  <i>The processing is necessary in order for us to fulfill the contract regarding your purchase. If the data is not provided, you will not be able to make a purchase with us.</i>
<b>Retention time:</b> The data is processed for twelve months after your products have been delivered.		
In addition to the above, your personal data is also processed, for example social security number, by the payment service provider Klarna to carry out your payment. Klarna is a controller for the processing of your personal data and is responsible for informing you separately in this respect.		

<b>Purpose: To send reviews to you after completed purchase</b>		
<b>Processing performed:</b>	<b>Personal data we process:</b>	<b>Legal basis:</b>
<ul style="list-style-type: none"> <li>• Send product reviews and reviews about your shopping experience</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> </ul>	Balancing of interest  <i>The processing is justified by our legitimate interest in contacting you with a request to review or rate the products you have purchased as well as your purchase experience.</i>
<b>Retention time:</b> We will send product reviews to you three weeks after your purchase.		

<b>Purpose: To send marketing via email and text messages</b>		
<b>Processing performed:</b>	<b>Personal data we process:</b>	<b>Legal basis:</b>
<ul style="list-style-type: none"> <li>• Send marketing and newsletters with offers and information via email and text messages</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Telephone number</li> </ul>	Balancing of interest  <i>The processing is justified by our legitimate interest in sending relevant advertising to you as a customer. You are entitled to object to the marketing when</i>

<ul style="list-style-type: none"> <li>• Send personalised, customised marketing so you get offers and information that we think you're interested in</li> <li>• Send information about your shopping cart if you have left our site without completing the purchase</li> </ul>	<p><b>For customised communication and reminder of your shopping cart, we also process:</b></p> <ul style="list-style-type: none"> <li>• Browsing history</li> <li>• Order history</li> </ul>	<p><i>the data is collected and in each mail.</i></p> <p>Consent</p> <p><i>If you have chosen to subscribe to our newsletter on our website or given your consent via email, we will send marketing based on your consent.</i></p>
<p><b>Retention time:</b> The data is processed for one year from completed purchase based on the balance of interest. If you have given your consent to receive marketing, we will send it to you until you unsubscribe to our newsletter or object to receiving marketing from us.</p>		

<b>Purpose: Provide customised marketing in digital channels</b>		
<b>Processing performed:</b>	<b>Personal data we process:</b>	<b>Legal basis:</b>
<ul style="list-style-type: none"> <li>• Provide customised marketing in digital channels, social media and third party web pages including sharing of data with those parties.</li> </ul>	<ul style="list-style-type: none"> <li>• Email address</li> <li>• IP address</li> <li>• Cookies</li> </ul>	<p>Balancing of interest</p> <p><i>The processing is justified by our legitimate interest in providing customised marketing to you as a customer and other potential customers.</i></p> <p><i>Your data is processed for this purpose only if you have made a purchase and have not objected to marketing.</i></p>
<p><b>Retention time:</b> The data is processed for twelve months after completion of purchase.</p>		

<b>Purpose: Inviting you to events and competitions</b>		
<b>Processing performed:</b>	<b>Personal data we process:</b>	<b>Legal basis:</b>
<ul style="list-style-type: none"> <li>• Invite you to events and competitions</li> <li>• Administer your registration or participation in the competition</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Geographic location</li> </ul>	<p>Balancing of interest</p> <p><i>The processing is justified by our legitimate interest in inviting you as a customer to events and competitions and administer your registration or participation in the competition.</i></p>
<p><b>Retention time:</b> The data is processed for twelve months after completion of purchase.</p>		

<b>Purpose: To administer customer service matters</b>		
<b>Processing performed:</b>	<b>Personal data we process:</b>	<b>Legal basis:</b>
<ul style="list-style-type: none"> <li>• Answer and administer your customer service matter by email, phone or social media</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Telephone number</li> <li>• The information you provide, such as order number.</li> </ul>	<p>Balancing of interest</p> <p><i>The processing is justified by our legitimate interest in helping you with your matter.</i></p>

**Retention time:** The data is processed for six months after completion of the matter.

**Purpose: To administer an order made in any of our physical stores**

Processing performed:	Personal data we process:	Legal basis:
<ul style="list-style-type: none"> <li>• Deliver your products</li> <li>• Carry out payment</li> <li>• Send order and delivery confirmation</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details (postal address, email address and telephone number)</li> <li>• Order information (e.g. what product you have ordered)</li> <li>• Payment information</li> </ul>	<p>Performance of contract</p> <p><i>The processing is necessary in order for us to fulfill the contract, i.e. in order to administrate and deliver the order you make in the store. If the data is not provided you will not be able to make the order.</i></p>

**Retention time:** The data is processed for twelve months after completion of purchase.

**Purpose: To handle the right of withdrawal, complaints or other claims**

Processing performed:	Personal data we process:	Legal basis:
<ul style="list-style-type: none"> <li>• Handle possible withdrawal of purchase</li> <li>• Handle possible complaints or other claims</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (postal address, email address and phone number)</li> <li>• Information from our communication with you regarding your claim (e.g. details about the current order)</li> </ul>	<p>Legal obligation and balancing of interests</p> <p><i>The processing is necessary in order for us to act in accordance with consumer law and comply with a legal obligation. We also have a legitimate interest in being able to defend ourselves against a possible legal claim.</i></p>

**Retention time:** The data is processed from the time you submit your claim and is processed as long as the process of the claim is in progress.

**Purpose: To comply with the Accounting Act**

Processing performed:	Personal data we process:	Legal basis:
<ul style="list-style-type: none"> <li>• Comply with the Accounting Act</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Postal address</li> <li>• Email address</li> <li>• Payment history and transactions</li> </ul>	<p>Legal obligation</p> <p><i>The processing is necessary in order for us to comply with a legal obligation, i.e. the Accounting Act.</i></p>

**Retention time:** The data is processed for seven to eight years in accordance with the Accounting Act.

## **Balancing of interests**

For some purposes, we process your personal data relying on our legitimate interest as legal basis for the processing. When assessing the legal basis we rely on a balance of interests test, through which we have determined that our legitimate interest for the processing outweighs your interest and your fundamental right not to have your personal data processed. We have stated what our legitimate interest is in the tables above. You are welcome to contact us if you want to read more about how we have done this test. Our contact details are as stated in the beginning of this privacy policy.

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This privacy policy was adopted on May 24, 2018.