

## **Integrity and Marketing Policy**

### **1. Generally**

This Privacy and Marketing Policy ("Privacy Policy") describes how Southworth International Group, Inc. (SIGI), P.O. Box 1380, Portland, ME 04104-1380, email [privacy@sigi-global.com](mailto:privacy@sigi-global.com), ("SIGI", "we") collects, uses, discloses and stores your personal information.

1.1 The Privacy Policy applies when SIGI provides services and products related to purchase, service issues and other contact with SIGI, such as website visits.

1.2 You should always be able to feel safe when you submit your personal information to us. We want to demonstrate with this Privacy Policy how we ensure that your personal information is processed in accordance with applicable privacy laws.

### **2. Personal Data Responsible**

SIGI is personally responsible for SIGI's processing of your personal data and is responsible for such processing in accordance with applicable law.

### **3. When do we process your personal information?**

3.1 In order to purchase our goods or services or contact us for service or information, we must collect and process personal information about you.

3.2 SIGI collects and processes personal information about you when using SIGI support, visiting the SIGI website or an event organized by SIGI or when you otherwise have contact with SIGI. The information collected from you on inquiries and purchases is required for you to enter into agreements with SIGI and for SIGI to be able to provide their services.

### **4. What personal data do we process about you?**

#### **4.1 For you who are SIGI customers**

The personal data SIGI collects and treats you as a customer regarding the request or purchase is:

- Name
- Address
- Phone number and e-mail
- Account number
- IP address and information about your use of website

### **5. Why do we process information about you?**

## **5.1 For you who are SIGI customers**

SIGI handles your personal information for different purposes. Mainly, SIGI deals with your personal information in order to:

- Comply with our obligations to you as a customer, such as inquiries, purchase execution, invoicing, and provision of support;
- Enable general customer care and customer service, such as answering questions and correcting incorrect information;
- Provide information and targeted marketing, by mail, e-mail, and telephone regarding SIGI and selected partners' goods and services;
- Manage the customer relationship and provide our services;
- Provide relevant information and custom offers in newsletters as well as on the web;
- Assess which payment methods we can offer you, for example through credit assessments; Improve our customer offering, such as product and service development;
- Prevent fraud and risk management; and
- Follow applicable legislation, such as accounting laws.

The data can also provide basis for market and customer analyzes, market research, statistics, business tracking and business and method development related to the purchase of goods and services.

## **6. The legal basics of our processing of your personal data**

SIGI bases the processing of your personal data on several legal bases. These are described in this section.

6.1 We treat your personal information in order to fulfill the agreement with you as a customer, such as to make bookings, purchase and to fulfill our obligations to you, such as simplified administration and order history.

6.2 SIGI does not treat sensitive personal data based on legitimate interest and does not provide any treatment that constitutes profiling based on legitimate interest.

6.3 In some cases, SIGI may have a legal obligation to process your personal information.

## 7. Compilation of our personal data processing

Purpose	Legal basis	Categories of personal data	Storage time
To administer, develop and deliver our goods and services as well as provide support	Completion of purchase agreement (terms of sale)	Name, address, telephone number and e-mail Geographic information IP address, device information, log information	Five years after you last been active at SIGI, for example by shopping with us or contacting our sales department
To ensure compliance with legal requirements	Legal obligation	Name, address, telephone number and e-mail Geographic information IP address, device information, log information	If we are required to store the data in accordance with applicable law
To market SIGI's trademarks and our affiliates or group companies' goods and services by mail, email, phone	Legitimate interest	Name, address, telephone number and e-mail Geographic information IP address, device information, log information	Five years after you last been active with SIGI, for example by shopping with us or contacting our customer service

## 8. How long do we save information about you?

8.1 Your personal information will only be stored if there is a need to save them to fulfill the purposes for which the data was collected in accordance with this Privacy Policy. SIGI may save the data for longer if it is required to comply with legal requirements or to monitor SIGI's legal obligations, e.g. if there is a legal process going on.

8.2 SIGI saves customer data for a maximum of 5 years after the customer last completed a purchase or otherwise integrated with SIGI.

## 9. Who do we provide personal information to?

9.1 SIGI may disclose your information to third parties, such as SIGI group companies and other partners as providers of transport services.

9.2 Third party to whom SIGI discloses information or otherwise provides information about a customer may use the information only for the purpose of selling and marketing SIGI and SIGI partners and group companies' products and services or for the purpose of providing services related to SIGI's agreement with you as a customer.

9.3 Personal data may also be submitted by SIGI if it is necessary to comply with applicable legal requirements or government requirements, to utilize SIGI's legal obligations or to detect, prevent or recognize fraud and other security or technical issues.

9.4 SIGI may transfer your personal data to SIGI's suppliers or partners. If personal data is transferred, SIGI will take steps to ensure that personal data remain protected and take the necessary steps to legally transfer personal data.

9.5 We will not sell your personal information to third parties unless we have your permission.

## **10. Application and amendment of the privacy policy**

10.1 The latest version of SIGI's privacy policy is always available on our website. Our privacy policy applies at any time in the form and to the content published on the site. If you do not accept the changes, you are entitled to terminate the agreement with SIGI before the amended Privacy Policy comes into force. You can terminate the agreement by contacting SIGI.

10.2 SIGI is entitled to update the privacy policy at any time. If the privacy policy changes, the updated policy will be published on the SIGI website. We may also inform you via email if there are major changes to the privacy policy.

## **11. The protection of your personal data**

You should always be able to feel confident when you submit your personal information to us. SIGI has therefore taken the security measures necessary to protect your personal data from unauthorized access, change and deletion. For example, all information about customers in databases protected by permission management and firewall is saved.

## **12. Your rights**

12.1 SIGI is responsible for processing your personal data in accordance with applicable legislation.

12.2 SIGI will, at your request or on its own initiative, correct, disassociate, delete or supplement information that is found to be incorrect, incomplete or misleading.

12.3 You are entitled to request

- a. Access to your personal information. This means that you are entitled to request a registry outline of the processing we conduct regarding your personal data. You are also entitled to receive a copy of the personal data being processed. You are entitled to once a calendar year, by written application, receive a registry extract from which personal data are registered about you, the purpose of the treatment and the recipients the information has been provided or to be disclosed. You also have the right to receive information on where the data has been retrieved if personal data have not been collected from you, the existence of automated

decision making (including profiling) and the predicted period during which the data will be stored or the criteria used to determine this period. You also have the right to obtain information about your other rights listed in this paragraph in the registry extract.

- b. Correction of your personal data. We will prompt you to correct the incorrect or incomplete information we process about you as quickly as possible.
- c. Deletion of your personal data. This means that you are entitled to request that your personal data be removed if they are no longer necessary for the purpose for which they were collected. However, there may be legal requirements that we cannot immediately delete your personal data in, for example, accounting and tax laws. We will then end the processing done for purposes other than complying with the legislation.
- d. Restriction of treatment. This means that your personal information is marked so that they can only be processed for certain delimited purposes. For example, you may request a limitation when you consider your information incorrect and you have requested a correction under item 12.3 b). Meanwhile, the accuracy of the data is investigated, their treatment will be limited.

12.4 If you do not wish to process your personal data for direct marketing, you are always entitled to object to such treatment by sending an email to [privacy@sigi-global.com](mailto:privacy@sigi-global.com). Once we receive your objection, we will cease processing your personal information for such marketing purposes.

12.5 You may submit any complaints regarding the processing of your personal data to the Data Inspectorate.

### **13. Cookies**

When you visit our website, we use cookies.

### **14. Contact information**

14.1 Contact us if you have any questions about this Privacy Policy, processing your personal information or requesting a registry extract. Contact: [privacy@sigi-global.com](mailto:privacy@sigi-global.com)