

1. Introduction

Trelleborg is responsible for how we handle your personal data. Trelleborg comprises Trelleborg AB (publ) (a public limited liability company incorporated in Sweden, registration number 556006-3421) and its direct and indirect subsidiary undertakings (referred to collectively as "Trelleborg" or "we" or "our"). For the purposes of Applicable Data Privacy Laws (as defined below), your data will be controlled by the Trelleborg affiliate or subsidiary undertaking that you have instructed or that is providing products or services to you or communicating to you or which has otherwise initially collected your data and decided the purposes and means for using your data and each such entity is regarded as an independent data controller of your personal data. This notice applies to all such entities.

This privacy notice ("Privacy Notice") sets out which Personal Data that we collect on our websites by e-mail and/or by entering into and fulfilling an agreement with the company you represent and for which purposes the Personal Data are processed. Throughout this Privacy Notice the term "processing" is used to cover all activities involving your Personal Data, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of information.

"Applicable Data Privacy Laws" means all legislation and regulations, including regulations issued by relevant supervisory authorities, protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of Personal Data that from time to time apply to Trelleborg, including without limitation data protection laws and regulations implementing the Data Protection Directive 95/46/EC and as of 25 May 2018 the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (the "GDPR").

"Personal Data" is defined as any information relating to an identified or identifiable natural person.

2. Cookies – why do we collect and process your Personal Data

Trelleborg uses cookies and other similar techniques to collect information about you and your device (such as phone or computer) when you visit our website. For more information regarding Trelleborg's use of cookies and a description of the current purposes your Personal Data may be used for, please view our cookie policy. The purposes for which we use cookies include:

2.1. Personalize our interactions with you - offering relevant products and services

When you visit our websites, landing pages and submit forms on those websites we may collect and process your Personal Data in order to better understand you as a customer and to personalize our interactions with you, for example to show you products and services we think you may like.

We look at your use of the website, for example where you have clicked, your visit frequency, time spent per visit etc.

Personal Data processed for these purposes include:

- IP-address
- Device id
- Country or region
- Post / zip code
- E-mail address
- First name
- Last name
- Company/organization name
- Job role
- Phone number
- Business sectors
- Areas of interest
- Document downloads, Video views, contact form submissions, page views, visit frequency etc.
- Original source ("referral") before visiting our websites, such as which e-mail link, website, social media post, advertisement clicks, etc. that led your visit to our website.

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to better understand you as a customer and to personalize our interactions with you to show you relevant products and services, article 6.1 f) GDPR.

2.2. Identify potential customers and business opportunities

When you visit our websites, landing pages and submit forms on those websites we may collect and process your Personal Data in order to identify if you could be a potential customer or business opportunity. We look at your use of the website, for example where you have clicked, your visit frequency, time spent per visit etc.

Personal Data processed for these purposes include:

- IP-address
- Device id
- Country or region
- Post / zip code
- E-mail address
- First name
- Last name
- Company/organization name
- Job role
- Phone number
- Business sectors
- Areas of interest

- Document downloads, Video views, contact form submissions, page views, visit frequency etc.
- Original source ("referral") before visiting our websites, such as which e-mail link, website, social media post, advertisement clicks, etc. that led your visit to our website.

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to identify potential customers and business opportunities, article 6.1 f) GDPR.

2.3. Identify usage trends and compile statistics

When you visit our websites, landing pages and submit forms on those websites we may collect and process anonymized Personal Data in order to identify usage trends and for statistical purposes. We look at from which geographic regions our users are, such as country and language settings.

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to identify usage trends and to compile statistics, article 6.1 f) GDPR.

3. Why do we collect and process your Personal Data

3.1. Provide you with information such as Newsletters, Catalogues, Press Releases, Chatbots and Webinars

If you sign up to subscribe to newsletters, catalogues, press releases, chatbots, webinars and similar information about Trelleborg and its business or order such information on a one-time basis we process your Personal Data for the purposes of providing you with the requested subscription or information. We will check the e-mail address you have entered to ensure that you are indeed the owner of the e-mail address provided or that its owner is authorized to receive the newsletter. For this purpose, we will send you an e-mail to the e-mail address you provided, which you will then confirm receipt of. After confirming the e-mail, you are registered for our newsletter.

Personal Data processed for these purposes include:

- Salutation
- First name
- Last name
- Address
- Post / zip code
- City
- Country
- E-mail address
- Business e-mail
- Phone number
- Company/organization/Industry
- Job title
- Areas of interest
- Password

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to provide you with the subscription and information you have requested, article 6.1 f) GDPR. If you do not provide information marked with * on the website form, we will not be in a position to provide you with the requested service.

3.2. Answer your Questions and handle Feedback in general

Most of our websites, as well as our corporate pages in social media (such as Facebook), provide functionality for the visitor to communicate with us to ask questions and give feedback regarding our services and business. Where you use such functionality, Trelleborg processes your Personal Data for the purposes of answering your questions and handle feedback from you. This may also include deletion of comments made on social media corporate pages and reporting to the social media network provider of un-appropriate comments. In addition, the data collected in this way will be compared with data that may be collected elsewhere by us if you have previously given us the corresponding consent, which you can withdraw at any time with effect for the future. To exercise the withdrawal, please contact the office mentioned at the end of this statement.

Personal Data processed for these purposes include (to the extent you choose to submit such information):

- First name
- Last name
- E-mail address
- Address
- Phone number
- Feedback and comments made by you
- Website source

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to answer questions and handle feedback from you, article 6.1 f) GDPR. If you do not provide information marked with * on the website form, we will not be in a position to provide you with the requested service.

3.3. Handle communications and orders or complaints sent by you through e-mail, fax and similar

If you send an e-mail or facsimile to one of our employees, we will process your Personal Data provided to handle your request or order.

Personal Data processed for these purposes include:

- First name
- Last name
- E-mail address
- Address
- Phone number
- Other Personal Data provided by you

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to answer requests and handle orders or complaints from you, article 6.1 f) GDPR.

3.4. Create personal Website User Accounts

Some of Trelleborg's websites allow users to set up a personal user account with log-in. For those websites and if you create a user account Trelleborg will process your Personal Data for the purposes of creating and managing your personal user account, create your log-in, provide you with access to your account and manage your subscriptions and/or requests.

Personal Data processed for these purposes include:

- First name
- Last name
- E-mail address
- Customer number
- Phone number
- Your subscriptions and/or requests

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to create and manage your user account and fulfil the user account agreement with you, articles 6.1 b) and f) GDPR. If you do not provide information marked with * on the website form, we will not be in a position to provide you with the requested service.

3.5. Manage complaints relating to our services and products

Some of our websites allow you to provide us with complaints relating to our services and products. Where you provide us with a complaint, Trelleborg will process your Personal Data for the purposes of investigating, managing and replying to your complaint.

Personal Data processed for these purposes include:

- First name
- Last name
- E-mail address
- Phone number
- Customer reference number
- Company/organization
- Complaints and comments by you

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest of investigating, managing and replying to your complaint, article 6.1 f) GDPR. If you do not provide information marked with * on the website form, we will not be in a position to provide you with the requested service.

3.6. Manage your request for a quotation or order relating to our products and services

Some of our websites allow you to request a quotation or order products and services provided by Trelleborg. Where you provide us with a request for a quotation or an order, Trelleborg will process your Personal Data for the purposes of managing the request or order.

Personal Data processed for these purposes include:

- First name
- Last name
- E-mail address
- Address
- Phone number
- Company/organization
- Organization number
- Invoice address
- Customer number

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to perform a contract between you and Trelleborg or in order to take steps prior to entering into a contract, article 6.1 b) GDPR. If you do not provide information marked with * on the website form, we will not be in a position to provide you with the requested service.

3.7. Manage your request regarding data privacy

Should you contact us to request one of the following data privacy actions (i) to be provided with a register extract, (ii) to restrict processing, (iii) to update, delete or transfer personal data, (iv) to object to personal data processing or to automated decision making, to (v) file a data privacy complaint, or to (vi) opt out of marketing communication, Trelleborg will process your Personal Data for the purposes of managing the request.

Personal Data processed for these purposes include:

- First name
- Last name
- E-mail address
- Country
- Request details
- Other information as necessary for the purpose of handling and responding to your request.

The legal basis for the above processing of your Personal Data is that the processing is necessary for Trelleborg's compliance with legal obligations, article 6.1. c) GDPR.

3.8. Enter into and fulfil an agreement with the company you represent

Should the company you represent choose to enter into an agreement with Trelleborg, we will process your Personal Data for the purposes of entering into and fulfilling the agreement.

Personal Data processed for these purposes include:

- First name

- Last name
- Orders, information, requests, notifications and complaints etc. by you

We would also process other data, not constituting your Personal Data, such as company e-mail address, company address, company phone number, company/organization, organization number, company invoice address, company customer number.

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to perform a contract between you and Trelleborg or in order to take steps prior to entering into a contract, article 6.1 b) GDPR.

4. For how long do we keep your Personal Data

Trelleborg will retain Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by local law to which Trelleborg is subject. We are using the following criteria to establish our retention period: (i) as long as we have an ongoing relationship with you (either as an individual or in your capacity as employed by one of our corporate customers, suppliers or co-operations partners or media, or as an investor/owner, board member or analyst); (ii) as required by legal obligations to which Trelleborg is subject (such as tax and accounting obligations); and (iii) as advisable in light of our legal position (such as applicable statutes of limitations).

5. Disclosure and transfer of Personal Data

Group companies

Trelleborg may disclose Personal Data processed to other companies within the Trelleborg group. Trelleborg has made sure to apply appropriate safeguards to your Personal Data in case of any such transfer of your Personal Data within the Trelleborg Group by entering into an Intra-Group Data Transfer Agreement, implementing the European Commission Standard Contractual Clauses to any such transfer.

Other recipients

Courts and outside counsels: Purpose of transfer: In order to exercise, establish or defend legal claims. Legal basis: To fulfil our and your legitimate interest to have disputes settled by competent courts.

To any successor in connection with a sale, merger, divestment or reorganization: we may disclose Personal Data as part of an asset to a new owner on the basis of our legitimate interest under the condition that the successor will process the data for the same purpose as Trelleborg.

Data processors acting on behalf of Trelleborg

Moreover, Trelleborg may disclose Personal Data to external parties, such as vendors and service providers processing Personal Data under the instructions of Trelleborg. Where such disclosure entails transfers of Personal Data outside the EU/EEA, Trelleborg will ensure that European Commission Standard Contractual Clauses have been entered into between the transferring Trelleborg entity and the receiving external party. Alternatively, other safeguards will be put in place prior to such transfers.

6 Security

6.1. We will ensure that the access to your Personal Data is accurately secured by applying appropriate safeguards, depending on the circumstances taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk. In support of this commitment, we have implemented appropriate technical, physical and organizational measures to protect your Personal Data against unauthorized or accidental destruction, alteration or disclosure; misuse; damage; theft or accidental loss; or unauthorized access.

7. Your rights

7.1. Right of rectification

Trelleborg will take steps in accordance with Applicable Data Privacy Laws to keep your Personal Data accurate, complete and up to date. If you identify that any Personal Data related to you is inadequate, incomplete or incorrect, you are entitled to have the Personal Data corrected.

Moreover, you also have the right to request access to the Personal Data that we process about you.

7.2. Further rights as of 25th May 2018

As of 25th May 2018, you may under Applicable Data Privacy Laws also in addition to rectification be entitled to:

(i) Access

You may request confirmation whether or not Personal Data is processed and if that is the case access to your Personal Data and additional information such as the purposes of the processing. You are also entitled to receive a copy of the Personal Data undergoing processing. If the request is made by electronic means the information will be provided in a commonly used electronic format if you do not request otherwise.

(ii) Object to certain processing

You may object to processing of your Personal Data processed on the basis of a legitimate interest, on grounds relating to your particular situation and to processing for direct marketing purposes. If you have opted to receive a subscription by e-mail each e-mail will include an easily accessible opt-out function where you may de-register from further communication.

(iii) Erasure

You may have your Personal Data erased under certain circumstances such as when your Personal Data is no longer needed for the purposes for which it was collected.

(iv) Restriction of processing

You may ask us to restrict the processing of your Personal Data to only comprise storage of your Personal Data under certain circumstances such as for example when the processing is unlawful, but you do not want your Personal Data erased.

(v) Withdrawal of consent

You have the right to at any time withdraw your consent to processing of Personal Data to the extent the processing is based on your consent.

(vi) Data Portability

You may ask to receive a machine-readable copy of the Personal Data processed on the basis of your consent or on the basis that the processing is necessary in order to perform an agreement with you, and which Personal Data has been provided to Trelleborg by you (data portability) and ask for the information to be transferred to another data controller (where possible).

7.3. Complaints to the supervisory authority

You acknowledge that you always have the right to lodge complaints pertaining to the processing of your Personal Data to the competent data protection authority if so provided under Applicable Data Privacy Laws. A list of supervisory authorities in the European Union, including our lead supervisory authority in Sweden, the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*), can be accessed [here](#).

8. Contact information

If you have any questions or concerns regarding the processing of your Personal Data or wish to exercise any of your rights or obtain a copy of the safeguard mechanisms put in place to protect your Personal Data in case of any transfer, please contact us by using this [contact form](#).

For further information on how you can contact Trelleborg, please see below. <https://www.blue-diamond.co.uk/>

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