

Privacy policy

This policy is in regard to data-collection and data-processing by Wismo Automotive AB ("Wismo")

We cherish privacy. This policy stipulates how we collect, process, use and protect your personal data. It is also intended to inform you about your rights. For inquiries, please contact us by referring to section 10 of this policy.

Any mention or referral to law includes the General Data Protection Regulation (hereby referred to as "GDPR"), or any other Swedish consumer- or data protection law.

1. What types of personal data do we collect?

The term "personal data" is an umbrella term covering any type of personal data which can be used to identify you.

You may usually use our website without disclosing any personal data. On certain parts of this site, or other websites owned and controlled by K.W. Bruun, personal data will be inquired through voluntary forms (for example our lease-forms) and Cookies. Please note that not all Cookies are voluntary as certain Cookies are required in order for the website to function and display properly. If you choose to disclose your personal data on other websites owned and controlled by us the data will be transferred to K.W. Bruun. The same is true if you choose to disclose any of your personal data with our subsidiaries or retailers. Further, please be informed that we use Swedish governmental traffic registries as well as third party marketing and market-analytic companies to inquire about your personal data.

Below is a list of what types of personal data we gather through aforementioned sources:

- **Personal contact information** (for example your name, address, email-address, phone number, demographical data as well as, when it is clearly justified in regard to the purpose of the acquirement and intended usage of your personal data, your national security number).
- **Technical specifications** about your device or internet-connection (for example your IP-address, Cookies, your geographical location, or username).
- **Information about your user behavior** (for example your search patterns and response time on our websites. Our websites and email communication may contain electronical images (so called image trackers or pixel tags).
- **User generated information** (content you voluntarily disclose or publish, for example when taking part in contests or signing up for our newsletter).

2. Purpose and lawful grounds

In order for any collection, processing or usage of personal data to be lawful it is required, by GDPR, to be based on a valid lawful ground in relation to the specified purpose. Lawful grounds may be found in GDPR. They are as follows: the collection, processing or usage is necessary for the fulfillment of an agreement or contract, is necessary for our legal compliance under national or international law or is necessary for the purpose of a legitimate interest. If none of the aforementioned legal grounds are current, we may only collect, process or use your personal data with your consent.

One of our primary purposes in regard to collecting, processing or using (hereby referred to as only "processing" or "processed") your personal data is to honor warranty obligations or to otherwise comply with law linked to the purchase or leasing of our products or services either directly through us or any of our retailers. Please be informed that we may need to share your personal data in road safety purposes (e.g., if we need to recall products or to notify you when your vehicle needs maintenance).

Lawful ground: Fulfillment of contract and/or legal compliance.

Another primary purpose of processing your personal data is to offer you good service through customized services. We use the personal data we have inquired to better understand our customers and offer you customized and relevant information we think you may be more interested in. We achieve this inter alia by conducting customer surveys. Furthermore, said surveys, demographical and geographical data and user behavior gathered from our website(s) or third-party services (so called profiling). Our customer and market analyze, as well as processing for statistical purposes, are not designed, or intended, to identify individual customers.

Lawful ground: Legitimate interest.

We may use your personal data to send you newsletters, inform you of product launches, campaigns, special offers or other information of our activities, products or services offered to you through us or our retailers which we think may interest you. Therefore, we may use your personal data to conduct direct marketing provided you have not instructed us not to. If you have no customer relation to us, we will only conduct direct marketing to you if you have consented to it.

Please be informed that you, at any given time pursuant to your right to object under GDPR, may object to processing for direct market purposes. Please refer to section 10 of this policy for more information on how to contact us for inquiries regarding personal data processing.

Legal ground: Legitimate interest and/or consent (provided nothing else is stated when we inquire about your personal data).

K.W. Bruun's above stated legitimate interest is to be able to provide you with good customer experience as well as personally customize offers and other relevant information.

3. How we collect your personal data and information about Cookies

We use Cookies, electronical images and other types of tracking technologies on our websites and email communication. For more information on how we use Cookies and similar technologies, please refer to our Cookie Policy page: <https://www.kwbruun.se/cookies>.

The majority of personal data you disclose is voluntary (e.g., by signing up for our newsletter or by sending us an email). If you choose to disclose personal data, it will be processed for internal use in K.W. Bruun for purposes stated in Privacy Policy. We may inquire your personal data through third parties, such as subsidiaries, retailers or The Swedish Transport Agency's Road Traffic Register. We may also share some of your personal data with above mentioned, or other, third parties. Please refer to section 4 for more information on third parties we may share your personal data with.

4. With who do we share your personal data with?

We process your personal data with the outmost care and respect.

Third parties we indenture (e.g., customer- and sales analytics companies) may only access your personal data on our behalf in a confined matter pursuant to the purpose and clear instructions they receive from us. They are, under all circumstances, obliged to keep your personal data confidential and safe. In other words, they act as a processor as defined by GDPR. Please note that you, pursuant to your right of access in GDPR, always may request a list of what type of personal data we are processing in regard to you.

In order to offer you better service and in purpose of direct marketing we may also share your personal data with our affiliated companies and retailers. We may also transfer your personal data to aforementioned third parties so that they process your personal data as sole controllers in order for them provide you or us with their services (e.g., banks, shipping companies etc.).

In case we need to transfer your personal data to a third country (states outside EU/EES) proper safety measures will be taken by entering an indenture and, depending on the circumstances, take other safety measures in order to protect your personal data in compliance with law.

In special cases we may need to share your personal data if we in good faith suspect the data is necessary to identify, contact or take legal action against someone whom we suspect have infringed our website or other intellectual or physical properties, or any other legal right.

We process your personal data as sole collectors. Please refer to the section below to inquire more about the producer's Privacy Policy.

What types of personal data does the producer process? The producer processes your name, address, phone number (if necessary), email address, vehicle registration- and chassis number as well as other relevant information about your vehicle (e.g., data relevant for honoring the warranty policy).

The producer's purpose and legal ground The producer processes your personal data for all aspects of the warranty on your vehicle, offer technical and other types of support to retailers and importers and handling complaints and technical questions regarding your vehicle. They also offer support in regard to specific maintenance-related questions or troubleshooting (Event Data Recorder). Retailers and importers are also offered soft- and hardware related support in regard to your vehicle, as well as administrating retail audits and document-control.

The producer also conducts market- and user research in purpose of receiving feedback related to their products and services (e.g., customer satisfaction research). Furthermore, they process personal data to further develop products and services and conduct campaigns, with Quality Control- and Assurance.

Legal ground: Legitimate interest and/or consent (provided nothing else is stated when we inquire about your personal data).

Please be informed that you, at any given time pursuant to your right to object under GDPR, may object to processing for direct market purposes. Please refer to section 10 of this policy for more information on how to contact us for inquiries regarding personal data processing.

5. Your rights

You have, pursuant to chapter 3 GDPR, various rights. In this section, we intend to inform you of your rights.

You have the right of access, meaning you at any given time may request confirmation and information regarding what types of personal data we have and are processing as well as the purpose of the processing. We ask that you do this by writing to us (please refer to section 10 for contact information) and that you sign the request. We will, as soon as possible, confirm and specify above stated records. In the case we can not fulfill your request we will notify you. All information will be sent to your registered address.

You may at all times revoke your consent. Please refer to section 10 for contact information.

If you believe your processed personal data is incorrect or incomplete, you have the right of rectification meaning you may ask us to rectify your personal data. We will fulfill your request as soon as possible. Please refer to section 10 for contact information.

You also have the right of erasure and data portability, meaning you may request us to delete your personal data or send you your personal data in a condensed manner for you to share with another controller. Please refer to section 10 for contact information.

Please note that we, due to legal obligations, may not always be able to delete or transfer your personal data (even if you revoke your consent). In some cases, if we have a legitimate interest, we may need to store your personal data to secure our own interests.

You have the right to object, meaning you object to the processing of your personal data when the legal ground is weighing of interests (including profiling). When you object, we are obliged to show that we are operating with a legitimate interest (as defined in GDPR). You also have the right to, at any given time, object to direct marketing.

6. For how long do we keep your personal data?

We securely store your personal data for as long as they are necessary for the specified purpose of processing found in this Privacy Policy. Alternatively, your personal data is kept for as long as we require them for the fulfillment of a contract between you and us, or if we otherwise are obligated by law to keep your personal data.

Your personal data is deleted or anonymized when they no longer are required for the above stated purposes. We will, for example, no longer store your personal data if you sell your vehicle, provided there is no contract between you and us and we by law are not obligated to store your personal data.

7. How do we keep your personal data safe?

In order to prevent unauthorized access, usage, revision, destruction or transfer of your personal data we implement various safety measures and precautions. These measures and precautions have been implemented to protect you and your personal data by protecting your personal data from unintentional loss, illegal access or any other type of harmful access.

Please be informed that you may contact the Swedish Authority of Privacy Protection (IMY) if you believe your data has been processed illegally.

8. Links to other websites

Please note that this website may contain links to other websites. If you chose to follow these links and visit other websites note that they may contain different Privacy Policies than what is stipulated in this Privacy Policy. Please refer to the respective website's Privacy Policy for specific information regarding those websites' processing of your personal data.

9. Changes and updates of the Privacy Policy

This Privacy Policy may be subject to change and may therefore be updated by us in the future. We will notify you of any significant changes in this Privacy Policy by displaying a clear and distinct message on this website. Alternatively, we will contact you via email provided we have a legal ground for doing so. We highly encourage you to read this Privacy Policy and keep yourself up to date.

10. Contact information and complaints

K.W. Bruun Automotive AB, 556556-8515, is the controller for the processing of your personal data as described above, provided nothing else is communicated to you when inquiring about your personal data. K.W. Bruun operates with due regard to both Swedish and international data- and consumer protection law.

Email: gdpr@kwbruun.se

Address: Hyllie Boulevard 17, 215 32 Malmö

Phone: 08-555 433 00

If you believe that the processing of your personal data is or has been illegal, we kindly ask you to contact and inform us as soon as possible. Please be informed that you may contact the Swedish Authority of Privacy Protection (IMY) to report illegal activity or otherwise file a complaint. If you believe you have been harmed by our processing of your personal data you may be entitled to compensation by either demanding it from us or by bringing an action before the court. For any inquiries regarding the course of action in court proceedings please refer to the Swedish Authority of Privacy Protection (IMY).