

# Fibo Privacy Statement

This Privacy Statement was published June 30th, 2018.

In Fibo we are committed to protect and respect your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679, dated April 27th 2016. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our products and to our sales, marketing and customer contract fulfilment activities. It also applies to individuals applying for a job in Fibo.

## Who are we?

Fibo Group AS produces and delivers wall paneling for wet rooms, kitchen walls and countertops. The company headquarters is located in Oslo, Norway, and our subsidiary companies are based in Sweden, Finland and The United Kingdom. The registered office address is Karenslyst Alle 8b, 0287 Oslo, Norway.

Fibo Group AS is the data controller and our Data Protection Officer can be contacted by email: [privacy@fibosystem.com](mailto:privacy@fibosystem.com).

## When do we collect personal data about you?

- When you buy our products.
- When you interact with us in person, through correspondence, by phone, by social media, or through our websites.
- When we collect personal information from other legitimate sources, such as third-party data aggregators, Fibo marketing partners, public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.
- We may collect personal data if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected we make sure an assessment is made, ensuring that there is an established mutual interest between you and Fibo.

## Why do we collect and use personal data?

We collect and use personal data mainly to perform customer service, direct sales and direct marketing. We also collect data about suppliers, partners and persons applying for a job or working in our company.

We may use your information for the following purposes:

- Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners' products and services. This communication is subscription based and requires your consent.
- Send you information about the products and services that you have purchased from us.
- Perform direct sales activities in cases where legitimate and mutual interest is established.
- Provide you content and venue details on events you have signed up for.
- Reply to a 'Contact me' or other web forms you have completed on one of our Fibo websites.
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Provide you with access and services related to electronic training.
- Provide access to our Customer Support portal.
- Perform contractual obligations such as order confirmation, license details, invoice, reminders, and similar.
- Notify you about critical product concerns.
- Contact you to conduct surveys about your opinion on our products and services.
- Process a job application.

## **Our legal basis for collecting personal data**

### **Collecting personal data based on consents**

The collection of personal data based on consent from the data subject will be done by using “Consent Forms” that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems.

## **Collecting personal data based on contracts**

We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers.

## **Collecting personal data based on legitimate interest**

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest.

Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between Fibo and the individual person has been identified. This legal basis is primarily related to our sales and marketing purposes. We will always inform individuals about their privacy rights and the purpose for collecting personal data.

## **What type of personal data is collected?**

We collect name, phone number, title and email address, in addition to your company’s name and contact information. We may also collect feedback, comments and questions received from you in service-related communication and activities, such as meetings, phone calls, documents, and emails. From our websites we may collect IP-address and actions taken on the site.

If you apply for a job at Fibo, we collect the data you provide during the application process.

Fibo does not collect or process any special categories of personal data, such as public unique identifiers or sensitive personal data.

## **How long do we keep your personal data?**

We store personal data for as long as we find it necessary to fulfill the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve possible problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data for a reasonable period of time after your last interaction with us. When the personal data that we have

collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

## Your rights to your personal data

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data that Fibo holds about you.
- The right to request that Fibo corrects your personal data if inaccurate or out of date.
- The right to request that your personal data is deleted when it is no longer necessary for Fibo to retain such data.
- The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communications:
  - If you want to withdraw your consent to e-marketing, please make use of the link to manage your subscriptions included in our communication. Please note that you may still receive system messages and administrative communications from Fibo, such as order confirmations, price lists, product news and other important information regarding your customer relationship.
- The right to request that Fibo provides you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
- The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data.
- The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing.

Queries about your Privacy Rights should be sent to [privacy@fibosystem.com](mailto:privacy@fibosystem.com)

## The use of cookies and beacons

We use cookies and web beacons ('Website Navigational Information') to collect information as you navigate the company's websites. Website Navigational Information includes standard information from your web browser, such as browser type and browser language; your Internet Protocol ("IP")

address; and the actions you take on the company's websites, such as the web pages viewed and the links clicked.

This information is used to make websites work more efficiently, as well as to provide business and marketing information to the owners of the site, and to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purposes of understanding how visitors use a website. Cookies and similar technologies help us tailor our website to your personal needs, as well as to detect and prevent security threats and abuse. If used alone, cookies and web beacons do not personally identify you.

## **Do we share your data with anyone?**

We do not share, sell, rent, or trade your information with any third parties without your consent.

### **If required by law:**

We will disclose your personal information if required by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

## **Use of sub-contractors (processors and sub-processors)**

We may use sub-contractors to process personal data on our behalf, we are responsible for making sure they commit themselves to adhere to this Privacy Policy and applicable data protection legislation by signing a Data Processing Agreement.

If the sub-contractor processes Personal Data outside the EU/EEA area, such processing must be in accordance with the EU Privacy Shield Framework, EU Standard Contractual Clauses for transfer to third countries, or another specifically stated lawful basis for the transfer of personal data to a third country.

## **Changes to this Privacy Statement**

Fibo reserves the right to amend this Privacy Statement at any time. The applicable version will always be found on our websites. We encourage you to

check this Privacy Statement occasionally to ensure that you are happy with any changes.

If we make changes that significantly alter our privacy practices, we will notify you by email or post a notice on our websites prior to the change taking effect.

## **Your right to complain with a supervisory authority**

If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact [privacy@fibosystem.com](mailto:privacy@fibosystem.com).

If you remain dissatisfied, then you have the right to apply directly to your national supervisory authority for a decision.