



# Integrity Policy

Our management of your  
personal data.

# General

Personal data related to your person that we collect and process may come from Stick AB's websites (both internal sites such as stick.se and other sites, as well as, social network sites belonging to third parties), our apps, e-mail, SMS and other electronic messages, calls to customer service, stores, printed and digital registration forms for example pertaining to competitions, campaigns, events etc. Also from public information in social networks and other such platforms.

What information and personal data we collect associated to your person depends on which of our services you use. Responsible for managing such data is Stick AB with company registration number 559081-5618 located in Sweden. All companies and websites in the Stick group of companies within EU/EES (including Norway) may in some form process your personal data.

With reference to laws associated to personal data we refer to General Data Protection Regulation (GDPR), as well as, other local or national data protection legislation.

# 1. Data collected

## General

We collect personal data such as contact information, personal identification number, name, postal address, e-mail, information on social networks or telephone number. It may also be other data required to provide you with access to your customer account, such as login alias/ email, device name, passwords or security questions and responses, or demographical data such as birthday, age or age cohort, gender, geographical location (for example postal code), preferred product(s), hobbies, as well as, household and lifestyle information.

We manage your personal security number to be able to verify your identity in order to allow for secure transactions and avoid fraud.

## Technical data

Information on technical equipment used to connect to any of our websites or apps, for instance IP-address to a computer or other device, operating system, browser and version data. If you connect to a Stick website or app we may also collect data on a mobile phone's unique ID, ad-ID, geographical location and similar data.

## Usage of websites

When you visit or interact with our websites, chat functions or news letters we employ automatic data collection technology to collect certain data in regards to your activities. This includes information on which links are clicked, which sites or contents is viewed, as well as, similar information and statistics in your visit - for example response times, data collection errors, page visit durations etc. This information is automatically collected through use of cookies (browser cookies, flash cookies) and web signals, as well as, supported by tracking services from third parties. Read more in the section Custom your data.

## Consumer feedback

Information that you on your own accord share with us, for instance your experiences with our products and services.

## Consumer generated contents

Contents that you create and subsequently share with us through uploading to any of our websites or apps, including apps on social networks such as Facebook. This may include images, videos, personal stories or similar. We may collect and publish consumer generated contents in connection to a wide range of activities, including competitions and other campaigns, web community and consumer activities, as well as, participation in social networks of third parties.

## Customer service calls

Calls with our customer support may be recorded for purposes of local operational requirements (e.g. for quality or educational purposes) and in some cases be archived to prove that information on our personal data management has been included. Certain information is never recorded (for example credit card information). If required by law you will be notified at the initiation of the call and offered to decline.

## Information in social networks

Information that you share on social networks or information in your social network profile that belong to a third party (i.e. Facebook) which you allow the network to share with us. This includes basic profile information (name, e-mail, gender, birthday, place of residence, profile picture(s), user name, list of connections and similar), as well as, other information or activities which you allow the network to share. We get information on your profile each time you download or communicate with a Stick AB web application on a social network such as Facebook, each time you use a function for social networking which is integrated in a Stick AB website (e.g. Facebook Connect), or when you communicate with us through a social network. To learn more on how your data in social networks which belong to third parties and is collected by Stick AB, or if you object to share data from social networks, please visit the respective social network and request information or change settings.

## Payment data and financial information

This pertains to all necessary information we require for concluding an order or that you may need to finalize a purchase, for example payment or credit card information (name of the cardholder, card number, date of expiry) or other forms of payments. We do not manage payment related data such as bank or credit card data, such information is handled by and restricted to associated bank suppliers. Regardless of payment method we manage transaction information in accordance with laws, regulations and standards (e.g. PCI DSS).

## Other sources

To keep your personal data up to date we may collect data from other sources, for example from publicly available person registers. To ensure safe payments we may also use data provided by credit rating institutes and from our collaboration partners.

# 2. Collection & lawful basis

In order for our management of personal data to be in accordance with laws lawful basis for storing and using data is required, e.g. that it is required to fulfill an agreement with you, a legal obligation, that the management is conducted based on an assessment of legitimate interests, or that you explicitly have agreed to specific management. Following below are examples of purposes for which we may manage your personal data and the lawful basis thereof, unless other purposes have been provided when your data was collected.

## Legitimate interests

Stick AB may conclude lawful basis for the below use of personal information based on balancing of interests in order to be able to offer a better purchasing and customer experience, as well as, to provide personally customized offers and other relevant information, and excellent service and communication. In our efforts to seek improvements for you as a customer we analyze how you interact with and use our services. Yet another lawful basis is preempting criminal activities and creating safe conditions for our customers, employees and us as a company.

## Log files

We collect data in log files which register activities on websites and compile statistics of your user behaviour. This data is stored automatically and help us troubleshoot, increase performance and maintain security measures on the websites.

Lawful basis: Legitimate interests.

## Web signals

Web signals are short strings of code which render a graphical representation on a website or in an email, with the intention of transferring data back to us. Information collected via web signals may include technical data such as IP address and information on how you respond to an email campaign (e.g. when the email was opened or links clicked). We use information from web signals for multiple purposes, for instance traffic data reports, counting unique visitors, advertising, auditing emails and individual adaptation of the website.

Lawful basis: Legitimate interests.

## Customer service

When we respond to tickets and other forms of enquiries we usually gather customer information, contact information and the information required to support the customer and close the ticket (e.g. questions, complaints, technical issues, order or delivery status).

Lawful basis: Contract (customer service) and legitimate interests (other).

## Competitions, marketing and other campaigns

We employ your personal data to provide you with information on products and services (e.g. marketing materials, campaigns or offers). This can be done via email, SMS, telephone calls or direct mail within the scope of valid legislation. This use of your personal data for marketing purposes may also be used for what is termed profiling. Our campaigns may also be carried out through third party websites and/or social networks. For more information on our competitions or other campaigns, please see the official rules and details which accompany each competition/campaign.

Lawful basis: Legitimate interests.

## Social networks

In order to present you with ads and communicate with you through social networks we use your personal data, when you interact with functions in third party social networks (i.e. "like" function). You can find out more on specific functions and what parts of your profile data we can access, as well as, find out how to restrict access to certain data by reading the integrity policy of the social network in question.

Lawful basis: Legitimate interests.

## Individual adaptation

We use your personal data to analyze your preferences and habits, to foresee needs, to improve and tailor your user experience on our websites and apps, in order to make sure content from our websites/apps is optimized for you and your computer or other device, as well as, for you to be able to use interactive functions if you may choose to do so. For example we may store your user name, email address or screen name to enable a quicker and more seamless login next time you visit our website or for you to easily find the items previously placed in your shopping cart.

Lawful basis: Legitimate interests (non-member) and contract (member).

**Order fulfillment**

We use your personal data to process and deliver your order(s), to inform you on status of your order, verify your address and identity together with other measures to avoid fraud. We or third party providers may use certain personal data and payment information.

Lawful basis: Contract.

**Other general purposes**

We use your information for other general business purposes, such as internal market research, demographical studies and to measure effectiveness of advertising. This in order to evaluate, develop and improve our offering and systems. Your data is also used for measures of our own security, to avoid misuse of our services, prevent and contribute to investigations of criminal activities, as well as, fulfill obligations in accordance with legislation.

Lawful basis: Legitimate interests and legal obligation.

# 3. Information to 3rd parties

We are very cautious to protect your personal data. With the exception where you have provided your consent we do not license nor sell your personal data. However, we may transfer or share your personal data with third parties under the following circumstances.

## Providers of services

Here defined as external companies which we employ for running our operations (such as order fulfillment, payments, fraud avoidance, identity verification, factoring, running websites, support, campaigns, web development, customer service etc.). Service providers and their employees only have permission to use your personal data on our behalf for the specific tasks they have been assigned, in accordance with our specifications and mandate. Service providers are required to keep your personal data confidential and safe.

## Legal grounds

In the case that Stick AB's or our assets is acquired by or is merged with another legal entity, including via bankruptcy, we may share your personal data with any successor. We may also share your personal data with third parties when required by law, in relation to legal proceedings (for instance when requested by law enforcement, to protect our rights, integrity, security, property or the public, or to secure terms and conditions - general or for our website.

## Customer service

When we respond to tickets and other forms of enquiries we usually gather customer information, contact information and the information required to support the customer and close the ticket (e.g. questions, complaints, technical issues, order or delivery status).

Lawful basis: Contract (customer service) and legitimate interests (other).

## Competitions, marketing and other campaigns

We employ your personal data to provide you with information on products and services (e.g. marketing materials, campaigns or offers). This can be done via email, SMS, telephone calls or direct mail within the scope of valid legislation. This use of your personal data for marketing purposes may also be used for what is termed profiling. Our campaigns may also be carried out through third party websites and/or social networks. For more information on our competitions or other campaigns, please see the official rules and details which accompany each competition/campaign.

Lawful basis: Legitimate interests.

## Social networks

In order to present you with ads and communicate with you through social networks we use your personal data, when you interact with functions in third party social networks (i.e. "like" function). You can find out more on specific functions and what parts of your profile data we can access, as well as, find out how to restrict access to certain data by reading the integrity policy of the social network in question.

Lawful basis: Legitimate interests.

## Individual adaptation

We use your personal data to analyze your preferences and habits, to foresee needs, to improve and tailor your user experience on our websites and apps, in order to make sure content from our websites/apps is optimized for you and your computer or other device, as well as, for you to be able to use interactive functions if you may choose to do so. For example we may store your user name, email address or screen name to enable a quicker and more seamless login next time you visit our website or for you to easily find the items previously placed in your shopping cart.

Lawful basis: Legitimate interests (non-member) and contract (member).

# 4. Protection of your data

## **Storage limitation**

In accordance with legislation we only use your data for the duration required for the purposes of which your data has been collected, or to correspond to legal obligations.

## **Access to your personal data**

Your personal data is only managed by authorized personnel in carrying out their professional tasks and in accordance with the purpose of the data having been collected (e.g. customer service employees have access to order and customer data to fulfill their tasks).

## **Measures in operating environments**

We store your personal data in operating environments with adequate security measures to avoid any unauthorized access. We follow standards for the protection of personal data. Transfer of data over the Internet is not entirely safe. So even if we take all measures to protect your data we cannot guarantee avoiding data breaches on our websites. If we find evidence of data having been compromised relevant authorities and affected customers will be notified when required by and in accordance with laws.

## **Your actions**

Your contribution to keeping your personal data safe is important. For example, choose a password that is difficult to guess, is not commonly used and never share your password with others. You are responsible for your password safety and for activities undertaken in your account. If you use a shared or public computer/device make sure that your data is not stored in the device and log out every time you leave the device. Also make use of security settings or verification controls employed on our websites or apps.

## **Transfer of data**

Storage and processing of your personal data according above may require transfer to/ or storage in other countries than your home country. Transfer of data to countries outside EU/EES requires the country (third country) to have an agreement with EU/EES, securing an adequate level of legislation for personal data security, or that we have an agreement with a third party that obligates them to manage data in accordance with the EU Commission's approved standard clauses, legislation and set standards for personal integrity. You can find a list of approved third countries and standard clauses on the EU Commission website.

# 6. Custom your data

## **Cookies and similar technologies**

You can set your browser to block all or some cookies, or to notify you when a website uses cookies.

## **Advertising, marketing and campaigns**

You can at any point in time cancel communications from us. Please note that even if you cancel such communications you may still receive administrative messages, for example order confirmations or other transaction related information, messages regarding accounts (account confirmations, password changes etc.), as well as, other important messages.



# 7. Your rights

## **Right to access**

In accordance with laws you have the right to free of charge request information on what data Stick AB manages in relation to your person, after providing clear notice on which information you seek (for example which categories of specific data we store and for what purpose). You may exert this right by contacting us. We will then proceed with confirming your identity. We will respond to your request without unnecessary delay and within a months time. If we are unable to provide the information you request we will notify you and express why that is the case.

## **Change, removal of data and data portability**

In a manner described and limited to what is required by law you may request to have your data erased, corrected, changed, object to handling of personal data, restrict what the data may be used for, receive a transfer of the data you have shared with us, as well as, recall any prior consent provided to us pertaining to using your personal data. Please note that in some cases we cannot erase your data without also erasing your user account. We may also need to keep certain data in order to obide by laws or to fulfill agreements. It may also be mandated by law that we keep certain data for business purposes. Some of our websites have special functions allowing you to view and edit the personal data which you share. Note that registered customers may need to provide evidence of their person (for example through user name or email address) before access is granted and changes can be executed. This helps us avoid any unauthorized access to your account. Observe that all personal data shared with us is managed in accordance with laws and to the extent as set forth by legislation.

## **Right to object**

In accordance with laws you have the right to object to our management of your data based on legitimate interests. We must then, after you have specified specific complaints, provide proof that other interests are of more importance. You also have the right to object to your data being used for marketing purposes (including profiling) at any point in time.

## **Changes/revision of policy**

Stick AB has the right to make changes to this Integrity Policy. Any major changes will be preceeded by clear communication on changes to come well in advance.

## **Complaints**

If you perceive that we manage your personal data not in accordance with laws and regulations we kindly ask of you to notify us immediately. In addition, you may also provide this information to relevant authorities with a formal complaint.

## **Damages/compensation**

If you perceive that you have suffered damages as a result of our management of your personal data not being in accordance with laws and regulations you may have the right for compensation. You may then request this directly from us or appeal in a court of law.

## **Contact us**

If you have questions or want to express views on our routines please e-mail to kontakt@stick.se or make contact through any other communications channels belonging to Stick AB.



**Stick<sup>®</sup>**

Stick is northern Europe's leading store for pest control products in homes and gardens - great products at the best prices! With us you find solid advice and the right tools to get rid of pests.