

# GENERAL PRIVACY NOTICE – RETRIEVER

*Last updated: 2025-01-16*

## 1. ABOUT THIS DOCUMENT

This Privacy Notice (the “**Notice**”) explains how Retriever (“**Retriever**”, “**we**”, “**us**”, or “**our**”) processes your personal data when you:

- (i) visit our website <https://www.retrievergroup.com/>;
- (ii) communicate with us e.g. via forms on our website or via email, or sign up to our newsletter or an event;
- (iii) are identified as a potential lead or contact person of a potential customer to Retriever; or
- (iv) get in touch with us in the course of your work or assignment with one of our customers, suppliers or business partners.

Please note that the processing of personal data taking place in relation to the provision of our services is subject to its own privacy notice, which is available [here](#).

## 2. WHO IS THE CONTROLLER FOR THE PROCESSING OF YOUR PERSONAL DATA?

Retriever Group is the controller for the processing of personal data which takes place when you visit our website, communicate with us via forms on our website, or sign up to our newsletter via our website. In other cases, it is the legal entity (company) within Retriever that you interact and/or communicate with that is the controller for the processing of your personal data.

If you have any questions about our personal data processing, you can always get in touch with us using the contact details set out in section 10 below.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

Most of the time, we collect your personal data directly from you, such as when you communicate with us e.g. via forms on our website or via email. We may also collect personal data from other sources, such as information that is provided to us by your employer or that is publicly available on your company's website.

Personal data can also be collected via cookies and other similar techniques which will collect and share information with us when you visit our website. A cookie can, for example, help us recognize your device and/or browser the next time you visit that website, provide you with access to certain functions on the and/or register your surf patterns. There are other technologies such as pixel tags, web bugs, web storage and other similar files and technologies that may carry the same functions as cookies. In this Notice, we use the term "cookies" for cookies and all such similar technologies. Except for strictly necessary cookies, you have a choice to allow or deny some or all of the cookies via the consent banner on our website. For information about the cookies we use and on how we use cookies, please click on "Read more about our cookies" in our cookie banner.

### 4. HOW WE PROCESS YOUR PERSONAL DATA AND WHY

#### 4.1 When you visit our website

The table below provides information about how we process personal data when you visit our website.

<i>Categories of personal data</i>	<i>Retriever's purpose(s) of the processing</i>	<i>Legal ground</i>	<i>How long will we store your personal data?</i>
<p>Your IP address (including IP city, IP country, IP country code,) and other information about your IT equipment, such as, your browser type, as well as personal data collected via cookies.</p> <p>The type of data we collect and process via cookies depends on which cookies you have chosen to allow or deny. However, in general, this type of data includes information about your interactions and use of our website. For further information about which</p>	<p>To ensure the technical functionality and to evaluate our website, as well as to understand our visitor's behaviour to be able to improve it.</p> <p>We also use personal data collected via cookies for marketing and sales activities, such as to identify you as a potential customer and to target audience for marketing. For further information about this processing activity, please see section 4.3 below.</p>	<p>Your IP address (including IP city, IP country, IP country code) and information about your IT equipment is processed based on our <b>legitimate interest</b> in providing a functioning and user-friendly website.</p> <p>The collection and further processing of personal data collected via cookies are based on your <b>consent</b>.</p>	<p>We store the personal data for as long as necessary to ensure technical functionality of our website.</p> <p>Personal data collected via cookies are stored during the duration of the cookie or for as long as we have your consent. You can always withdraw your consent by changing your settings in our cookie banner.</p>

data we collect via cookies, please click on “Read more about our cookies” in our cookie banner.			
--	--	--	--

## 4.2 When you communicate with us e.g. via forms on our website or via email or sign up to our newsletter or events

The table below provides information about how we process personal data when you communicate with us via forms on our website, by email or otherwise, or when you ask us to provide you with certain content, such as a newsletter or when you register for an event.

<i>Categories of personal data</i>	<i>Retriever’s purpose(s) of the processing</i>	<i>Legal ground</i>	<i>How long do we store the personal data?</i>
Personal data which you provide to us via forms on our website or in emails to us, such as name, email address, phone number, job title, company name, information concerning your matter and other personal data included in the correspondence.	To be able to respond to your contact request.	We base the processing of your personal data on <b>our legitimate interest</b> in responding to your request, depending on what your request concerns, and to provide you with an answer to your contact request.	<p>We store the personal data as long as necessary for our communication with you depending on your request or matter.</p> <p>Please note that if you have given your consent for us to use the information you provide when submitting a contact request to provide you with information about our services, we will retain the personal data necessary for this purpose. See below* how this personal data is processed.</p>
Personal data which you share with us when signing up to an event or webinar held by Retriever, such as name, email address, company name, topic of interest, job title and	To provide you with information about the event you have registered for and administer the registration and the event.	We base the processing on our <b>legitimate interest</b> to be able to communicate with you, to administer and enable your participation in the event and to market our business and our services.	<p>The personal data is kept until the event has taken place and for a subsequent period of 12 months.</p> <p>Please note that if you have given your consent for us to use the information you provide when signing</p>

any other personal data you provide to us in an unstructured form.			up to an event to provide you with information about our services, we will retain the personal data necessary for this purpose. See below* how this personal data is processed.
Name, email address, company name, topic of interest, job title	To contact you and provide you with information about our products and services, or other content that may be of interest to you.	We base the processing on your <b>consent</b> to receive the communications from us.	When we base the processing on your consent, we will store the personal data for as long as we have your consent. You have the right to withdraw your consent at any given time and you can do this by clicking “unsubscribe” at the bottom of one of our emails or contact us at <a href="mailto:dpo@retriever.se">dpo@retriever.se</a> .
Email address	If you sign up to our newsletter, we will process your email address to provide the requested newsletter to you.	We base the processing on your <b>consent</b> to receive the communications from us.	When we base the processing on your consent, we will store the personal data for as long as we have your consent. You have the right to withdraw your consent at any given time and you can do this by clicking “unsubscribe” at the bottom of one of our emails or contact us at <a href="mailto:dpo@retriever.se">dpo@retriever.se</a> .

#### 4.3 When you are identified as a potential lead or contact person of a potential customer to Retriever

The table below provides information about how we process personal data when conducting marketing and sales activities, such as identifying leads and potential customers.

<i>Categories of personal data</i>	<i>Retriever's purpose(s) of the processing</i>	<i>Legal ground</i>	<i>How long do we store the personal data?</i>
<p>First and last name, email address, phone number and job title</p> <p>Location data: IP city, IP country, IP country code, IP state/region, IP time zone</p> <p>Interactions with our website and browsing history.</p> <p>Personal data included in unstructured material, such as notes written by a Retriever employee on the sales process/account management or personal data included in email communication</p>	<p>To find new potential customers who may be interested in our services, create targeted audiences to be able to effectively market our business and services and to increase our sales.</p>	<p>We base the processing on our <b>legitimate interest</b> in marketing our business and services as well as to increase our sales by finding and reaching new potential customers.</p> <p>If the personal data is collected via cookies and other similar techniques, the collection and further processing of the personal data are based on your <b>consent</b>.</p>	<p>We store the personal data for as long as necessary to market our business and services.</p> <p>Personal data collected via cookies and other similar techniques are stored during the duration of the cookie or for as long as we have your consent. You can always withdraw your consent by changing your settings in our cookie banner.</p>

#### 4.4 When you get in touch with us in the course of your work or assignment with one of our customers, suppliers or business partners

The table below provides information about how we process personal data when you get in touch with us in the course of your work or assignment with one of our customers, suppliers or business partners.

<i>Categories of personal data</i>	<i>Retriever's purpose(s) of the processing</i>	<i>Legal ground</i>	<i>How long do we store the personal data?</i>
<p>Name, email address, phone number, job title, company name and other personal data included in various types of unstructured material such</p>	<p>To conduct the daily operations in an effective and appropriate manner</p>	<p>We base the processing on our <b>legitimate interest</b> in conducting our daily operations and handling our</p>	<p>We store the personal data for as long as necessary to handle the demands of our customers, suppliers, and business partners.</p>

as running texts, lists and email correspondence.	such as handle customers', suppliers' and business partners' demands.	customers', suppliers' and business partners' demands.	
Name, email address, phone number, job title and company name.	To sign an agreement, or otherwise administer agreements and negotiations with a customer, supplier, or business partner (your employer).	We base the processing on our <b>legitimate interest</b> in signing or otherwise administer agreements and negotiations with a customer, supplier, or business partner.	We store the personal data for as long as necessary for the administration of the specific agreement or negotiation.
Name, email address, phone number, company name, and job title.	To send out personalised marketing and sales communications, such as information on events, to contact persons at our customers, suppliers or business partners.	We base the processing on our <b>legitimate interest</b> in marketing our business and to uphold relationships with our existing and potential customers, suppliers or business partners.	When we base the processing on our legitimate interest in marketing our business, we will store the personal data for as long as we have a business need to do so. You have an absolute right to object to receiving further marketing material or communications from us by clicking "unsubscribe" at the bottom of one of our emails or contact us at <a href="mailto:dpo@retriever.se">dpo@retriever.se</a> .

## 5. RECIPIENTS AND TRANSFERS OF PERSONAL DATA

The personal data described above may be disclosed to the following categories of recipients:

- **Our suppliers:** We may share personal data for the above stated purposes to our suppliers, such as:
  - o Companies that provide services on which we rely for our core activities, e.g. data management services, digital infrastructure, and technical support.
  - o Our CRM-system, event management-system, and companies that provide marketing services to us.
- **Courts and similar judicial entities and/or authorities,** if we are required to do so by law.

We aim to store all the personal data covered by this Privacy Notice in the EU/EEA. However, in case we would transfer your personal data (e.g. by service providers who uses global delivery models) we will ensure that adequate safeguards are in place to require that your personal data remains protected in accordance with this Notice and applicable data legislation. We do this through one of the following measures:

- (i) The country of destination or the organisation is on the European Commission's list of countries with an adequate level of protection, or;
- (ii) By implementing a transfer mechanism such as the controller-to-controller or controller-to-processor standard contractual clauses that have been approved by the European Commission (as applicable from time to time) for the transfer of personal data to third countries. If, for example, the standard contractual clauses are deemed ineffective due to national law of the country of destination, we will take additional technical, organisational, or contractual measures to ensure an adequate level of protection.

If you have any questions about how we transfer personal data to countries outside the EU/EEA, please contact our DPO on the contact details available in section 9.

## 6. YOUR RIGHTS

According to the GDPR, you have various data protection rights which you can exercise, including the right to be informed in accordance with this Notice. We've outlined these rights below to help you understand them better. If you have any comments or complaints regarding our processing of your personal data, please contact us directly by contacting our DPO at the contact details set forth in section 9.

Once we receive a request from you, we will respond as soon as possible, and in any case, within the deadline stipulated in applicable legislation. Please note that before taking any action, we may ask you to verify your identity.

WHAT DOES IT MEAN	HOW YOU CAN EXERCISE YOUR RIGHT
<b>Right to access</b>	
You have the right to access and receive a copy of your personal data that we process, as well as other supplementary information at any given time.	Such requests should be made to <a href="mailto:dpo@retriever.se">dpo@retriever.se</a> . If possible, please specify the type of information you would like to access to ensure that our disclosure meets your expectations.
<b>Right to rectification</b>	
You can challenge the accuracy of your personal data at any given time. Depending on the purpose of the processing you can request the completeness of your personal data. If your personal data is	We encourage you to notify us of any inaccuracies regarding your personal data as soon as they occur, including changes to your contact details.  A request to exercise this right is made in writing to <a href="mailto:dpo@retriever.se">dpo@retriever.se</a>

indeed inaccurate, you are entitled to have the inaccurate data removed, corrected, or completed, as appropriate.	
<b>Right to rectification</b>	
In certain cases, you are entitled to have your personal data erased (also known as the “right to be forgotten”), such as in cases where the personal data is no longer needed for the purpose for which it was collected, or if we no longer have a legal basis to continue processing it.	A request to exercise this right is made in writing to dpo@retriever.se
<b>Right to objection</b>	
You have the right to object to the processing of your personal data at any time. This means that we will stop or be prevented from processing further your personal data.  You have the <b>absolute right</b> to object to receiving further marketing material or communications from us.	A request to exercise this right is made in writing to dpo@retriever.se  If possible, please specify to which purpose of processing you wish to object to ensure that our actions meet your expectations.
<b>Right to restriction</b>	
By exercising this right, you limit the way we will process your personal data for a certain period of time. This right is an alternative to requesting the erasure, in case you don’t want the deletion of your personal data.	A request to exercise this right is made in writing to dpo@retriever.se
<b>Right to withdraw your consent</b>	
You have the right to withdraw your consent to any processing for which you have previously given consent at any given time.	A request to exercise this right is made in writing to dpo@retriever.se

You also have the right to contact and lodge a complaint to the competent data protection authority.



<p>Sweden Integritetsskyddsmyndigheten</p> <p>Drottninggatan 29 5th Floor Box 8114 104 20 Stockholm Tel. +46 8 657 6100 Fax +46 8 652 8652 Email: <a href="mailto:imy@imy.se">imy@imy.se</a> Website: <a href="http://www.imy.se/">http://www.imy.se/</a></p>	<p>Finland Office of the Data Protection Ombudsman</p> <p>P.O. Box 800 FI-00531 Helsinki Tel. +358 29 56 66700 Fax +358 29 56 66735 Email: <a href="mailto:tietosuoja@om.fi">tietosuoja@om.fi</a> Website: <a href="http://www.tietosuoja.fi/en/">http://www.tietosuoja.fi/en/</a></p>
<p>Norway Datatilsynet</p> <p>P.O. Box 458 Sentrum 0150 Oslo Tel. +47 22 39 69 00 Email: <a href="mailto:postkasse@datatilsynet.no">postkasse@datatilsynet.no</a> Website: <a href="https://www.datatilsynet.no">https://www.datatilsynet.no</a></p>	<p>Denmark Datatilsynet</p> <p>Carl Jacobsens Vej 35 2500 Valby Tel. +45 33 1932 00 Email: <a href="mailto:dt@datatilsynet.dk">dt@datatilsynet.dk</a> Website: <a href="http://www.datatilsynet.dk/">http://www.datatilsynet.dk/</a></p>

## 7. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM

In addition to what has been described above, we may also access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

## 8. CHANGES TO THIS NOTICE

If we make changes to this Notice, we will notify you on our Website. You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice.

## 9. OUR DATA PROTECTION OFFICER

Retriever has appointed a Data Protection officer (“**DPO**”) tasked to monitoring and to ensuring Retriever’s compliance with the GDPR.

The data protection officer can be reached at [dpo@retriever.se](mailto:dpo@retriever.se)

## 10. CONTACT INFORMATION

Our contact information is:

<b>Sweden</b>  Name: Retriever Sverige AB Address: Karlavägen 31, 114 31 Stockholm Phone number: +46 8 546 121 00 Email address: <a href="mailto:support@retriever.se">support@retriever.se</a>	<b>Finland</b>  Name: Retriever Suomi Oy Address: Kalevankatu 20, 00100 Helsinki Phone number: +358 207 705730 Email address: <a href="mailto:info@retriever.fi">info@retriever.fi</a>
<b>Norway</b>  Name: Retriever Norge AS Address: Langkaia 1, 0150 Oslo, NO Phone number: +47 22 91 03 50 Email address: <a href="mailto:post@retriever.no">post@retriever.no</a>	<b>Denmark</b>  Name: Retriever Danmark A/S Address: Pilestræde 58, 1112 København Phone number: +45 36 99 05 86 Email address: <a href="mailto:infodanmark@retriever.dk">infodanmark@retriever.dk</a>