

# PRIVACY POLICY

NIBE AB (“NIBE”, “we”, “our” and “us”) respect your privacy and therefore want to inform you about how we process your personal data and what rights you have in relation to our processing of your personal data.

If you have any questions regarding our processing of your personal data or if you wish to assert any of rights, you are welcome to contact us by following this link to our contact form.

## **In summary: How we process your personal data**

- [If you represent a customer, supplier or other third party](#), we process your personal data to enter into agreements and administrate our relationship.
- [If you or your company wishes to use NIBE Uplink](#), we process your personal data to enable you or your company to use our service.
- [If you buy our products](#), we process your data so we can contact and correspond with you to provide the warranty service.
- [If you subscribe to our newsletters](#), we process your personal data to send you our newsletter as well as develop and improve our newsletter and marketing.
- [If you use Product Choice Guide](#), we process your personal data to suggest a range of products for your home.
- [If you buy our products](#), we process your personal data so you can be contacted by an installer or a service representation as well as contact you for a follow-up after the visit.
- [If you buy our products](#), we process your personal data in order to insure your products.

In some cases your personal data can be transferred outside the EU/EEA by our suppliers and companies within the NIBE Group.

*You can access a more detailed description regarding the specific processing of your personal data and your rights by clicking on the links above.*

## **Your rights, in summary:**

- ✓ [The right to lodge a complaint with a supervisory authority](#)
- ✓ [The right to withdraw your consent](#)
- ✓ [The right to access](#)
- ✓ [The right to object](#)
- ✓ [The right to erasure](#)
- ✓ [The right to rectification,](#)
- ✓ [The right to restriction of processing](#)
- ✓ [The right to data portability](#)



# PRIVACY POLICY – DETAILED VERSION

## Below you will find information on:

Who is responsible for the processing of your personal data?

How we process your personal data

Balancing of interests' assessment

What are your rights when we process your personal data?

## NIBE is responsible for the processing of your personal data

NIBE AB, org. no. 556056-4485, Box 14, 285 21 Markaryd, Sweden is responsible for the processing of your personal data as described in this privacy policy.

If you have any questions regarding our processing of your personal data or if you wish to assert any of rights, you are welcome to contact us by following this link to our contact form.

## HOW WE PROCESS YOUR PERSONAL DATA

### CONTACT PERSONS FOR CUSTOMERS, SUPPLIERS AND OTHER THIRD PARTIES

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
We process your personal data in order to enter into an agreement with your company and administrate our business relationship.	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone number</li> <li>Email</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) GDPR)</i></p> <p>Your personal data will be processed based on our legitimate interest to negotiate and enter into an agreement with your company and to administer our business relationship with your company.</p>

### HOW LONG DO WE KEEP YOUR DATA?

Your personal data will be deleted if we conclude that we will not enter into an agreement with your company and your company does not want to keep contact with us.

If you company enters into an agreement with us, we will keep your personal data as long as we have a business relationship with the company and for a period of one year after that in order to evaluate our previous business relationship and/or potential future business relationship.

If we receive information that you no longer represent the company, we will delete your data, except for agreements and similar documentation where your name is included.

#### WHO HAS ACCESS TO YOUR DATA?

We share your data with IT providers who will process these on our behalf and following our instructions to ensure good and secure IT operations.

We will also share your personal data within the NIBE group. If a company in the NIBE group is based outside the EU or the EEA, we will obtain a separate consent from you before disclosing your data.

NIBE Energy Systems  
Box 14, 285 21 Markaryd  
0433-27 30 00  
nibe.se | nibe.eu

## NIBE UPLINK

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
<p>We process your data to enable us to provide you or your company with the NIBE Uplink service.</p> <p>Where the smartphone app is used, we check the storage space on your device so we can download images from NIBE Uplink locally. We can then modify and erase the images we have downloaded. The images we use are the images that are displayed in NIBE Uplink's interface (e.g. icons and background images). The images that are used belong to NIBE. NIBE doesn't use images that are owned by you or that access your camera. The purpose of the use of images is to make the application more effective.</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• IP address</li> <li>• Email</li> </ul> <p>Where the smartphone app is used, the following data is also processed.</p> <ul style="list-style-type: none"> <li>• The ID number of the device</li> <li>• Information about the device's Google account (not applicable to Apple phones)</li> <li>• The android version of the device (not applicable to Apple phones)</li> </ul>	<p><i>Contract (Article 6.1 (b) GDPR)</i></p> <p>The legal basis for the processing is the fulfilment of the agreement between you and NIBE.</p> <p>We need to collect the data to be able to enter into a contract with you. You do not have to provide your data. However, if you don't provide your data, we may not be able to provide you with the services you require.</p> <p><i>Legitimate interest (Article 6.1 (f) GDPR)</i></p> <p>If you are a contact person at a company, your personal data will be processed based on our legitimate interest to enter into an agreement with your company.</p>

**HOW LONG DO WE KEEP YOUR DATA?**  
 We will store your personal data while you are a NIBE customer in relation to NIBE Uplink.

**WHO HAS ACCESS TO YOUR DATA?**

We share your data with IT providers who will process these on our behalf and following our instructions to ensure good and secure IT operations.

Your data is also shared with those individuals you have invited to have access to it. You can control the level of authority of invited individuals and you can stop them accessing your profile at any time. Data from NIBE Uplink may also be disclosed to other providers of applications that you choose, such as different types of smart home solutions. Your data is disclosed in this way by you yourself choosing to use an application and then linking it to NIBE Uplink. NIBE can't control how the recipient uses your data. You are recommended to review the privacy policy of the recipient before connecting the application to NIBE Uplink. If you as a user have consented to a service partner having access to NIBE Uplink, your data will be disclosed to this service partner.

If you switch service from NIBE Uplink to myUplink or myUplink PRO, we will share your personal data with myUpTech AB, a company within the NIBE Group, who process your personal data for its own purpose, i.e. as controller. Information about how myUpTech AB process your personal can be found in myUpTech AB's privacy policy.

**CONTACTS FOR END CUSTOMER WARRANTY SERVICE**

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
We process your data so we can contact and correspond with you in order to provide the warranty service.	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone number</li> <li>Email</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) GDPR)</i></p> <p>Your personal data will be processed based on our legitimate interest to guaranteeing the functionality and reliability of the product.</p>

**HOW LONG DO WE KEEP YOUR DATA?**

We store your data for the period during which we are responsible for the product's warranty, and for six months after the warranty has expired.

**WHO HAS ACCESS TO YOUR DATA?**

We share your data with installers and service representatives who will process your personal data for their own purposes, i.e. as controller, in order to service your product. Information about how they process your personal data can be found in their respective privacy policy.

## NEWSLETTERS

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
We process your data so we can send you relevant marketing and information in our newsletters.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> </ul>	<p><i>Consent (Article 6.1 (a) GDPR)</i></p> <p>We will process your personal data based on your consent. You have the right to withdraw your consent at any time by contacting us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>
We process your data in order to develop and improve our newsletter and our marketing by analyzing how you interact with our newsletter.	<ul style="list-style-type: none"> <li>• Information about how you interact with our newsletter, for example information that you open our newsletter and information about what you click on in the newsletter.</li> <li>• Name</li> <li>• Email</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) GDPR)</i></p> <p>Your personal data will be processed based on our legitimate interest to develop and improve our newsletter and marketing.</p>

### HOW LONG DO WE KEEP YOUR DATA?

We store your data while you are subscribed to our newsletters. You can choose to unsubscribe from mailings at any time by following the instructions in each mailing.

### WHO HAS ACCESS TO YOUR DATA?

We share your personal data with IT providers who will process these on our behalf and following our instructions to ensure good and secure IT operations.

## PRODUCT CHOICE GUIDE

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
We process your data so we can suggest a range of products for your home based on your responses in Product Choice Guide. At your request, the result containing the various options is emailed to you.	<ul style="list-style-type: none"> <li>Email</li> <li>Address</li> </ul>	<p><i>Consent (Article 6.1 (a) GDPR)</i></p> <p>We will process your personal data based on your consent. You have the right to withdraw your consent at any time by contacting us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>
<p><b>HOW LONG DO WE KEEP YOUR DATA?</b> We store your data until the result has been sent to you.</p>		
<p><b>WHO HAS ACCESS TO YOUR DATA?</b> We do not share your personal data with anyone.</p>		

## CONTACT WITH INSTALLER AND SERVICE REPRESENTATIVE

PURPOSE	CATEGORIES OF DATA	LEGAL BASIS
We process your data so you can be contacted by an installer or service representative at your request. We may also process your data so we can contact you to follow up after you have been visited by an installer or a service representative.	<ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Telephone number</li> <li>Address</li> <li>Your chosen message</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) GDPR)</i></p> <p>Your personal data will be processed based on our legitimate interest to ensure that you can be contacted by an installer or service representative when such need occur.</p>



**HOW LONG DO WE KEEP YOUR DATA?**

We store your data until such time as it has been shared with the right installer or service representative. If we choose to follow up after a visit by an installer or a service representative, your data will be stored for two months after completion.

**WHO HAS ACCESS TO YOUR DATA?**

We will share your data with the installer or service representative who will contact you. These parties process your personal data for their own purposes, i.e. as controllers. Information about how they process your personal data can be found in their respective privacy policy.

INSURANCE

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
We process your data so your product is insured for six years.	<ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Telephone number</li> <li>Address</li> </ul>	<p><i>Legitimate interest (Article 6.1 (f) GDPR)</i></p> <p>Your personal data will be processed based on our legitimate interest to ensure that your product is insured.</p>

**HOW LONG DO WE KEEP YOUR DATA?**

We store your data for six years from the date you purchased the product.

**WHO HAS ACCESS TO YOUR DATA?**

We will share your personal data with the insurer who process your personal data for its own purpose, i.e. as controller. Information about how the insurer process your personal data can be found in its privacy policy.

**Balancing of interests’ assessments**

For some purposes, we process your personal data based on our “legitimate interest”. By carrying out a balancing of interests’ assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data.

If you want more information in relation to our balancing of interests’ assessments, please do not hesitate to contact us. Our [contact information](#) can be found at the beginning of this Privacy Policy.

## YOUR RIGHTS – DETAILED DESCRIPTION

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

*If you want to know more about your rights or if you want to exercise any of your rights, please [contact us](#) and we will help you.*

### Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

You have the right to lodge a complaint with a supervisory authority.

The supervisory authority in Sweden is the [Swedish Authority for Privacy Protection](#) (Integritetsskyddsmyndigheten, the IMY)

***In detail:** Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority, in particular, in the EU/EEA member state of your habitual residence, place of work or place where the alleged infringement of applicable data protection laws has allegedly occurred.*

*The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.*

### Right to withdraw consent (Article 7.3 GDPR)

You have the right to withdraw your consent at any time.

***In detail.** The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.*

### Right of access (Article 15 GDPR)

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. If we process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

***In detail.** The information we provide includes the following:*

- *the purposes of the processing,*
- *the categories of personal data concerned,*
- *the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations,*
- *where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,*

- *the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,*
- *the right to lodge a complaint with a supervisory authority,*
- *if the personal data are not collected from you, we provide you with available information about the source of the personal data;*
- *the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and*
- *where your personal data are transferred to a third country or to an international organization, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.*

*For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.*

*Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.*

### Right to object (Article 21 GDPR)

You have the right to object to our processing of your personal data at any time.

***In detail:*** *Your right to object applies as follows:*

- *You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 e or 6.1 f GDPR, including profiling based on those provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.*

### Right to erasure (“the right to be forgotten”) (Article 17 GDPR)

You have the right to ask us to erase your personal data.

***In detail:*** *We have the obligation to erase your personal data without undue delay where one of the following grounds applies:*

- *the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;*
- *you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;*
- *you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;*
- *the personal data have been unlawfully processed; or*
- *the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.*

Where we have made the personal data public and are obliged in accordance with the rights stated above to erase the personal data, we shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law which applies to us; or
- for the establishment, exercise or defence of legal claims.

### Right to rectification of processing (Article 16 GDPR)

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you.

**In detail:** Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

### Right to restriction of processing (Article 18 GDPR)

You have the right to obtain from us restriction of the processing of your personal data.

**In detail:** Your right applies if:

- the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,
- you have objected to processing pursuant to [Article 21.1 GDPR](#) pending the verification whether our legitimate grounds override yours,
- the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or
- you need the personal data for the establishment, exercise or defence of legal claims even though we no longer need the personal data for the purposes of the processing.

*Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.*

*We will notify each recipient to whom the personal data has been provided about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to [contact us](#).*

### Right to data portability (Article 20 GDPR)

You have the right to receive your personal data (that you have provided to us) from us in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transferred to another data controller (“data portability”).

***In detail:*** *The right applies if:*

- *the processing is based on the lawful basis consent or on a contract, and*
- *the processing is carried out by automated means.*

*The exercise of the right to data portability shall be without prejudice to the right to erasure, i.e. Article 17.*

*Your right to data portability shall not adversely affect the rights and freedoms of others.*