

# TK Logistik AB

## Integrity Policy

The following policy has been implemented by TK Logistik AB, org nr 556707-8356 (the "Company" or "we") and is effective as of May 4, 2018.

### Introduction

The Company takes a structured approach to processing personal information in accordance with applicable law. This policy provides an overview of our routines in that respect and applies to information relating to employees, clients, vendors and partners as well as the usage of the Company's services and webbservices. Personal information is any information that independently or in combination with other services can be used to identify a currently living individual. Such information includes name, physical address, email address, phone number and any other information that you have provided for purposes of the Company completing its undertakings to you.

### Roles and Responsibilities

The chief executive officer has primary responsibility for handling and supervising the topics covered by this policy. All of the officers are responsible for their respective department's compliance.

Specific roles and responsibilities are addressed in more detail in the Company's responsibility matrix.

### Principles for processing personal information

Any personal information provided to the Company must be processed in accordance with law in a correct and open manner in respect of the registrant. The Company will be transparent regarding the personal information it processes and the manner in which such information is processed.

The collection of personal information only occurs for appropriate purposes. The Company shall take reasonable measures to ensure that the information is correct. We process different categories of information for different purposes and legal requirements. The time period during which the Company retains personal information vary depending on the purpose for which the Company is processing such information.

In order to ensure compliance with applicable law and to appropriately record such compliance, the Company collects all information relating to the Company's data protection efforts and maintains a register of the Company's treatment and processing of personal information in the same location as the register and such location will only be accessible by the relevant responsible parties at the Company.

### Engagement of IT-service providers

Prior to purchasing IT-services and engaging IT-providers, the Company will complete a risk analysis of the available solutions/providers. The outcome of that analysis contributes to the Company's selection of solution/service provider.

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To the extent possible, the Company avoids transferring personal information to third parties. When such transfers are nonetheless deemed necessary or appropriate, such transfers will only occur after appropriate security measures have been implemented in accordance with law.

## IT-security

**Risk assesment:** the Company shall perform a continuous risk assesment of its treatment and processing of personal information. We shall implement technical and organizational approaches and take actions to achieve a security level that is appropriate in light of the risk associated with such treatment and processing. Risk analysis and decisions regarding actions relating to personal information must be documented.

**Authorizations:** authorization to access the Company's IT-system and personal ifnormation thereon is only given to persons as necessary or appropriate. Depending on the sensitivity of the relevant personal information, the accessibility thereto may be more or less restricted.

**Incident management:** security incidents are documented in a deviation journal that includes information regarding the circumstances surrounding the personal information incident, the effects thereof and the corrective actions that have been taken.

**IT policy/security policy:** the Company has adopted an IT policy/security policy whereby employees' interaction with the IT-environment is regulated in more detail.

## Dataprotection

We will implement appropriate technical and organizational measures to ensure that your personal information is protected. Access systems are required on all computers and phones that manage personal information. Personal information that exists in hard copies are stored in locked cabinets.

## Education

The Company's employees will receive relevant and continuous regarding the appropriate treatment of personal information. Employees that handle sensitive information are provided with instruction on an as-needed basis and any such instructions are documented in the Company's Education plan.

## Follow-up and internal revisions

Compliance with this policy shall be reviewed within the framework of the Company's Quality work in accordance with this plan for internal revisions. The Company shall continuously evaluate whether its data protection work is in compliance with the applicable legal requirements and shall implement revisions as needed.

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