

PRIVACY POLICY

BVB Service AB (Byggvarubedömningen)

Last updated: 15/04/2026

1. Background and Purpose

This privacy policy describes how BVB Service AB ("Byggvarubedömningen", "we") processes personal data in connection with our digital services, business relationships and contacts. We process personal data in accordance with the EU General Data Protection Regulation (EU) 2016/679 ("GDPR").

This privacy policy is intended for:

- Visitors to the Byggvarubedömningen website,
- Users of the Service,
- Individuals who otherwise contact us with questions,
- Contact persons and representatives of organisations that provide services to Byggvarubedömningen,
- Job seekers applying for job openings at Byggvarubedömningen.

For Byggvarubedömningen's board, employees and consultants, there is an internal privacy policy. In this privacy policy, "the Customer" refers to Byggvarubedömningen's customers, i.e. companies or other legal entities that have entered into an agreement to use the Service.

"Service" refers to Byggvarubedömningen's web-based platform, including the ability to apply for assessments of building products, search for goods and products, access assessments and use the logbook tool, as well as other functions and services that are included in the Service from time to time in accordance with the Agreement.

"User" refers to natural persons within the Customer who have been provided with login credentials to the Service and who are authorised to use the Service on behalf of the Customer.

2. Data controller and contact details

BVB Service AB, company reg. no.: 556895-6964.

Postal address: Landsvägen 50A, 172 63 Sundbyberg.

E-mail: info@byggvarubedomningen.se.

3. Definition of personal data

Personal data is any information that can directly or indirectly be linked to a living natural person. Examples of personal data include name, address, phone number, email address containing a first and/or last name, personal identity number, electronic identifiers such as IP addresses, and cookies (if they can be linked to a natural person). Examples of information that is not personal data include company registration numbers. Data that has been anonymised is not personal data.

Personal data processed by Byggvarubedömningen may include:

- Identity information, such as first and last name, job title and position.
- Contact details such as postal address, email address and telephone number.
- Information linked to user accounts and authentication, such as login credentials, IP address, log data, and data related to multi-factor authentication (MFA).

4. How is personal data collected?

Byggvarubedömningen collects personal data in various ways:

4.1 Direct contact

- Customers, representatives/contact persons for customers and users provide personal data when creating an account for the Service.
- Representatives/contact persons of third parties may provide personal data in connection with the submission of information to Byggvarubedömningen regarding a product/good to be assessed.
- Personal data is collected from individuals who contact Byggvarubedömningen.
- Personal data is collected from representatives/contact persons of suppliers of goods and services to Byggvarubedömningen.
- Personal data is collected from job applicants.

4.2 Users and Representatives/Contact Persons for Customers

- Representatives/contact persons of the customer may provide information about the customer company's employees.
- Users may provide personal data about other users.
- Personal data regarding representatives or contact persons for manufacturers and suppliers, for example, may be collected in connection with requests for assessments.

4.3 Third Parties

- Personal data is collected from our customer companies, partner organisations and suppliers.

4.4 Publicly available sources

- Personal data is collected from our customer companies, partner organisations and suppliers.

5. Legal basis for processing

Byggvarubedömningen only processes personal data where permitted by law. Under the General Data Protection Regulation, there must always be a legal basis for processing personal data. Byggvarubedömningen typically processes personal data on the basis of one of the legal grounds set out below:

- **Legal obligation:** The processing is necessary to comply with a legal obligation to which Byggvarubedömningen is subject, for example the requirements under the Swedish Accounting Act to retain accounting records.
- **Agreements:** The processing is necessary for the performance of an agreement to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into such an agreement.
- **Legitimate interest:** The processing is necessary for the purposes of the legitimate interests pursued by Byggvarubedömningen or by a third party, unless the interests or fundamental rights and freedoms of the data subject override those interests and require the protection of personal data.
- **Consent:** In certain cases, Byggvarubedömningen may process personal data based on the data subject's consent. You may withdraw your consent at any time by contacting us. If consent is withdrawn, personal data will no longer be processed for purposes that require consent.

6. Recipients of personal data

Byggvarubedömningen may share personal data with the parties listed below. For more information about any of these, please contact Byggvarubedömningen.

6.1 Data processors

We engage data processors who process personal data in accordance with our instructions, such as:

- **Providers of financial management systems**
Byggvarubedömningen uses a system for invoicing and payment processing. Personal data processed in connection with invoicing and payments will therefore be shared with the provider of the financial management system.
- **Providers of IT and system administration services**
Byggvarubedömningen uses a customer management system. Personal data regarding representatives/contact persons for Customers will therefore be shared with the system provider.
- **Customer service system provider**
Byggvarubedömningen uses a customer service system to manage its support. Personal data regarding individuals who contact Byggvarubedömningen's support team will therefore be shared with the provider of the customer service system.
- **Provider of newsletter and customer survey systems**
When we send out newsletters and customer surveys, and process the responses to

the customer surveys, Byggvarubedömningen uses a system for this purpose. Personal data processed for the purpose of sending newsletters and customer surveys, as well as conducting customer surveys, will therefore be shared with the provider of the system.

- **Provider of cloud hosting and storage services within the EU/EEA**
When processing personal data, Byggvarubedömningen uses a cloud hosting service and backup system. Personal data is therefore shared with the cloud hosting provider.
- **Email service provider**
When communicating via email, personal data is shared with the email service provider.
- **Server and IT support provider**
When Byggvarubedömningen processes personal data, an external server is used. Personal data is therefore shared with the server provider. Personal data may also be shared if IT support is required.
- **HR system provider**
When you apply for a job at Byggvarubedömningen, Byggvarubedömningen uses an HR system. Your personal data will therefore be shared with the provider of the HR system.
- **External consultants and technical providers**
Byggvarubedömningen uses external consultants and technical providers. Personal data may be shared with those working on behalf of Byggvarubedömningen.

Byggvarubedömningen has entered into data processing agreements with all of the aforementioned parties. Data processors may not process personal data for their own purposes.

If you would like more information about any of the companies listed above, please contact Byggvarubedömningen.

6.2 Other recipients

Personal data may also be shared with the following categories of recipients:

- **External consultants and technical providers** who work independently on behalf of Byggvarubedömningen.
- **Customers** to the extent necessary for the administration of accounts and users.
- **Users within the same Customer and Users within the same Logbook** where names and information associated with user accounts are displayed for traceability and administrative purposes and to enable contact.
- **Professional advisers** such as legal advisers, accounting consultants and auditors. Personal data relating to individuals who are representatives or contact persons for a Customer or supplier may be shared with such advisers in connection with legal matters, accounting or auditing.
- **Insurance companies.** In the event of an insurance claim, personal data relating to the person concerned by the claim may be shared with Byggvarubedömningen's insurance company.

- **Public authorities.** Byggvarubedömningen may share personal data with public authorities where such data is included in documents that we are required to submit to the relevant authority.

Byggvarubedömningen requires all third parties to respect the security of your personal data and to process it in accordance with applicable laws and regulations.

6.3 Transfers to third countries

We strive to ensure that all processing takes place within the EU/EEA. If personal data nevertheless needs to be transferred to a third country, this will only be done to countries that are subject to an adequacy decision by the European Commission (i.e. a decision that the country in which the recipient is located ensures an adequate level of protection for personal data) or in accordance with standard contractual clauses (transfer of personal data using the European Commission's standard contractual clauses). Link to the standard contract clauses: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj.

Personal data may be transferred to the United States pursuant to the European Commission's adequacy decision, the EU-US Data Privacy Framework. Data is transferred to the United States only if the recipient complies with the EU-US Data Privacy Framework.

In countries outside the EU/EEA, the General Data Protection Regulation does not apply, which may entail an increased privacy risk, including with regard to the ability of authorities in the third country to access your personal data and the ability to exercise control over the personal data.

7. Security of personal data

We have implemented appropriate technical and organisational security measures in accordance with Article 32 of the General Data Protection Regulation to prevent personal data from being lost, used or accessed in an unauthorised manner, altered or disclosed. These measures include:

- **Role- and permission-based access control** - Only employees, processors and consultants who need access to personal data in order to perform their duties are granted such access. These individuals may only process personal data that they have received from us in accordance with our instructions. They are also bound by confidentiality obligations.
- **Encryption.**
- **Logging and monitoring.**
- **Backup.**
- **Documented procedures for handling any personal data breaches.** In the event of a personal data breach, we will inform you and the relevant supervisory authority, which in Sweden is the Swedish Authority for Privacy Protection ("IMY"), where required by law.

8. Data subject rights

As a data subject, you have several rights under the General Data Protection Regulation. To exercise your rights under the General Data Protection Regulation, please contact us via info@byggvarubedomningen.se. Learn more about your rights on the IMY website www.imy.se.

8.1 Right to Information and Access

You have the right to obtain confirmation as to whether we are processing personal data about you and, if so, to receive a copy of such data – a so-called register extract.

8.2 Right to rectification

You have the right to have inaccurate personal data concerning you rectified and the right to have your personal data completed.

8.3 Right to object

You have the right to object to our processing of your personal data when our processing is based on the legal basis of legitimate interest. If we cannot demonstrate that there are compelling legitimate grounds for continuing to process the data, we will cease processing it. Processing may still take place, even where your interests in not having your data processed override ours, where it is necessary for the establishment, exercise or defence of legal claims.

8.4 Right to restriction of processing

In certain cases, you have the right to request restriction of the processing of your personal data, for example if you believe that the data concerning you is incorrect and you have requested rectification of the data. While the matter is being investigated, you may request that the processing of the data be restricted. You may also request restriction where the processing of the personal data is unlawful but you object to the erasure of the personal data. The processing of personal data may also be restricted where we no longer need the personal data, but you require it for the establishment, exercise or defence of legal claims. Finally, you may request restriction where you have objected to processing based on the legal basis of legitimate interests, for the period during which we are assessing whether our legitimate interests override your interests.

Where processing has been restricted in any of the above situations, we may, in addition to storage, only process the data for the establishment, exercise or defence of legal claims, to protect the rights of another person, or with your consent.

8.5 Right to erasure (right to be forgotten)

Personal data may, in certain cases and upon your request, be erased. This applies, for example, to data that is no longer necessary for us to process for the purposes for which it was collected. This also applies in cases where the processing is based on the legal basis of consent and in situations where you have withdrawn your consent. It also applies where the processing is carried out for direct marketing purposes and you object to such processing. It also applies where you have objected to the processing of personal data based on the legal basis of legitimate interests and there are no overriding legitimate grounds for continuing the processing that outweigh your interest in the protection of your personal data. This also applies where the data is being processed unlawfully.

The right to erasure does not apply where the data must be retained in order for us to comply with a legal obligation requiring processing under Union law or under national law. We will also not erase the data if we need it for the establishment, exercise or defence of legal claims.

8.6 Right to data portability

If you have given your consent to the processing of your personal data, or if we process your personal data based on the legal basis of a contract, you have the right to receive a copy of the data and have it transferred to another data controller. The right to data portability applies to data that you have provided to us and that is processed by automated means. Data will only be transferred where it is technically feasible.

8.7 Right to object to direct marketing

You have the right to request that your personal data not be processed for direct marketing purposes. We will then stop processing your personal data for that purpose.

9. Handling of personal data matters

You do not have to pay to access your personal data or to exercise any of your other rights. However, if your request is wholly unfounded or excessive, in particular because of its repetitive nature, we may charge a reasonable fee. Alternatively, we may deny your request in such situations.

To process your request to exercise your rights, we may need to request additional information from you in order to verify your identity. This is a security measure to ensure that personal data is only disclosed to the correct person. Byggvarubedömningen aims to respond to requests to exercise your rights within one month, although some cases may take longer. If we are unable to respond to your request within one month, we will notify you.

10. Complaints to the supervisory authority

If you are dissatisfied with our processing of your personal data, you may lodge a complaint with the Swedish Authority for Privacy Protection (IMY). Visit the IMY website www.imy.se for more information.

11. Monitoring and auditing

The policy is reviewed annually as part of the safety and health review. If necessary, it is updated to comply with new legal requirements, guidelines, or changes in operations. The latest version is always available on our website and in the Service.

12. Annexes

Annexes are updated and approved by Byggvarubedömningen's Management Team and do not require approval by the Board of Directors.

Related annexes

1. Record of processing activities

Approval:

Approved by: The Board of Directors of Byggvarubedömningen

Date: 15/04/2026

Responsible for follow-up and monitoring: Head of IT and Digitalisation