

## 1. GENERAL

1.1 This policy on the processing of personal data (Privacy Policy) presents how Panduro Hobby AB (Panduro, us, our, we) collects and processes personal data about you in conjunction with your use of our website, [www.panduro.com](http://www.panduro.com).

1.2 The privacy policy applies to personal data that you provide to us or that we collect via [panduro.com](http://panduro.com), email, text message and other electronic messages, calls with customer service, stores, and printed and digital forms, for example for contests and events, as well as generally available information from social networks.

1.3 Panduro is the data controller for the processing of your personal data. All questions for Panduro can be submitted via the contact information given under point 7.

## 2. WHAT PERSONAL DATA WE COLLECT, FOR WHAT PURPOSES, AND LAWFUL BASES FOR PROCESSING

2.1 When you visit [panduro.com](http://panduro.com), we automatically collect data about your use of [panduro.com](http://panduro.com), for example regarding what type of browser you use, what search criteria you use on [panduro.com](http://panduro.com), your IP address, including your network location, as well as information about your computer or mobile device, geographic location and similar data.

2.1.1 The purpose is to optimise the user experience and [panduro.com](http://panduro.com)'s functionality, for example by showing you a relevant selection, as well as conducting targeted marketing, including retargeting via Facebook, Instagram, Pinterest, YouTube and Google.

2.1.2 The legal basis for processing is "weighing of interests" in accordance with Article 6 of the General Data Protection Regulation. Our legitimate interests consist of optimising the user experience and [panduro.com](http://panduro.com)'s functionality, for example by showing you a relevant selection and conducting targeted marketing.

2.2 When you enter a contract or communicate with us at [panduro.com](http://panduro.com), we collect the data that you provide to us yourself, for example your name, address, email address, telephone number, payment method, information about the products you purchase and

possibly return, delivery requests, as well as information about the IP address from which the order was placed.

2.2.1 The purpose is to enable us to deliver the products you have ordered and otherwise fulfil our contract with you, including to be able to facilitate your rights to return and to make a complaint. We may also process information about your purchases in order to comply with legal requirements, including those pertaining to bookkeeping and accounting. When a purchase is made, the IP address is collected for these purposes.

2.2.2 The legal basis for processing is “contract” and “legal obligation” in accordance with Article 6 of the General Data Protection Regulation. Processing is necessary in order for us to fulfil our obligations in accordance with the contract between you and Panduro as well as our legal obligations. If the data are not provided, our obligations cannot be fulfilled.

2.3 When you enter a contract, communicate with us, or collect products (that you have ordered at panduro.com) from a store, we collect the data that you provide to us yourself, for example your name, address, email address, telephone number, payment method, and information about which products you are purchasing and possibly returning.

2.3.1 The purpose is to enable us to deliver the products you have ordered and otherwise fulfil our contract with you, including to be able to facilitate your rights to return and to make a complaint. We may also process information about your purchases in order to comply with legal requirements, including those pertaining to bookkeeping and accounting. We also process your personal data in order to handle your cases, answer questions, and investigate any complaints and support cases (including technical support) & similar.

2.3.2 The legal basis for processing is “contract” and “legal obligation” in accordance with Article 6 of the General Data Protection Regulation. Processing is necessary in order for us to fulfil our obligations in accordance with the contract between you and Panduro as well as our legal obligations. If the data are not provided, our obligations cannot be fulfilled.

2.4 When you register for our newsletter and you are not a member of our customer club, We are Panduro, we collect your email address.

2.4.1 The purpose is to enable us to fulfil our obligation and deliver the newsletter to you.

2.4.2 The legal basis for processing is your consent, in accordance with Article 6 of the General Data Protection Regulation.

2.5 When you register for our customer club, We are Panduro, you will be asked to provide, for example, your name, address, email address and telephone number. Beyond this, you can choose what information you want to provide to us. In addition, while you are a member we collect information about your use of We are Panduro's benefits, what contests you participate in etc. We compile this data with other data we have about you, including data on what you have purchased and possibly returned.

2.5.1 The purpose is to administer your membership and offer you the services and benefits connected to membership in We are Panduro, and to send newsletters, text messages, and mailings, as well as to engage in targeted marketing.

2.5.2 The legal basis for processing is "contract" in accordance with Article 6 of the General Data Protection Regulation. Processing is necessary in order for us to fulfil our obligations under the membership agreement for the customer club. If the data are not provided, our obligations cannot be fulfilled. However, processing in connection to sending newsletters, text messages and mailings and other targeted marketing is instead supported by a weighing of interests, and our legitimate interest consists of being able to conduct such targeted marketing.

2.5.3 We use automated decision-making, so-called profiling, to show you the offers that we believe are best suited to you and to provide customised marketing. Profiling is carried out because we could not otherwise show or send relevant offers and marketing for you. Without profiling, instead you would see offers that are not relevant to you. You have the right to object to profiling, see point 4.7 below.

2.6 When you contact Customer Care via telephone, letter, or through digital channels, including social media, we collect the data that you provide, such as

- Name, personal identity number, contact information such as address, email and telephone number.

- Your correspondence, data on time of purchase, place of purchase, any errors/complaints. Technical information about your equipment.

- User information for My Pages (members only).

Calls with our Customer Care may be recorded in accordance with applicable legislation for local operational requirements (for example, for quality or training purposes) and in some cases, to archive proof of consent for direct marketing and profiling. Credit card information is not recorded. If this is required under applicable law, you will be informed of the recording at the beginning of the call and you will be given the opportunity to decline.

2.6.1 The purpose is to handle your Customer Care cases. Answer any questions, investigate any complaints and support cases (including technical support) and similar.

2.6.2 The legal basis for processing is “contract” and “legal obligation” in accordance with Article 6 of the General Data Protection Regulation. Processing is necessary in order for us to fulfil our obligations in accordance with the contract between you and Panduro as well as our legal obligations. If the data are not provided, our obligations cannot be fulfilled.

2.7 Processing of personal data for suppliers and partners

2.7.1 We process personal data provided by our suppliers and partners for the purposes of maintaining and fulfilling the contracts into which we have entered. Such processing takes place in accordance with the applicable data protection legislation, GDPR. The legal basis for processing is “contract”.

2.7.2 The personal data that are processed may include name, contact information, payment information, and other necessary information for management of the business relationship. This information is used for purposes such as administration, payments, communication and other necessary management of supplier contracts.

2.7.3 We ensure that processing of personal data is limited to what is necessary for fulfilling the contract and that the data are not used for other purposes without the supplier's explicit consent or another legal basis.

### 3. RECIPIENTS OF PERSONAL DATA

3.1 Data such as your name, address, email address, telephone number, customer number, order and invoice number as well as special delivery requests will be forwarded to DHL or a carrier that is handling delivery of the purchased goods to you.

3.2 Data may be transferred to external partners, who process the data on our behalf. We use external partners for the technical operation of and improvements to panduro.com, mailing of newsletters and targeted marketing, including retargeting, and for your evaluation of our company and our products. Among other things, your name and email address may be forwarded to TrustPilot and Gamifiera, in order for them to send an invitation on our behalf to evaluate us on TrustPilot's website and products on our website. If you choose to register something, TrustPilot and Gamifiera are the data controllers for the data you provide. These companies are data processors acting in accordance with our instructions and process data for which we are the data controller. Data processors may not use the data for purposes other than fulfilling the contract with us and are subject to confidentiality regarding this data. We have entered into written contracts for data processing with all data processors that handle personal data on our behalf.

External partners are:

- Freight forwarders
- Partners for technical operation
- Outsourced customer service

3.3 Two of these data processors, Google Analytics v/Google LLC and Facebook Inc., are established in the US. The required guarantees for the transfer of data to the US have been established by Panduro entering into standard contractual clauses with these data processors. The standard contractual clauses are available on the European Commission's website: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

3.4 We also share personal data with certain companies that are independent data controllers. The company being an independent data controller means that we do not dictate how information provided to the company will be handled. Independent data controllers with which we share your personal data are

1. Government authorities (Swedish Police Authority, Swedish Tax Agency, or other government authorities) if we are required to do so by law or in the event of a suspected crime.

2. Companies that provide payment solutions (payment facilitators, banks and other payment service providers).

When your personal data are shared with a company that is an independent data controller, that company's privacy policy and personal data management regarding their personal data processing will apply.

## 4. YOUR RIGHTS

4.1 For the purposes of creating transparency regarding the processing of your data, as the data controller, we would like to inform you of your rights.

### 4.2 Right of access

4.2.1 You have the right to request information from us at any time about, among other things, the categories of personal data that are processed, the purposes of the processing, recipients of the personal data where applicable, and the source of the personal data (if the data was not collected from you).

4.2.2 You have the right to obtain a copy of personal data about you that we process. If you would like a copy of your personal data, you must submit a written request to Panduro Hobby AB, Att: GDPR, 205 14 Malmö. Verification of your identity may be requested.

#### 4.3 Right to rectification

4.3.1 You have the right to have us correct any incorrect personal data concerning you. If you identify mistakes in the data we have registered about you, we recommend that you notify us in writing in order for the information to be corrected.

4.3.2 You can correct data that we have collected in connection to your registration with We are Panduro yourself by logging in to My Pages at [panduro.com](https://panduro.com).

#### 4.4 Right to erasure

4.4.1 In some cases, you have the right to have us delete all or some of your personal data, for example, if you withdraw your consent and we have no other legal basis for continuing the processing. To the extent that continued processing of your data is necessary, for example in order to comply with our legal obligations or to establish, exercise, or defend legal claims, then we cannot accommodate your request to erase your personal data.

#### 4.5 Right to restrict processing to storage

4.5.1 In some cases, you have the right to restrict the processing of your personal data to storage only, for example if you believe that the data we process about you is inaccurate.

#### 4.6 Right to data portability

4.6.1 In some cases, you have the right to receive personal data that you have provided to us in a structured, commonly used and machine-readable and compatible format and to transmit these data to another data controller.

#### 4.7 Right to object

4.7.1 You have the right at any time to object to our processing of your personal data for the purposes of direct marketing, including profiling carried out for the purposes of conducting direct marketing.

4.7.2 Furthermore, you have the right to object at any time to the processing of your personal data that we carry out under the legal bases for processing set out in this policy. However, we cannot guarantee that we can meet such requests in their entirety.

#### 4.8 Right to withdraw consent

4.8.1 You have the right at any time to withdraw consent you have given to us regarding the processing of personal data, including to profiling of you as a member of We are Panduro. Withdrawal of consent does not affect the legality of processing based on consent prior to its withdrawal. If you would like to withdraw your consent, please contact us at [customercare@panduro.se](mailto:customercare@panduro.se).

#### 4.9 Right to file a complaint

4.9.1 You have the right at any time to file a complaint about our processing of your personal data with the Swedish Authority for Privacy Protection, Box 8114, 10420 Stockholm. Complaints can be filed for example via email to [imy@imy.se](mailto:imy@imy.se) or via telephone +46 8 657 61 00.

### 5. ERASURE AND TRANSFER OF PERSONAL DATA

5.1 We only store personal data for as long as necessary to fulfil the purpose of the processing.



5.2 Data collected about your use of Panduro.com, see point 2.1, are erased at the latest when you have not used panduro.com for 12 months.

5.3 Data collected in connection to purchases you have made at Panduro.com or purchases in a store, see points 2.2 and 2.3, will first be erased two years after the end of the calendar year in which the purchase was made. However, the data may be retained for a longer period if we have a legitimate reason for extended storage, but for no longer than three years, for example if necessary to establish, exercise, or defend legal claims, or if storage is necessary to fulfil complaint requirements under the law. To comply with the requirements of the Accounting Act, accounting materials are saved for seven years, until the end of a financial year.

5.4 Data collected in connection to your registration for our newsletter, see point 2.4, are erased upon the withdrawal of your consent to receive the newsletter.

5.5 Data we have collected in connection to your registration for and during your membership in We are Panduro, see point 2.4, are automatically erased if you have not created a membership or clicked on the newsletter in 24 months or prior to then if you end your membership in We are Panduro.

5.6 You have the right to request a transfer of your personal data (data portability).

## 6. SECURITY

6.1 We have taken suitable technical and organisational measures to prevent personal data from being unintentionally or unlawfully destroyed, lost, modified, or compromised, and to ensure that unauthorized parties do not gain access to or misuse the data.

6.2 Access to your personal data is only granted to employees who have a legitimate need to do so in order to carry out their work.

## 7. CONTACT INFORMATION

7.1 Panduro.com, Panduro Hobby AB, org. no. 556073-6356, is data controller for the processing of your personal data in connection to your use of the website Panduro.com.

7.2 If you have any questions or comments regarding this Privacy Policy or if you would like to exercise one or more of your rights as described in point 4, you may contact:

Panduro Hobby AB

GDPR

205 14 Malmö

Phone: +46 (0)40 – 22 30 70

Email: [dataprotection@panduro.se](mailto:dataprotection@panduro.se), [customerservice@panduro.se](mailto:customerservice@panduro.se)

## 8. CHANGES TO THE PRIVACY POLICY

8.1 You can always find the latest updated version of the privacy policy on this page.

8.2 In the event of significant changes (for example of purposes for the processing of personal data, or categories of personal data), you will receive information regarding this via email or at [panduro.com](https://panduro.com).

## 9. VERSIONS

9.1 This is version 7 of Panduro's Privacy Policy, dated 1 November 2024.