



Privacy notice - Customer

HL Display's processing of customers' and prospects'
personal data

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Contents

Introductions	2
Application of this privacy notice	2
Personal data processed in HL Display.....	2
Purpose with processing personal data.....	3
Disclosure of your personal data	3
Centralised data processing activities	4
Updating, deleting or accessing your personal data	4
Protecting your personal data.....	4
Contact information.....	4

Introductions

HL Display (“**We**”) are committed to safeguarding the privacy of the personal data that we gather concerning our prospective and current customers (“**you**” or “**customers**”) for business purposes. As an HL Display customer (or prospective customer), you understand and acknowledge that we collect, use and disclose your personal data in accordance with this Global Privacy Notice for Customers (this “**Notice**”).

Application of this privacy notice

This Notice applies to customers’ personal data and to the use of that personal data in any form – whether oral, electronic or written.

This Notice gives effect to HL Display’s commitment to protect your personal data and has been adopted by all legal entities within HL Display. References to “**HL Display**”, “**we**” and “**our**” throughout this Notice, depending on the context, collectively refer to those legal entities.

While this Notice is intended to describe the broadest range of our personal data processing activities globally, those processing activities may be more limited in some countries due to the restrictions of their local legislation and regulations. For example, the laws of a particular country may limit the types of personal data we can collect or the manner in which we process that personal data. In those instances, we adjust our internal policies and/or practices to reflect the requirements of local law.

Personal data processed in HL Display

The legal basis related to processing personal data of the customer is the agreement/contract between HL Display and the customer. The legal basis for prospective customers is legitimate interest; HL Display’s need to find relevant customers in order to maintain business as usual.

The types of personal data that we process under the legal basis (which may vary by jurisdiction based on applicable law and the nature of the customer relation) may include:

- Name, E-mail address, Company phone number to specific personal contact
- Other information required to comply with laws

Much of the personal data we process is information that you knowingly provide to us. Data related to prospects can be collected through public records, eg. LinkedIn. Prospects will be informed with the source of the collected contact information when contacted.

In the normal case, the personal data collected is considered to be harmless (no sensitive data). There may be instances in which the personal data that you provide to us is considered as Sensitive Personal Data under the privacy laws of some countries (Eg. sensitive personal data as health data). We only process Sensitive Personal Data with your specific consent and to the extent permitted by applicable law.

Purpose with processing personal data

Depending on the respective country and applicable laws, we may collect, use and disclose personal data concerning customers in order to:

- Manage all aspects of a customer relationship, including, but not limited to, delivery, payments, development, training and other general administrative and business-related processes;
- Maintain communication/contact records;
- Protect the safety and security of HL Display's customer contacts personal data and property relevant in the business relationship;
- Comply with applicable laws, including juridical or administrative orders regarding individual customers.

HL Display will only retain personal data for as long as it is necessary for the legal basis and in all cases for no longer than permitted by HL Display's formally defined storage time for relevant system and applicable law.

Unless otherwise stated, all personal data we request from you is necessary for the business relation. If you do not provide and/or allow us to process all requested personal data, we will not be able to keep complete information about you, thus, affecting our ability to accomplish the purposes set out above.

Disclosure of your personal data

In order to carry out the purposes outlined above, information about you will be disclosed for the purposes set out above to HL Display staff and authorised consultants (if needed).

Like many businesses, from time to time, we outsource the processing of certain functions and/or information to third parties, example for invoicing and marketing services. Please note that your personal data may be transferred to a third-party with whom HL Display has contracted to process your personal data on our behalf. When we do outsource the processing of your personal data to third parties or provide your personal data to third-party service providers, we oblige those third parties to protect your personal data in accordance with the terms and conditions of this Notice, with appropriate security measures. In these cases, we also document information internally about the outsourcing relation to increase the control that information is processed accurately and securely.

We reserve the right to disclose any personal data we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal data collected and to process such personal data to comply with specific laws.

Centralised data processing activities

Like most international businesses, we have centralised certain aspects of our data processing and administration in accordance with applicable laws in order to allow us to better manage our business. That centralisation may result in the transfer of personal data from one country to another where HL Display has its office. Whenever or wherever your personal data is transferred within HL Display, your personal data will be processed in accordance with the terms and conditions of this Notice and applicable laws.

Updating, deleting or accessing your personal data

With some limited exceptions, you may enquire about the personal data we maintain about you by sending us a written request by letter or email (please see contact information in last section of this Notice). Please be sure to include your full name and name of Company where your employment is/was registered. We may not disclose data that you are not entitled to receive under applicable laws. Please note that, for excessive and repetitive requests, we will charge a fee based on administrative costs to provide you this information. We will let you know about the fee prior any action is taken to answer the request.

You may request to obtain information about the processing of your personal data. You may also request to correct, to delete or to stop processing, personal data that we hold about you. If we agree that the information is incorrect, or that the processing should be stopped, we will delete or correct the information. If we do not agree that the information is incorrect, we will tell you that we do not agree and record the fact that you consider that information to be incorrect in the relevant file(s).

It is assumed that regularly pruning routines (within reasonable time), defined in contract with the customer and/or formal system descriptions, is considered as a legitimate interest to HL Display, considering keeping the personal data until date of pruning. This means that when it comes to fulfilling the Right of the customer, according to GDPR, to be forgotten the pruning routines shall stand strong and only in special cases the personal data shall be immediately deleted if that is requested.

Protecting your personal data

The personal data that we collect from you is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls and other reasonable security measures. Where required under law, we will notify you of any loss, misuse or alteration of personal data that may affect you, so that you can take the appropriate actions for the due protection of your rights.

Contact information

If you have any questions about this Notice, about the processing of your personal data as described herein, or any concerns or complaints with regards to the administration of the Notice, or if you would like to submit a request for access to the personal data that we maintain about you, please contact us by any of the following means:

- For prospects and former customers, by contacting your local HL Display office.
- For current customers, by contacting your specific HL Display contact person

All requests for access to your personal data must be submitted in writing by letter or email. We may respond to your request by letter, email or any other suitable method.

Complaints can also be sent directly to Supervisory Authority in the specific country where your legal entity is located. Please go directly to the Supervisory Authority's webpage for contact information.