

Privacy policy for BrakeIT Online

Introduction

Haldex AB, company reg. no. 556010-1155, with the address Box 507, 261 24 Landskrona, Sweden (hereinafter: “**We**”), as the provider of the BrakeITOnline application, are the controllers of the personal data of the users (hereinafter: “**You**”) of the BrakeITOnline application within the meaning of the General Data Protection Regulation (“**GDPR**”).

For any questions regarding our processing of your personal data, integrity or privacy, please contact us at brakeitonline@safoholland.com.

We protect Your privacy and Your personal data. We collect, process and use Your personal data in accordance with the content of this Privacy Policy and the applicable data protection regulations, in particular the GDPR. These data protection provisions regulate which personal data We collect, process and use about You. We therefore ask You to read the following carefully.

1. Collection of Personal Data

1.1 Personal data for the purposes of this Privacy Policy, means any information relating to an identified or identifiable natural person (hereinafter “**data subject**”).

1.2 We process personal data only to the extent necessary for registration/access, operations, IT security, and support.

1.3 When you register for access to BrakeIT Online, we store your email request. This typically includes:

- Email address
- Name
- Organization/Company

1.4 When users are required to give consent, we store:

- Consent (“I agree”)
- Timestamp
- Association with user account/ID

1.5 Access to BrakeIT Online is provided via Microsoft Entra ID (Identity Provider). In doing so, we typically process:

- User ID (e.g., email)
- Name (display/profile name), organization/company if applicable
- Authentication/session information (e.g., token metadata)

1.6 When you request support, we process the data you provide (e.g., email address, content of the request, attachments if applicable) exclusively for processing purposes.

1.7 To prevent misuse and analyze system issues, we may log security-related events. These typically include:

- Login and access data (e.g., successful/failed logins)
- Security-related events (e.g., suspicious access activity, error codes)

2. Purpose and Legal Basis

2.1 Purposes

We use Your personal data for the following purposes:

2.1.1 To provide you with the web-based application for trailer brake calculation (“BrakeIT Online”).

2.1.2 To provide you with personalized access to BrakeIT Online via a user account.

2.1.3 To ensure IT security, prevent misuse, and analyze errors.

2.1.4 To process customer support requests and communication.

2.1.5 To document consents.

2.2 Legal Basis

The processing of Your personal data is based on the following legal grounds:

2.2.1 The collection of the data listed in Sections 1.3 and 1.5 is based on Article 6(1)(b) of the GDPR (contract/user relationship) and/or Article 6(1)(f) of the GDPR (legitimate interests: efficient B2B account management).

2.2.2 The collection of the data listed in Section 1.4 is based on Article 6(1)(f) of the GDPR (legitimate interests: compliance/evidence interests).

2.2.3 The collection of the data listed in Section 1.6 is based on Article 6(1)(f) of the GDPR (legitimate interests: qualified customer support).

2.2.4 The collection of the data listed in Section 1.7 is based on Article 6(1)(f) of the GDPR (legitimate interests in security/integrity/availability); where applicable, Article 6(1)(c) of the GDPR (legal obligations), if applicable.

3. Data Security

All information You submit to us is stored on servers within the European Union. Unfortunately, the transmission of information via the Internet is not completely secure, which is why We cannot guarantee the security of data transmitted to our website via the Internet. However, We secure our Website and other systems against loss, destruction, access, alteration or distribution of Your data by unauthorised persons by means of technical and organisational measures. In particular, We transmit Your personal data in encrypted form. We use the TLS (Transport Layer Security) coding system.

4. Retention Period / Erasure

We generally erase personal data when there is no longer a need for further storage. A need may exist, in particular, if the data is still required to fulfill contractual obligations or to assess, grant, or defend against warranty and, where applicable, guarantee claims. In the case of statutory retention obligations, erasure may only be considered after the respective retention period has expired.

5. Recipients of Personal Data

Personal data is processed by carefully selected service providers who act on behalf of Haldex AB in accordance with Article 28 of the GDPR for the provision, operation, maintenance, support, and security of BrakeIT Online.

The SAF-HOLLAND Group's IT organization is responsible for the technical operation, administration, maintenance, support, and security of BrakeIT Online. To the extent necessary for these purposes, authorized employees of SAF-HOLLAND Group companies may be granted access to personal data based on the "need-to-know" principle and in compliance with applicable confidentiality and security obligations.

BrakeIT Online is operated using Microsoft 365 and Microsoft Azure services. Microsoft acts as a data processor in the provision of these services. Personal data is hosted and processed exclusively within the European Union.

All recipients and service providers process personal data only to the extent necessary to fulfill their respective tasks and are contractually obligated to implement appropriate technical and organizational measures to protect personal data.

Personal data processed in connection with BrakeIT Online is stored and processed exclusively within the European Union. No regular transfers of personal data to countries outside the European Union or the European Economic Area are planned in connection with the operation of BrakeIT Online.

6. Changes to this Privacy Policy

We reserve the right to change this Privacy Policy at any time with effect for the future. A current version is available on this website. Please visit the website regularly and inform Yourself about the applicable data protection provisions.

7. Your Rights and Contact

You have extensive rights with regard to the processing of Your personal data. First of all, You have a comprehensive right to information and, if necessary, You can demand the correction and/or

deletion and/or blocking of Your personal data. You can also request a restriction of processing and have a right to object and a right to data portability. If You would like to exercise any of Your rights and/or receive more information about this, please contact us at: Datenschutz@safholland.de. In addition, You have the right to lodge a complaint with a supervisory authority. If You have any questions, comments or requests regarding the collection, processing and use of Your personal data by us, please also contact us using the contact details provided.

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