

PRIVACY NOTICE

M Refine Group AB. Corp. Reg. No. 559480-0855

Privacy notice for website | Version 2026-05-19

1. Scope and limitation

This privacy notice applies to M Refine Group AB when the parent company processes personal data in its capacity as controller. The notice describes, for example, processing carried out within the parent company’s management, group-wide administration, investor relations, acquisition and transaction work, corporate law, certain finance administration, IT and security governance, and other functions where M Refine Group AB itself determines the purposes and means of the processing.

This notice does not cover processing of personal data carried out by M Refine Group’s subsidiaries. Each subsidiary is a separate legal entity and is independently responsible for its own processing activities, records of processing activities, legal bases, retention periods and information to data subjects.

2. General privacy notice for the website

M Refine Group AB respects your privacy. In this privacy notice, we describe how M Refine Group AB processes personal data about you as, for example, a customer contact, supplier contact, business partner, candidate, employee, shareholder, investor contact, adviser, representative, system user or other person who comes into contact with the parent company’s operations.

Personal data means any information that can be directly or indirectly linked to a living natural person. Processing means, for example, that we collect, record, store, use, share, archive or erase personal data.

M Refine Group AB is the controller when the company determines the purposes and means of a particular processing activity.

If you have questions about M Refine Group AB’s processing of personal data, you can contact us at privacy@mrefinegroup.com

2.1 Where do we collect personal data from?

- directly from you, for example when you contact us, apply for a job, report a matter, use our systems or enter into an agreement,
- from the company or organisation you represent, such as a customer, supplier, adviser, investor or business partner,
- from internal systems and processes, such as HR, finance, IT, access permissions, logs and support,
- from public registers, authorities, banks, auditors, lawyers, financial advisers or other external parties where this is necessary for a specific purpose,
- from technical systems, such as signing tools, mileage log systems, login systems, security logs and backups.

2.2 Why do we process personal data?

Area	Examples of purposes	Examples
Customer, supplier and business relationships	Administer contact details for customer representatives and contact persons in business relationships.; Manage invoicing, payments, reminders and financial follow-up of customer receivables.; Administer contact with supplier representatives and contact persons in purchasing and contractual relationships.	Customer contact register, Payment administration, Supplier contact register, Complaint and supplier matters, Invoicing, Purchasing process, Supplier contract process, Service delivery, Customer contracts and contract archive
Finance, payments and accounting	Calculate, document and report car benefits and retain accounting records.; Manage invoicing, payments, reminders and financial follow-up of customer receivables.; Consolidate subsidiaries, prepare group	Car leasing - tax and accounting documentation, Payment administration, Group accounting, Invoicing, Storage of financial data

	accounts and manage reporting documentation.	
HR, recruitment and employment	Administer allocation, use, contact with finance companies and practical handling of company cars provided as benefits.; Administer the recruitment process, communicate with candidates and assess suitability.; Administer onboarding, account creation, introduction, equipment and practical measures in connection with new employment.	Car leasing - benefits administration, Recruitment, Onboarding, Absence and leave administration, Rehabilitation and sickness absence management, Personnel administration / personnel file, Payroll administration, Offboarding, Digital mileage log - tax documentation, Digital mileage log - detailed...
Corporate administration, IR and ownership matters	Maintain and retain the share register and administer ownership changes and corporate law documentation.; Manage adviser dialogue, project material and contact details in preparation for capital markets activities.; Publish and retain financial and regulatory information for the market, shareholders and stakeholders.	Share register administration, Financial advisory, Investor Relations - regulatory reporting, Investor Relations - contact lists and dialogue
Acquisitions, transactions and legal matters	Manage legal advice relating to agreements, acquisitions, corporate law, disputes and compliance.; Identify, contact and maintain dialogue with owners/representatives of potential acquisition targets.; Administer acquisition processes, agreements, decisions, closing, integration and documentation of completed or advanced transactions.	Legal advice, Acquisition dialogue - initial contact, Acquisition process - transaction and agreement, Due Diligence
IT, security and support	Administer user accounts, identities, access permissions, roles and system access.; Manage IT support, troubleshooting, technical user support and case history.; Log and follow up access, authentication and administrator actions for security, traceability and incident management.	Identity and access administration, IT support, Access and security logging, Security incident management, Backup and recovery
Whistleblowing and compliance	Receive, assess, investigate, provide feedback on and document whistleblowing matters in accordance with whistleblowing rules.	Whistleblowing management
Digital signing	Sign, verify and retain agreements and other company-related documents digitally.	Digital signing

2.3 What personal data do we process?

The personal data we process depends on the relationship and the purpose. It may include, among other things, names, business contact details, role, company, communications, contract details, invoice and payment information, signing metadata, access permission data, logs, support information, recruitment materials, employment data, payroll and tax documentation, absence and rehabilitation data, vehicle and mileage log data, ownership data, investor contacts, whistleblowing data and data in legal matters.

We must not process more data than is necessary. Free-text fields, attachments, e-mails, export files and local working copies must therefore be used restrictively.

2.4 What legal basis do we use?

Legal basis	When is it used?	Examples
Contract	When the processing is necessary to enter into, administer or perform agreements.	Customer agreements, supplier agreements, digital signing, service delivery, benefits administration.
Legal obligation	When law requires processing or retention.	Accounting, tax, payroll administration, share register, whistleblowing, regulatory reporting.
Legitimate interest	When we have a legitimate business interest that overrides opposing privacy interests.	Customer and supplier contacts, IT security, support, legal advice, IR dialogue.

Consent	When the processing is based on freely given, specific, informed and withdrawable consent.	External publication of certain employee data or images where consent is used.
Legal claims / special exemptions	When data is needed for legal claims or where special rules provide support for special categories of data.	Legal matters, rehabilitation, disputes, incidents, certain whistleblowing matters.

2.5 Special categories of personal data, personal identity numbers and criminal offence data

In certain limited situations, we may process special categories of personal data, such as health data in absence and rehabilitation matters, or data that occurs in whistleblowing matters, legal matters or due diligence. Such data is processed only where there is specific support under the GDPR or other applicable law, and access must be restricted.

Personal identity numbers are used only where this is clearly justified with regard to the purpose, secure identification or legal requirements. Criminal offence data is processed only where there is legal support and a clear need.

2.6 Sharing, processors and transfers

M Refine Group AB may share personal data with internal functions within the parent company and, where necessary for group administration, governance, reporting or service delivery, with relevant subsidiaries. We may also share data with external recipients such as banks, auditors, lawyers, authorities, financial advisers, customers, suppliers, system providers, processors, insurance and vehicle providers, whistleblowing service providers and signing services.

Where a supplier processes personal data on our behalf, a data processing agreement is put in place. If processing takes place outside the EU/EEA, a valid transfer mechanism and appropriate safeguards must be in place.

2.7 How long do we retain personal data?

We retain personal data for as long as it is needed for the purpose, and thereafter only if legal requirements or another legitimate reason require continued retention. The retention period varies between processing activities. Financial material may need to be retained under accounting rules, while contact details, working copies, logs, support matters and recruitment materials should normally be erased earlier.

When data is no longer needed, it must be erased, de-identified or anonymised. Erasure routines must cover both primary systems and secondary storage locations such as e-mail, export files, shared folders, local files and temporary working copies.

2.8 Your rights

- the right to information and access to your personal data,
- the right to request rectification or erasure in certain cases,
- the right to request restriction of processing in certain cases,
- the right to object to processing based on legitimate interests,
- the right to data portability where the conditions are met,
- the right to withdraw consent where processing is based on consent.

Contact us at privacy@mrefinegroup.com if you wish to contact our Data Protection Coordinator or otherwise exercise your rights.

You also have the right to lodge a complaint with the Swedish Authority for Privacy Protection (IMY).