

Privacy Policy

Your privacy is our business. Foxway protects your privacy by making sure to collect and handle personal information in a responsible way. Our privacy policy dives deep into exactly how Foxway collects and uses your personal information. It's highlighting your rights when it comes to personal data and how you can argue your rights.

"Foxway", "we" "our", or "us" refers to Foxway AB and all Foxway Group companies acting as Joint Controllers. In accordance with EU data protection legislation, we are responsible for the personal data that you provided us with, or that we collected from you. All processing of your personal data by Foxway is done in accordance with applicable data protection legislation.

1 General

Foxway AB (Group Joint Controller)

Grusåsvägen 7, 352 45 Växjö, Sweden (Registered number: 556470-0309)

Foxway Finance AB (Service Joint Controller)

Grusåsvägen 7, 352 Grusåsvägen 7, 352 45 Växjö, Sweden (Registered number: 556812-9877)

Foxway Services AB (Service Joint Controller)

Evenemangsvägen 21 169 79, Solna, Stockholm, Sweden (Registered number: 556972-9782)

Foxway Education AB (Service Joint Controller)

Anders Carlssons gata 9, 417 55 Gothenburg, Sweden (Registered number: 556746-4440)

Greentech Denmark Aps (Service Joint Controller)

Th. Bergs Gade 12, 9900 Frederikshavn, Denmark (Registered number: 33503474)

Foxway AS (Service Joint Controller)

Fokserødveien 31, 3241 Sandefjord, Norway (Registered number: 913506952)

Foxway Oy (Service Joint Controller)

Voivalantie 26A, FI-20780 Kaarina, Finland (Registered number: 2855562-2)

Foxway Circular UK Ltd (Service Joint Controller)

4 Bradbury Park, Bradbury Drive, Braintree, Essex, United Kingdom CM7 2DH (Registered number: 10010176)

Foxway A/S (Service Joint Controller)

Delta 6, 8382 Hinnerup, Denmark (Registered number: 18759136)

Foxway OÜ (Service Joint Controller)

Killustiku Põik 1, Raadi, 60534 Tartu maakond, Estonia (Registered number: 12703942)

Foxway GmbH (Service Joint Controller)

Nymphenburger Str. 82, 80636 Munich, Germany (Registered number: HRB 202638)

Foxway Ibérica SL (Service Joint Controller)

C. Casas de Miravete, 24C, edificio 4 piso 2 local 2, Vallecas, 28031 Madrid, Spain (Registered number: B85727535)

Foxway Remanufacturing ApS (Service Joint Controller)

Delta 6, 8382 Hinnerup, Denmark (Registered number: 38267086)

Foxway Latvia SIA (Service Joint Controller)



Indras iela 32 k-1, Krāslava, Krāslavas nov., LV-5601, Latvia (Registered number: 41503079616)

Foxway Distribution Germany GmbH (Service Joint Controller)

Südportal 5, 22848 Norderstedt, Germany (Registered number: HRB 146541)

Foxway Distribution Spain SL (Service Joint Controller)

Avenida Puerta del Ángel 36, 08002 Barcelona, España (Registered number: B09847716)

Foxway Poland Sp. z o.o. (Service Joint Controller)

Williama Heerleina Lindleya 16, 02-013 Warsaw; Mazowieckie, Poland (Registered number: 821-267-93-48)

Foxway France SAS (Service Joint Controller)

129 AV DE Geneve 7 4000 Annecy, France (Registered number: 941 470 619)

Foxway Romania S.R.L. (Service Joint Controller)

Str. Rasaritului Nr. 47D, 070000 Buftea, Ilfov, Romania (Registered number: J1996002627400)

Contact Foxway's Data Protection Officer at any time at privacy@foxway.com to exercise your rights under applicable data protection laws.

2 Data processing

Foxway is responsible for the personal data collected and processed by us and our subcontractors within the framework of our services (the "Foxway Services") and for the processing of personal data through our digital channels, such as this website and/or other digital touchpoints.

2.1 Types of processed data

- Name
- Address data (street, house number, postal code and city)
- Contact data (e.g. email, phone numbers)
- Content data (e.g. text entries, history, photo)
- Mobile devices data (e.g. IMEI, SN)
- Contract data (e.g. contract number, invoice number)
- Payment data (e.g. BIC, IBAN)
- Usage data (e.g. visited websites, access times, location)
- Meta/communications data (e.g. device information, IP addresses)
- identification numbers (e.g. customer account number)

Foxway does not process special categories of personal data.

2.2 Categories of Data Subjects

"User", "you" or "yours" refers to you as the visitors, supplier's, partner's, vendor's, customer's and users of Foxway Services.

2.3 Purpose of processing



When processing data, Foxway ensures compliance with contractual, legal, and security obligations while enhancing service functionality and user experience. Whenever possible, only anonymized data will be used to achieve these objectives. We process your personal data for the following purposes:

2.3.1 Provide and Administrate Your Access to Foxway Services

Foxway Services processing personal data might consist of ordering products, selling products, purchasing products, asset management, product support, repair, data wiping, logistics, warehousing, financing reporting or sign up for events. Foxway must process User data to verify identity, create and manage accounts, and facilitate authentication for secure access. This includes managing subscriptions, user preferences, and permissions within the service environment.

2.3.2 Fulfill Our Contractual and Legal Obligations

Data processing ensures that Foxway can comply with agreements made with users. Legal obligations such as invoicing, tax regulations, financial reporting, and compliance with data protection laws (e.g., GDPR) require the collection and storage of certain User information.

2.3.3 To Answer Customer Service Issues

User interactions and queries require data processing to identify accounts, track service usage, and resolve complaints or inquiries efficiently. This may include analyzing previous interactions and troubleshooting service issues.

2.3.4 Data Analytics

Data analytics help tailor Foxway Services to individual User preferences, optimizing functionality and navigation. user behavior insights allow for a more personalized experience, enhancing usability and efficiency. Where possible, anonymized data will be utilized to enhance the user experience.

2.3.5 Secure Information and Infrastructure to Provide Foxway Services

Security measures such as encryption, fraud detection, and access control mechanisms rely on data processing. Monitoring and logging User activities help prevent unauthorized access and maintain the integrity of the system. Processing data aids in detecting suspicious activities, preventing fraudulent transactions, and mitigating security risks. This includes identifying policy violations, restricting unauthorized activities, and conducting internal investigations if necessary. Wherever possible, anonymized data will be used to prevent and investigate misuse without compromising security.

2.3.6 Further Develop the Foxway Services

Collected data supports product improvements, feature enhancements, and innovation in services. Feedback analysis and usage statistics help identify trends and areas for technological advancements. Anonymized data will be prioritized for development purposes.

2.3.7 Processing of Personal Data in the Context of Job Applications

If you apply for a position with us, we process the personal data you provide as part of the application process (e.g., contact details, résumé, certificates, qualifications). This data is processed solely for the purpose of carrying out the application procedure and making a decision regarding the establishment of an employment relationship. Your data will only be shared internally with individuals involved in the specific recruitment process. It will not be

disclosed to third parties. If no employment relationship is established, your data will be deleted no later than six months after the conclusion of the application process, unless legal retention obligations apply or you have explicitly consented to longer storage (e.g., for inclusion in a talent pool).

3 Cookies

Cookies are a standard technology consisting of small text files stored on the User's device. We use both first-party cookies and third-party cookies, which might receive your personal data. They help enhance browsing experience by making the website more convenient and secure. Additionally, cookies can be used to tailor website content to visitors' interests or improve offerings through statistical analysis. The processing of personal data through cookies that are essential for the website's operation and functionality is carried out as necessary. All other cookies (Analytics, Marketing and Personalization) require your consent, which can be managed via our consent banner with the checked-cookie-button you will always find at the bottom of the website.

Users can also manage their cookie preferences through their browser settings, or our cookies consent manager. However, it is important to note that disabling cookies may limit or even prevent certain website functionalities.

4 Legal bases and storage period

Unless explicitly stated otherwise, we retain your personal data only for as long as necessary to fulfill the intended purposes or as required by applicable retention regulations. Additionally, your data will be deleted once it is no longer needed to comply with contractual or legal retention obligations (e.g., tax and commercial law requirements) or to address potential warranty and similar obligations.

We may also retain your personal data for the purpose of asserting, exercising, or defending legal claims. If your data can no longer be processed for its original purpose but is still subject to retention requirements, it will be archived and removed from active processing or storage locations. It will then be fully deleted from operational systems, with access strictly restricted.

Once all retention obligations have been met, legal rights to storage have expired, and applicable deletion periods have lapsed, the relevant data will be permanently deleted as part of our routine processes.

5 Your rights as a Data Subject

Under applicable law, you are entitled to the following rights concerning your personal data. If you wish to exercise these rights, please submit your request to the Data Protection Officer via email or postal mail, ensuring that your identity is clearly stated (see Section 1).

The easiest and most convenient way is to use this [Data Subject Rights Request Form](#).

5.1 Right of access

You have the right to request confirmation from us regarding whether your personal data is being processed. If so, you are entitled to receive, at no cost, information about the personal data we have stored about you, along with a copy of that data.

5.2 Right to rectification



You have the right to request the prompt correction of any inaccurate personal data we hold about you. Additionally, considering the intended purposes, you may also request the completion of any incomplete personal data, including through a supplementary statement.

5.3 Right to erasure ("Right to be forgotten")

You have the right to request the immediate deletion of your personal data, and we are obligated to comply unless legal or contractual obligations require us to retain certain records. In such cases, further processing of your data will be restricted.

If we have made your personal data public and are required to erase it, we will take appropriate measures, considering available technology, implementation costs, and technical feasibility, to inform relevant data controllers of your request to delete any copies or replications of the data.

5.4 Right to restriction of processing

You have the right to request a restriction on the processing of your data, particularly in cases where immediate deletion is not feasible. Additionally, you may ask us to limit processing to only the personal data essential for the provision of our Foxway Services.

5.5 Right to data portability

You have the right to obtain the personal data you have provided to us in a structured, commonly used, and machine-readable format. Additionally, you have the right to transfer this data to another controller without any interference from us.

5.6 Right to object

You have the right to object, at any time and for reasons related to your particular situation, to the processing of your personal data, including profiling based on relevant provisions. In such cases, we will cease processing your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

5.7 Right of withdrawal of a declaration of consent given under data protection law

You have the right to withdraw your previously given consent for data processing at any time, without the need to provide a reason. If there is no other legal basis justifying the continued processing of your data, your personal information must be promptly deleted. Otherwise, the processing of your personal data must be temporarily restricted (blocked).

5.8 Right to appeal to a supervisory authority

You have the right to appeal to a supervisory authority, particularly in the Member State of your residence, workplace, or the location where the alleged infringement occurred, if you believe that the processing of your personal data is unlawful.

6 Data security

We are committed to ensuring the security of your personal data in accordance with applicable data protection laws and the best available technical measures. To protect your data from accidental or unlawful destruction, loss, alteration, unauthorized access, disclosure, or any other unlawful forms of processing, we implement a range of technical, physical, and organizational safeguards.

All personal data transmissions, including order processing and customer logins, are encrypted using the SSL (Secure Socket Layer) protocol. However, we must highlight that data



transmission over the Internet, particularly via email communication, may still present security vulnerabilities, and complete protection cannot be guaranteed.

Access to personal data is strictly controlled and limited to authorized personnel, who can only retrieve data via encrypted connections. By default, access to personal data is blocked, and only employees with specific authorization are granted access based on a strict role and permission framework. Furthermore, our system's performance and availability are continuously monitored by both internal and external services to maintain security and reliability. Our technical and organizational security measures are regularly updated to align with the latest technological advancements.

While we strive to provide uninterrupted service, we cannot guarantee availability at all times, as occasional disturbances, interruptions, or failures may occur. In the unfortunate event of a data breach that poses a risk to your personal information, we will promptly notify you and the relevant regulatory authorities. Our notification will include details on the extent of the breach, the data involved, potential impacts on the service, and the measures we are taking to secure the data and mitigate any adverse effects.

7 Automated decision-making

No automated decision-making will be done on the basis of the collected personal data.

8 Transfer of data to third parties, data transfer to non-EU/EEA countries

8.1 General

We generally use your personal data exclusively within our company. Foxway may share your personal data to partners who perform services on behalf of Foxway. These recipients only have the right to process your personal data in connection with performing a service for Foxway. Your data will only be shared with third parties under specific circumstances: if you have given your explicit consent, if the transfer is necessary for the fulfillment of a contract, if we are legally required to do so (e.g., for tax compliance or participation in criminal investigations), or if the transfer is necessary to protect our legitimate interests, provided that your fundamental rights and freedoms requiring the protection of personal data do not outweigh these interests.

When third parties are involved in fulfilling contractual obligations, they will receive personal data only to the extent necessary for the provision of their respective services. If we engage external service providers for data processing, we ensure through contractual agreements that they process personal data strictly in compliance with data protection laws and this Privacy Policy, while also safeguarding the rights of the individuals concerned.

Furthermore, the transfer of personal data to institutions or individuals outside the EU/EEA is only permitted under the conditions set out in Article 44 and subsequent provisions GDPR. In such cases, adequate protection is ensured through appropriate safeguards, such as the EU Commission's standard contractual clauses.

8.2 Website Hosting

The hosting services provided by Microsoft Azure (Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland), DigitalOcean LLC (101 Avenue of the Americas, 10th Floor, New York, NY 10013, USA), Amazon Web Services EMEA SARL (38 Avenue John F. Kennedy, L-1855, Luxembourg) and Zendesk (Zendesk, Inc., 181 Fremont St, San Francisco, CA 94105, USA; and Zendesk



International Limited, 55 Charlemont Place, Saint Kevin's, Dublin D02 F985, Ireland) support the operation of our online platform and our support platform by providing essential infrastructure and platform services, computing capacity, storage space, database systems, security measures and technical maintenance.

For the operation of our support platform, Zendesk processes personal data submitted via support requests (e.g., contact details and ticket content) on our behalf as a data processor and may use vetted sub-processors to provide the Services (e.g., cloud infrastructure and security services).

To enhance security, we also use the Cloudflare Web Application Firewall (Cloudflare, Inc., 101 Townsend St, San Francisco, CA 94107, USA). This service helps us protect our website against malicious traffic, attacks, and unauthorized access attempts.

The processing of your personal data is based on our legitimate interest in ensuring the efficient and secure operation of this online platform (Art. 6 (1) (f) GDPR). Where hosting and related services are required to fulfill user contracts (e.g., for account management or order processing), processing may also be based on Art. 6 (1) (b) GDPR.

Data may be stored within the EU/EEA regions (e.g., Ireland for AWS and Azure) but can also involve transfers to the United States when necessary. In such cases, providers like AWS, Microsoft, DigitalOcean, Cloudflare, and Zendesk participate in the EU-U.S. Data Privacy Framework, which regulates the lawful and secure transfer of personal data from EU citizens to the US. More information about this framework is available on the website of the European Commission. More information on this framework is available at [European Commission](#).

Further details on data protection and IT security can be found at the privacy policies of the respective providers:

- [Microsoft Privacy](#)
- [DigitalOcean Privacy](#)
- [Cloudflare Privacy](#)
- [AWS Privacy](#)
- [Zendesk Privacy](#)

9 Changes to the Data Protection Declaration

We reserve the right to make changes to this Privacy Policy. If such changes occur, the latest version will be available on our website, www.foxway.com.