Privacy Policy for the Return Portal

Supplemental information about the processing of personal data

This Privacy Policy explains how personal data is processed when you register and track a return through the Axjo Return Portal. It supplements the Axjo Group Privacy Policy available at www.axjo.com/privacy-policy. The Group Privacy Policy describes, among other matters, your rights, our shared security principles, and how Axjo handles international data transfers. If the information differs, this more specific Policy applies to processing carried out through the Return Portal.

1. Responsibility for personal data

The Axjo company with which you register the return and which is responsible for handling the return case is the controller. Its identity will be stated in the Return Portal, the applicable return information, or the confirmation you receive when registering the return. Other Axjo Group companies may process personal data on behalf of the responsible company or may be responsible for a defined part of the processing. You may contact privacy@axjo.com at any time to identify the company responsible for a particular case.

2. Personal data we process

Depending on the return case, we may process the following categories of personal data:

- the contact person's name, job title, telephone number, and email address;
- company name, company registration or VAT number, customer or supplier number, and invoicing details;
- address, collection location, and other delivery or transport information;
- information about the products or packaging being returned, including quantities, condition, photographs, and other documentation;
- banking, payment, or credit information where required for payment or financial settlement;
- messages and other communications relating to the return case; and
- technical information, such as IP address, timestamps, account information, and security or event logs.

3. Sources of personal data

The information is normally provided by you or by the company or organization you represent. Certain information is generated when the Return Portal is used or obtained from Axjo's existing customer, supplier, and business systems to avoid errors and administer the case.

4. Why we process personal data

Purpose	Processing	Legal basis
Handle the return	Register, administer, arrange transport, follow up, and communicate about the return case.	Contract or legitimate interests
Financial administration	Register the customer as a supplier, make a payment or issue a credit, and administer the financial settlement.	Contract or legitimate interests
Accounting	Retain documentation required for accounting, tax, audit, and other legal records.	Legal obligation
Security and support	Protect accounts and systems, troubleshoot, prevent misuse, and investigate incidents.	Legitimate interests and legal obligation

Where processing is based on legitimate interests, those interests consist of providing and administering an effective return system, managing the business relationship, and protecting our operations and systems. We have assessed that the processing is necessary and that these interests are not normally overridden by the rights and interests of the individual.

5. How personal data is processed in our systems

The Return Portal is hosted in Axjo's Microsoft Azure environment in the West Europe region in the Netherlands. Customer and contact information registered in connection with a return case is stored in Axjo's local SQL environment in Sweden.
When a return is registered, the information required to handle the case is transferred to Axjo's Pyramid enterprise resource planning system. The customer is registered as a supplier so that Axjo can administer the return, make any applicable payment or issue a credit, and comply with accounting requirements. Pyramid and its database are operated in Axjo's local IT environment in Sweden.

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6. Who may access personal data

Personal data is available to authorized employees who need it to manage the return case, transport, financial administration, support, or security. Information may also be shared with:

- other relevant Axjo companies where a return case is handled across company or national borders;
- Microsoft and other providers of IT operations, support, and business systems that process personal data on behalf of Axjo;
- transport providers and recycling or logistics partners where necessary to complete the return;
- banks and payment service providers where payment or crediting is required; and
- public authorities, auditors, or advisers where disclosure is required by law or necessary to protect legal interests.

Service providers processing personal data on behalf of Axjo may use the information only in accordance with Axjo's instructions and are subject to contractual requirements concerning data protection, confidentiality, and security. Axjo does not sell personal data registered in the Return Portal.

7. Processing outside the EU and EEA

The primary processing and storage of Return Portal information takes place within the EU and EEA. If a service provider or Axjo company processes or accesses personal data outside the EU and EEA in a particular case, Axjo ensures that the processing is covered by a permitted transfer mechanism and, where required, supplementary safeguards. Further information is available in the Axjo Group Privacy Policy.

8. How long we retain personal data

Information in the Return Portal and related business systems is retained for as long as it is needed to administer and follow up the return case. It is then deleted or anonymized unless it must be retained for longer for accounting, tax, contractual commitments, complaints, limitation periods, or legal claims. Information forming part of accounting records is retained for the period required by applicable law.

The information is backed up using Veeam, and the backup copies are stored on Axjo-owned storage devices in Swedish data centers. Backup copies are retained for up to four months and are then overwritten in accordance with Axjo's established backup procedures. If information is restored from a backup, the restored information remains subject to the same deletion requirements as the original information.

9. How we protect personal data

Axjo uses technical and organizational security measures appropriate to the risks associated with the processing. These measures include access controls, authentication, logging, backup, system monitoring, updates, and protection against unauthorized access. Access is limited to people who need the information for their work.

10. When information must be provided

Information marked as mandatory is required to identify the person registering the return, arrange and complete the return, and manage any financial settlement. If the information is not provided, Axjo may be unable to register or complete the return case.

11. Cookies and technical information

The Return Portal may use cookies and similar technologies that are necessary for login, security, language settings, and the Portal's core functions. If other cookies are used, additional information will be provided and, where required, you will be able to provide or withdraw consent through the Portal's cookie settings.

12. Your rights

You may have the right to access your personal data, request correction or deletion, request restriction, object to processing based on legitimate interests, and, where the relevant conditions are met, receive certain information in a portable format. These rights and any applicable limitations are described in greater detail in the Axjo Group Privacy Policy.

13. Contact

Questions about processing in the Return Portal or requests to exercise a data protection right may be sent to privacy@axjo.com. Please state the relevant return case and Axjo company where possible, but do not send sensitive information or complete payment details by ordinary email.

14. Changes to this Policy

We may update this Policy when the Return Portal, our procedures, or applicable rules change. The latest version will be made available in the Return Portal or on the Axjo website. Where material changes are made, we will provide appropriate notice.