

The scope of the privacy policy

This privacy policy applies to the personal data of existing and potential customers, partners, applicants, sourced or referred candidates, and other external parties and website visitors of NCAB Group ("NCAB") that is collected or used by NCAB Group AB or its subsidiaries. NCAB appreciates the interest you have shown in our company, products and services by visiting our website www.ncabgroup.com, or related communication channels, including, but not limited to, our social media pages.

This privacy policy applies to all the personal data that NCAB collects when you interact with NCAB such as when you visit our websites, when you apply for a job position, when you purchase NCAB products or services, when you subscribe to newsletters, when you contact customer support, and when you interact with NCAB as an existing or potential customer, supplier or business partner, etc.

NCAB takes your privacy seriously. Protecting the personal rights and privacy of each and every individual is the foundation of trust in NCAB's business relationships. With respect for your privacy, NCAB collects and process your personal data responsibly.

What is personal data and what does processing mean?

Personal data includes all information that can be directly or indirectly linked to a living individual, i.e. data such as name, personal identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing is more or less any use of personal data. According to law, processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who is responsible for your personal data?

The controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. NCAB Group AB Mariehällsvägen 37 A 168 65 Bromma, with company registration number 556733-0161, is responsible for the processing of personal data and is responsible for guaranteeing that the processing within the NCAB Group is performed in accordance with the law.

Purpose, categories, lawful basis and retention times.

The legal basis for the processing of personal data by NCAB, within the scope of business operations, will vary depending on what personal data is being processed and for what purpose the processing of personal data is performed. NCAB will collect and process data about suppliers and business partners in order to manage customer relationships, facilitating information access and to enhance communication in order to fulfill agreements and legal obligations. NCAB will also process your personal data as part of a recruitment process. Furthermore, personal data is processed in order for NCAB to comply with its legal statutory obligations stated in applicable legislation, such as labor laws, accounting laws, and other financial regulations.

NCAB will retain customer personal data for the purpose of fulfilling contractual obligations, satisfying our legitimate interests and managing and meeting any legal demand. The retention times will vary and will ultimately depend on what purpose the personal data has been collected for and will be subject to local law in each of the countries where we conduct operations.

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Personal data concerning customers, suppliers and business partners regarding verifications will be retained in compliance with the laws in each of the countries where we conduct operations.

Customer relationships

To manage our customer relationship

NCAB will collect and process personal customer data within the scope of our customer relationship processes. The personal data is collected and processed for the following purposes:

- Improve and optimize customer offering such as product development and product features;
- Managing general customer inquiries;
- Storing customers preferences for future interactions and communications from NCAB;
- Providing basis for market and customer analysis; market research; statistics; business tracking; and business and method development related to the purchase of goods and services.

From where do we get your personal data?

The data that we process is collected from the registered, external monitoring (such as web, social media), personal contacts and other public sources. Data is also collected if you choose to register in our customer portals.

The following personal data may be processed within our customer relationship:

Categories of personal data	Lawful basis
Contact information (such as name, e-mail address and telephone number) Customer category Contact preferences	Article 6.1 f GDPR – legitimate interest. The processing of the personal data is necessary to satisfy NCAB’s legitimate interest of being able to maintain, improve and document customer relationships and related activities.
Retention period: NCAB will keep your personal data for the above stated purpose for up to 24 months. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

In addition, NCAB will collect and process personal customer data when such processing is necessary for the performance of a contractual obligation. The personal data is collected and processed for the following purposes:

- Completing obligations to customers such as execution of purchase, invoicing and providing support,
- Providing the products and services ordered,
- Fulfilling other obligations in accordance with a customer agreement.
- Information exchange regarding the design of our products involving the customer

The following personal data may be processed to fulfil a contractual obligation:

Categories of personal data	Lawful basis
Contact information (such as name, e-mail address and telephone number) Customer category Contact preferences	Article 6.1 b GDPR – contract. The processing of the personal data is necessary to fulfil contractual obligations.

Retention period: NCAB will keep your personal data for as long as necessary in order to fulfil NCAB Group's contractual obligations. NCAB will keep your personal data for up to 24 months after the fulfillment of contractual obligations. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.

NCAB will also collect and process personal data in order to identify and develop potential customers relationships and to present offers. During the first interaction between a potential customer and NCAB, we will share information with the potential customer about the collecting and processing of personal data, pertaining to the rights of the potential customer as stipulated by the GDPR. These rights include the right to rectify, the right to object to the processing and the right to lodge a complaint with a supervisory authority, to name a few.

The following personal data may be processed to satisfy NCAB's legitimate interest:

Categories of personal data	Lawful basis
Contact information (such as name, e-mail address and telephone number) Position within the company	Article 6.1 f GDPR – legitimate interest. The processing of the personal data is necessary to satisfy NCAB's legitimate interest of being able to reach out to new potential customers.
Retention period: NCAB will keep your personal data for as long as customer interaction is ongoing. If you don't interact with us we will delete your information after 24 months of non-activity. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

Partner relationships

To manage our partner relationships

NCAB will process personal data in order to manage our partner relationships.

From where do we get your personal data?

The data that we process is collected from the registered, external monitoring (such as web, social media) personal contacts and other public sources. Data is also collected if you choose to register in our customer portals.

The following personal data may be processed within our partner relationship:

Categories of personal data	Lawful basis
Contact information (such as name, e-mail address and telephone number) Position within the company	Article 6.1 f GDPR – legitimate interest. The processing of the personal data is necessary to satisfy NCAB's legitimate interest of managing our partner relationships.
Retention period: NCAB will keep your personal data for as long as partner interaction is ongoing. If you don't interact with us we will delete your information after 24 months of non-activity. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

Recruitment process

Job applications and recruitment process

In the context of a recruitment process, NCAB will collect and process your personal data as an applicant, sourced or referred candidate- before, during and after the recruitment process.

From where do we get your personal data?

NCAB collects personal data which you provide us, either directly or indirectly, in connection to the recruitment process. Such examples include your CV, Cover Letter and test results.

NCAB will collect the personal data which has been provided by a Recruitment Agency, if such an agency has been used to aid the recruitment process.

NCAB regularly contact persons of reference towards the end of a recruitment process. In such a case, NCAB will collect your personal data provided by the person of reference.

In certain situations, NCAB will gather public information, which have been made readily available through social media platforms, to be used in assessment of an application.

When and why do we process your personal data?

In general, NCAB process your personal data as part of a recruitment process.

To manage the recruitment process

NCAB process your personal data to receive and review your application documents – for example CV and Cover Letter – and to evaluate your application. It is necessary that you provide us with the data needed for us to be able to evaluate your application. The personal data you provide will be used to communicate with you throughout the recruitment process.

In case NCAB want to save your personal data for possible future recruitment, we will ask for your consent. This is the standard procedure should you provide us with an open application.

The following personal data may be processed to manage the recruitment process:

Categories of personal data	Lawful basis
Personal data NCAB process in connection with your application: Photo and audio data Demographical data Identity data, including personal number Data pertaining to competence and qualification Contact information Data pertaining to Union membership Data pertaining to personal assessment by reference Data pertaining to social conditions	Article 6.1 b GDPR – contract. The processing of the personal data is necessary to take necessary measures before the applicant enter into a possible employment contract with NCAB. With regards to particular categories of personal data, such as data pertaining to health or Union Membership, will only be processed by NCAB if you provide us with such data voluntarily and with reference to your explicit consent.
Retention period: NCAB will keep your personal data during the recruitment process for the above stated purpose for up to 24 months. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

To perform controls, to run tests and character assessments

NCAB will, in certain circumstances, perform controls, run tests and character assessments as part of the recruitment process. In such a case, NCAB will inform you that controls have been performed and tests and character assessments have been run; and NCAB will ask you to provide consent for such processing for this purpose.

The following personal data may be processed to run tests and character assessments:

Categories of personal data	Lawful basis
Identity data, including personal number Data pertaining to test results	Article 6.1 a GDPR – consent. The processing will be carried out with your consent. With regards to particular categories of personal data, such as data pertaining to your health, will only be processed by NCAB with reference to your explicit consent.
Retention period: NCAB will keep your personal data during the recruitment process for the above stated purpose for up to 24 months, starting from the time of a completed recruitment process, provided that you have not withdrawn your consent. After 24 months, or after you have withdrawn your consent, your personal data will be deleted. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

To manage future recruitment

NCAB will, if you provide your consent, process your personal data after a completed recruitment process, and NCAB will provide you with a newsletter if you have opted for such a service, with the purpose of being able to contact you if NCAB would like to recruit you to a position that matches your profile.

The following personal data may be processed to manage future recruitment:

Categories of personal data	Lawful basis
Photo and audio data Demographical data Identity data, including personal number Data pertaining to competence and qualification Contact information Data pertaining to Union membership Data pertaining to personal assessment by reference Data pertaining to social conditions	Article 6.1 a GDPR – consent. The processing will be carried out with your consent. With regards to particular categories of personal data, such as data pertaining to health or Union Membership, will only be processed by NCAB if you provide us with such data voluntarily and with reference to your explicit consent.
Retention period: NCAB will keep your personal data during the recruitment process for the above stated purpose for up to 24 months, starting from the time of a completed recruitment process, provided that you have not withdrawn your consent. After 24 months, or after you have withdrawn your consent, your personal data will be deleted. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

To evaluate and perform follow up assessments of the recruitment process

NCAB will process your personal data in order to evaluate and perform follow up routines in connection with the recruitment process. NCAB will, more specifically, perform such processing in order to produce reports and statistics regarding the number of applications per position, and the number of applications in general.

The following personal data may be processed to evaluate and perform follow up assessments of the recruitment process:

Categories of personal data	Lawful basis
Employment data Demographical data Identity data Data pertaining to competence and qualification Organizational data	Article 6.1 f GDPR – legitimate interest. The processing of the personal data is necessary to satisfy NCAB’s legitimate interest to evaluate and perform follow up routines in connection with the recruitment process.
Retention period: NCAB will keep your personal data during the recruitment process for the above stated purpose for up to 24 months, starting from the time of a completed recruitment process. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

To perform legal obligations

NCAB has to process your personal data in order to fulfill NCAB’s legal obligations. These obligations can be derived from, for example, national labor law regulations.

The following personal data may be processed to perform legal obligations:

Categories of personal data	Lawful basis
All personal data necessary with regards to any given legal obligation.	Article 6.1 c GDPR – legal obligation. Processing of the personal data is necessary to fulfill NCAB’s legal obligations.
Retention period: NCAB will keep your personal data for as long as necessary in order to fulfil NCAB Group’s legal obligations. NCAB will keep your personal data for up to 24 months after the fulfillment of NCAB’s legal obligations. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

To manage and meet legal demands

NCAB has to process your personal data to manage and respond appropriately to legal demands, in case of litigation or legal process.

The following personal data may be processed to manage and meet legal demands:

Categories of personal data	Lawful basis
All personal data collected by NCAB, deemed necessary with regards to any particular case, in order to investigate and prevent fraud, other legal violations, and to manage legal demands.	Article 6.1 f GDPR – legitimate interest. The processing of the personal data is necessary to satisfy NCAB’s legitimate interest to manage and meet legal demands, for example, in case of litigation or legal process. With regards to particular categories of personal data, such as data pertaining to health or Union Membership, will only be processed by NCAB if necessary, to manage and meet legal demands.
Retention period: In case of legal demands, NCAB will keep your personal data for as long as necessary in order to manage or meet the legal demands.	

Shareholders

NCAB will process the personal data of shareholders in order to maintain the register of shareholders, identifying shareholders, facilitating general meetings and exercising voting rights.

From where do we get your personal data?

The data that we process is collected directly from shareholders and agencies.

The following personal data may be processed to fulfill the legal obligations of keeping a register of shareholders:

Categories of personal data	Lawful basis
Contact information Identity data, including personal number Dates of acquisition/sales Shareholding Voting rights Pledges	Article 6.1 c GDPR – legal obligation. Processing of the personal data is necessary to fulfill NCAB’s legal obligations.
Retention period: NCAB will keep your personal data for as long as necessary in order to fulfill NCAB Group’s legal obligations according to Swedish corporate and tax legislation. NCAB will keep your personal data for up to 24 months after the fulfillment of NCAB’s legal obligations. In case of legal demands, we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

The following personal data may be processed to satisfy NCAB’s legitimate interest of identifying shareholders:

Categories of personal data	Lawful basis
Contact information Identity data, including personal number	Article 6.1 f GDPR – legitimate interest. Processing of the personal data is necessary to satisfy NCAB’s legitimate interest of identifying shareholders.

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Retention period: Upon identification, NCAB will keep your personal data for as long as necessary in order to fulfil NCAB Group's legal obligations according to Swedish corporate and tax legislation. NCAB will keep your personal data for up to 24 months after the fulfillment of NCAB's legal obligations. In case of legal demands we will keep your personal data for a longer period of 24 months, for the purpose of serving our legitimate interest of managing the legal demands.

The following personal data may be processed to fulfill the legal obligations to hold general meetings.

Categories of personal data	Lawful basis
Contact information Identity data, including personal number	Article 6.1 c GDPR – legal obligation. Processing of the personal data is necessary to fulfill NCAB's legal obligations.
Retention period: NCAB will keep your personal data for as long as necessary in order to fulfil NCAB Group's legal obligations according to Swedish corporate and tax legislation. NCAB will keep your personal data for up to 24 months after the fulfillment of NCAB's legal obligations. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

The following personal data may be processed to fulfill the legal obligations of ensuring that shareholders can exercise their voting rights:

Categories of personal data	Lawful basis
Contact information Identity data, including personal number Shareholding Voting rights	Article 6.1 c GDPR – legal obligation. Processing of the personal data is necessary to fulfill NCAB's legal obligations.
Retention period: NCAB will keep your personal data for as long as necessary in order to fulfil NCAB Group's legal obligations according to Swedish corporate and tax legislation. NCAB will keep your personal data for up to 24 months after the fulfillment of NCAB's legal obligations. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

Potential investors

NCAB will process the personal data of potential investors who have subscribed to press releases and financial information.

From where do we get your personal data?

The data that we process is collected from those registered when they subscribe to press releases and financial information.

The following personal data may be processed in order to provide press releases and financial information:

Categories of personal data	Lawful basis
Email address	Article 6.1 c GDPR – consent. Processing of the personal data will only be carried out with your consent.
Retention period: NCAB will keep your personal data as long as the subscription is active. After cancellation of the subscription we will keep your data for up to 24 months. In case of legal demands we will keep your personal data for a longer period than 24 months, for the purpose of serving our legitimate interest of managing the legal demands.	

Cookies

What are cookies?

Cookies are small text files with information that are stored on your computer (or other Internet enabled devices, such as smartphones or tablets) when you visit a website. A cookie normally contains the name of the website it originates from, the duration period of the cookie (i.e. how long the cookie will be stored on your device) and a value, which is usually a randomly generated unique number.

What does NCAB Group use cookies for?

Cookies are used to make our website work more efficiently, but also to provide us with certain information. Cookies make it possible to distinguish between users, which in itself can give each user a more customized and positive experience of the website.

Cookies that are used on the websites

There are five types of cookies on the websites:

- Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.
- Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

To see the current list of cookies please click [here](#)

How you block and/or delete cookies

If you do not want that your computer or other device accepts or stores cookies you can change your settings here or you could change your settings in your browser. Some parts of our website can only be used to the full extent if your browser allows cookies.

The following personal data may be processed in order to customize and enhance a visitor's website experience:

Categories of personal data	Lawful basis
Cookies	Article 6.1 a GDPR – consent. The processing will be carried out with your consent.
Retention period: Please click here to see the retention times of different cookies.	

Recipients with whom NCAB shares your personal data in certain situations

NCAB needs to, in certain situations, share your personal data with other recipients. In such a case, the recipient will be responsible for making sure that your personal data is being processed in a secure and lawful way. When you interact with NCAB as a supplier or business partner, NCAB may disclose personal data to another business partner and or a supplier, such as factories, warehouses and transportation suppliers.

NCAB shares personal data with the following:

Suppliers

NCAB shares your personal data with the company's suppliers. These companies may only process your personal data in accordance with the clear instructions given by NCAB and these companies may not process your personal data for their own ends.

- NCAB shall only appoint processors who can provide sufficient guarantees that the requirements of the GDPR will be met and the rights of data subjects protected.
- The processor shall not engage another processor without prior specific or general written authorization of NCAB. In the case of general written authorization, the processor shall inform NCAB of any intended changes concerning the addition or replacement of other processors, thereby giving NCAB the opportunity to object to such changes.
- Processing by a processor shall be governed by a contract or other legal act under Union or Member State law.
- Data processing agreements shall be established. Each business unit within NCAB shall review their data processing agreements to ensure that agreements are in place and updated according to the new regulation.

NCAB is responsible for how your personal data is being processed by the suppliers performing tasks for NCAB.

Government agencies and public authorities

NCAB is obliged, in certain situations, to provide government agencies and public authorities with the personal data collected by NCAB. This includes disclosing personal data in response to lawful requests by national security or law enforcement. We might also share your personal data collected by NCAB, in order to manage and meet all kinds of legal demands. Such sharing of your personal data is necessary to satisfy our legitimate interest to manage and meet all kinds of legal demands, for example, in case of litigation or legal process.

Unions and Employers' organizations

NCAB will in certain situations, share your personal data collected by NCAB, with Unions and employers' organizations, in connection with the recruitment process. This is done by NCAB in order to fulfill legal obligations, which can be derived from, for example, national labor law regulations. NCAB might also share your personal data, collected by us in connection with the recruitment process, in order to manage and meet legal demands, for example, in case of litigation or legal process.

External advisors

NCAB will, if necessary, in order to manage and meet a legal demand, share your personal data collected by us, with external advisors such as law firms. This kind of sharing of your personal data is necessary to satisfy NCAB's legitimate interest to manage and meet legal demands, for example, in case of litigation or legal process. In addition, NCAB may share your personal data collected by us with PR agencies, customer survey and marketing providers and other parties bearing a necessary relationship for NCAB to provide its services.

International transfers outside EU/EEA

NCAB may disclose personal data to companies within NCAB that may be located in countries outside the EU/EEA. NCAB needs to ensure adequate protection of personal data when transferred outside the EU/EEA.

Personal data may also be disclosed to external parties, such as service providers which process personal data under the instructions of NCAB. Where such disclosure entails transfers of personal data outside the EU/EEA, NCAB will ensure that appropriate safeguards will be put in place prior to such transfers.

NCAB commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

NCAB is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Individuals have the possibility, under certain conditions, to invoke binding arbitration.

NCAB is liable in cases of onward transfers to third parties.

Your rights

Once NCAB have collected your personal data, you are entitled to:

- Request confirmation whether or not personal data is processed and obtain access to your information;

- Object to any processing of your personal data processed on the basis of a legitimate interest, on grounds relating to your particular situation;
- Have your personal data erased under certain circumstances, e.g., for direct marketing;
- Restrict the processing of your personal data under certain circumstances;
- Request information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”).

To exercise any of the rights mentioned above we refer you to the contact person in each country or the Data Protection Officer (for contact details see below).

You always have the right to lodge complaints pertaining to the processing of your personal data to the competent supervisory authority responsible for data protection matters.

Appropriate safeguards

NCAB recognizes and takes our responsibility seriously to protect the personal data you entrust to NCAB from loss, misuse or unauthorized access. NCAB uses a variety of security technologies and organizational procedures to help protect your personal data. For example, access controls, firewalls, antispam, antivirus and secure servers. We encrypt certain types of data, such as financial information and other sensitive data.

The level of security measures implemented shall correspond with the measures that NCAB has identified as appropriate to ensure and to be able to demonstrate that processing is performed in accordance with GDPR.

Where such disclosure entails transfers of personal data outside the EU/EEA, NCAB must ensure that sufficient safeguards will be put in place prior to protect transfers.

Changes to this privacy policy

NCAB reserve the right to change or add to this privacy policy from time to time and will post any material revisions on our websites. We will post a prominent policy on our privacy policy page to notify you of any significant changes to this privacy policy and will indicate at the top of the policy when it was most recently updated. We encourage you to check back often to review the latest version.

Contact information

If you have any queries about how NCAB treat your information, the contents of this privacy policy or your rights under local law, please contact our Data Protection Officer Salma Syed at NCAB; salma.syed@ncabgroup.com or phone no. +46 8 403 000 10, or any of the contact person in each country, see contact details below:

Country	Local contact person	E-mail
Benelux	Jeroen Verbeek	jeroen.verbeek@ncabgroup.com
China Factory Management	Alen Liang	alen.liang@ncabgroup.com
China Sales	Kathy Xie	kathy.xie@ncabgroup.com
Denmark	Claus Bue Olsen	claus.bue.olsen@ncabgroup.com
Finland	Ari-Pekka Tenko	ari-pekka.tenko@ncabgroup.com
France	Nicolas Chauveau	nicolas.chauveau@ncabgroup.com
Germany	Claire-Lise Sarnin	claire-lise.sarnin@ncabgroup.com
Italy	Pascal Lequerre	pascal.lequerre@ncabgroup.com

North Macedonia	Slobodan Shokoski	slobodan.shokoski@ncabgroup.com
Malaysia	Vacancy	
Norway	Vegar Slåttum	vegar.slattum@ncabgroup.com
Poland	Katarzyna Klimek	katarzyna.klimek@ncabgroup.com
Portugal	Ingrid Cazalis	ingrid.cazalis@ncabgroup.com
Russia	Vladimir Makarov	makarov@ncabgroup.com
Spain	Ingrid Cazalis	ingrid.cazalis@ncabgroup.com
Sweden	Marie Lundborg	marie.lundborg@ncabgroup.com
United Kingdom	Leanne Seymour	leanne.seymour@ncabgroup.com
USA	Steven Davis	steven.davis@ncabgroup.com

Controller:

NCAB Group AB
Mariehällsvägen 37 A
168 65 Bromma
Sweden
Phone: 08-403 000 50

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