

Klaravik AB Privacy Policy

We care about your privacy and want you to feel confident about how we at Klaravik AB process your personal data. In this privacy policy, we explain how we process your personal data when you visit our websites, when you shop and place bids, when you sell through us, and when you contact us regarding various matters. You can read, amongst other things, about what personal data we collect, how we use it, your rights, and the measures we take to ensure it is processed securely.

1 Data Controller

When you visit, sell or shop with Klaravik AB, company registration number 556881-8693, Tynäsgatan 10, 652 16 Karlstad, we will process your personal data. Klaravik AB is the data controller. The terms "we", "our", "our and us" below refer to Klaravik AB.

You will find the contact details for Klaravik AB's data protection officer in section 8.

2 Explanation of definitions and terms

Our processing of personal data is governed by the (EU) 2016/679 (General Data Protection Regulation) and other laws and regulations. The privacy policy therefore contains certain terms derived from legislation. To help you understand the privacy policy, we would like to explain some of the terms used in the text. If you have any questions, please feel free to contact us using the contact details in section 8 below.

"Personal data" means any information that we can directly or indirectly link to you as a natural person. The Privacy Policy describes in more detail the types of personal data we process for various purposes.

"Data controller" means the party that determines why and how personal data is to be processed, and is responsible for ensuring that processing is carried out in accordance with the law. It is Klaravik AB as an organisation that is the data controller, not individual employees working at Klaravik.

"Processing" means any handling of personal data, such as collection, recording, organisation, storage, adaptation, alteration, transmission or consultation. Processing usually takes place automatically within systems.

We consider a "customer relationship" to exist between you and us when you create an account or are a selling customer to us. When the customer relationship ceases depends on when the contractual obligations between us have been fulfilled. "**Legitimate** interest" means an interest that Klaravik pursues in its business and which is acceptable under the law. Our privacy policy describes in more detail the circumstances in which we process personal data to pursue our legitimate interests.

3 How we process your personal data

3.1 When you visit our websites, interact with us or take part in a competition on social media

Below you will find more information about the purposes for which we use your personal data, the legal basis for doing so, and how long we retain your data when you visit our websites and our app or interact with us on social media.

Some of the personal data we process about you when you visit the website is collected via cookies. You can read more about how we use cookies in our [cookie policy](#).

3.1.1 Ensuring that our websites function correctly, optimising our websites, monitoring visitor statistics and improving your experience of our websites		
Description	Personal data processed	Legal basis
<p>Analysing how you interact with us on our websites using anonymised data on how our visitors use the website via third-party tools.</p> <p>To provide necessary functions on our websites, such as navigation, bid history and access to your account.</p> <p>When you opt out of analytics and marketing cookies, certain anonymised signals are still sent to our analytics and advertising partners (e.g. Google). These contain no identifiable information and are used only in aggregated form to improve website functionality and statistics.</p> <p>Customise our websites to suit your preferences and settings.</p>	<p>From you: IP address, information about the hardware and software you use, browser settings, time zone.</p> <p>Behaviour and visitor statistics on pages you visit on the website and bidding/purchase history</p>	<p>Consent via cookie for marketing and analysis</p> <p>Legitimate interest in being able to provide necessary functions on our websites.</p>
<p>Retention period: The retention period varies depending on which cookies are set in your browser and which tools are used. See our cookie policy for more information. See section 4 of this privacy policy specifically regarding retention periods.</p>		
3.1.2 To provide you with personalised offers and marketing on our websites		
Description	Personal data processed	Legal basis

When you visit our websites, we may display personalised information.	From you: Bids/purchase history, website behaviour, visitor statistics.	Consent Legitimate interest in being able to provide you with information and offers that match your preferences and needs.
---	--	--

Retention period: The retention period varies depending on which personalisation cookies are set in your browser. See our cookie policy for more information. See section 4 of this privacy policy specifically regarding retention periods.

3.1.3 Conducting and administering competitions and prizes

Description	Personal data processed	Legal basis
Administering competitions. Providing gift vouchers and other prizes in competitions administered by us or a third party. Communicating with you in connection with the competition.	From you or the third party administering the competition: Name, email address, postal address, telephone number, customer number and communications with you.	Legitimate interest in being able to organise competitions and prizes for customers and potential customers.

Retention period: See section 4 of this privacy policy for specific details on retention periods.

3.2 When you place a bid and make a purchase with us

When you make a purchase or place a bid with us, we need to process your personal data in order to, among other things, handle your purchase and payment, manage our customer relationship with you, and provide our services in a satisfactory manner. For example, we process your personal data when you create an account with us, if you contact our customer service, for the maintenance of our websites, and for marketing purposes. In the table below, you will find more detailed information on how we process your personal data when you place a bid and purchase an item through us.

3.2.1 Administering, providing and maintaining your customer account		
Description	Personal data processed	Legal basis

<p>Providing you with a customer account on our websites where, by logging in, you can, for example update your information, manage consents, and access your purchase history and bids.</p> <p>Where applicable, technical troubleshooting.</p>	<p>From you: Name, address, personal identification number, telephone number, email address, customer number, bid history, purchase history, login details.</p> <p>The above data may also be obtained from public registers and providers of banking, business and market information.</p>	<p>Performance of a contract.</p> <p><i>Without this processing, we cannot provide and maintain your customer account.</i></p>
<p>Retention period: For as long as you have an account or are logged in to our websites. Please refer specifically to section 4 of this privacy policy regarding retention periods.</p>		

3.2.2 Managing orders, purchases and delivery

Description	Personal data processed	Legal basis
<p>To enable and process bids and purchases on our websites.</p> <p>To process payments.</p> <p>Send you information relating to your bids and purchases.</p> <p>To handle returns and complaints.</p> <p>Passing on information to the buyer/seller to complete the transaction.</p>	<p>From you: Name, address, personal identification number, telephone number, email address, customer number, order details, delivery address, collection point, delivery status, payment details, etc.</p>	<p>Fulfilment of the contract.</p> <p><i>Without this processing, we cannot complete the purchase.</i></p> <p>Fulfilment of a legal obligation to uphold your rights under consumer law.</p>

Retention period: For as long as there are rights and/or obligations associated with the purchase. See section 4 of this privacy policy for specific details on retention periods.

3.2.3 Providing customer service and support to you when you contact us, as well as follow-up and quality assurance of customer service work

Description	Personal data processed	Legal basis
<p>Handling various matters such as enquiries, complaints, returns, claims and other matters via email, telephone, chat and our social media channels.</p>	<p>From you: Information you provide to us in connection with the communication, such as your name, telephone number, email address and customer number</p>	<p>Performance of a contract</p> <p><i>Without this processing, we cannot handle your enquiry.</i> https://www.klaravik.se/cookies.html</p> <p>Legitimate interest in providing you with good customer service.</p>

Recording of telephone calls for customer service evaluation.		
---	--	--

3.2.4 Preventing and deterring our business from being exploited for fraud, abuse and other crimes

Description	Personal data processed	Legal basis
<p>We verify that you are who you claim to be, for example when you log in to our websites, place bids, make purchases, or interact with us or in other contexts.</p> <p>We analyse your behaviour to prevent our business from being exploited for fraud, for example through identity theft.</p>	<p>From you: Name, personal identification number, telephone number, purchase history, address, email address, IP address, etc.</p>	<p>Legitimate interest in preventing and deterring the misuse of our websites or our business for fraudulent purposes against us or third parties.</p>

Retention period: Once your identity has been verified and your session has ended. See section 4 of this privacy policy for specific details on retention periods.

3.2.5 Improving our business, products, services and offers

Description	Personal data processed	Legal basis
<p>Carrying out statistical compilations and analyses of our business.</p> <p>Carrying out analyses of you, your preferences, behaviour and interests.</p> <p>The emails we send contain tracking links which allow us to identify whether and when you have opened an email and which links you have clicked on.</p>	<p>From you: Bid history, purchase history, information about your purchase, your preferences, interactions on our websites and visitor statistics (including data collected via cookies, see section 3.1 above), and how you have interacted with our emails.</p>	<p>Legitimate interest in getting to know our customers and their preferences, thereby enabling us to develop our business and to evaluate and optimise our email campaigns.</p>

Retention period: For as long as you are a customer of ours; see section 4 of this privacy policy for specific details on retention periods.

3.2.6 Marketing of our business, products and services, as well as information during ongoing auctions.

Description	Personal data processed	Legal basis
-------------	-------------------------	-------------

For marketing purposes and to provide information during ongoing auctions in which you are a bidder. we send emails and text messages to you or push notifications via our app. For example, we may send newsletters and offers or remind you of bidding, outbidding or a won auction.	From you: Name, email address, telephone number, and the results of our analyses of you as a customer, bidding history, previous purchases, your preferences and behaviour on the website.	Consent upon acceptance of marketing cookies. As well as our legitimate interest in information during ongoing bidding.
---	---	--

Retention period: See section 4 of this privacy policy for specific details on retention periods.

3.2.6.1 Marketing of our business, products and services via third-party platforms

Description	Personal data processed	Legal basis
We process personal data to market our services and products to you via third-party platforms such as Meta Platforms Ireland Ltd. (Facebook, Instagram) and Google LLC (Google Ads, YouTube). The purpose is to create targeted advertising (known as “remarketing” or “custom audiences”), improve the relevance of adverts, and measure the effectiveness of campaigns.	The data that may be shared includes, for example, your email address, IP address, cookies, and information about your profile/user behaviour on our website.	Consent pursuant to Article 6(1)(a) of the GDPR: When you accept marketing cookies in our cookie banner.

3.2.7 Managing customer reviews and customer surveys to analyse and develop our business

Description	Personal data processed	Legal basis
Offering you the opportunity to complete customer surveys via external services and analyse these to better understand your experience. Enable you to submit a review and publish it on our website via, for example, Trustpilot.	From you: Bid/purchase history, information about your order, interactions on our websites and visitor statistics, payment method and information you provide in your review or in your response.	Legitimate interest in quality assurance and developing our business, and monitoring customer satisfaction.

Retention period: Customer reviews via Trustpilot remain permanently on the Trustpilot website and can be removed via your Trustpilot account. Read Trustpilot's privacy policy for more information: <https://se.legal.trustpilot.com/for-reviewers/end-user-privacy-terms>

3.2.8 Complying with legal obligations regarding accounting

Description	Personal data processed	Legal basis
Maintaining accounting records. Defending sales during audits.	From you: Name, address, telephone number, customer number, personal identification number, email address, purchase history, payment details.	Compliance with a legal obligation (Accounting Act (1999:1078)). <i>Without this processing, we cannot fulfil our legal obligations.</i>

Retention period: See section 4 of this privacy policy for specific details on retention periods.

3.2.9 Defend, establish or assert legal claims in the event of a dispute or offence.

Description	Personal data processed	Legal basis
In the event of a dispute or suspected crime, we may need to use personal data, for example to <ul style="list-style-type: none"> defend a sale in an intellectual property matter report suspected fraud, theft or other offences handle consumer law matters 	From you: Name, address, telephone number, customer number, personal identification number, email address, order information, delivery and payment information, IP address, interactions.	Legitimate interest in being able to defend, establish or assert legal claims.

Retention period: See section 4 of this privacy policy for specific details on retention periods.

3.3 Payment for your purchase

When you make a purchase from us, we process your personal data in order to handle your payment.

The table below provides more detailed information on how we process your personal data when you use our various payment options

3.3.1 Transfer of data to financial partners

Description	Personal data processed	Legal basis
-------------	-------------------------	-------------

<p>If, as a buyer, you choose to request assistance with financing a property, we will transfer data about you and your company to one of our financial partners. This transfer is made to enable contact and further processing of your financing request.</p>	<p>From you: Company name Company registration number Contact person's name Email Telephone</p>	<p>Our legitimate interest in facilitating contact and the further processing of your financing enquiry via a partner.</p>
<p>Retention period: The data is processed in accordance with the partner's own terms and conditions and privacy policy; see the lender's policy on their respective website. See section 4 of this privacy policy for specific details on retention periods</p>		

3.3.1 Payment via invoice provider		
Description	Personal data processed	Legal basis
<p>To enable the sending of invoices to customers following a completed purchase.</p>	<p>From you: Name, company name, address, personal identification number/ company registration number, telephone number, information about the items you have purchased.</p>	<p>Performance of the contract with you.</p>
<p>Retention period: The data is processed in accordance with the partner's own terms and conditions and privacy policy; please refer to the lender's policy on their respective website. Please refer specifically to section 4 of this privacy policy regarding retention periods.</p>		

4 Retention periods

We retain personal data only for as long as is necessary for the purposes for which the data was collected. The retention period is determined, among other things, by the type of data involved, the purpose of the processing and any legal obligations.

Personal data is normally stored for the duration of your customer relationship with us. Data may subsequently be stored for a longer period if required by law or if necessary to establish, exercise or defend legal claims.

When personal data is no longer necessary for the purposes for which it is processed, it is securely deleted or anonymised. We work continuously to delete or anonymise data that no longer needs to be processed.

For example, accounting data is retained in accordance with accounting legislation, and data linked to contracts is retained for as long as necessary to handle legal claims.

5 How we share your personal data with others

We share your personal data with companies within the TBA Group, our partners or other parties who provide services on our behalf. Klaravik is always the data controller for the data you have provided to us. Below are examples of who we share your data with:

- Marketing partners and advertising networks, e.g. Meta, Google.
- Partners for payment services and payment solutions
- Freight forwarders and carriers for the delivery of products
- IT service providers, e.g. for email marketing and analysis. E.g. Bloomreach, Telavox for SMS services, Hubspot.
- Credit reference agencies and debt collection agencies
- Professional advisers and consultants

When we use partners and service providers who process personal data on our behalf, we enter into data processing agreements with the partner or provider to ensure that they process your personal data in accordance with this privacy policy and our instructions.

We may be required to share your data with authorities where required by law or by an official decision. We may also share your data with authorities where we otherwise have a legitimate interest in doing so, for example with the police where necessary to investigate fraud and other misuse of our website.

Klaravik AB may disclose your personal data to facilitate a merger, acquisition or sale of all, or part of, Klaravik's assets.

6 Transfer of data outside the EU and EEA

In certain situations, we transfer your personal data to partners or service providers located outside the EU and the EEA (so-called "third countries").

The third country to which we transfer personal data is primarily the USA. Transfers take place if you visit our websites and consent to our use of cookies, to provide customer reviews and other

user-generated content on our websites, when we process your personal data to market our properties via advertising networks and external channels, and when we send marketing emails using our service providers.

Before personal data is transferred to a recipient in a third country, we take certain measures to ensure that your personal data is protected in the same way as if it had remained within the EU and the EEA, including:

- that the European Commission has decided that the country outside the EU/EEA to which your personal data is transferred achieves an “adequate” level of protection equivalent to that provided by the GDPR. You can find more information about which countries are considered to have an “adequate level of protection” on [the European Commission's website](#), or
- that we have entered into [the European Commission's standard contractual clauses](#) with our service providers or partners who process personal data in third countries, or
- that the transfer is covered by the [EU-US Data Privacy Framework Adequacy Decision](#), which is a self-certification scheme for US companies,
- and that we have implemented additional technical and organisational security measures where necessary.

7 Your rights

When we process your personal data, you have certain rights under the law. You can find more information about these rights below. If you wish to exercise any of your rights, please contact us or our Data Protection Officer using the contact details provided below in section 8.

In order for you to exercise your rights, we need to be able to identify you securely. This is to ensure that unauthorised persons are not given the opportunity to access or alter your data. We will get back to you as soon as possible, and no later than one month, from the date we receive your request. If we are unable to respond to your request or need more time, we will explain why.

Right to information and access

You have the right to know whether or not we are processing personal data about you. If we are, you also have the right to receive information about what personal data we are processing and how we are processing it. You also have the right to receive a copy of the personal data we are processing about you.

If you are interested in specific information, please state this in your request. For example, you can specify whether you are interested in a particular type of data (e.g. what contact and identity details we process about you), or whether you would like information about data from a specific time period.

Right to rectification

If any of the personal data we process about you is inaccurate, you have the right to have it rectified. You also have the right to supplement incomplete personal data with further information necessary to ensure the data is accurate.

Once we have corrected your personal data, or supplemented it with new information, we will inform those to whom we have disclosed your data of the updated information, provided that this is not impossible or unduly burdensome. If you request it, we will also tell you to whom we have disclosed your data.

If you request a correction, you also have the right to request that we restrict our processing of your data whilst we investigate the matter.

If you have registered an account on any of our websites, you can always update your contact details in your profile settings.

Right to erasure

In certain cases, you have the right to request that we erase the personal data we hold about you. You have the right to have your data erased if:

- a) The data is no longer needed for the purposes for which it was collected
- b) We process your data solely on the basis of your consent and you withdraw your consent
- c) The data is used for direct marketing and you opt out of it
- d) You object to the processing of the data carried out on the basis of our legitimate interest and we cannot demonstrate that our reasons for the processing outweigh your interests
- e) The data has been used unlawfully
- f) Deletion is required to comply with a legal obligation.

In some cases, we are unable to delete all your personal data despite your request. This is because, in some cases, the data needs to be processed for the purpose for which it was collected, our interest in continuing to process the personal data outweighs your interest in having it erased, or the data is required for us to comply with legal requirements.

If we delete your data following your request, we will also inform those to whom we have disclosed the data of the deletion, provided that this is not impossible or unduly difficult. If you ask us, we will also tell you to whom we have disclosed your data.

Right to data portability

Data portability means that you have the right to receive the data we have collected about you, from you, in a structured, commonly used and machine-readable format, and that you have the right to transmit this to another data controller.

The right to data portability applies only to:

- a) To data collected about you,
- b) Where the processing is based on your consent or for the performance of a contract with you, and
- c) The data is not in paper format.

Right to object to our processing of personal data

You have the right to object to our processing of your personal data carried out on the basis of our legitimate interest. If you object to the processing, we will, based on your specific situation, assess whether our interests in processing the data outweigh your interests in the data not being processed for that purpose. If we cannot demonstrate compelling legitimate grounds that outweigh yours, we will cease the processing to which you object – provided that we do not need to process the data to establish, exercise or defend legal claims.

If you object to the processing, you also have the right to request restriction of processing whilst we investigate the matter. With regard to direct marketing, you always have the right to object to, and thereby opt out of, such processing.

Right to withdraw consent

You have the right to withdraw your consent to a specific processing activity at any time. Withdrawal does not affect the lawfulness of our processing prior to the withdrawal of consent.

Right to request restriction

Restriction means that the data is marked so that, in future, it may only be processed for certain limited purposes.

The right to restriction applies:

- a) When you believe the data is inaccurate and you have requested rectification. In such cases, you may also request that the processing of the data be restricted whilst we investigate whether the data is accurate or not,
- b) If the processing is unlawful and you do not want the data to be erased,

- c) When we no longer need to process the data for the purposes for which we collected it, but you need it to establish, exercise or defend legal claims, or
- d) If you have objected to the processing. In that case, you may request that we restrict the processing whilst we investigate whether our interest in processing your data outweighs your interests.

Even if you have requested that we restrict the processing of your data, we are entitled to use it for storage purposes, if we have obtained your consent to the processing, to assert or defend legal claims, or to protect someone's rights. We may also process the data for reasons relating to an important public interest.

We will inform you when the restriction ceases.

If we restrict the processing of your data, we will also inform those to whom we have disclosed the data of the restriction, provided that this is not impossible or would involve disproportionate effort. If you ask us, we will also tell you to whom we have disclosed your data.

Right to lodge a complaint

If you have any questions about our processing of your personal data, wish to exercise any of your rights, or have a complaint about the processing, please feel free to contact our Data Protection Officer using the contact details below.

The Swedish Data Protection Authority (IMY) is the supervisory authority responsible for our use of your personal data. If you are dissatisfied with our use of your personal data, you may also lodge a complaint with IMY. You also have the right to lodge a complaint regarding our processing of personal data with the supervisory authority in the country where you reside or work, or in the country where the processing of personal data with which you are dissatisfied has taken place.

Specifically regarding rights relating to PayEx and Nordea Finance, etc.

Klaravik AB is the data controller for the processing of personal data relating to our credit provider responsibilities until the invoice is transferred to our factoring partner, Nordea Finance, or another party. Thereafter, Nordea Finance, or another party, is the data controller for the processing of personal data specifically relating to your financial dealings connected to the transferred invoice. You can read more about how Nordea Finance and other entities – Nordea Finans Sverige AB, DNB Bank ASA, Swedish branch, and Edge & Gain AB – process your personal data and exercise your rights on their respective websites.

8 Changes

If we make changes to this privacy policy, we will publish an updated version here. In the event of significant changes, we will also notify you of the change in another appropriate manner, such as via our website, by email or through another suitable channel.

This privacy policy was last updated on 10 March 2026.

9 Contact

If you have any questions or would like us to explain any part of this privacy policy to you, please feel free to contact us.

Customer Service

Email: info@klaravik.se

Telephone: 054-151304

Data Protection Officer

Email: dpo@tbauctions.com