

	ViaCon Privacy Policy for Employees	Document number
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1. Introduction

This Privacy Policy (the “**Policy**”) describes how ViaCon Group (“**ViaCon**” “**we**”, “**us**” or “**our**”), processes your personal data as you are employed by us or has been employed by us.

We are responsible for the processing of your personal data as described in the Policy in the capacity of data controller. If you would like to know more about our processing of your personal data, you are welcome to contact us, e.g. via our email address: GDPR@viacongroup.com.

It is important to us that you feel comfortable with how we process your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes to the Policy, the new version will apply from the time it is published on our intranet [[Governance Policies \(sharepoint.com\)](#)]. At the top of the page, you can see when the Policy was last changed.

2. The scope of this Policy

The Policy covers our processing of personal data regarding you who are employed or has been employed by us.

3. How we collect your personal data

The personal data we process relating to you is collected directly from you or from others such as the local tax authority, insurance companies which we have entered into agreements with and, where applicable, health care partners, external recruitment companies, job coaches and/or references.

4. How we process your personal data

We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This means inter alia that we need to have a legal basis for the purposes for our processing of your personal data, which in our context generally means one of the following legal bases.

Performance of a contract – the processing is necessary in order for us to provide you with our services or otherwise perform a contract between us (this applies if you conduct your business in a sole proprietorship), or to take steps at your request prior to entering into a contract.

Performance of legal obligations – the processing is necessary in order to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are subject to orders or decisions by courts or authorities, which require us to process your personal data.

Legitimate interests – the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, provided that they are not overridden by your interests or fundamental rights or freedoms (in which case the processing would not be allowed).

Generally, the processing of your personal data takes place for personnel administrative purposes with reference to the fact that it is necessary for us to be able to fulfill our obligations according to the employment agreement between us, or due to the legal obligations to which we are subject as your employer.

In the respective table below, we explain in detail the categories of personal data we process, the purposes for which we process them and the legal bases on which our processing of your personal data is based, including how long the information about you is stored with us. In section 4.25 below there is also information on the conditions under which we can check, prepare access to and investigate your IT use, such as the use of computers, mobile phones, e-mail and the Internet and which complements the internal guidelines for managing IT-equipment of which you have been informed at any time of the current IT policy [Governance Policies \(sharepoint.com\)](http://sharepoint.com) .

4.1 Selection and recruitment

What we do and why:	The personal data that we process:
We will select and recruit candidates for our job offerings. To be able to do this we register candidates' personal data. We will also conduct personality and intelligence tests.	We will process your: <ul style="list-style-type: none">• First and last name.• Contact details: e-mail address, address and telephone number.• Application documents such as CV and personal letter.• Photo (if applicable).

	<ul style="list-style-type: none"> • Information provided about you during reference taking, such as assessments from previous employers. • Test results from personality and intelligence tests.
Our legal basis for processing:	
<p><i>Legitimate interest and legal obligation:</i> where our legitimate interest is to make it possible for us to evaluate your qualifications and personal qualities in connection with decisions on recruitment, and for fulfillment of a legal obligation to document information about education, professional experience and other qualifications for the persons employed to meet the requirements of local anti-discrimination laws, if applicable.</p>	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
<p>Until the recruitment process is completed and two (2) years thereafter and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).</p>	

4.2 Employment Contract

What we do and why:	The personal data that we process:
<p>We regulate rights and obligations between the employer and the employee, by entering into and storing employment contracts.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and telephone number • Personal identification number • Title • Salary • Pension information • Insurance • Vacation • Benefits

Our legal basis for processing:
<i>Performance of contract:</i> The processing is necessary for the performance of the contract with the employee.
How we share and transfer your data:
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. We will transfer your personal data to a third country as necessary for the use of our global HR system.
How long we keep your data:
Until the employment expires or is terminated, and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).

4.3 To assess conditions for employment in another country

What we do and why:	The personal data that we process:
<p>If applicable, to determine whether the conditions for employment are met, we can contact you and store information you provide us with, as well as internal communication about the information you have provided.</p> <p>This may include, where applicable, control of citizenship and work-permit/residence permit as well as notification to the applicable local tax agency.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details such as e-mail address and telephone number • Personal identity number (or equivalent information) • Copy of a decision from the local migration agency on residence and work permits • Residence permit card
Our legal basis for processing:	
<i>Legal obligation:</i> To control and document the right to reside and work in a country other than where you are a citizen and to inform the local tax agency of the employment in accordance with mandatory legislation.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • The local tax agency and the local migration agency when required by law, regulation or court or decision from an authority, for the purpose of fulfilling the legal obligation, 	

<ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>
How long we keep your data:
The data is kept for one (1) year after the termination of employment and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).

4.4 Staff development

What we do and why:	The personal data that we process:
<p>We will store information you have provided about your employment with us. We will also perform administration of employment development measures and documentation of implemented measures. The data will also be processed for contact and communication with you, and for staff appraisals.</p> <p>The personal data will be processed for staff development measures e.g., in the form of performance review, follow-up, planning and agreements regarding your employment and your implementation of professional development and training.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Position/Professional title • Work experience • Skills, qualifications and completed training programs • Work performance and evaluation of work performance • Documentation and notes from previous development interviews, planning and agreement regarding your employment
Our legal basis for processing:	
<i>Legitimate interest:</i> Our legitimate interest to improve our business and support the development of our employees.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	

The personal data is saved during the time you are employed by us. Certificate of education will be stored for one (1) year after the employment has been terminated or expired.

4.5 To administer salary, benefits, holiday leave and other absence

What we do and why:	The personal data that we process:
<p>We process your data to administer and fulfill obligations regarding salary, travel and expense compensation, absence, holiday leave and other leave and other benefits, including e.g., insurance and occupational pension.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Administration and communication regarding the received information. • Communication with affected parties, such as insurance companies. • Registration of employees in the HR and salary management system. • Registration and attestation of salary data and benefits. • Salary preparation, payroll specification and pay out. • Preparation and registration of warrants and bonus programs. • Reporting and payment of social fees and tax to the local tax agency. 	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Employment period, form of employment and terms of employment • Position/professional title • Worked hours • Salary, benefits and other compensation (e.g., warrants and bonus) • Travel and expenses compensation • Absence • Holidays and other leave • Insurance, pension and other benefits • Employers' contributions, social fees, and taxes • Personal identity number • Bank account number
<p>Our legal basis for processing:</p>	
<p><i>Performance of contract and legal obligation:</i> Our obligation to perform our undertakings under the contract entered into with the you, and our legal obligation to comply with requirements in local laws.</p>	
<p>How we share and transfer your data:</p>	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our insurance company, • The local pensions authority, 	

<ul style="list-style-type: none"> • The local tax agency, • Microsoft, our supplier of personnel administration services and HR-systems • Our supplier of local payroll management systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>
How long we keep your data:
The personal data will be stored as long as required by local accounting laws and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).

4.6 In order to provide employees with a company car

What we do and why:	The personal data that we process:
If you are eligible for a company car, we will process your personal data in order to be able to provide the car, as well as share your personal data with the car portal and processing your personal data for administration of car benefits in our salary system.	<p>We will process your:</p> <ul style="list-style-type: none"> • First- and last name • Contact details: e-mail address, address and phone number • Personal identification number • Registration number • Benefit taxation, net salary deductions
Our legal basis for processing:	
<i>Performance of a contract.</i> We need to process your personal data to fulfil our obligations in relation to the employment contract.	
<i>Legal obligation.</i> To comply with applicable tax regulations regarding benefit taxation.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • The local tax agency. • The car leasing company. <p>We will not transfer your personal data to a country outside the European Union (“EU”)/European Economic Area (“EEA”) within the scope of this processing activity.</p>	
How long we keep your data:	
The personal data will be stored for one (1) year after the end of the leasing agreement and for the time necessary in order for us to defend and/or establish legal claims (normally no	

longer than ten (10) years). Financial information will be stored as long as required by applicable local laws.

4.7 Salary revision

What we do and why:	The personal data that we process:
We will review salaries annually, and where applicable, share personal data with collective bargaining parties.	We will process your: <ul style="list-style-type: none"> • First and last name • Personal identification number • Title • Salary • Time of employment
Our legal basis for processing:	
<i>Legal obligation:</i> To document an annual review of salaries required by local laws, if applicable.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • Collective bargaining parties, if applicable. • Microsoft, our supplier of personnel administration services and HR-systems. We will transfer your personal data to a third country as necessary for the use of our global HR system.	
How long we keep your data:	
The personal data will be stored as long as required by local accounting laws and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).	

4.8 In order to administer and report your pension

What we do and why:	The personal data that we process:
We will administer pension, including reporting of pension, pensionable compensation, administration and payment of pension provision, as well as providing information to the local tax authority.	We will process your: <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and phone number • Personal identification number • Salary

	<ul style="list-style-type: none"> • Number of days worked per year • Time of employment
Our legal basis for processing:	
<p><i>Performance of a contract.</i> We need to process your personal data to fulfil our obligations in relation to the employment contract.</p> <p><i>Legal obligation.</i> We have a legal obligation in relation to applicable tax laws.</p>	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Relevant tax authority • Microsoft, our supplier of personnel administration services and HR-systems • Our supplier of salary systems • Private pension companies with whom we have an agreement. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
The data is stored for the time the employee have the right to pension from us.	

4.9 In order for us to administer your health insurance

What we do and why:	The personal data that we process:
If you have a health insurance, we will administer your health insurance, including reporting of contact details.	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and phone number • Personal identification number • Benefit taxation
Our legal basis for processing:	
<p><i>Legitimate interest.</i> We have a legitimate interest to administer our employees health insurance.</p>	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Relevant tax authority • Local social insurance authority, if applicable 	

<ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. • Our supplier of salary systems <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>
How long we keep your data:
The data is stored for the time of employment, and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).

4.10 Absence and rehabilitation measures

What we do and why:	The personal data that we process:
<p>We will process your personal data to administer and fulfill our obligations regarding salary/sick pay, absence, insurance, contacts with the local state insurance authority, if applicable, and other authorities, rehabilitation and adaptation measures and assessment of work ability.</p> <p>If applicable, this includes collection and storage of medical certificates (only to the extent necessary to fulfil our obligation to report to the local social insurance agency) and management and monitoring of health matters/rehabilitation.</p> <p>If applicable, we will also report and communicate with the local social insurance agency.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and telephone number • Personal identification number • Salary • Employment rate • Absence • Time reported • Medical certificate (if necessary)
Our legal basis for processing:	
<p><i>Performance of contract and legal obligation:</i> Performance of the employment contract with you and fulfillment of legal obligations for us as an employer such as, if applicable, our legal obligation to administer employee rehabilitation as required by local laws. If applicable, upon request, report information on social insurance to the local social insurance agency according to local laws.</p>	
How we share and transfer your data:	
We will share your personal data with the following recipients:	

<ul style="list-style-type: none"> • The local social insurance agency, • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>
How long we keep your data:
The personal data is saved for the time needed for us to be able to fulfill our commitments and obligations. E.g., accounting information will be stored as long as required by local accounting laws and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).

4.11 Emergency contacts

What we do and why:	The personal data that we process:
If you have provided us with your emergency contact, we will register your next of kin and contact your next of kin in case of emergency, such as an accident or serious illness.	<p>We will process your next of kin's</p> <ul style="list-style-type: none"> • First and last name • Telephone number
Our legal basis for processing:	
<i>Legitimate interest:</i> Our legitimate interest is to be able to contact and inform the emergency contact that you have stated to us, if an accident should occur or if you should become seriously ill during working hours.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
Until the employment is terminated or expires, unless the employee or the employee's next of kin requests erasure of the personal data before the termination or expiration of the employment.	

4.12 Questions concerning work related injuries

What we do and why:	The personal data that we process:
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<p>For questions concerning work related injuries, we will collect and store medical certificates (only to the extent necessary to fulfil our obligation to report to the local social insurance agency).</p> <p>This includes management and monitoring of health matters as well as reporting and communicating with the local social insurance agency and local work environment authority (if applicable).</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and telephone number • Personal identification number • Salary • Employment rate • Absence • Time reported • Medical certificate, injury and/or disease (if necessary)
Our legal basis for processing:	
<p><i>Legal obligation:</i> We have a legal obligation to manage and follow up on work related injuries to authorities in case required by local laws and submit information regarding occupational injury insurance to the local social insurance agency according to the local social insurance code.</p>	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • The local work environment authority, • The local social insurance agency, • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
<p>For the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).</p>	

4.13 Measures to prevent discrimination

What we do and why:	The personal data that we process:
<p>We document measures taken in order to prevent discrimination at the workplace, this includes documentation of salaries and other remunerations, as well as measures taken to prevent discrimination.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Personal identification number • Gender

<p>We will also collect data to share it with collective bargaining parties (if applicable).</p>	<ul style="list-style-type: none"> • Salary • Age • Department • Title and education • Task assignment • Time of employment
<p>Our legal basis for processing:</p>	
<p><i>Legal obligation:</i> in order to document measures taken to prevent discrimination at the workplace, required by local laws, if applicable.</p>	
<p>How we share and transfer your data:</p>	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Collective bargaining parties, if applicable. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>	
<p>How long we keep your data:</p>	
<p>The personal data is saved during the time you are employed by us and during time found necessary in order to determine, exercise or defend legal claims (normally not longer than ten (10) years).</p>	

4.14 Misbehavior/Misconduct

<p>What we do and why:</p>	<p>The personal data that we process:</p>
<p>We collect facts and data together with documentation of conversations, and where applicable, negotiations with collective bargaining parties, in order to manage personnel cases concerning misbehaviour/misconduct.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and telephone number • Personal identification number • Facts and data about the misbehaviour/misconduct
<p>Our legal basis for processing:</p>	
<p><i>Legitimate interest and legal obligation:</i> We have a legitimate interest to manage personnel cases concerning the employees' misbehaviour/misconduct. If applicable, we may have the legal obligation to negotiate with the collective bargaining parties and to document such negotiation as required to local employment laws.</p>	

How we share and transfer your data:
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Collective bargaining parties, if applicable. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>
How long we keep your data:
<p>Until the personnel case concerning misbehaviour/misconduct has been closed, and for the time necessary in order for us to defend and/or establish legal claims (normally no longer than ten (10) years).</p>

4.15 In order to be able to carry out employee surveys

What we do and why:	The personal data that we process:
<p>We will process your personal data in order to be able to carry out employee surveys.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • E-mail address • Department
Our legal basis for processing:	
<p><i>Legitimate interest:</i> We have a legitimate interest to be able to carry out employee surveys.</p>	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
<p>The personal data will be stored for three (3) years after that the employee survey has been carried out.</p>	

4.16 Obligations and rights in connection with the termination of the employment

What we do and why:	The personal data that we process:
<p>We will process your personal data in order to fulfil obligations in connection with the termination of the employment,</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Personal identification number

<p>e.g., calculate time of employment that may be required by local laws as to calculate the list of seniority or to regulate benefits.</p>	<ul style="list-style-type: none"> • The date of beginning and end of the employment • Form and terms of employment • Employment number • The reason for termination of the employment and what has been agreed between the employer and the employee in connection with the termination of employment
<p>Our legal basis for processing:</p>	
<p><i>Legitimate interest:</i> Our legitimate interests is to be able to determine, exercise or defend legal claims in relation to the termination of employment or preferential right to re-employment.</p> <p><i>Legal obligation:</i> We have an obligation to calculate time of employment according to local laws.</p>	
<p>How we share and transfer your data:</p>	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Collective bargaining parties, if applicable. • Microsoft, our supplier of personnel administration services and HR-systems. • Our supplier of salary systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
<p>How long we keep your data:</p>	
<p>The personal data is saved during the time you are employed by us and during time found necessary in order to determine, exercise or defend legal claims (normally not longer than ten (10) years).</p>	

4.17 Certificate, referral, grade

<p>What we do and why:</p>	<p>The personal data that we process:</p>
<p>We gather information concerning salary and term of employment in order to provide certificates, referrals and grades.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and telephone number • Personal identification number

	<ul style="list-style-type: none"> • Time of employment • Task assignment • Grade
Our legal basis for processing:	
<i>Legitimate interest:</i> We have a legitimate interest to, upon the employee's or previous employee's request, provide certificates, referrals and grades.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. • Our supplier of salary systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
We will store your data for two (2) years after the employment has been terminated or expired.	

4.18 Employer's certificate

What we do and why:	The personal data that we process:
We gather information concerning salary and term of employment in order to issue employer's certificates.	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address, address and telephone number • Personal identification number • Salary • Title • Time of employment • Reported time
Our legal basis for processing:	
<i>Legal obligation:</i> We have a legal obligation to, upon request, issue an employer's certificate as required by local unemployment insurance laws.	
How we share and transfer your data:	
We will share your personal data with the following recipients:	

<ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>
How long we keep your data:
We will store your data for ten (10) years after the employment has been terminated or expired.

4.19 Documentation requirements with collective bargaining parties

What we do and why:	The personal data that we process:
We establish records of negotiations with collective bargaining parties.	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • The personal data relevant for the negotiation
Our legal basis for processing:	
<i>Legal obligation:</i> Our legal obligation to keep minutes at the request of a party as required by the local laws.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Collective bargaining parties, if applicable. • Microsoft, our supplier of personnel administration services and HR-systems. <p>We will transfer your personal data to a third country as necessary for the use of our global HR system.</p>	
How long we keep your data:	
The personal data is stored for ten (10) years after the relevant negotiation.	

4.20 External communication on website

What we do and why:	The personal data that we process:
<p>We will process your data to enable external communication on our website. The processing is performed to present you as an employee with a management or customer-oriented position on our website, to manage communication tools, to register contacts in</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Picture • Contact details: e-mail address, address, and telephone number

telephone/contact registers, and to contact through letters, e-mail, messages or telephone.	<ul style="list-style-type: none"> Position/professional title and professional competence as well as, where applicable, professional experience or other information that describes you as an employee
Our legal basis for processing:	
<i>Legitimate interest:</i> Our legitimate interest is to enable us to market our services, competence and employees.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> Our customers and possible customers. Our suppliers. Visitors on our website. We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.	
How long we keep your data:	
We will keep your data until the employment expires or is terminated. The employee can request deletion of picture before the termination of the employment.	

4.21 Description of the organization

What we do and why:	The personal data that we process:
We process your data in order to be able to describe the organization and who works with what, including a matrix over responsibilities, role description and distribution.	We will process your: <ul style="list-style-type: none"> First and last name Contact details: e-mail address, address and telephone number Department /organization Position/Professional title Picture
Our legal basis for processing:	
<i>Legitimate interest:</i> Our legitimate interest is to be able to describe and present the organization and describe who works with what.	
How we share and transfer your data:	
We will share your personal data with the following recipients:	

<ul style="list-style-type: none"> • Our customers and possible customers. • Our suppliers. • Visitors on our website. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>
<p>How long we keep your data:</p>
<p>The data will be kept for three (3) years after the organization scheme has been published. Personal data about which employees that work with what will be saved until the employment expires or is terminated. The employee can request deletion of picture before the termination of the employment.</p>

4.22 Publication on our website and in marketing material

What we do and why:	The personal data that we process:
<p>We will process your personal data in order to be able to make publications on our website and in other marketing materials if you are in a manager position or if you have communication with our customers.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address and phone number • Department • Title • Photo
<p>Our legal basis for processing:</p>	
<p><i>Legitimate interest:</i> We have a legitimate interest to be able to market our services, to provide your contact details and describe your role.</p>	
<p>How we share and transfer your data:</p>	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our customers and possible customers. • Our suppliers. • Other collaboration partners. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>	
<p>How long we keep your data:</p>	
<p>We will store your personal data until the end of your employment. The employee can request deletion of picture before the termination of the employment.</p>	

4.23 Invoicing and receiving payment

What we do and why:	The personal data that we process:
In case you are a contact person to a customer, supplier or another partner, we will process your personal data to be able to invoice and receive payment.	We will process your: <ul style="list-style-type: none"> • First and last name • Relevant cost centre • Department
Our legal basis for processing:	
<i>Legitimate interest:</i> Our legitimate interest is to be able to send invoices and receiving payments.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • Our customers. • Our suppliers. • Other collaboration partners. We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.	
How long we keep your data:	
The data is kept for as long as required according to local accounting laws.	

4.24 Access control

What we do and why:	The personal data that we process:
In order to administer and control permissions and access to premises and information to check the connection of an individual to a key card and check registration of entry and exit.	We will process your: <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address and telephone number • Logging information regarding entry and exit on our premises
Our legal basis for processing:	
<i>Legitimate interest:</i> where our legitimate interest is to ensure that unauthorized access to our premises does not occur.	

How we share and transfer your data:
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our supplier of IT-systems. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>
How long we keep your data:
<p>The personal data is saved during the time you are employed by us and is then normally deleted within one (1) month. Logging information is normally stored for one (1) month from the time it is registered.</p>

4.25 In order to control compliance with our IT policy

What we do and why:	The personal data that we process:
<p>We will process your personal data in order to ensure compliance with our policies regarding IT equipment (e.g. computer, e-mail and phone number), as well as control registers, software etc.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address • Computer and phone • Information about your use of the IT equipment
Our legal basis for processing:	
<p><i>Legitimate interest:</i> We have a legitimate interest to ensure compliance with our IT policy in the event of serious suspicion of breach of our IT policy, misconduct or criminal behavior.</p>	
How we share and transfer your data:	
<p>We will not share your personal data with any recipients.</p>	
How long we keep your data:	
<p>The personal data is saved during the time you are employed by us and during time found necessary in order to determine, exercise or defend legal claims (normally not longer than ten (10) years).</p>	

4.26 To be able to provide an electronic personnel ledger/register worked hours

What we do and why:	The personal data we process:
<p>We process your personal data to administer access control and control permissions and access to premises and</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name. • Department.

workplaces to prevent access from unauthorized persons, including the installation and operation of access control systems and the connection of the employee to access cards or tags, registration of entry and exit in an electronic personnel ledger or to maintain a register of worked hours.	<ul style="list-style-type: none"> • Social security number/coordination number or foreign social security number. • Time of entry and exit. • Entry card or entry tag.
Our legal basis for the processing:	
<i>Legal obligation.</i> We have an obligation to fulfill documentation requirements in local tax law and/or labour law.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • The local tax agency. We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.	
How long we keep your data:	
The data is stored for two (2) years from the end of the calendar year in which the tax year has ended.	

4.27 To be able to administer telephone subscriptions

What we do and why:	The personal data we process:
We process your personal data in order to be able to administer and pay for telephone subscriptions and terminals (such as mobile phones) used during employment.	We will process your: <ul style="list-style-type: none"> • First and last name. • Telephone number. • Telephone (unit number). • Use of mobile data. • Department.
Our legal basis for the processing:	
<i>Legitimate interest.</i> We have a legitimate interest in being able to make payment for telephone subscriptions used by you in your employment.	
How we share and transfer your data:	
We will share your personal data with the following recipients:	

<ul style="list-style-type: none"> • Our terminal provider, as well as our telephone subscription provider. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>
How long we keep your data:
The data is stored for as long as required by the applicable local accounting laws.

4.28 To manage reports of violations of the law within the framework of our internal whistleblowing function

What we do and why:	The personal data we process:
<p>We process your personal data in order to handle reports received in accordance with the ViaCon Whistleblower Policy, e.g., regarding persons in key positions or leading positions or other employees and their violations of law, including the collection of reports via the whistleblowing system, administration and communication to those to whom the reports concern, and the usual handling, follow-up and documentation of the content of the report and arising issues in connection therewith.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name. • Contact details: e-mail address, address and telephone number • Registration history and registration number. • Employment information (such as job title, employee identification number and responsibility role). • Images and audio recordings. • Personal data related to convictions in criminal cases, suspicion of and / or actual violations of the law in the form of violations of, for example, the relevant local anti-money laundering laws.
Our legal basis for the processing:	
<p><i>Legal obligation.</i> The processing is necessary to fulfill our legal obligations based on the requirements of the applicable “whistleblower” laws.</p>	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our external legal advisor. • PWC, our external partner who manages the reports. • Your labor organisation, if applicable. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>	

How long we keep your data:
For this purpose, we will process your personal data until the investigation case is closed and for the time necessary for the establishment, exercise or defense of legal claims (normally no longer than ten (10) years).

4.29 To investigate reports of violations of the law within the framework of our internal whistleblowing function

What we do and why:	The personal data we process:
We process your personal data in order to handle reports received in accordance with the ViaCon Whistleblower Policy, e.g., regarding persons in key positions or leading positions or other employees and their violations of law, including the usual handling, follow-up and documentation of the content and questions of the report, the collection of information from the IT equipment and digital systems that you as an employee use within the framework of your employment and which we control, review of the information obtained from the IT equipment and digital systems that you as an employee use within the framework of your employment, conducting interviews within the framework of the investigation, and, where applicable, contact with the relevant authorities.	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name. • Contact details: e-mail address, address and telephone number. • Registration history and registration number. • Employment information (such as job title, employee identification number and responsibility role). • Images and audio recordings. • Communications history data. • Web history data. • User history from the IT equipment and digital systems that you as an employee use within the framework of your employment and which we control. • Personal data related to convictions in criminal cases, suspicion of and / or actual violations of the law in the form of violations of, for example, the relevant local anti-money laundering laws.
Our legal basis for the processing:	
<i>Legal obligation.</i> The processing is necessary to fulfill our legal obligations based on the requirements of the applicable “whistleblower” laws.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our external legal advisor. 	

<ul style="list-style-type: none"> • PWC, our external partner who handles the reports. • Your labor organization, if applicable. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>
How long we keep your data:
The personal data is stored until the investigation case is completed and for the time necessary for the establishment, exercise or defense of legal claims (normally no longer than ten (10) years).

4.30 To manage reports of violations of internal policies within the framework of our internal reporting function

What we do and why:	The personal data we process:
We process your personal data to handle reports received through our internal reporting function regarding violations of ViaCon policies.	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name. • Contact details: e-mail address, address and telephone number. • Registration history and registration number. • Employment information (such as job title, employee identification number and responsibility role). • Images and audio recordings. • Personal data related to conduct in violation of our internal policies.
Our legal basis for the processing:	
<i>Legitimate interest.</i> We have a legitimate interest in being able to ensure that our internal policies for our business are complied with.	
How we share and transfer your data:	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our external legal advisor • Your labor organization, if applicable. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>	
How long we keep your data:	

For this purpose, we will process your personal data until the investigation case is closed and for the time necessary to establish, exercise or defend legal claims (normally no longer than ten (10) years).

4.31 To investigate violations of internal policies within the framework of our internal reporting system

What we do and why:	The personal data we process:
<p>We process your personal data in order to investigate misconduct within our organization in the form of violations of, ViaCon policies, including follow-up and documentation of the content and questions of the report, collection of information from the IT equipment and digital systems that you as an employee use within the framework of your employment and which we control, review of the information collected from the IT equipment and digital systems that you as an employee use within the framework of your employment, conduct of interviews within the framework of the investigation, and, where appropriate, contact with the relevant authorities.</p>	<p>We will process your:</p> <ul style="list-style-type: none"> • First and last name. • Contact details: e-mail address, address and telephone number. • Registration history and registration number. • Employment information (such as job title, employee identification number and responsibility role). • Images and audio recordings. • Communications history. • Web history data. • User history from the IT equipment and digital systems that you as an employee use within the framework of your employment and which we control. • Personal data related to conduct in violation of our internal policies.
<p>Our legal basis for the processing:</p>	
<p><i>Legitimate interests.</i> The processing is necessary to satisfy our legitimate interest in ensuring that our internal policies for our business are followed.</p>	
<p>How we share and transfer your data:</p>	
<p>We will share your personal data with the following recipients:</p> <ul style="list-style-type: none"> • Our external legal advisor • Your labour organization, if applicable. <p>We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.</p>	

How long we keep your data:
For this purpose, we will process your personal data until the investigation case is closed and for the time necessary for the establishment, exercise or defense of legal claims (normally no longer than ten (10) years).

4.32 Selling or transfer of our business

What we do and why:	The personal data that we process:
We will process your personal data in order for a potential buyer/investor to be able to examine our business and, where applicable, take necessary measures and preparations before a possible purchase.	We will process your: <ul style="list-style-type: none"> • First and last name • Contact details: e-mail address and telephone number • Department • Position/Professional title • Employment contract
Our legal basis for processing:	
<i>Legitimate interest:</i> Our legitimate interest is to accommodate our legitimate interest to perform an examination before a transfer of the business.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • Our external legal advisor. • The potential buyer and its legal advisors. We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.	
How long we keep your data:	
The data will be kept until the transfer has been completed (if applicable).	

4.33 To enable us to respond to requests from authorities

What we do and why:	The personal data we process:
We process your personal data in order for us to be able to respond to and fulfill our obligations in accordance with requests from authorities (such as the local tax authorities or the local police authority). We will inform you when we	We will process your: <ul style="list-style-type: none"> • First and last name. • Contact details: email address and phone number.

receive such a request, thereby indicating what personal data the authority requests in addition to those listed here on the right.	<ul style="list-style-type: none"> • Organizational affiliation. • Job title.
Our legal basis for the processing:	
<i>Legal obligation.</i> Fulfillment of legal obligation in accordance with official requests from authorities.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • local authorities that address a request to us. We will not transfer your personal data to a country outside the EU/EEA within the scope of this processing activity.	
How long we keep your data:	
The personal data is stored for the time you are employed by us, as well as for the time necessary to be able to establish, exercise or defend legal claims (normally no longer than ten (10) years).	

4.34 Microsoft 365

What we do and why:	The personal data we process:
We process your personal data that is included in e-mail, documents and other personal data stored in Microsoft 365 (e.g. OneDrive and Microsoft Teams).	We will process your: <ul style="list-style-type: none"> • Any personal data contained therein, e.g. first and last name and contact details. • Workplace, Device, Usage, and Content data
Our legal basis for the processing:	
<i>Legitimate interests.</i> The processing is necessary to satisfy our legitimate interest in ensuring that it is possible to communicate within and outside the organization.	
How we share and transfer your data:	
We will share your personal data with the following recipients: <ul style="list-style-type: none"> • Microsoft, our supplier of personnel administration services and HR-systems We will transfer your personal data to a third country as necessary for the use of our global HR system.	
How long we keep your data:	

The personal data is stored for the time you are employed by us, as well as for the time necessary to be able to establish, exercise or defend legal claims (normally no longer than ten (10) years).

5. With whom do we share your personal data?

In addition to the parties mentioned above, we may share your personal data with other entities within the ViaCon Group of companies and our affiliates. Affiliate means a company or other entity which (a) is controlled by us, directly or indirectly, (b) controls us, directly or indirectly, or (c) is under common control with us, where the expressions “is controlled”, “controls” and “is under common control with” shall be interpreted as referring to control of more than 50% of the voting power by virtue of ownership, and/or the decision right over the appointment and/or dismissal of a board member and or the CEO.

6. Security measures

We have taken measures to ensure that your personal data is handled in a safe way. For example, access to systems where personal data is stored is limited to our employees and service providers who require it in the course of their duties. Such parties are informed of the importance of maintaining security and confidentiality in relation to the personal data we process. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure or misuse. We also monitor our systems to discover vulnerabilities.

7. Where we process your personal data

The processing of your personal data which entails transfer to a country outside the EU/EEA will be transferred in accordance with the mechanisms stated below.

We strive to always process your personal data within the EU or EEA. However, if we transfer your personal data, in accordance with what is stipulated in the tables above, to service providers who, either themselves or by their sub-contractors, are located or have business activities in a country outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it occurs, e.g. by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission.

You may access a list of the countries that the European Commission has decided provide an adequate level of data protection at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en.

If the EU Commission has not decided that a country to which your personal data is transferred does not have an adequate level of protection for the processing of your personal data, we will apply standard contractual clauses according to Article 46 GDPR which the European Commission has adopted and other appropriate measures to safeguard your rights and freedoms.

You may access the European Commission's standard contractual clauses at <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914>.

The countries outside the EU/EEA to which our suppliers currently transfer personal data are the United States of America, since we use Microsoft as our supplier of personnel administration services and HR-systems, the Dynamics 365 Human Resources-system.

For more information about whether we transferred your personal data to a country outside the EU/EEA, which countries we have transferred your personal data to and which security measures have been taken for the transfer, please contact us with a written request to [e-mail address].

8. Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them.

Please note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights where applicable. We also ask you to note that we may need more information from you in order to e.g. confirm your identity before proceeding with your request to exercise your rights.

To exercise your rights or request information about them we ask that you contact us, which is most easily done via email: GDPR@viacongroup.com

- (a) **Right of access.** You have the right to obtain a confirmation as to whether or not we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.
- (b) **Right to rectification.** You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.
- (c) **Right to erasure.** You have the right to obtain that we erase your personal data without undue delay in the following circumstances:
 - (i) The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - (ii) Our processing is based on your consent and you withdraw your consent to the relevant processing;
 - (iii) You object to processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
 - (iv) The processed personal data is unlawfully processed;

- (v) The processed personal data has to be erased for our compliance with one or more legal obligations.
- (d) **Right to restriction.** You have the right to request that we restrict the processing of your personal data in the following circumstances:
 - (vi) You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
 - (vii) The processing is unlawful and you oppose erasure of the personal data and request restriction instead;
 - (viii) The personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defense of legal claims;
 - (ix) You have objected to the processing of the personal data which we carry out based on a legitimate interest, pending the verification whether your objection overrides our or another party's legitimate interest to continue with the processing.
- (e) **Right to object.** You have a right to object to our processing of your personal data when it is based on our or another party's legitimate interest. If you object, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms in order to be allowed to continue with our processing.
- (f) **Right to data portability.** If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible.

We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

- (g) **Right to withdraw consent.** If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

9. Complaints with the supervisory authority

The relevant local authority for privacy protection is the authority responsible for supervising the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact us so that we can review your concerns. However, you may file a complaint with the local authority for privacy protection at any time.