

# PRIVACY POLICY

## 1 INTRODUCTION

SiteTel Sweden AB, 556654-4176 (the "**Company**" or "**We**") is the controller of your Personal Data and is therefore responsible to ensure that all Personal Data is processed in a correct manner and in accordance with applicable data protection legislation.

This Privacy Policy (hereinafter referred to as the "**Privacy Policy**") describes the Company's processing of personal data relating to you as an employee or contractor and has the purpose of ensuring you that we, in our capacity as controller of personal data, are processing the information about you in accordance with applicable data protection legislation.

Personal data means all types of information which can, directly or indirectly, be associated with a living physical person. Within the Company's activities there may occur personal data described in the tables below (hereinafter collectively referred to as "**Personal Data**").

If you cannot find answers to your questions, please get in touch with us. You will find information about how to contact us under the heading "Contact Information" below.

## 2 SCOPE OF THE PRIVACY POLICY

### 2.1 Who does the Privacy Policy apply to?

This Privacy Policy is applicable to individuals who are employed or are performing assignments, e.g. consultants, on behalf of the Company (hereinafter, together, referred to as "**Employees**").

### 2.2 What does the Privacy Policy apply to?

This Privacy Policy regulates how the Company collects and processes Employees' Personal Data in relation to their employments and contracts.

### 2.3 When does the Privacy Policy not apply?

This Privacy Policy does not apply in relation to external websites which are not owned or administered by the Company. The Company has not reviewed such websites or other websites which contain links to the Company's website. This Privacy Policy does not apply to processing of Personal Data on such websites and the Company is not responsible for such processing. You should therefore review such websites' privacy policies before you provide your Personal Data to them.

### 3 PROCESSING OF PERSONAL DATA

#### Administration

Purpose	Type of processing	Categories of Personal Data
To administer employees according to the employee agreement.	<ul style="list-style-type: none"> <li>• Administer and pay salaries or compensation,</li> <li>• Administer pensions and insurances via partners</li> <li>• Communicate with Employees</li> <li>• Create, edit and close user accounts to internal systems</li> <li>• Reset passwords if needed and similar activities</li> <li>• conducting</li> <li>• storing CV and other merits</li> <li>• conducting employee performance reviews</li> <li>• providing internal training</li> <li>• administer incident notifications</li> <li>• administer vacation leave</li> <li>• conducting employee surveys</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Employee number</li> <li>• Gender</li> <li>• Address</li> <li>• Photographic image</li> <li>• Contact information</li> <li>• Marital status</li> <li>• CV and merits</li> <li>• Personal identification number</li> <li>• Bank and account details</li> </ul>
<p><b>From which sources will we collect your Personal Data?</b> For this purpose we only process data you give to us.</p>		
<p><b>Who else will have access to the Personal Data?</b> Companies within the Company group as well as providers of IT service providers will be given access to the Personal Data.</p>		
<p><b>Legal grounds:</b> The processing is necessary to fulfill our obligations as an employer according to the employment agreement we have entered into.</p>		
<p><b>Automated decision-making:</b> No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.</p>		
<p><b>Your right to oppose the processing:</b> As the legal basis is contractual obligation, you may oppose the processing of your Personal Data. However, if we are not able to process your data the outcome might be that we cannot provide you a job.</p>		
<p><b>Storage time:</b> for this purpose the Personal Data will be processed for up to three months from the termination of the employee contract. However, factual data, such name and reasons for termination of contract as well as certificate of employment will be stored for up to ten years from the termination of the employee contract for administration purposes. Information necessary to administer pensions and insurances will be processed until the Company's commitments have ceased. Information necessary to fulfill legal obligations.</p>		

#### To administer sick leave

Purpose	Type of processing	Categories of Personal Data
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To administer reimbursement during sick leave.	<ul style="list-style-type: none"> <li>• Administer and pay salaries or compensation,</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Employee number</li> <li>• Personal identification number</li> <li>• Certification of illness</li> <li>• Sick leave period</li> </ul>
<b>From which sources will we collect your Personal Data?</b> For this purpose we only process data you give to us.		
<b>Who else will have access to the Personal Data?</b> For this purpose only the Company will have access to the Personal Data		
<b>Legal grounds:</b> The processing is necessary to fulfill our obligations in the field of employment and social security and social protection law.		
<b>Automated decision-making:</b> No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.		
<b>Storage time:</b> For this purpose we will process the Personal Data up to one year from your return from sick leave.		

#### In case of emergency

Purpose	Type of processing	Categories of Personal Data
To contact next of kin in case of emergency	<ul style="list-style-type: none"> <li>• Contact next of kin in case of emergency</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Phone number</li> </ul>
<b>From which sources will we collect your Personal Data?</b> For this purpose we only process data you give to us.		
<b>Who else will have access to the Personal Data?</b> For this purpose the Company as well as providers of IT service providers will have access to your data.		
<b>Legal grounds:</b> The processing is necessary for our and for your next of kin's interest to contact them in case of an emergency.		
<b>Automated decision-making:</b> No, this processing does not mean that decision-making will be made based on automated processing of Personal Data.		
<b>Your right to oppose the processing:</b> You may, whenever, oppose us the processing mentioned here. This can be done by contacting us at the contact information provided below.		
<b>Storage time:</b> For this purpose we will process the Personal Data up to three months from the termination of the employment agreement or when given information that a new in case of contact person has been designated.		

## 4 YOUR RIGHTS AS REGISTERED

You have the right to:

- request information about which of your Personal Data we process and you can request a copy of these;

- have incorrect Personal Data rectified and you can under certain circumstances have your Personal Data erased;
- oppose against certain processing of your Personal Data and request that the processing should be restricted,
- have your Personal Data transferred to another controller (right to data portability), and
- If you are unsatisfied with our processing of your Personal Data, report our processing to the Swedish Data Protection Authority, who is the supervising authority.

For some processing activities you may, erase or restrict the processing of your Personal Data. Please notice that if we restrict the processing of or erase your Personal Data we might not be able to provide the employment to you.

## **5 PROTECTION OF THE PERSONAL DATA**

The Company has undertaken appropriate technical and organizational measures in order to protect Personal Data against loss, abuse, unauthorized access, revealing, alteration and destruction. In order to ensure that the Personal Data is processed in a secure and confidential manner, the Company uses Firewalls and host-based intrusion detection systems are deployed on the system. All security monitoring systems including, but not limited to, firewalls and host intrusion detection systems are deployed and enabled. All infrastructure platforms and services (operating systems, web servers, database servers, firewalls, etc.) are configured according to industry best practices. Northstar Battery IT team is responsible for configuration and administration of the firewall and system ACL's to control security and access to "internal" network infrastructure. Northstar Battery regularly conducts internal and external audits to assure the above is in place.

The Data Importer makes HTTPS encryption (also referred to as SSL or TLS) available. Web sessions are encrypted using HTTPS to provide secure data communication with all applications. Backend server access (for support) is over SSH, SFTP and RDP. And access between the exporter and importer are over an encrypted IPsec VPN tunnel.

All sensitive data used by the system is stored encrypted, and direct access privilege to data store instances is given to database administrators only. There is no direct end-user access to data store. End-user access is available only via the application. This data is backed up into encrypted containers and put into a safe at a secure locked location.

[Company employees and suppliers are bound by confidentiality agreements and are obligated to follow the Company's rules for information and IT security, this Privacy Policy and other internal rules and policies which regulate the processing of Personal Data.]

## **6 SHARING OF PERSONAL DATA WITHIN THE GROUP**

As a general rule, Company shares Personal Data related to Employees with other companies in the group for the purpose of providing uniform routines and effective administration with regards to its Employees.

Sensitive Data will generally not be shared with the companies in the group, however, such processing may occur. Before any Sensitive Data is shared with other companies in the group, Company will always assess whether such processing is necessary for the purposes for which the Sensitive Data has been collected, as well whether additional consent is needed or if the processing is supported by law or legislation.

A prerequisite for sharing Personal Data between companies in the group is that the processing will be carried out in accordance with the Personal Data Policy and applicable data protection legislation.

## **7 SHARING OF PERSONAL DATA OUTSIDE THE GROUP**

The Company will not sell, disclose or transfer Personal Data to third parties, except for as described in this Privacy Policy.

The Company may, in its business activities, disclose Personal Data to Company customers, suppliers, sub-contractors and partners, if it is necessary for the performance of Company services.

The Company may also disclose Employees' Personal Data to other third parties, such as suppliers for the Company's business activities, e.g. salary administration, technical support or IT system operations.

Parties as well as certain group companies which the Company may disclose Personal Data to may be situated outside the European Union (EU) or the European Economic Area (EEA), which means that Personal Data may be transferred to countries outside the EU/EEA which have a lower level of protection for Personal Data. If the Company discloses Personal Data to third parties outside the EU/EEA the Company will undertake measures to ensure that the Personal Data will continue to be protected and also undertake measures required for the legal transferring Personal Data to countries outside the EU/EEA.

Furthermore, the Company may disclose Personal Data if obliged pursuant to law, court order or if such disclosure otherwise is necessary in order to cooperate in a criminal investigation.

If the Company is subject to a reorganization, a merger or a sale, the Company may transfer Personal Data to the relevant third party, provided that the third party undertakes to process Personal Data pursuant to this Privacy Policy.

## **8 THE COMPANY AS A PERSONAL DATA PROCESSOR**

The Company is the controller of the Company's Personal Data but situations may occur where the Company is not the controller, but only processing Personal Data on behalf of a third party. For such processing, the Company is bound by instructions given by the third party controller of Personal Data. In such situations the Company will always ensure that the processing is conducted pursuant to applicable data protection legislation and, as far as possible, in accordance with this Privacy Policy.

## **9 AMENDMENTS TO THIS PRIVACY POLICY**

The Company retains the right to amend this Privacy Policy as the Company sees fit. The date for the latest amendment is indicated at the end of this Privacy Policy. If the Company amends this Privacy Policy the Company will notify you. You are therefore recommended to read this Privacy Policy regularly in order to be updated on any amendments.

If this Privacy Policy is substantially amended compared to when the Company obtained your consent, the Company will notify you of these amendments and, if necessary, obtain new consent to the Company's processing of your Personal Data.

## **10 CONTACT INFORMATION**

If you have any questions regarding this Privacy Policy or any other question regarding our processing, please feel free to contact us:

SiteTel Sweden AB, 556654-4176

Haukadalsgatan 8A

Privacy@nsb.email

This Privacy Policy was adopted on 2018 May 24