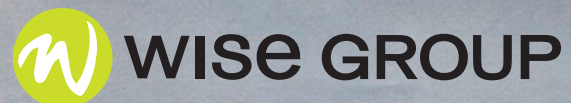


PRIVACY POLICY



1. Introduction

Wise Group operates within human resources and has built its business on insights on entrepreneurship, working life, people and their driving forces. Within our respective operations the subsidiaries process a large variety of personal data which has been obtained either from you or from third party sources. Your personal data is for instance processed during recruitment, hiring of consultants and during the provision of digital HR services. Since we safeguard your personal integrity and believe that matters of data security is of the utmost importance, we would like to describe the way we process your personal data in this privacy policy (the “Policy”). The policy is effective from May 25th 2018.

In this Policy we will thus describe what kind of personal data the subsidiaries process, for what purposes the data is processed and the legal basis for the processing. We will also describe who will gain access to and process the data, the principles for removal of data, which third parties the subsidiaries may share the data with, where the data is stored and your rights as a data subject in terms of access, rectification and erasure. We ask that you read this Policy carefully and familiarise yourself with its contents, since it applies to all processing of personal data within Wise Group.

THE WISE GROUP CONSISTS OF WISE GROUP AB, REG. NO 556686-3576, AND THE FOLLOWING SUBSIDIARIES:

Brilliant Future AB, org. nr 556392-3332, Box 22109, 104 22 Stockholm. dpo@brilliantfuture.se
Edge HR AB, org nr. 556643-3248, Box 22109, 104 22 Stockholm. dpo@edgehr.se
K2 Search AB, org. nr 556271-3593, Sveavägen 13, 111 57 Stockholm. dpo@k2search.se
SalesOnly Sverige AB, org. nr 556576-8099, Box 22109, 104 22 Stockholm. dpo@salesonly.se
Wise Consulting AB, org. nr 556421-9763, Box 22109, 104 22 Stockholm. dpo@wiseconsulting.se
Wise IT AB, org. nr 556919-5356, Box 22109, 104 22 Stockholm. dpo@wiseit.se
Wise Professionals AB, org nr. 556761-2865, Box 22109, 104 22 Stockholm. dpo@wiseprofessionals.se
K2 Search ApS, Org: 34899681, Codanhus, Gammel Kongevej 60, 18, DK- 1850 Frederiksberg, dpo@k2search.se
K2 Search Oy, Org: 2287333-9, Salomonkatu 17 B krs 9, 00100 Helsinki, dpo@k2search.se
SalesOnly ApS, Org: 34899703, C/o K2 Search Aps, Codanhus, Gammel Kongevej 60, 18, DK- 1850 Frederiksberg, dpo@salesonly.se
SalesOnly Oy, Org: 2313582-1, Salomonkatu 17 B krs 9, 00100 Helsinki, dpo@salesonly.se
Wise Consulting ApS, Org: 34899711, C/o K2 Search Aps, Codanhus, Gammel Kongevej 60, 18, DK- 1850 Frederiksberg, dpo@wiseconsulting.se

Wise Hr Consulting Oy, Org: 2313584-8, Salomonkatu 17 B krs 9, 00100 Helsinki, dpo@wiseconsulting.se
Wise IT Oy, Org: 2345023-1, Salomonkatu 17 B krs 9, 00100 Helsinki, dpo@wiseit.se
Wise Professionals ApS, Org: 37463590, C/o K2 Search Aps, Codanhus, Gammel Kongevej 60, 18, DK- 1850 Frederiksberg, dpo@wise.se

Each subsidiary processes your personal data in the capacity of data controller and is therefore obligated to ensure that the processing is executed in accordance with this Policy and applicable data protection regulations. As a data subject, you always have the right to turn to the subsidiary which you have been in contact with before on the address above to exercise your rights. For more information on your rights as a data subject, please see section 11 below.

We may sometimes need to make updates or changes to this Policy. If we do so, we will inform you in an appropriate manner and ask you to carefully read through the updated Policy. You can always find the latest version of this Policy on our website.

We trust that this Policy answers your questions about our and our subsidiaries' collection, use, protection and disclosure of your personal data. If you have additional questions, you are most welcome to contact our Data Protection Officer, Christian Rossi, by sending a letter to Wise Group, Att. DPO, Box 22109, 104 22 Stockholm or by e-mail on dpo@[subsidiary].se or on dpo@wisegroup.se (if your query is not subsidiary related).

2. Table of contents

By using this table of contents, you can easily navigate to the sections that are of interest to you.

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A top-down view of a desk with a light blue background. In the top left, a small green succulent in a white hexagonal pot sits on a bed of light-colored pebbles. Below it is a yellow notebook with the text 'CONTROL AND SAVE YOUR MONEY' and a small table. To the left of the laptop are two more yellow notebooks, one with 'Sys' and 'Use' written on it. A laptop is open in the bottom right, showing a bar chart on its screen. Hands are visible typing on the keyboard.

3. Personal data and personal data processing

“Personal data” means any information directly or indirectly relating to a living natural person. Information such as names, e-mail addresses and phone numbers are typical examples, but also information contained in photos or IP-addresses will be viewed as personal data if it can be related to a natural person.

“Processing” means any operation or set of operations which is performed on personal data, whether or not by automated means. Typical examples of data processing are collection, recording, organisation, structuring, storage, disclosure by transmission or erasure.

4. Our processing of personal data

In this section, we will describe what personal data each subsidiary collects, how it is collected and for which purposes. We will also describe in which situations the data may be transferred to third parties and for how long the subsidiary will process the data.



4.1 Data processed by all subsidiaries

4.1.1 Contacts at potential customers

Establishing and maintaining business relationships with customers in order to develop its services, products and systems is an important part of the subsidiary's core business. In order to approach you as a potential contact regarding the subsidiary's services and products as well as for marketing activities, the subsidiary collects your personal data. The data is either collected through our internal networks or from third parties, such as public records and social media, and is stored in the Wise Group's business system with the aim of the subsidiary to establish a business relationship with you and to invite you to market activities.

The processing of the personal data is based on the subsidiary's legitimate interest of being able to establish and keep business relations as well as being able to develop and improve its services, products and systems.

In those instances where the subsidiary has initiated the first contact through an e-mail or printed material, there will always be a link or reference to this Policy in order for you to receive the necessary information regarding the processing of your personal data.

Your personal data is stored on the subsidiary's platforms for communicative and informative marketing. The subsidiary will only send you such marketing messages that are deemed to be relevant for your profession. You will also always be given the

opportunity to opt-out from the marketing. For more information, please see section 7.

In those instances where the subsidiary has made contact with you and you have declined further contact, your personal data will be labelled in such a way that the contact will not be renewed. The subsidiary will also stop sending you marketing messages.

DELETION OF DATA

The subsidiary will process your personal data until it is no longer needed for the purposes mentioned above or until you request that the data is deleted from the subsidiary's systems. The personal data will upon your request be deleted without undue delay. The subsidiary process all such requests on a monthly basis. If a business relation has not been established within one (1) year from the subsidiary's first contact with you, your personal data will be deleted. The subsidiary has also established routines to ensure that contacts' personal data that is no longer needed for its purpose is deleted at regular intervals.

FOR THE PURPOSES ABOVE, THE SUBSIDIARY MAY COLLECT AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- Name and surname.
- Contact information, such as e-mail address, phone number, title and business address.
- Information of your previous employer (if you have been a customer before).
- Civic registration number (only if you are a sole proprietor).
- Correspondence between you and the subsidiary.
- Technical information on how you have interacted with the subsidiary.
- IP-address and web browser settings.
- Information regarding dietary preferences (only in connection with events and lectures etc.).



4.1.2 Contacts at customers

Maintaining business relationships with customers in order to develop its services, products and systems is an important part of the subsidiary's core business. In order to maintain contact with customers regarding the subsidiary's services and products as well as marketing activities, the subsidiary will process your personal data. The data is either collected through our internal networks or from third parties, such as public records and social media, and is stored in the Wise Group's business system with the aim of the subsidiary to establish a business relationship with you and to invite you to marketing activities.

The processing of the personal data is based on the subsidiary's legitimate interest of being able to maintain and develop the business relationship as well as being able to communicate with you, in your capacity of a customer contact.

Your personal data is stored on the subsidiary's platforms for communicative and informative marketing. The subsidiary will only send you such marketing messages that are deemed to be relevant for your profession. You will also always be given the opportunity to opt-out from the marketing. For more information, please see section 7.

DELETION OF DATA

The subsidiary will process your personal data until it is no longer needed for the purposes mentioned above. Personal data that has become outdated, due to e.g. retirement or ended business with the customer, will be deleted without undue

delay as soon as the subsidiary receives information about this. The personal data will also be deleted without undue delay per your explicit request. The subsidiary process all such requests on a monthly basis. The subsidiary has also established routines to ensure that contacts' personal data that is no longer needed for its purpose is deleted at regular intervals.

FOR THE PURPOSES ABOVE, THE SUBSIDIARY MAY COLLECT AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- Name and surname.
- Contact information, such as e-mail address, phone number, title and business address.
- Information of your previous employer (if you have been a customer before).
- Civic registration number (only if you are a sole proprietor).
- Order history.
- Correspondence between you and the subsidiary.
- Technical information on how you have interacted with the subsidiary.
- IP-address and web browser settings.
- Information regarding dietary preferences (only in connection with events and lectures etc.).



4.1.3 Notifications of interest made on website

Establishing and maintaining business relationships with customers and other parties of interest in order to develop the subsidiary's services, products and systems is an important part of the subsidiary's core business. In order to contact you and other persons who have shown an interest regarding the subsidiary's services and products as well as for marketing activities, the subsidiary processes your personal data. This personal data is collected from you when you submit a notice of interest on the subsidiary's website. The data is stored in the subsidiary's marketing tools with the aim of establishing a business relationship with you.

Your personal data is also stored on the subsidiary's platforms for communicative and informative marketing. The subsidiary will only send you such marketing messages that are deemed to be relevant for your profession. You will also always be given the opportunity to opt-out from the marketing. For more information, please see section 7.

DELETION OF DATA

The subsidiary will process your personal data until it is no longer needed for the purposes mentioned above or until you request that the data is deleted from the subsidiary's systems. The personal data will upon your request be deleted without

undue delay. The subsidiary process all such requests on a monthly basis. If a business relation has not been established within one (1) years from receipt of your notification of interest, your personal data will be deleted. The subsidiary has also established routines to ensure that contacts' personal data that is no longer needed for its purpose is deleted at regular intervals.

FOR THE PURPOSES ABOVE, THE SUBSIDIARY MAY COLLECT AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- Name and surname.
- Contact information, such as e-mail address and phone number.
- Correspondence between you and the subsidiary.
- Technical information on how you have interacted with the subsidiary.
- Information regarding cost preferences (only in connection with events and lectures etc.).
- IP-address and web browser settings.

The processing of your personal data is based on the consent you give when submitting your notification of interest.

4.1.4 Potential candidates

The information below regarding the processing of potential candidates' personal data applies to all subsidiaries. In relation to Brilliant and Edge HR, the information is however only applicable with regard to internal recruitment.

A major part of the subsidiary's core business consists of finding candidates for both external and internal recruitment and/or consulting hiring processes, as well as contacting and presenting them with job offers. The interest of finding candidates and offering them jobs weighs heavily since it promotes individual's opportunity to career advancement and labour mobility. The processing of personal data collected from third party sources lies in the potential candidates' interest, as it will be able to receive job offers that are adapted after their competence.

In order to be able to contact you in your capacity of a potential candidate regarding relevant career opportunities, the subsidiary collects personal data both from internal networks and searches at third party sources. Such personal data will be processed in the subsidiary's candidate system.

The processing of the personal data is based on the subsidiary's legitimate interest of finding you as a potential candidate and presenting, from the subsidiary's point of view, relevant recruitment and/or consulting hiring processes as well as being able to contact and present you with future career opportunities.

DELETION OF DATA

The personal data is stored in the subsidiary's candidate system for a limited period of time, not longer than six months, in order to establish a relationship between you and the subsidiary with the aim of converting the initial contact to a recruitment and/or consulting hiring process.

If in contact with one of the subsidiary's employees, you indicate that you are not interested in a further dialogue, the subsidiary will no longer process your personal data in its candidate system. The subsidiary process all such requests on a monthly basis.

FOR THE PURPOSES ABOVE, THE SUBSIDIARY MAY COLLECT AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- Name and surname.
- Contact information, such as e-mail address, phone number, business title and home address.
- URL:s to candidate profile at third party.
- Competence-based suitability for a job.
- Information uploaded in social media, e.g. LinkedIn, that is deemed to be of relevance and of a significant importance to be able to assess your qualifications.

4.1.5 Candidates who have consented to continued relationship with the subsidiary

The information below applies to all subsidiaries. In relation to Brilliant and Edge HR, the information is however only applicable with regard to internal recruitment. The subsidiary has implemented a routine according to which, every employee who contacts a potential candidate by telephone or through a digital channel and where the contact leads to a mutual wish for a continued dialogue, will send a follow-up e-mail directing the potential candidate to a digital candidate platform. On this digital platform, consent is obtained from the potential candidate to the processing of personal data in accordance with this Policy and to the storage of the personal data in the subsidiary's database. Once consent has been obtained, the potential candidate is considered to be a candidate.

In order to contact or present job offers to candidates who have consented to the storage of their personal data in the subsidiary's candidate database and to maintain a relationship with these candidates, the subsidiary processes the candidates' personal data. The subsidiary has collected the personal data from you, the subsidiary's internal networks and/ or through searches in third party sources.

Apart from information regarding dietary preferences (in connection with events and lectures etc.) the subsidiary will not actively collect or process any special categories of personal data (such as trade union membership, political opinions, sexual orientation or religious beliefs) or data that is irrelevant to recruitment and/or consulting. It is therefore important that you as a candidate do not



provide such sensitive personal data when applying for a job. It is also important that you, if applicable, inform any references that their personal data has been transferred to the subsidiary.

During a recruitment and/or consulting process, you, as a candidate, may need to perform personality and/or competency tests provided by a third party. Your personal data may be transferred to and processed by the third party provider for the performance of such tests.

The processing of your personal data for the purpose of the performance of recruitment and/or consulting processes is based upon your consent.

DELETION OF DATA

The subsidiary will store your personal data for future career opportunities. You may at any time send an e-mail to dpo@[subsidiary].se to withdraw your consent (for more information, please see section 11.6 – the right to withdrawal of consent). The subsidiary process all such requests on a monthly basis.

Personal data that is relevant only to a specific recruitment or consulting process, such as notes from interviews and information from references is stored as long as it is needed for the process in question and thereafter up to two years. The data is stored in order for the subsidiary to exercise its rights in the event of a discrimination dispute. The subsidiary also has routines in place for deleting personal data in its candidate system in order to keep it updated.

Transferring of personal data to customer

RECRUITMENT PROCESSES

The subsidiary may transfer your personal data to a customer during a recruitment process. With regard to your integrity, the subsidiary only transfer personal data stored in your profile after there has been a dialogue and you have shown interest for the job in question. The subsidiary does however preserve the right to share (not transfer) your profile with customers that the subsidiary regards to be of interest due to your professional qualifications. Your test results delivered from a test provider may be transferred to the customer for the job you have applied for.

CONSULTING HIRING PROCESSES

The subsidiary may transfer your personal data to a customer or a potential customer during a consulting hiring process. With respect to your integrity, the subsidiary will only transfer personal data stored in your profile after there has been a dialogue and you have shown interest for the assignment in question. The subsidiary does however preserve the right to share (not transfer) your profile with customers that the subsidiary regards to be of interest due to your professional qualifications. Your test results delivered from a test provider may be transferred to the customer for the assignment you have applied for.

FOR THE PURPOSES ABOVE, THE SUBSIDIARY MAY COLLECT AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- Name and surname.
- Contact information, such as e-mail address, phone number, business title and home address.
- Information uploaded in social media, e.g. LinkedIn, that is deemed to be of relevance and of a significant importance to be able to assess your qualifications.
- IP-address and web browser settings.
- URL:s.
- Gender.
- Year of birth.
- Competence-based suitability for a job.
- Notes from interviews.
- Test results from tools used for selection and development.
- References.
- Correspondence between you and the subsidiary.
- Technical information on how you have interacted with the subsidiary. Information regarding dietary preferences (only in connection with events and lectures etc.) .



4.1.6 Candidates who have been registered before 2018-05-25

The information below applies to all subsidiaries. In relation to Brilliant and Edge HR, the information is however only applicable with regard to internal recruitment.

In order to make contact with or present career offers to candidates who historically have been registered in the subsidiary's candidate database and in order to maintain the relationship with such candidates, the subsidiary process the candidates' personal data. The personal data has been collected from you as a candidate during an earlier recruitment process or general application. The personal data is stored in the subsidiary's candidate database.

The subsidiary's processing of your personal data is based on the subsidiary's legitimate interest in preserving and

developing the relationship with you as a candidate as well as being able to present relevant career offers. The information above under the section "Candidates who have consented to continued relationship with the subsidiary", regarding categories of personal data, transferring of personal data to customers and deletion of data etc. also applies to you as a candidate in our system prior to 2018-05-25, why we refer you to section 4.1.5 for more information.

4.1.7 References

The information below applies to all subsidiaries. In relation to Brilliant and Edge HR, the information is however only applicable with regard to internal recruitment. In order to conduct well-founded recruitment and/or consulting processes, the subsidiary will process your personal data in your capacity of a reference submitted by a candidate.

The processing of your personal data is based upon the subsidiary's legitimate interest of being able to contact references in order to conduct as thorough and well-founded recruitment and/or consulting processes as possible.

The subsidiary has implemented a routine according to which this Policy will be sent to you at the time of the first communication in order for you to understand how your personal data is processed.

With regard to your integrity, the subsidiary has implemented a routine according to which each reference's statements are summarized and anonymized in a reference report.

DELETION OF DATA

This report is shared with the customers and will be stored by the subsidiary for up to two years. The reports are stored in order for the subsidiary to exercise its rights in the event of a possible discrimination dispute.

FOR THE PURPOSES ABOVE, THE SUBSIDIARY MAY COLLECT AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- Name and surname.
- Contact information, such as e-mail address, phone number, title and business address.



4.2 Processing specifically conducted by Edge HR

4.2.1 Users of information services

In order to fulfil its obligations under the service agreements with customers and to be able to keep track of which persons have access to and use the subsidiary's information services, the subsidiary has a need to process the user's personal data.

Your personal data is stored in Wise Group's system and on the subsidiary's platforms for communicative and informative marketing. The subsidiary will only send you such marketing messages that are deemed to be relevant for your profession. You will also always be given the opportunity to opt-out from the marketing. For more information, please see section 7.

The processing of your personal data is based upon the consent that you give in connection when logging in and using the information portal after May 25th 2018.

Your personal data may be transferred to third parties who develop the services, provides chat functions or assist with marketing. The processing is conducted in order for the subsidiary to be able to provide the information services and

other functions as well as direct marketing to you as a user. In relation to the subsidiary, the third party providers will process the personal data in the capacity of data processors. For more information regarding the subsidiaries use of personal data processors and the location for the processing of your personal data, please see sections 9 and 10.

DELETION OF DATA

The subsidiary will process your personal data during the business relationship with the customer and one year thereafter for marketing purposes. The processing of your personal data will however cease if you withdraw your consent or upon your explicit request. The subsidiary process all such requests on a monthly basis.

**FOR THE PURPOSES ABOVE, THE
SUBSIDIARY COLLECTS AND PROCESSES
THE FOLLOWING CATEGORIES OF
PERSONAL DATA:**

- Name and surname.
- E-mail address.

This personal data is collected either from you as a user or from the customer administrator who provides you with login details to the information portal.

4.2.2 Seminars and educational sessions

In order to provide seminars and educational sessions, register the number of participants, print the necessary documentation and market such seminars and educational sessions, the subsidiary has a need to process the participants' personal data.

The processing is based on the subsidiary's legitimate interest of being able to, inter alia, draft attendance lists and to administer the seminars and educational sessions that you have signed up for. It is also in your employer's interest that you attend such seminars that you have shown an interest in.

Your personal data that is included on a participants' list may be transferred to the external lectures who are responsible for conducting the seminars and educational sessions and to hired printing companies. The transfer of personal data is made for preparatory purposes, such as the printing of teaching materials, certificates and diplomas.

DELETION OF DATA

Your personal data will be processed by the subsidiary during the relevant seminar or educational session and one year thereafter for marketing purposes. The processing of your personal data will however cease without undue delay upon your explicit request. The subsidiary process all such requests on a monthly basis.

**FOR THE PURPOSES ABOVE, THE
SUBSIDIARY MAY COLLECT AND PROCESS
THE FOLLOWING CATEGORIES OF
PERSONAL DATA:**

- Name and surname.
- Contact information, such as e-mail address, phone number, title and business address.
- Information for billing.
- Notes from seminars or educational sessions.
- Information regarding dietary preferences.

This personal data is collected either from you as a participant or from the customer contact who administers the registration and coordination with the subsidiary before each seminar or educational session.

5. For customers or users of Brilliant's or Edge HR's digital services

In those instances where Brilliant and Edge HR provide digital services, such as customer and employee surveys, the companies take the position of data processors. This is because the customer, when using such services, will provide the companies with personal data and determine the purposes and means of the processing. The companies' position as data processors means that it is the customer who is responsible for the processing of the users personal data and that it is the customer's privacy policy or equivalent document that will be applicable in relation to the users.

If you have used a digital service in your work or participated in a customer or employee survey and want to find out personal data Brilliant or Edge HR process about you, please contact the customer or employer who is responsible for the processing of your personal data. It is only upon instruction from the responsible customer or the employer that Brilliant or Edge HR may disclose your personal data.

6. Processing of civic registration numbers

The subsidiary will only process your civic registration number without your consent when it is justified with regard to the purpose, the importance of a secure identification or some other noteworthy reason. This means that civic registration numbers will only be processed in order to conduct background checks or in those instances where the customer's business is run in the form of a sole proprietorship.


7. Direct marketing

You are entitled to object to the processing of your personal data for direct marketing. Direct marketing refers to all types of marketing measures taken by for instance by mail, e-mail and text messages. You have the right to object to such measures free of charge and may opt-out from further marketing messages at any time by using the un-subscription link provided in every marketing message. The processing for the purpose of direct marketing is based on the subsidiary's legitimate interest to promote its services or on your prior consent. If you choose to unsubscribe from further marketing messages, the subsidiary will make a note in its systems to stop sending you such messages.

8. Security measures

The subsidiary has taken a number of security measures to ensure that the personal data is kept secure and to protect it against unauthorized access, disclosure or misuse. For example, access to areas where personal data is stored is limited to employees and service providers who require it in the course of their duties and who are informed of the importance of maintaining the security and confidentiality of the personal data that the subsidiary stores. Moreover, the subsidiary has established routines for the usage of passwords and work that is conducted outside of the office and abroad. The subsidiary also monitors its systems to discover vulnerabilities in order to protect your personal data.



A close-up, high-angle photograph of a person's hand typing on a white Apple keyboard. The hand is positioned on the left side of the frame, with fingers pressing keys. In the background, a white Apple mouse is visible on a light-colored surface. The overall lighting is soft and even.

9. The use of personal data processors

In those instances where it is necessary in order for the subsidiary to be able to offer its services, the subsidiary will transfer your personal data to companies, who in relation to the subsidiary, takes the position of personal data processor. The data processors may only process the transferred data on behalf of the subsidiary and in accordance with the subsidiary's documented instructions. The subsidiary will only transfer your personal data to data processors for purposes that are compatible with the purposes for which the subsidiary has collected the personal data. The subsidiary will also ensure, through written agreements that the data processors undertake to comply with the subsidiary's security requirements and restrictions as well as requirements regarding international transfer of personal data.

10. The location for personal data processing

The subsidiary aims at always processing your personal data with the EU/EEA, where all of the subsidiary's IT-systems are located. However, your personal data may be shared with data processors who, either themselves or through hired sub-contractors, are established in or stores the data in a country outside of the EU/EEA. In the event of such transfer, the subsidiary will take all reasonable legal, organisational och technical measures needed to ensure that the level of protection is the same as in the EU/EEA, for example by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission or by use of standard contractual clauses in the agreements with the data processors.

11. Your rights

As a data subject, you always have the right to turn to the subsidiary which you have been in contact with before on the address under section 1 to exercise your rights. You are also always entitled to contact us at [dpo@\[subsidiary\].se](mailto:dpo@[subsidiary].se). Below, you will find a brief description of your rights.

11.1 The right to access

If you would like to receive information regarding what personal data the subsidiary process about you, you have the right to request access to the data. The information will then be provided in the form of a register extract which specifies the personal data processed by the subsidiary, the purposes for which it is processed, where the data has been collected, third parties to which the data has been transferred and how long the data will be stored. If you make your request electronically, the information will be provided in a commonly used electronic format, unless you have requested otherwise.

11.2 The right of rectification

You have the right to have incorrect information about you rectified without undue delay. You also have the right to amend incomplete information.

11.3 The right to erasure

You may request that we erase your personal data without undue delay (all such requests are processed on a monthly basis) in the following circumstances:

- a) The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) You withdraw your consent on which the processing is based (if applicable) and there is no other legal ground for the processing;
- c) You object to the subsidiary's processing of personal data and the subsidiary do not have any overriding legitimate grounds for the processing;
- d) The processed personal data is unlawfully processed; or
- e) The processed personal data has to be erased for compliance with legal obligations.

In case there are legal obligations that prevent the subsidiary from deleting certain personal data immediately, the subsidiary may deny your request of erasure. The legal obligations may for instance follow from accounting legislation. It may also be necessary with further processing in order for the subsidiary to submit, defend or determine legal claims. Should the subsidiary's legal obligations prevent it from deleting your personal data, the subsidiary will instead label the data in such a way it is no longer actively used in the subsidiary's systems.

11.4 The right to restriction

You have the right to restrict the processing of your personal data in the following circumstances:

- A. You contest the accuracy of the personal data during a period enabling the subsidiary to verify the accuracy of such data;
- B. The processing is unlawful and you oppose erasure of the personal data and request restriction instead;
- C. The personal data is no longer needed for the purposes of the processing, but are necessary for you for the establishment, exercise or defence of legal claims;
- D. You have objected to the processing of the personal data based on the subsidiary's legitimate interest, pending the verification whether the subsidiary's legitimate grounds for its processing override your interests, rights and freedoms.

If your personal data has been restricted in accordance with this section they may, with exception of storage, only be processed for the establishment, exercise or defence of legal claims, or for the protection of the rights of a third party or for reasons of important public interest according to EU or EU member state legislation.



11.5 The right to data portability

If your personal data has been provided by you and the subsidiary's processing of your personal data is based on your consent or on the performance of a contract with you, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format in order to transmit these to another service provider where it would be technically feasible and can be carried out by automated means.

11.6 The right to withdraw consent

When the subsidiary processes your personal data on the basis of your consent, you always have the right to withdraw your consent at any time. Please note that the lawfulness of processing based on consent before its withdrawal is not affected. If you withdraw your consent, the subsidiary will no longer process personal data that has been collected with your consent, unless further processing is required for legal reasons. If the subsidiary is prevented from erasing your personal data by requirements set out in applicable laws and regulations, the subsidiary will instead label the data in such a way that it no longer is used in the subsidiary's systems.

You can send an e-mail to [dpo@\[subsidiary\].se](mailto:dpo@[subsidiary].se) at any time to withdraw your consent. The subsidiary process all such requests on a monthly basis.

A top-down photograph showing a pair of hands holding a light blue ceramic cup filled with dark coffee. The hands are positioned on the left side of the frame. The person is wearing a light blue long-sleeved shirt. The background is a white surface with grey marble-like veining. The lighting is soft and even.

11.7 The right to file a complaint

The Swedish Data Protection Authority is the authority responsible for monitoring companies' compliance with applicable data protection regulation. If you believe that we or the subsidiary have processed your personal data incorrectly, you may, in addition to contacting us at [dpo@\[subsidiary\].se](mailto:dpo@[subsidiary].se), file a complaint to the Data Protection Authority.

12. The use of cookies, tags and pixels

The subsidiaries use cookies, tags and pixels on their websites to enhance your website experience and to improve the company's website and services. A cookie is a text file sent from the subsidiary's web server and that is stored in your web browser or on your device. The subsidiaries also use cookies for overall analytical information regarding your use of the company's services, to save functional settings and to direct relevant marketing to you. You have the option to change the settings in your browser for the use of cookies. You have, for instance, the ability to adjust your settings to block all cookies or delete them when you close your web browser.

For more information on how each subsidiary uses cookies, tags and pixels, please see the cookie policy for the respective subsidiary. The cookie policies can be found on the respective subsidiary's website.

We hope that we've answered your questions.
For more information, please visit us at www.wisegroup.se

