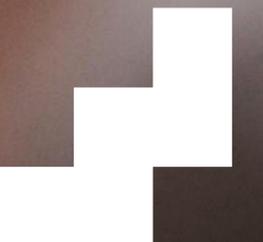


# WISE GROUP

## Privacy policy GDPR



# 1. Introduction

Wise Group ('we', 'our', 'us') has operations within HR related services and has based its operations on insights into business, working life, people and their motive forces. Within the framework of our respective operations, the subsidiaries process some personal data that you have provided yourself or that they have collected from other entities (so-called third parties). Your personal data are processed in connection with, i.a., recruitment processes, consultancy assignments and provision of digital HR services. As we care about your privacy and take matters related to data protection seriously, we want to use this privacy policy ('the Policy') to describe how the subsidiaries process your personal data.

In this Policy, we will therefore describe the categories of personal data processed by subsidiaries, the purposes for which data are processed and the legal grounds for such processing. We also describe which entities have access to and process the data, the principles for data culling, the security measures taken, which third parties the subsidiaries may share personal data with, where personal data are processed and your rights as a data subject as regards information, rectification, erasure, etc. We want you to feel comfortable with how we process your personal data within our group and therefore ask that you read this Privacy policy.

Each subsidiary processes your personal data as a personal data controller and therefore has a duty to ensure that the processing takes place in accordance with this Privacy policy and the data protection legislation in force at the relevant time. As the data subject, you always have the right to contact the subsidiary you have been in touch with at the address above, to exercise your rights. You also always have the right to contact us at [dpo@\[subsidiary name\].se](mailto:dpo@[subsidiary name].se). See section 10, below, for more information on your rights.

We may from time to time have to update or change this Policy. In such cases, we will inform you in an appropriate manner and ask you to review the changes made. The latest version of the Policy can always be found on our website.

It is our hope that this Policy will answer your questions regarding how we and our subsidiaries collect, use, disclose and protect your personal data. If you have any further questions or thoughts, please contact us by post at Wise Group AB, att. DPO, Box 22109, 104 22 Stockholm or by e-mail at [dpo@wisegroup.se](mailto:dpo@wisegroup.se). If your question pertains to a specific subsidiary, please send an e-mail to [dpo@\[subsidiary name\].se](mailto:dpo@[subsidiary name].se).

## The Wise Group consists of Wise Group AB and the following subsidiaries:

K2 Search AB	Company reg. no.: 556271-3593, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@k2search.se">dpo@k2search.se</a>
Sales Only Sverige AB	Company reg. no.: 556576-8099, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@salesonly.se">dpo@salesonly.se</a>
Wise Consulting AB	Company reg. no.: 556421-9763, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@wiseconsulting.se">dpo@wiseconsulting.se</a>
Wise IT AB	Company reg. no.: 556919-5356, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@wiseit.se">dpo@wiseit.se</a>
Wise IT Konsult AB	Company reg. no.: 556605-0513, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@wiseit.se">dpo@wiseit.se</a>
Wise IT Ascent AB	Company reg. no.: 556912-1675, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@wiseit.se">dpo@wiseit.se</a>
Wise Professionals AB	Company reg. no.: 556761-2865, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@wiseprofessionals.se">dpo@wiseprofessionals.se</a>
Wise Professionals Konsult AB	Company reg. no.: 556612-7030, Box 22109, 104 22 Stockholm. <a href="mailto:dpo@wiseprofessionals.se">dpo@wiseprofessionals.se</a>
Wise People Group Oy	Company reg. no.: 2287333-9, Salomonkatu 17 B krs 9, 00100 Helsinki. <a href="mailto:dpo@wpg.fi">dpo@wpg.fi</a>
K2 Search ApS	Company reg. no.: 34899681, c/o Azets Insight A/S Sverigesgade 2, st. th. 5000 Odense C. <a href="mailto:dpo@k2search.se">dpo@k2search.se</a>
Sales Only ApS	Company reg. no.: 34899703, c/o Azets Insight A/S Sverigesgade 2, st. th. 5000 Odense C. <a href="mailto:dpo@salesonly.se">dpo@salesonly.se</a>
Wise Consulting ApS	Company reg. no.: 34899711, c/o Azets Insight A/S Sverigesgade 2, st. th. 5000 Odense C. <a href="mailto:dpo@wiseconsulting.se">dpo@wiseconsulting.se</a>
Wise Professionals ApS	Company reg. no.: 37463590, c/o Azets Insight A/S Sverigesgade 2, st. th. 5000 Odense C. <a href="mailto:dpo@wise.se">dpo@wise.se</a>

## 2. Table of contents

Using the table of contents below, you can easily navigate to the sections that are of particular interest to you.

3.	The meaning of personal data and personal data processing	04
4.	The subsidiary's processing of your personal data	05
	- 4.1 How the subsidiary collects your personal data	06
	- 4.2 Creating, maintaining and developing potential business relations	07
	- 4.3 Maintaining and developing existing business relations	08
	- 4.4 Managing conclusion and performance of contracts	09
	- 4.5 Newsletters and other marketing communication	10
	- 4.6 Seminars and training	11
	- 4.7 Expression of interest through the website	12
	- 4.8 Performing legal obligations and establishing legal claims	13
	- 4.9 Potential candidates	14
	- 4.10 Candidates who have consented to being part of our network	15
	- 4.11 References	16
5.	Processing of personal identity numbers	17
6.	Direct marketing	18
7.	Protection for your personal data	19
8.	Entities that your personal data are shared with	20
9.	The location for processing of your personal data	21
10.	Your rights	22
	- 10.1 Right of access	23
	- 10.2 Right to rectification	23
	- 10.3 Right to erasure	24
	- 10.4 Right to restriction of processing	25
	- 10.5 Right to data portability	25
	- 10.6 Right to object	26
	- 10.7 Right to withdraw your consent	26
	- 10.8 Right to lodge a complaint	26
11.	Use of cookies, tags and pixels	27

### 3. The meaning of personal data and personal data processing

'Personal data' means any information that directly or indirectly can be attributed to a living natural person. This can be data such as name, e-mail addresses, or phone number, but images or IP addresses can also be included in the information connected to a natural person.

'Personal data processing' is any operation or set of operations performed on personal data, whether or not such processing is automated. Examples of common forms of processing include collection, registration, organisation, structuring, storage, disclosure and erasure.

4. The subsidiary's processing of your personal data



## 4.1 How the subsidiary collects your personal data

The data that subsidiaries process about you are usually collected directly from you when you visit and use our/the subsidiaries' website or in connection with contact between our subsidiaries and you – for instance by e-mail, phone or internal networks, conferences, industry fairs or similar. Subsidiaries may also collect data about you from third parties, usually the company that you represent or from public registers or social media. The personal data are stored in our systems.

## 4.2 Creating, maintaining and developing potential business relations

Creating, maintaining and developing business relations with clients in order to develop the subsidiary's services, products and systems is an important part of the subsidiary's core operations. Your personal data will therefore be processed based on this purpose, in order to communicate with you in your role as a potential client contact.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, hometown and address, job title, information on the company you represent and workplace address
- Data on past employer (only if you have previously been a client)
- Personal identity number (only if you are a sole proprietorship)
- Correspondence between you and the subsidiary
- Technical information on how you have interacted with the subsidiary
- IP address and browser settings
- Other information that you provide to the subsidiary in connection with the subsidiary's communications with you

**Legal grounds**

The processing of your personal data is based on an assessment of interests, where the subsidiary's legitimate interest is to create and thereafter maintain and develop a business relation with you or the company you represent and to develop the subsidiary's services, products and systems.

Where the subsidiary has initiated the first contact through an e-mail message, this always includes reference to the Policy, so that you, as the data subject, can get the necessary information regarding the processing of your personal data.

In cases where the subsidiary has contacted you and you refuse to create or explore any further relations, the personal data in the subsidiary's part of the business system will be tagged with a note not to continue the contact. The subsidiary will also cease with all market communication to you (please see also section 4.5).

**Culling**

The subsidiary will process and store your personal data for a period of six (6) months from when the data were collected. If a business relation is established between the subsidiary and you or the company you represent, your personal data will thereafter be processed in accordance with the sections below. In other cases, the personal data will be erased without undue delay. The subsidiary processes all such cases once per month. The subsidiary also has culling routines to regularly erase any personal data that no longer serve their purpose.

**Sharing of personal data**

The subsidiary will share your data with its suppliers and group companies.

## 4.3 Maintaining and developing existing business relations

Maintaining and developing existing business relations with clients in order to develop the subsidiary's services, products and systems is an important part of the subsidiary's core operations. Your personal data will therefore be processed in accordance with this purpose, in order to contact and communicate with you in your role as a contact person at one of our existing clients, partners, suppliers and other business contacts.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, hometown and address, job title, information on the company you represent and workplace address
- Data on past employer (only in cases pertaining to previous clients)
- Personal identity number (only if you are a sole proprietorship)
- Order history
- Correspondence between you and the subsidiary
- Technical information on how you have interacted with the subsidiary
- IP address and browser settings
- Other information that you provide to the subsidiary in connection with the subsidiary's communications with you

**Legal grounds**

The processing of your personal data is based on an assessment of interests, where the subsidiary's legitimate interest is to maintain and develop the business relation with you or the company you represent.

**Culling**

The subsidiary will process and store your personal data as long as it has a business relation with you or the company that you represent, though not longer than two (2) years from when the subsidiary was last in contact with you as a result of the business relation. The subsidiary may, however, need to store data for a longer period of time for other reasons, for instance if the subsidiary must take actions to establish, exercise or defend legal claims. The subsidiary will also need

to store data for a longer period to fulfil legal obligations, for instance regarding bookkeeping under the Bookkeeping Act (see further in section 4.8 below). Personal data that have become obsolete, for instance due to pensioning or a terminated business relation, will also be erased without undue delay on your explicit request. The subsidiary processes all such requests once per month. The subsidiary also has culling routines to regularly erase any personal data that no longer serve their purpose.

**Sharing of personal data**

The subsidiary will share your data with its suppliers and group companies.

## 4.4 Managing conclusion and performance of contracts

The subsidiary will process your personal data with the aim of being able to conclude or perform contracts between the subsidiary and you or the company you represent. This includes administrative work and communication, invoicing and standard management, follow-up and documentation of contract-related matters.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, hometown and address, job title, information on the company you represent and workplace address
- Data on past employer (only in cases pertaining to previous clients)
- Personal identity number (only if you are a sole proprietorship)
- Correspondence between you and the subsidiary
- Other information that you provide to the subsidiary in contract-related matters, e.g., questions about or input on contractual services

**Legal grounds**

The processing of your personal data is necessary for the subsidiary to be able to conclude and perform contracts with you or the company you represent. If you are acting on the behalf of some other entity, for instance as a representative of a client, partner or supplier to the subsidiary, the subsidiary's processing is based on an assessment of interests, where the subsidiary's legitimate interest is being able to conclude or perform the contract with the company you represent.

**Culling**

The subsidiary will process and store your personal data as long as it has a business relation with you or the company that you represent, though not longer than two (2) years from when the subsidiary was last in contact with you as a result of the business relation. The subsidiary may, however, need to store data for a longer period of time for other reasons, for instance if the subsidiary must take actions to

establish, exercise or defend legal claims. The subsidiary will also need to store data for a longer period to fulfil legal obligations, for instance regarding bookkeeping under the Bookkeeping Act (see further in section 4.8 below). Personal data that have become obsolete, for instance due to pensioning or a terminated business relation, will be erased without undue delay as soon as the subsidiary receives information on this. The data will also be erased without undue delay on your explicit request. The subsidiary processes all such requests once per month. The subsidiary also has culling routines to regularly erase any personal data that no longer serve their purpose.

**Sharing of personal data**

The subsidiary will share your data with its suppliers, group companies, advisors and authorities.

## 4.5 Newsletters and other marketing communication

The subsidiary will process your personal data with the aim of contacting and informing you, in your role as a potential client contact or contact person of one of the subsidiary's existing clients, partners, suppliers or other business contacts, regarding the subsidiary's services, products, systems and ongoing activities.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, job title and workplace address
- Personal identity number (only if you are a sole proprietorship)
- Correspondence between you and the subsidiary
- Technical information on how you have interacted with the subsidiary
- IP address and browser settings
- Data on dietary preferences (in connection with lectures, events, etc.)

**Legal grounds**

The subsidiary will only send marketing communication to you if the contents are relevant to you and the company that you represent. The subsidiary's communication is then performed based on an assessment of interests, where the subsidiary's legitimate interest is to be able to market and inform about its services, products, systems and ongoing activities.

Where the subsidiary has initiated the first contact through an e-mail message or printed materials, these always include reference to the Policy, so that you, as the data subject, can get the required information regarding the processing of your personal data.

Your personal data are stored on the subsidiary's platforms for marketing communication and information. The subsidiary will only send communications and information deemed relevant for your role. Each communication will provide you the option to unsubscribe, a so-called opt-out. Please read more in section 6.

**Culling**

The subsidiary will process and store your personal data for performing market communication by e-mail or printed materials as long as you have not unsubscribed from receiving future communication. You can unsubscribe at any time by using the unsubscribe link included in the subsidiary's communications. The data will then be erased without undue delay. The subsidiary processes all such requests once per month. The subsidiary also has culling routines to regularly erase any personal data that no longer serve their purpose.

**Sharing of personal data**

The subsidiary will share your data with its suppliers or marketing services and group companies.

## 4.6 Seminars and training

In order to hold seminars and training, register the number of participants, print the necessary documentation and perform marketing communication, the subsidiary needs the participants' personal data.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, workplace address and job
- Invoicing data
- Notes ahead of training sessions
- Data on dietary preferences

These data are gathered either from you as the participant or from a contact person with the client who manages registration and coordination with the subsidiary ahead of each training session.

**Legal grounds**

The processing of your personal data is based on an assessment of interests, where the subsidiary's legitimate interest is to be able to create lists of participants and similar, in order to manage the seminars and training session you have registered for. It is also in the interests of your employer that you participate in the training you have shown interest for.

**Culling**

The subsidiary will process and store your personal data during the training in question and thereafter for one (1) year, for marketing purposes. However, the subsidiary's processing of personal data will be terminated sooner, if you explicitly request this. The subsidiary processes all such requests once per month. The subsidiary also

has culling routines to regularly erase any personal data that no longer serve their purpose.

**Sharing of personal data**

Your personal data as entered in a participant list will be transferred to external lecturers in charge of the training and to printing providers. This is done as part of preparatory work, for instance to print training materials, certificates and diplomas. The subsidiary will share your data with group companies.

## 4.7 Expression of interest through the website

Maintaining and developing existing business relations with clients in order to develop the subsidiary's services, products and systems is an important part of the subsidiary's core operations. In order to contact and communicate with you in your role as a party interested in the subsidiary's services and products and for marketing activities, the company collects your personal data. These personal data are collected from you when you submit an expression of interest through the subsidiary's website. The personal data will be stored in the subsidiary's marketing tool, with the goal that the company can create a business relation with you.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First 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
- IP address and browser settings

**Legal grounds**

The processing of your personal data is based on the consent you provide in connection with submitting your expression of interest.

**Culling**

The subsidiary will process and store your personal data for the aforementioned purpose, as long as you have not withdrawn your consent or unsubscribed from being contacted or receiving further communications. This can be done at any time by using the unsubscribe link included in the subsidiary's communications. The personal data will in such cases be erased without undue delay (the subsidiary processes all such requests once per month).

If a business relation has not developed within one (1) year from when the subsidiary received your expression of interest, your personal data will be erased. The subsidiary also has culling routines to regularly erase any personal data that no longer serve their purpose. Your personal data are stored on the subsidiary's platforms for marketing communication and information. The subsidiary will only send communications and information deemed relevant for your role. Each communication will provide you the option to unsubscribe, a so-called opt-out. Please read more in section 6.

**Sharing of personal data**

The subsidiary will share your data with group companies.

## 4.8 Performing legal obligations and establishing legal claims

The subsidiary will process your personal data to be able to perform its legal obligations, for instance in accordance with legal acts or other statutes that encompass the subsidiary or a decision from a court or other authority requiring the subsidiary to process data concerning you. The subsidiary will also process your personal data in order for you or the company you represent, the subsidiary itself, or any affected third part to be able to establish, exercise or defend legal claims, for instance in the case of an expected or ongoing dispute.

## 4.9 Potential candidates

A large part of the subsidiary's core operations consists of finding candidates for recruitment and/or consultant proposal processes, and to contact candidates or present job offers to them. The interest of finding candidates and offering them works is large, as it promotes individuals' possibilities of career development and mobility on the job market. The processing of personal data collected through searches via a third party is in the potential candidate's interest, as they will get the chance to receive job offers that are tailored to their competence.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, job title and home address
- URLs to candidate profiles listed by third parties
- Competence-based suitability for a position
- Data posted in social media, such as LinkedIn, and assessed as relevant and of significance for judging your qualifications
- Images

**Legal grounds**

In order to contact you as a potential candidate regarding relevant career opportunities and work-related communication, the subsidiary collects personal data from both internal networks and external searches using third parties. These data are processed in the subsidiary's candidate system.

The processing of your personal data is based on an assessment of interests, where the subsidiary's legitimate interest is being able to find potential and what the subsidiary considers to be relevant candidates for recruitment and consultant proposal processes, and to contact you and present future career opportunities.

**Culling**

The personal data are stored in the subsidiary's candidate system for a limited time, though not longer than six (6) months, in order to create a relationship between you and the subsidiary, with the goal that the contact will transition into a recruitment or consultant proposal process. If you during contact with an employee at the subsidiary state that you are not interested in further dialogue with the subsidiary, the subsidiary will terminate processing of your personal data in its candidate system. The subsidiary processes all such requests once per month.

**Sharing of personal data**

The subsidiary will share your data with group companies.

# 4.10 Candidates who have consented to being part of our network

The subsidiary has as its routine that each time an employee contacts a potential candidate by phone or a digital channel and where the contact leads to a mutual desire for a continued dialogue, this is followed up with an e-mail message referring the candidate to a candidate platform. On this platform, consent in accordance with this Policy is obtained and the candidate profile is stored in the subsidiary's database. After this, the potential candidate is to be considered a candidate.

**The personal data that the subsidiary processes, in the subsidiary's database, for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, job title and home address
- Data posted in social media, such as LinkedIn, and assessed as relevant and of significance for judging your qualifications .
- IP address and browser settings
- URLs
- Gender
- Year of birth
- Competence-based suitability for a position
- Interview notes
- Test results from testing tools used in candidate selection and development References provided
- Correspondence between you and us
- Information on how you have interacted with us
- Data on dietary preferences (in connection with lectures, events, etc.)

## Legal grounds

In order to be able to contact or convey career opportunities to candidates who have consented to being stored in the subsidiary's candidate database and to establish relations with these candidates, the subsidiary processes the candidates' personal data. The personal data have been collected by the subsidiary from you as the candidate, through the internal networks of the subsidiary and/or through searches using a third party.

Aside from dietary preferences (in connection with lectures, events, etc.), the subsidiary will not actively collect or process sensitive personal data (such as membership in a trade union, political views, sexuality or religion) or data that are irrelevant in recruitment and or consultancy assignments. Therefore, it is important that you as a candidate do not provide any such sensitive personal data or information irrelevant in the positions you are applying for. It is also important that you inform any reference contacts that their personal data have been provided to the subsidiary. The processing that takes place in the subsidiary's database to perform recruitment and/or consultant proposal processes is done with a basis in your consent.

## Culling

The subsidiary will store your personal data for future career opportunities. You can, at any time, withdraw your consent by sending an e-mail to [dpo@\[subsidiary name\].se](mailto:dpo@[subsidiary name].se) (see further under section 10.7). However, the data that are relevant for individual recruitment or consultant proposal processes, such as interview notes and data from references, are only stored as long as they are necessary for the process in question and then for up to two (2) years after the end of the recruitment and/or consultant proposal process. This is done so the subsidiary can protect its rights in case of a discrimination lawsuit. The subsidiary also regularly culls its candidate system in order for it to fulfil its purpose and be kept up to date.

## Sharing of personal data

It may be the case that you as a candidate undergo personality and/or competence tests provided by an external supplier. Your personal data will be shared with the subsidiary's supplier for performance of such tests. The personal data that the subsidiary processes about you may come to be transferred to (the subsidiary's existing) clients during recruitment processes. To protect your privacy, the subsidiary will only transfer your profile to a client after having had a dialogue with you during which you have expressed interest in the position in question.

However, the subsidiary reserves the right to show (but not transfer) your profile to clients that the subsidiary assesses are a good match for your competence. Test results from test suppliers may be transferred to clients if you are under consideration for an assignment.

Your personal data will be shared with the subsidiary's supplier for performance of such tests. The personal data that the subsidiary processes about you may come to be transferred to (the subsidiary's potential or existing) clients during consultant proposal processes. To protect your privacy, the subsidiary will only transfer your profile to a client after having had a dialogue with you during which you have expressed interest in the assignment in question.

However, the subsidiary reserves the right to show (but not transfer) your profile to clients (potential or existing) that the subsidiary assesses are a good match for your competence. Test results from test suppliers may be transferred to clients if you are under consideration for an assignment.

# 4.11 References

In order to perform thorough recruitment and/or consultant proposal processes, the subsidiary will process personal data concerning reference contacts provided by candidates.

**The personal data that the subsidiary processes for the aforementioned purpose are:**

- First name and surname
- Contact information such as e-mail address, phone number, job title and workplace address

## **Legal grounds**

The processing of reference contacts' personal data is based on an assessment of interests, where the subsidiary's legitimate interest is to be able to contact reference persons to perform as thorough recruitments and/or consultant proposals as possible.

The subsidiary has as its routine to, upon first contact with you as a reference person, send you this Policy, so that you can learn how your personal data are processed. To protect your privacy, the subsidiary has as its routine to summarise all reference contacts' statements and anonymise them in a reference report which is disclosed to the client in writing.

## **Culling**

The reference report is stored for up to two (2) years. This is done in order for the subsidiary to be able to protect its rights in case of a discrimination lawsuit.

## **Sharing of personal data**

The subsidiary will not share your personal data with any third party.

## 5. Processing of personal identity numbers

Where the subsidiary processes your personal identity number without your consent, this will only be done when clearly justified based on the purpose of the processing, which is certain identification, background checks or some other pressing reason. This means that personal identity numbers will, as a rule, only be processed in connection with background checks or where a client's operations are in the form of a sole proprietorship. As a candidate, you should therefore not provide your personal identity number in your résumé/application/profile.

## 6. Direct marketing

You have the right to object to your personal data being used for direct marketing. Direct marketing refers to all types of outreach marketing measures, for instance through digital communication, e-mail and text message. You have the right to object – at no cost – to your data being used in this way, and each communication from the subsidiary that has a marketing purpose contact a possibility to unsubscribe, a so-called opt-out. If you choose to unsubscribe from future communication, the subsidiary will make a note in its systems to cease with direct marketing to you. The subsidiary processes all such requests once per month and we therefore ask for your understanding and patience in this.



## 7. Protection for your personal data

The subsidiary takes precautions to ensure that its processing of your personal data is performed in a secure fashion. For instance, access to the systems in which the personal data are stored is restricted to the subsidiary's employees and service suppliers that need the data to perform their work. They are also informed about the importance of security and secrecy in relation to the personal data that the subsidiary processes. The subsidiary takes relevant security measures and applies norms for security to protect your personal data from unauthorized access, disclosure and abuse, and has implemented internal routines that regulate, for instance, use of passwords and work performed outside the office or abroad. The subsidiary also monitors its systems continually, to discover any vulnerabilities and protect your personal data.

## 8. Entities that your personal data are shared with

Access to your personal data is restricted to the persons who need such access for the purposes described in section 4 above. Your personal data may thus be shared with the following recipients.

- a) Companies within our group: The subsidiary will share your personal data with other companies within our group in connection with situations described in section 4 above. If the subsidiary shares your personal data within the group, it will ensure that the data continue to be processed in accordance with this Privacy policy.
- b) The subsidiary's suppliers: The subsidiary uses third-party suppliers to manage parts of its operations. The subsidiary will share personal data with these suppliers when they perform services at its request, such as providing the subsidiary with support and business systems or performing assignments as subcontractors to the subsidiary related to the subsidiary's own services. When the subsidiary uses suppliers in accordance with this item, it concludes personal data processor agreements and takes other appropriate actions to ensure that your personal data are processed in a way that is in accordance with this Privacy policy.
- c) Collaboration partners: The subsidiary sometimes collaborates with external parties, such as advisors, to improve its services and operations. These entities process personal data either as personal data controllers, in accordance with their own terms and guidelines for processing of personal data, or as personal data

Processors of the subsidiary, in accordance with the subsidiary's instructions on processing. In the latter case, the subsidiary will conclude personal data processor agreements and take other appropriate actions to ensure that your personal data are processed in a way that is in accordance with this Privacy policy.

d) Sales or acquisitions: The subsidiary may transfer your personal data to a buyer/investor or potential buyer/investor in connection with the sale or any other acquisitions of all its shares, assets or operations, or a subset thereof. In case of such transfer, the subsidiary will take measures to ensure that the receiving party processes your personal data in a way that complies with this Privacy policy. The purpose of such processing is to let a (potential) buyer/investor perform a review of the subsidiary's operations and, where relevant, take actions or make preparations ahead of a purchase or investment, where the transfer is done based on the legitimate interest in such review, actions and preparations.

e) Authorities: The subsidiary will provide your personal data to authorities, such as the Swedish Police, the Swedish Tax Agency or others, when required under law, other statutes or a decision from a court or authority.

## 9. The location for processing of your personal data

The subsidiary has the goal to always process your personal data within the EU/EEA. As some of its suppliers are international, your personal data will be transferred to countries outside the EU/EEA in accordance with the agreements the subsidiary has with the suppliers. In such cases, the subsidiary has a duty to ensure that the transfer is performed in accordance with applicable data protection legislation, before the data are transferred, for instance by ensuring that the country to which the data are transferred meets the requirements on an adequate level of data protection in accordance with the decision of the European Commission, or by ensuring that the transfer is subject to appropriate safety measures in the form of standard contractual clauses that the European Commission has pre-approved as ensuring that appropriate data protection safeguards are taken to protect your rights and freedoms.

Through the following link, you can find information on the countries outside the EU/EEA that the European Commission has determined have adequate levels of data protection that permit transfer of personal data: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_sv)

Through the following link, you can find the standard contractual clauses that the European Commission has pre-approved: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_sv)

(The countries outside the EU/EEA that the subsidiary's suppliers currently transfer personal data to are the following: England.)

# 10. Your rights

You have rights in relation to the subsidiary and its processing of your personal data and can always exercise these rights in relation to the subsidiary you have been in contact with. Information on your rights and how you can exercise them is given on the following pages.

The subsidiary asks you to note that your rights apply to the extent specified in applicable data protection legislation and that there may, in certain cases, be exceptions to those rights. If our legal obligations prevent us from erasing your data, we will instead tag them so that they are no longer actively used in our systems.

The subsidiary also asks you to note that the subsidiary may need further information from you, for instance to confirm your identity, before the subsidiary can move forward with your request to exercise your rights.

To exercise your rights or request more information, we ask that you contact the subsidiary at the address given in section 1 or at [dpo@\[subsidiary name\].se](mailto:dpo@[subsidiary name].se).









# 11. Use of cookies, tags and pixels

The subsidiary's website and our website use cookies, tags and pixels to improve your website searches, the subsidiary's/our services and the subsidiary's/our website. A cookie is a text file that is sent from the subsidiary's/our web server and is stored in your web browser or device. The subsidiary/we also use/s cookies for general analytical information regarding your use of the subsidiary's/our services, to store functional settings and to target relevant marketing to you.

Collection of cookies and similar technologies is done with a basis in your consent, with the exception of any use that is necessary of you to be able to use the subsidiary's/our website in the intended way. You can adjust the settings for your web browser regarding the use and scope of cookies. Examples of such settings are blocking all cookies or erasing cookies when you close the browser.

Read more about our and our subsidiaries' use of cookies, tags and pixels in the cookie policy found on the respective company's website.

We hope that we have  
answered your questions.

You can find more  
information about us at  
[www.wisegroup.se](http://www.wisegroup.se)

