

Axholmen's Integrity Policy

1. Background

Axholmen AB handle personal data in our daily work. The purpose of this policy is to inform how we gather, store and process personal data as well as to ensure that Axholmen process personal data in accordance with the EU General Data Protection Regulation (GDPR).

The policy covers all processing of personal data and includes both structured and unstructured data.

Acceptance of this Integrity Policy, is an act of consent and you approve of our handling of your personal data.

2. Processing and revision

The Board of directors is responsible for compliance to this policy in all personal data processing. The policy is confirmed by the Board of directors on a yearly basis and is updated when necessary. The data controller is responsible for facilitating the yearly revision process in accordance with new or changed regulations.

3. Organization and responsibility

The CEO has the overall responsibility for the content of this policy and to ensure that it is implemented and complied with in the organization. The CEO can delegate the operational responsibility and implementation to a suitable party. The CEO has delegated the operational responsibility and the implementation of the integrity policy to the data controller, Jenny Hasselblad.

4. Personal data

Personal data is all types of data that directly or indirectly can be attributed to a physical person who is alive. The person the data refers to, the physical person that directly or indirectly can be identified through the personal data in a register, is referred to as registered. Processing personal data is one or a combination of actions regarding personal data, independent of if they are carried out automatically or not, for example registering, gathering, organizing and structuring.

4.1 Sensitive personal data

Axholmen occasionally process sensitive categories of personal data. For example, regarding health or union membership. All handling of sensitive categories of personal data is done only with consent from the registered.

4.2 Data breach

In the event of a data breach the incident is reported to the data controller within 24 h. The data controller then has the responsibility of reporting the incident to the regulatory authority, Datainspektionen, within 72 h if that is found necessary.

5 Data processors

To ensure our ability to deliver our services Axholmen use several data processors. When using data processors a data processor agreement has been established stipulating that all data processing is carried out in accordance with GDPR. One example where Axholmen use data processors is for IT services.

6 What personal data we gather and why we process your personal data (purpose of processing)

Axholmen only process personal data when there is a legal basis for processing. In most cases it concerns processing that is necessary to fulfill an agreement, but it can also be done with consent from the registered, balancing of interest, legal claims or legal requirements.

Below is an overview of personal data handled by Axholmen and the legal basis for processing.

6.1 Employment relation

In order to handle all administration, payment of salaries and communication with employees Axholmen process personal data of our employees. Personal data related to emergency contacts is also gathered and kept for the event of an emergency.

Personal data	Legal basis	Data source
Employees: Name, personal identification number, position, pictures, phone number, address, e-mail, salary, bank account number Emergency contacts: Name, phone number	To fulfill agreement, follow up and administration, consent	From the registered

6.1 Client contact and marketing

Axholmen use personal data to keep in touch with clients and for direct marketing in the form of newsletters and similar.

Personal data	Legal basis	Data source
Name, company, position, phone number, e-mail	To fulfill agreement, balancing of interest, consent	From the registered

6.2 Recruitment

Axholmen use personal data in the recruitment process for the purpose of evaluation potential candidates and to stay in touch with candidates that has showed previous interest in Axholmen.

Personal data	Legal basis	Data source
Name, e-mail, company, position, CV, telephone number	Consent	From the registered, staffing company

6.3 Suppliers

Axholmen process personal data for administration and communication with suppliers.

Personal data	Legal basis	Data source
Name, address, e-mail, telephone number, health, personal identification number, bank account number	To fulfill agreement, legal requirements, consent	From the registered

6.4 Legal claims

In the event of any legal claims Axholmen may have to process personal data.

Personal data	Legal basis	Data source
Name, personal identification number, address, e-mail, telephone number	Legal requirements	From the registered

6.5 In projects

In some cases Axholmen process personal data as part of projects, depending on the nature of the project. In all cases Axholmen is data processor we act according to the instructions of the data controller, our client.

Personal data	Legal basis	Data source
Name, position, health, union membership, salary	To fulfill agreement, consent	From the client

6.6 Cookies on the website

Axholmen's website is using cookies. A cookie is a text file containing information about a user's visit on the website that is placed on the user's computer. This is partly done to facilitate functionality but also to use for statistics regarding the website's visitors.

Sometimes cookies contain information that can be considered personal, e.g. IP-address, but no personal information that can be used to directly identify individuals. Information that is gathered through cookies is only used by Axholmen and is not shared with third parties. Cookies are deleted either when the browser is closed or after a predefined time period. A user can set the browser to deny use of cookies if the user doesn't want them to be stored.

7 How we gather personal data

Most of the personal data that Axholmen process comes directly or indirectly from the registered. Personal data related to recruitment can be obtained from staffing companies. Emergency contacts for relatives of the employees are obtained from the employees. In some projects personal data regarding the employees of the client is obtained from the client.

8 Who has access to your personal data

8.1 Service suppliers

Axholmen use service suppliers for several services, for example IT services and salary and employment administration. Suppliers process personal data in accordance with the instructions of Axholmen and according to data processor agreements and are not allowed to process personal data for any other purpose. All suppliers are also bound by law to protect personal data in accordance with GDPR.

8.2 Other recipients

In some cases Axholmen share personal data with other recipients. Primarily with authorities as a result of legal regulations or during legal processes.

9 Technical and organizational measures taken for the purpose of protecting personal data

Axholmen have taken several technical and organizational measures to ensure that personal data is protected from any unauthorized access, sharing or destruction. In terms of technical measures all personal data is handled on encrypted units. Axholmen also use firewalls and other technical protection to detect any unauthorized access, usage, changes and sharing of personal data. All employees have been instructed to handle personal data according to this policy and legal requirements for protection of personal data, and only employees that are granted necessary credentials has access to personal data of clients.

10 Where does Axholmen process personal data?

Axholmen's aim is that all personal data should be processed within the EU/EES area. In certain cases personal data may be processed by suppliers outside the EU/EES area. By using supplier agreements Axholmen ensures that personal data outside the EU/EES area also is processed in accordance with legal requirements within the EU/EES area.

11 How long we save personal data

Axholmen store personal data as long as there is a legal basis for the processing, for example during a client relationship during a project and some time thereafter. When there no longer is any legal basis

for storing the personal data the personal data is deleted. Every employee is responsible for continuously updating lists of contacts, e-mail inbox, etc.

12 Rights of the registered

The General Data Protection Regulation gives the registered the following rights.

12.1 Access to personal data

As registered you have the right to demand confirmation whether we handle personal data regarding you, or not. If we are processing personal data regarding you, you have the right to, through a register excerpt, see what personal data is handled.

12.2 Correction

As registered you have the right to demand incorrect or incomplete personal data to be corrected.

12.3 Oppose processing of personal data for direct marketing

The registered has the right to oppose processing of personal data if the purpose of the processing is direct marketing, newsletters or similar. This can be done simply by contacting us and letting us know that you would like to be deregistered.

12.4 Revoke consent

If the legal basis for processing of personal data is consent the registered has the right to at any point revoke the consent. This can be done by contacting our data controller, Jenny Hasselblad.

12.5 The right to leave a complaint to authorities

The registered has the right to contact the responsible authority, Datainspektionen, directly to make a complaint. Datainspektionen will then investigate what has happened and take the appropriate actions according to their findings.

12.6 Opposing processing with balancing of interest as legal basis

The registered has the right to oppose processing of personal data with balanced interest as legal basis if there are reasons in the specific case speaking against the processing. If the registered is opposing processing but legal or other requirements require continued processing, the processing will continue. For opposing please contact data controller, Jenny Hasselblad.

12.7 Deletion

The registered has the right to demand that the personal data being processed is deleted and under some circumstances get the data deleted. One exception is when Axholmen is obliged by law to save the personal data.

12.8 Limitation of processing

The registered has the right to demand that the processing of personal data is limited.

12.9 Data portability

The registered has the right to obtain copies of the personal data that is being processed in a structured and machine-readable format. This right only includes personal data being obtained directly from the registered and under the legal basis of consent or if there is a contract.

13. About the integrity policy

This integrity policy is valid from 2018-05-25.

Axholmen may change this policy if needed. If the policy is changed the updated version will be published at our webpage and the date of the change will be disclosed. If the changes are extensive we may also inform you directly, for example by sending an e-mail.

The updated version of the integrity policy will be applicable for all registered at the time.

14. How to contact Axholmen

If there are any questions regarding our processing of personal data feel free to contact our data controller. Contact information for Axholmen's data controller are the following:

Axholmen AB, att: Jenny Hasselblad, Ingmar Bergmans Gata 2, 114 34 STOCKHOLM

or

jenny.hasselblad@axholmen.se