

Privacy policy for Knowit employees

Approved by

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1 Introduction

Knowit AB (publ) is a consultancy firm that creates unique customer values by offering digital and cross-functional solutions from three business areas: Experience, Insight and Solutions. It is the capacity to combine competencies within IT, design and communication, and management consultancy that sets us apart from other consultancy firms. Within the framework of our operations, Knowit AB and the subsidiaries in the Knowit group process personal data regarding you as our employee.

We safeguard your privacy and take matters relating to data protection very seriously. In this Privacy policy for Knowit employees, we describe the processing of personal data that is performed within the framework of our operations, the purpose of such processing, the legal basis for the processing, who we may share your personal data with, and your rights in relation to your personal data. In order for you to understand how your personal data are processed, we recommend that you read our Privacy policy for Knowit employees carefully. If you have any questions relating to our Privacy policy for Knowit employees, or wish to enforce the rights you have in relation to your personal data, you are always welcome to contact me or dataprotection@knowitgroup.com.

Joakim Pilborg
HR Director

2 Personal data

Personal data means any information that can directly or indirectly identify a living natural person. Examples of personal data include a name, an address, a phone number and an e-mail address, but can also include information about IP numbers or photos combined with other data if the information can be connected to a natural person. Processing of personal data includes any operation which is performed on personal data, such as collection, recording, analysis, adaptation, storage or destruction.

3 Data controller

The party ultimately responsible for processing personal data regarding you as an employee is always the Knowit company at which you are employed.

4 Purpose and legal basis for processing of your personal data and storage period

For a detailed description of purposes, legal bases for processing of your personal data, and storage periods, see the Appendix on page 9.

4.1 Processing of personal data

Personal data are processed only for the purposes and aims described in this Privacy policy. We process your personal data in order to be able to:

- administrate our relationship to you as our employee,
- fulfill our commitments in relation to you as our employee, in accordance with the employment contract and current policies,
- manage any matters relating to alleged discrimination, handle disputes, and perform negotiations with unions.

The personal data we may come to process about you consist of, i.a., name, address, e-mail address, personal identification number, grades, certificates, education and work life experience, photos, test results, information from background checks, results of drug tests, contact information to next of kin, salary information, and bank account details.

Where you agree to be photographed or where you, without instruction from us, provide a photo of yourself, you also consent to our processing of such photo.

Ahead of consultancy assignments that entail particular requirements on you as an employee, we may in some cases have to perform security interviews, background checks, health check-ups, and/or drug tests. Such reviews may come to encompass sensitive personal data about you and you will have to give special consent ahead of a security check, background check, health check-up or drug test. You may always choose not to provide such consent and in this case risk no longer being considered for the assignment in question.

As a result of a security interview or security check, a report on your suitability for the assignment in question will be presented. A negative report will be handled with utmost secrecy and will never be processed by us.

We may also ask you to provide further personal data, but in such cases you will always be asked to provide special consent. Personal data provided/processed after special consent will also be encompassed by this Privacy policy.

We may also need to process sensitive personal data about you, such as information about your health. Health-related information may be necessary to process in order for us to fulfill our obligations as an employer.

4.2 Storage period for personal data

The period during which personal data is stored depends on the type of personal data and the purpose of the processing. As a rule, we will store personal data relating to:

- employment contracts, for as long as you are employed and another ten (10) years after that;
- information on business events, such as data on timesheets, assignments, salary, invoices, tax returns, year-end reports, for as long as you are employed and another ten (10) years after that; and
- income statements, until our pension commitment has come to an end.

4.3 Sharing of personal data between group companies

As a rule, we share consultant profiles with all companies within Knowit. This is necessary in order for us to quickly and efficiently be able to offer consultants in assignments to other clients, regardless of which Knowit company is making the offer.

We also share personal data between companies within Knowit for administrative reasons in cases where, e.g., bookkeeping, invoicing, or salary management is handled by another Knowit company than the one at which you are employed.

Sensitive personal data is not shared between group companies without special consent from the employee.

4.4 Sharing of personal data with a party outside the group that is not a processor

Where we are subject to a reorganization, a merger or a company sale, we may transfer personal data to the relevant third party, given that the third party commits to processing the personal data in accordance with this Privacy policy.

5 Data processors

A data processor is an enterprise that processes personal data on behalf of Knowit and in accordance with our instructions. We have data processors that assists us with, for instance:

1. Salary management
2. Bookkeeping
3. IT environments for collaboration and communication

4. IT support
5. Corporate healthcare and health check-ups
6. Pensions and insurance
7. Employee surveys

When your personal data is shared with data processors, this is done only for purposes in line with the purposes for which we collected the information (e.g., to fulfill our commitments in accordance with contracts concluded or legislation). We have written contracts with all data processors, through which they guarantee security for the data processed and commit to observing our security requirements and delimitations and requirements regarding international transfer of personal data.

We may also be obliged to share your personal data with certain enterprises and authorities with the role of independent data controllers. If an enterprise or authority is an independent data controller, this means that Knowit cannot govern how the information provided to the enterprise or authority is processed. Independent data controllers that we may need to share your personal data with in accordance with legislation or on suspicion of crime include:

1. Governmental authorities (the Police, the Tax Authority and other authorities), if we are obliged to do so pursuant to legislation or on suspicion of crime.
2. Consultancy brokers, in order to identify interesting and challenging consultancy assignments.
3. Travel agencies which we use, for instance for conference trips.

When your personal data are shared with an enterprise or authority which is an independent data controller, the privacy policy and data processing of this enterprise or authority will apply.

6 Your rights

6.1 Right of access (so-called register extract)

We are always open and transparent regarding how we process your personal data and if you want greater insight into which personal data we process regarding you specifically, you can request access to this data.

6.2 Right of rectification

You can request rectification of your personal data if the data are inaccurate. Within the context of the purpose stated, you also have the right to provide additional information in the case of any incomplete personal data.

6.3 Right of erasure

You can request erasure of personal data that relates to you and that we process, if:

- The personal data are no longer needed for the purpose for which they were collected or processed.
- You object to the balancing of interests that we have performed based on a legitimate interest and your reasons for objection outweigh our legitimate interest.

- You revoke your consent to processing that is based on consent and there is no other legal basis for the processing.
- The personal data are processed in an illegal manner.
- The personal data must be erased to fulfill a legal obligation by which we are encompassed.

Keep in mind that we may have the right to reject your request if there are legal obligations preventing us from immediately erasing certain personal data. These obligations may spring from, i.a., discrimination law, bookkeeping law, tax law, labor law or similar. It may also be the case that the processing is necessary for our establishment, exercise or defense of legal claims. If we are prevented from acting on a request of erasure, we will instead block the personal data from use for other purposes than the purpose that prevents the requested erasure.

You always have the right to revoke consent given and to announce that you oppose further processing of your personal data. Such right applies only if the personal data processing is not covered by other legislation, for instance tax law, bookkeeping law, labor law or similar.

6.4 Data portability

In cases where our processing of personal data is based on your consent or the fulfillment of a contract, you have the right to request that the information that concerns you and that you have provided us with is transferred to another data controller. However, this is provided that the transfer is technically possible and that it can be performed in an automated manner.

7 Complaints

The national Data Protection Authority is the authority responsible for monitoring the application of the legislation. If you believe that Knowit is processing your personal data in an incorrect manner you can, aside from getting in touch with your closest superior or contacting us at dataprotection@knowitgroup.com (which we hope you choose to do as a first resort), present a complaint to the national Data Protection Authority.

8 How do we handle personal identification numbers?

We will only process your personal identification number when this is clearly motivated given the purpose, required for secure identification, or there is another substantial reason. We always minimize the use of your personal identification number to the greatest extent possible.

9 How is your personal data protected?

We use IT systems to protect secrecy, privacy, and access to personal data. We have taken special security measures to protect your personal data against unlawful or unauthorized processing (such as unlawful access, loss, destruction or damage). Only the people who actually need to process your personal data in order for us to fulfill our stated purposes have access to the data.

We do not sell any personal data to others and we do not share any personal data with anyone other than the Data processors with which we have entered into Data processing agreements, in accordance with Chapter 5.

10 Updates to our Privacy policy

We may come to make changes to our Privacy policy. The latest version of the Privacy policy is always available on Shareit. In connection with updates that are of significant importance for our processing of personal data or updates which are not of significant importance for processing, but which we assess may be of significant importance for you, you will receive information on the start page of Shareit and by e-mail in a timely manner, before the update is made (when possible).

11 Appendix – Processing of personal data (detailed description)

Purpose of the processing	Personal data	Legal basis	Storage period
To ensure that we have correct information on all new employees and to ensure correct handling at the end of employment	Name, personal identification number, address, phone number, salary, vacation days, terms for overtime work	Contract	Throughout employment and for ten years after employment ends.
To perform employee surveys	Name, e-mail address, closest superior	Contract	Anonymous responses (not erased). At the end of employment, questionnaires will no longer be sent and user data will be deleted.
To perform developmental talks	Name, personal strengths and weaknesses, goals, role as a consultant	Contract	Erased at the end of employment.
To be able to reach next of kin in a crisis situation	Name, address, phone number, next of kin, phone number	Balancing of interests	Information on next of kind is deleted at the end of employment.
To be able to review salaries	Name, personal identification number, salary information, other relevant terms, closest superior	Contract	Throughout employment and for ten years after employment ends.
To be able to document events that have resulted in a warning/reprimand to an employee	Name, personal identification number, reason for warning	Contract/Legal obligation	Deleted after 2 years.
To be able to determine the order in which employees are to be given notice in cases of redundancy and to investigate the possibilities of transferring and finally to execute a decision of termination	Name, personal identification number, employee number, time of employment, title/role	Legal obligation	Deleted 2 years after the end of employment.

Purpose of the processing	Personal data	Legal basis	Storage period
To avoid to expose an employee to food that the employee for any reason refrains from eating	Name, information on allergies/food preferences	Balancing of interests	Erased after each occasion that the information has been requested.
To be able to ensure payment of sick pay, reporting to the Swedish Social Insurance Agency, prevent future sickness absence	Name, personal identification number, testimonials from doctors (as applicable)	Contract/Legal obligation	Throughout employment and for ten years after employment ends.
The employer's need to investigate the need for measures to adapt work conditions given an employee's particular needs in the workplace	Name, personal identification number, testimonials from doctors, health status	Contract/Legal obligation	Erased when rehabilitation is completed and the employee is back at work.
To ensure correct management of application for leave and payment of salary during absence	Name, personal identification number, reason for leave	Contract/Legal obligation	Throughout employment and for ten years after employment ends.
To be able to manage contracts and safeguard legal obligations regarding bookkeeping	Name, personal identification number, address, phone number, registration number, distances driven	Contract	Throughout employment and for ten years after employment ends.
To be able to ensure reporting and payment of pensions/fees	Name, personal identification number, address, phone number, salary information, salary exchanges	Contract	Throughout employment and for ten years after employment ends.
To be able to ensure reporting and fees relating to sales	Name, personal identification number, address, phone number	Contract	Throughout employment and for ten years after employment ends.
Consultant profiles needed to present consultants to existing/potential clients	Name, images/photos, role	Balancing of interests	Deleted at the end of employment.
To be able to ensure that salaries are paid to the right person,	Name, e-mail, personal identification number, employee number, address, phone number,	Contract during employment Legal obligation	Throughout employment and for

Purpose of the processing	Personal data	Legal basis	Storage period
with the right tax information, and to send out salary specifications	bank account number, salary, vacation days, terms for overtime work, tax information, tax adjustments (where applicable), collection (where applicable)	after employment ends	ten years after employment ends.
To be able to facilitate time reporting as a basis for invoicing, salary payments and vacations	Name, e-mail, date of birth, employee number, employee number, hours of absence and reason for absence, hours worked	Contract	Throughout employment and for ten years after employment ends.
To be able to make payments for expenses for travelling and expenditures	Name, e-mail, date of birth, employee number, employee number, information on trip (expense allowance) and/or expenditure	Contract/Legal obligation	Throughout employment and for ten years after employment ends.
To be able to present consultants to existing/potential clients	Name, phone number, e-mail, role, company, portrait photo, education, work life experience	Balancing of interests	Deleted at the end of employment.
In order for an employee, sub-consultant or third party at Knowit to perform certain tasks, a connection to an AD account is required	Name, last name, employee category, superior, phone number, city of work, gender, title	Contract	The AD account is deleted 30 days after the end of employment.
To be able to use the O365 applications, employees, sub-consultants and third parties need an Azure AD account	Name, last name, employee category, superior, phone number, city of work, gender, title	Contract	The Azure AD account is deleted at the same time as the AD account, i.e., 30 days after the end of employment.
To be able to act on and manage incidents	Name, last name, e-mail and information provided by the data subject	Balancing of interests	If the incident report needs to be stored for longer than 24 months, the report will be anonymized.