



**GRÄNGES**

## Your privacy at Gränges

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## TABLE OF CONTENTS

Introduction .....	3
Application of this introductory text.....	3
Personal data processed in Gränges .....	3
Purpose of processing personal data.....	4
Disclosure your personal data.....	5
Centralised and decentralised processing of personal data.....	5
Updating, deleting and accessing your personal data.....	6
Protection of your personal data .....	6
Contact.....	6

The General Data Protection Regulation applies to employers who process personal data about employees within the framework of their activities within the EU, regardless of where the processing itself is carried out or where the data subject is located. This information text concerns Gränges' operations within the EU.

## INTRODUCTION

Gränges ("**We**") is committed to protecting personal integrity given the personal data we collect about our prospective, current and former employees for the purposes of management HR, payroll, communication and marketing.

As an employee (or prospective employee) of Gränges, you understand and acknowledge that we collect, use and share your personal data in accordance with this employee privacy information.

## APPLICATION OF THIS INTRODUCTORY TEXT

This information text applies to employees, prospects employees and all temporary employees who have an contract with Gränges (this includes part-time, interim, etc.). The information text applies to personal data and processing of personal data.

This information text is intended to describe the broadest spectrum of our personal data processing.

The information text shows Gränges' responsibility to protect your personal data. References to "**Gränges**", "**We**" and "**Our**" in this information text, depending on the context, refer to our operations within the EU.

## PERSONAL DATA PROCESSED IN GRÄNGES

The legal basis for processing personal data of the employee is primarily based on the contract between Gränges and the employee, but it is also based on national legal obligations e.g. the Work Environment Act, Tax legislation, etc. The legal basis for processing information about prospective employees is legitimate interest; Gränges has an interest in finding suitable and competent employees when recruiting.

The types of personal data we process under the legal basis may include:

- Name, gender, address, private telephone number, date of birth, social security number, photo and film, private e-mail address, marital status, next of kin, criminal record
- Passport information, visa applications, biometric data, citizenship

- Bank details, transaction history, sick pay, pensions, insurance, salary history, health data
- Gränges' work history, recruitment data, trade union membership
- Statistics on work absences, holiday entitlement
- Information required to comply with laws, e.g. tax, expenses etc
- Information collected through security systems, including video surveillance, location data and access control systems.
- Information created by Gränges about you: System login profiles, email, phone number, personal development and performance at work, driving statistics linked to company car

Much of the personal data we process is information that you have knowingly provided to us. There may be occasions when personal data that you provide to us is considered sensitive personal data under applicable data protection law in Sweden (e.g. personal data about your health). We only process sensitive personal data with your specific consent and to the extent permitted by applicable law.

## PURPOSE OF PROCESSING PERSONAL DATA

Depending on applicable law, we may collect, use and disclose data about employees or prospective employees in order to:

- Evaluate applications for employment, including recruitment tests
- Manage all aspects of an employment relationship, including, but not limited to; payroll, pensions, taxes, benefits, corporate travel, expenses with the right to compensation, development and training, absence, communication, performance appraisals, and other general administrative and HR-related processes
- Establish sick leave registers
- Ensure the safety and security of Gränges' personnel and property (including controlling, facilitating access to and monitoring activity and use of Gränges' computers, means of communication and other resources)
- Administer termination of employment and provide references
- Comply with applicable laws (e.g. related to health and safety), including legal and administrative tasks related to the employee

There are surveillance cameras within and around our facilities, they are used for the following purposes:

- Preventing and identifying crime
- Ensuring the health and safety of employees
- To manage and protect Gränges' property and our employees' property in the workplace

We may also monitor internet usage and communications in accordance with applicable law and Gränges' IT policy. We may save personal data about employees after termination of employment in order to fulfill the above-mentioned purposes. We only save personal data as long as this is necessary and never longer than stated in the specified deletion procedure and according to applicable law.

Unless otherwise stated, the personal data we wish to collect about you is mandatory. If you do not share or allow us to use the requested personal data, we will not have complete information about you to fulfill our aforementioned purposes.

## DISCLOSURE YOUR PERSONAL DATA

In order to fulfil the purposes specified above, information about you will be shared with HR personnel, relevant managers and other relevant appropriate persons in our organisation.

Like other companies, we sometimes outsource specific processes or information to third parties. When we do this and the processing of your personal data takes place with third parties, we oblige those third parties that they will protect your personal data according to the conditions in this information text, as well as in accordance with applicable data protection law.

We retain the right to share personal information about you if we are required to do so by law or if we determine that it is necessary or desirable to comply with the law or to protect or defend our rights or property under applicable law. We also reserve the right to retain collected personal data and to process personal data to comply with retention periods according to various laws, e.g. the Accounting Act.

## CENTRALISED AND DECENTRALISED PROCESSING OF PERSONAL DATA

We have decentralized personal data processing and HR-related tasks locally at our operations within the EU because it allows us to create a better management of the company.

If you are being discussed for a position or applying for a position within Gränges but in another country, certain personal data about you may be sent to the country where the open employment is located and discussed. Personal data may also be sent to managers or HR in other legal entities, in accordance with applicable law, to enable them to contact you for the application of a new position. When personal data is sent within Gränges, it will be handled in accordance with the conditions set out in this information text, in accordance with Gränges' policies and as required by law.

## UPDATING, DELETING AND ACCESSING YOUR PERSONAL DATA

You have the right to request what personal data we process about you. The request is made by sending us a written request by letter or e-mail (please see contact information in the last section of this information text). Please include your full name, current (or former) job role and placement within Gränges. We will not share your personal data with you unless you have the right to receive it given applicable laws. Please note that for requests that go beyond what you are legally entitled to do, as well as for repetitive requests, we will charge an administrative fee to be able to retrieve the requested information. We will inform you of this fee before any further action is taken to answer your request.

You have the right to request a register extract about the personal data we process about you. You also have the right to ask about the rectification, deletion or termination of processing of your personal data that we hold about you. If we agree that the information is not correct, or that processing should stop, we will take action to comply with your rights.

It is assumed that regular erasure procedures (within a reasonable timeframe), defined in contracts with the employee or in formal erasure procedures, are considered a legitimate interest for Gränges to retain personal data until the erasure procedure occurs. This means that when Gränges is to satisfy the employee's rights to be removed in Gränges' system, according to applicable law, the erasure procedures shall apply and only in exceptional cases shall personal data be removed if requested.

## PROTECTION OF YOUR PERSONAL DATA

The personal data we collect about you is stored by us and by our service providers. The storage takes place on databases protected by a combination of physical and logical permission limitation (technical and organizational). Under applicable law, we will notify you of any loss, misuse or unauthorized alteration of your personal information that may affect you, in order to allow you to take the necessary steps to protect your rights.

## CONTACT

If you have any questions related to this information text, about our processing of your personal data as described above, or other concerns or complaints about the administration of this information text, or if you want to submit a request for correction, deletion or registry extraction of the personal data we have about you, please contact us:

- For applicants and former employees, please contact: [hr.sweden@granges.com](mailto:hr.sweden@granges.com)
- For current employees, contact your immediate manager

All requests for access to your personal data must be made in writing by letter or e-mail. We will respond to your request by letter, e-mail or other appropriate method.

Complaints can also be sent directly to the Swedish Authority for Privacy Protection. Please visit their website for contact information: <http://www.imy.se>