

# Combitech Privacy information for assignees

## 1. Purpose and content

Combitech AB ("Combitech") in its role as employer and assigner, needs to collect and process personal data about its employees and assignees. The group assignees includes consultants, students and trainees. Combitech protects the integrity of its employees and assignees and takes care to protect the personal data being processed. Combitech's processing of personal data is in accordance with the EU General Data Protection Regulation, the "GDPR" (as well as national adaptations of this regulatory framework) aiming to the protection of the integrity of individuals in processing their personal data.

The following describes how Combitech collects, processes and shares your personal data. Furthermore, information is provided about your rights when Combitech processes your personal data.

## 2. What personal data will be processed?

As an employer or assigner, Combitech collects and processes the following personal information about you:

- Contact information, both private and work-related (*e.g. name, address, email, phone number, photographs*);
- Personal identification number, citizenship and nationality;
- Information about employment or assignments (*e.g. appointment or job assignment, job position, information about salary and benefits, CV, travel information, login details, information about job performance and education data*);
- Financial information (*e.g. bank details and account information*);
- Health information (*e.g. information about possible rehabilitation and absence*); and
- Communication information (*e.g. any logged information, data and telephone traffic as well as entry and exit logs*).

Combitech usually collects personal data directly from you. In some cases, personal data may be processed as Combitech collects from publicly available services or registers, for example from the Tax Agency, Work Environment Authorities, Social Insurance Office or other authorities and institutions. All employments and assignments in Combitech are tested for safety and therefore data relating to criminal charges or incidents in the legal context may be obtained from you, from your references and verified by authority. These data are not saved.

### 3. For what purposes are personal data processed?

Combitech processes your personal data for the following purposes:

- i. To act in accordance with and comply with Combitech's obligations under applicable law;
- ii. To act in accordance with and comply with other rules and regulations;
- iii. To administer and fulfil the relationship to you as an employer or assigner (*e.g. for managing salary and other benefits*) and for related agreements;
- iv. To administrate and manage your possible participation in Saabs incentive program;
- v. To address health and safety issues and to record emergency contacts in case of possible accidents or other emergencies;
- vi. To handle work-related complaints (*e.g. insurance claims and compensation claims*);
- vii. To follow up and apply Combitech's internal policies;
- viii. To maintain statistics (*e.g. regarding internal diversity work*);
- ix. To keep Combitech's internal records updated with current contact information;
- x. To evaluate and follow up work efforts;
- xi. To analyse costs; and
- xii. To manage access to Combitech's IT-systems and other systems.

### 4. What is the legal basis for processing personal data?

Combitech will process your personal data for the following legal reasons:

- i. So that Combitech as an employer can act in accordance with applicable legislation;
- ii. In order to fulfil Combitech's obligations under contract of employment or the contract of assignment with you;
- iii. When it is necessary to process your personal data for purposes that concern Combitech's legitimate interests and when the interest in processing the data is greater than your interest in the data not being processed (*e.g. in evaluations of performance or security*). When Combitech process your personal data based on Combitech's legitimate interest, Combitech do so taking best practise into account and does a balancing of interest between Combitech and the data subjects; and
- iv. In certain cases processing will be based on a separately obtained consent from you (*e.g., to publish pictures on Combitech's external website or in other similar contexts*).

## **5. How are personal data protected and who has access to them?**

Combitech has taken appropriate technical and organizational security measures to protect personal data against, among other cases loss, abuse and unauthorized access.

Access to your personal data is given only to those persons in Combitech who need to process personal data in accordance with the purposes stated above. Combitech may come to transfer your personal data to other companies within the Combitech/Saab Group, for example with Nobeli Business Support who handles payroll, Travle expenses and Benify etc.

Combitech may come to transfer your personal data to third party providers that provide services to Combitech, such as partners which process personal data for staff and salary administration purposes. Other examples to who Combitech share your personal data with a third party is with Travel Agencies, pension corporations (Söderberg & Partners in Sweden). Insofar as it is necessary to administer and comply with the employment contract or contract of assignment with you or due to requirements arising from law or collective agreement, your personal data may be transferred to the relevant authority or similar institution. Tax Authorities, Social Insurance offices, Pension Authorities etc.

Your personal data may come to be transferred to a so-called third country, i.e. a country outside the EU/EEA where the protection of personal data may not be as strong. In that case, Combitech will ensure that the recipient of personal data guarantees suitable and appropriate security measures that ensure that your rights are safeguarded. If your personal data will come to be transferred to such a third country, specific information about this will be provided to you.

## **6. How long are personal data stored?**

Combitech applies different retention periods for different categories of personal data. Your personal data will usually be saved during your employment period or assignment and for a certain period thereafter, as long as there is a legitimate purpose and/or in accordance with applicable law. When personal data processing is no longer necessary, based on the purpose for which personal data was collected, Combitech will delete the personal data. The storage period varies depending on your employment contract, from the day your employment contract ends to when your age is 67 (In Sweden), according to national laws.

## **7. Your rights**

### **7.1 Right to access the data**

You are entitled to request more detailed information about how Combitech processes your personal data and what personal data is processed concerning you. You are also entitled to receive a copy of the personal data being processed.

### **7.2 Right to rectification, objection, erasure and restriction**

If your personal data are incorrect, incomplete or irrelevant, you may want to have them corrected or deleted. If you do not agree with a balance of interests that Combitech has done, you may also object to the processing, or request it to be restricted. You may also on other legal grounds request a restriction of the processing performed. For example, you may request a restriction of processing if you consider the personal data to be incorrect or if you consider that your personal data is no longer required for the purpose of the processing. Please note that

restriction or erasure of your personal data may mean that we will not be able to fulfil our commitments to you.

### **7.3 Right to withdraw consent**

If you have specifically provided your consent for a particular personal data processing, you are always entitled to withdraw the consent. You can do this by contacting Combitech via the contact details listed in section 8.

### **7.4 Right to data portability**

To the extent that Combitech processes your personal data based on your consent or because it is necessary to fulfil an agreement with you, you may, upon request, obtain the personal data you have provided Combitech in a structured, widely used and machine-readable manner format and is entitled to transfer these to another controller.

### **7.5 Right to complain**

It is important for Combitech to make sure that you are confident in personal data processing. Combitech protects the personal integrity of all employees and assignees and strives to treat all personal data with maximum respect. If you still consider your personal data being processed incorrectly, please feel free to contact us. You also have the opportunity to file complaints about personal data processing to the relevant data protection authority or similar body within your jurisdiction. Your data protection authority is the authority that supervises the processing of personal data.

## **8. Contact details**

Combitech, org. no. 556218-6790 with address Ljungadalsgatan 2b, 351 80 Växjö, Combitech A/S, Combitech OY or Watchcom is controller for processing your personal data, depending on who your employer is. This means that Combitech is responsible for processing your personal data correctly and in accordance with applicable privacy laws. If you have questions regarding Combitech's processing of your personal data, please contact your local HR manager. General questions regarding privacy at Combitech can be sent to [legal@combitech.com](mailto:legal@combitech.com).