

PRIVACY POLICY CONSULTANTS

1 INTRODUCTION

Dewire recognizes the importance of protecting the privacy of your personal data. We have instituted strict policies and security measures to protect the information you provide us.

The purpose of this privacy policy is for you, as a consultant, to learn how Dewire handles your personal data and for you to be able to feel secure that the processing is being carried out in accordance with the General Data Protection Regulation and other applicable data protection law. The privacy policy also describes your rights vis-à-vis us and how you can enforce those rights.

2 WHO IS THE CONTROLLER OF PERSONAL DATA?

The Swedish company Dewire Consultants Aktiebolag, reg. no. 556403-0996 ("**We**" "**Us**"), is the controller of your personal data. Our affiliated companies (including other companies within the group, joint ventures, franchisees and licensees) and selected suppliers may process your personal data on our behalf and in accordance with our instructions as stated below and are thereby processors of your personal data.

You may contact us at any time, please find our contact details below.

Address: Magasinallén 2, 891 31 Örnköldsvik
E-mail: privacy@knightec.se

3 PERSONAL DATA, PURPOSE AND LEGAL GROUNDS

We process the below specified data about our consultants. Please note that all personal data specified below is not necessarily processed regarding every consultant.

3.1 Personal data for administration of consultant's work and enabling payment

We will process your name, e-mail address, telephone number, personal or organisation identification number and reference number (an internal reference number provided by us) for the purpose of administering your work for us, granting you access to our IT-systems and to provide your contact information to participants in projects. We will process work details such as your working hours, provided services etc., as well as bank account information for the purpose of paying invoices for services provided. The legal basis for the processing is that it is necessary in order for us to be able to fulfil our contractual obligations towards you as a consultant.

Joint database: Furthermore, we will process your name, e-mail address, telephone number and calendar in a joint database established by the Group companies Knightec AB, Dewire Consultants Aktiebolag and Daresay AB (the "**Group**"). The purpose of the processing is to enable the Group to communicate with consultants working within the Group, to schedule appointments, book meetings and otherwise administer its consultants. The processing based on a balancing of interests, where our legitimate interest is to be able to administer and communicate with our consultants. You may enforce your rights as a data subject against any of the companies within the Group in relation to the processing performed in the joint database.

3.2 Personal data that is communicated through our website and social media etc.

We may publish your name, picture and work contact information on our website or social media channels to be communicated with clients and other parties who visit the website or social media channels. The processing is carried out on the basis of balancing of interests,

where our legitimate interest is to be able to communicate our consultants' contact details to customers and other parties.

3.3 Ensuring proper IT-security

We may process user logs of our different IT-systems for the purpose of controlling and ensure that security in the IT-systems are sufficient and to prevent or investigate criminal activities in our IT-systems. The legal basis of the processing is a balancing of interests, where our legitimate interest is to be able to discover, prevent and investigate criminal activities and to adopt measures to remedy potential harm to us and our customers, employees, consultants and affiliated parties.

3.4 Data in business documents and the like

Your personal data may be found in agreements, documentation of minutes, correspondence and business matters, etc. (for example, when you have represented us). This type of information is saved to the extent and as long as necessary for us to be able to conduct our business operations in a satisfactory manner. The processing takes place based a balancing of interests, where our legitimate interest is to be able to document our business transactions and conduct our business operations.

4 WHO WE MIGHT SHARE YOUR DATA WITH

We may share your data with affiliated companies including other companies within the Group, joint ventures, franchisees and licensees. We may transfer your personal data to suppliers that provide services for us, such as cloud service providers and the likes thereof. These recipients are only entitled to process your personal data on behalf of us in conjunction with the performance of a service. We take all reasonable legal, technical and organizational measures in order to ensure that your data is handled securely and with an adequate level of protection when transferring to, or sharing with, selected third parties.

We may also disclose your personal data to a public authority when we are obligated to do so by law, for example the Tax Agency and the Swedish Social Insurance Agency. In the event all or part of our business is sold, we may transfer your personal data to a potential purchaser of the business.

5 WHERE IS YOUR PERSONAL DATA PROCESSED?

Your personal data will be processed primarily within the EU/EEA, but may be transferred to countries outside of the EU/EEA if the service providers that process data on behalf of us transfer the data to such locations. We have taken appropriate protective measures in order to protect your personal data through the recipient of the personal data, for example by having signed an agreement containing certain standard contract clauses which ensure that your data is processed in accordance with the General Data Protection Regulation.

6 HOW LONG DO WE SAVE YOUR DATA?

As a basic rule, we process your personal data as long as it is necessary for the purposes for which the data was collected. In this section 6 we have outlined, for certain processes, our deletion process. For events not outlined there, the general rule is that personal data regarding consultants will be deleted once the consultant's role at Dewire has expired, should the data no longer be deemed necessary. The types of personal data saved, and how long it is saved, may vary depending on circumstances in each individual case. Set forth below is a summary of what types of data that are normally saved after the expiry of the consultant's role at Dewire.

6.1 Data which might be required to exercise our rights

As a general rule, we may save your personal data for five months after a your role as a consultant has expired, to the extent that the data is deemed relevant to be able establish, enforce or defend against legal claims. The processing is carried out on the basis of a balancing of interests, where our legitimate interest is to exercise our rights in accordance with above.

6.2 Salary details and other information that must be stored according to the accountancy law

We save salary data, invoice details and other information that must be saved in accordance with Swedish accountancy law for several years after the expiry of your role as a consultant for us. The data is saved in order for us to be able to perform our legal obligations.

6.3 Data published on our website

Upon the expiry of your role as a consultant, your e-mail account and other personal data shall be removed from our website. This data will normally be removed within a week from the expiry of your role as a consultant.

6.4 Data in business documents and the like

Personal data regarding a former consultant may be found from time to time in agreements, documentation of minutes, correspondence and business matters, etc. This type of data is saved to the extent and as long as necessary for us to be able to conduct our business operations in a satisfactory manner. The processing is based on a balancing of interests, where our legitimate interest is to be able to document our business transactions and conduct our business operations.

6.5 Miscellaneous

Notwithstanding the aforementioned, we may also save your personal data for a longer period of time where it is necessary to fulfil a legal obligation which requires processing according to applicable employment law legislation or other legislation, or in order for us to be able to establish, enforce or defend against legal claims.

7 DATA SUBJECT RIGHTS

In this section 7, we have summarized your data subject rights to request access, portability, rectification, erasure of your personal data, to restrict the processing of your personal data, to object to processing, and your right to lodge a complaint with the supervisory authority.

If you want to exercise your rights, please send us an e-mail to privacy@knightec.se. Please note however that if you want to lodge a complaint with the supervisory authority, you need to contact the authority directly.

7.1 Right of access

You have the right to obtain confirmation of whether personal data concerning yourself is being processed and, where that is the case, access to the personal data and information regarding, inter alia, the purpose of processing, the categories of personal data concerned, the categories of recipients to whom your data have been or will be disclosed, and the envisaged period of time for which personal data will be stored (or the criteria for determining this).

7.2 Right of rectification

You have the right to request rectification of inaccurate personal data concerning yourself, and to complete incomplete data.

7.3 Right of erasure and right or restriction

Under certain circumstances you are entitled to request that we erase your personal data or restrict our processing of your data, namely in the following events:

- (a) When it is no longer necessary for us to process your data taking into consideration the purposes for which it was collected.
- (b) When our processing is based on your consent and you have withdrawn your consent, and there is no other legal basis for the processing of your data.
- (c) When our processing of your data is based on a legitimate interest legal basis and you object to such processing, and there is no overriding legitimate ground for our processing.
- (d) When you have objected to our processing of your data for direct marketing purposes.
- (e) When your personal data has been unlawfully processed.
- (f) When the personal data must be erased for compliance with a legal obligation that applies to us.
- (g) When the personal data collected concerns a child (under 13 years of age) in relation to the offer of information society services.

7.4 Right to objection

Under certain circumstances you have the right to object to our processing of your data, whereupon we shall no longer process your data unless we can demonstrate compelling legitimate grounds for the processing.

7.5 Data portability

If our processing is based on your consent or if the processing is necessary for our performance of a contract with you, you have the right to request that the data which you have provided to us shall be provided to you in a structured, commonly used and machine-readable format and you also have the right to transmit such data to another controller.

7.6 Right to lodge a complaint with supervisory authority

Please note that if you consider the processing of your data to be in violation of applicable data protection laws, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence or the place of the alleged infringement (see http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

8 CHANGES IN THE PRIVACY POLICY

We reserve the right to make changes to this privacy policy. Where such changes are made, notice will be provided in a way that we deem fit.
