

## EXTERNAL PRIVACY POLICY CONTACT PERSONS AT DEWIRE CONSULTANT'S COMPANY CUSTOMERS

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### 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 contact person of one of our company customers, 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 RESPONSIBLE FOR THE PROCESSING OF YOUR 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 our 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 Örnsköldsvik  
E-mail: [privacy@knightec.se](mailto:privacy@knightec.se)

### 3 CATEGORIES OF DATA PROCESSED, PURPOSE AND LEGAL BASIS FOR PROCESSING

If you are the contact person at one of our company customers, we will process your name, telephone number, email address and your role at the company customer. We process the data for the purpose of being able to manage the relationship with the company customer, meaning e.g. administering and exercising our rights and obligations under the agreement with the company customer, manage orders or provided services, and to otherwise enable us to communicate and conducts our business. The processing is based on a "balancing of interests" legal basis, where our legitimate interest is to administer our contractual obligations and rights, communicate with and otherwise maintain a good relationship with the company customer.

If you work with us as a sole proprietorship (Sw. *Enskild firma*), we will process your name, telephone number, email address and personal identity number (since it is the same as the sole proprietorship's registration number). We process the data for the purpose of being able to manage the relationship with the company customer, meaning e.g. administering and exercising our rights and obligations under the agreement with the company customer, manage orders or provided services, and to otherwise enable us to communicate and conduct our business. The legal basis for the processing is that is is necessary in order for us to fulfill our contractual obligations towards the sole proprietorship.

Joint database: Furthermore, we process your name, e-mail address, telephone number and role at the company customer in a joint database established by our 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 its customers, to schedule appointments, book meetings and otherwise administer the Group's relationship with its customers. The processing is based on a balancing of interests, where our legitimate interest

is to be able to administer and communicate with our customers and to enable the Group to offer its services to its customers. 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.

#### **4 DO WE SHARE YOUR INFORMATION WITH OTHERS?**

We do not sell or rent the personal data to any other entity.

We may share your data with affiliated companies including other companies within our group, joint ventures, franchisees and licensees. These recipients are only entitled to process your personal data on behalf of us while performing a service for us. 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 it to, or sharing it with, such selected third parties.

We may also release your personal data to public authorities where we are obligated to do so by law.

In the event all or part of our operations are sold, we may transfer your personal data to a potential purchaser of the business.

#### **5 HOW LONG DO WE KEEP YOUR DATA?**

We will retain your name and contact information in our register of contact persons and the Group's joint database while our contractual relationship with the company customer is active or if we otherwise require the data for any matter related to our contractual relationship with the company customer. If you notify us that your employment with the company customer has terminated or that you should no longer be the contact person, we will delete your data from our register of contact persons within one month.

Your data (for example your name) may be found in agreements, correspondence or other documentation regarding our relationship with the company customer which we may need to save for commercial, business or legal reasons. The processing is based on our legitimate interest to store such documentation to the extent it is of commercial, business or legal significance to our business operations. This data will be stored for as long as it is necessary for the reasons mentioned.

We may also save your personal data for a longer period of time where necessary in order to fulfill a legal obligation which requires processing according to applicable law or in order for us to be able to establish, enforce, or defend against legal claims, for example in relation to confidentiality and liability provisions that outlive the termination of the contract with a company customer.

#### **6 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.

## **7 DATA SUBJECT RIGHTS**

In this section 0, 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](mailto: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 of 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](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)).

#### **8 MODIFICATION**

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.

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