

PRIVACY POLICY EMPLOYEES

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 an employee, 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 employees. Please note that all personal data specified below is not necessarily processed regarding every employee. For instance, if you do not suffer from illness during the term of your employment, or if you do not incur expenses for which we are to reimburse you, we will not process those types of data about you.

3.1 Personal data for administration of employment or contract

Name, role, job description, term of employment, personal ID number, address, telephone number, e-mail address, bank account information, information about your salary and benefits, tax tariff and pension, as well as data regarding time sheets, absence, leave of absence, vacation, are processed for the purpose of administering the employment, which among other things includes making salary payments and pensions contributions. The legal basis for the processing is that it is necessary in order for us to be able to fulfil our obligations as an employer according to the employment agreement and under employment law.

Joint database: Furthermore, we process your name, e-mail address, telephone number, schedule and your role at Dewire 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 employees within the Group, to schedule appointments, book meetings and otherwise administer its employees. The processing is based on a balancing of interests, where our legitimate interest is to be able to administer and communicate with our employees. 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 Data regarding leave due to illness, pregnancy or care of children

We process data regarding leave due to illness, pregnancy, or childcare including sickness certificate from the Swedish Social Insurance Agency only for the purpose of administering any absence due to illness, pregnancy, parental leave or childcare, e.g. to calculate sick pay and investigate absence. The legal basis for the processing of these data is that the processing is necessary for us to be able to fulfil our legal obligations and obligations under the employment. The personal data may include sensitive data but may be processed because the processing is necessary for us to fulfil our obligations under employment law.

3.3 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 that visit our website or social media channels. The processing is carried out on the basis of a balancing of interests, where our legitimate interest is to be able to communicate our employees' contact details to customers and other parties.

3.4 Notes from employee review discussions/evaluations

Data from employee review discussions/evaluations including information on performance from other colleagues, tasks completed, may be processed for the purpose of enabling us to carry out our assignment as an employer. We have particularly strict routines for handling such data and that the data may only be processed to the extent absolutely necessary. The processing is carried out based upon a balancing of interests as the legal ground, where our legitimate interest is to e.g. enable us to staff the organization in the best possible manner, to evaluate you for promotion and to develop the employment relationship.

3.5 Data in relation to customer reviews

If you are part of an external project with a customer, the customer may be asked to evaluate your performance during the project. The evaluation data will be collected from the customer after the project has been completed. The evaluation data will only be processed for internal purposes in order to evaluate the quality of the provided service and to improve our service delivery. The processing is based upon a balancing of interests, where our legitimate interest is to evaluate the performance of our services and our employees in order to staff our organisation and develop our services.

3.6 Ensuring proper IT-security

We may process user logs of our different IT-systems for the purpose of controlling and ensure that security in our IT-systems is sufficient and to prevent or investigate criminal activities in our IT-systems. The legal basis for 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 employees, customers and other affiliated parties.

3.7 Data regarding employees' health, including alcohol/drug problems

In the event it is learned that an employee has a substance abuse problem regarding alcohol or drugs or has other needs for rehabilitation, we have an obligation under employment law to rehabilitate the employee. The purpose of processing data regarding employees' health/alcohol/drug abuse is thus to rehabilitate the employee. The legal grounds for the

processing are that we, as an employer, must be able to perform our obligations under employment law.

We are aware that data regarding an individual's health, including substance abuse problems, is considered very sensitive information from a privacy perspective. This means that we have particularly strict routines for handling such data and that the data may only be processed to the extent absolutely necessary in order to fulfil the rehabilitation obligation.

3.8 Other personal data which we are obligated to process under the employment law

In addition to the obligation to rehabilitate the employee, we may, under employment law, be obligated to process certain data about our employees. For instance, we may be obligated to offer terminal glasses or report on accidents in the workplace and may therefore be forced to process data regarding your health. We may also have reason to process data regarding illegal or inappropriate performance or behaviour, and disciplinary actions including issued warnings against you as the employee. The legal basis for such processing is that it is necessary in order to fulfill our legal obligations.

3.9 Data regarding company credit cards

If you have a company credit card, we process your name and your purchasing history including information regarding whether you have used the card for private purchases. The data is processed in order for us to be able to make any necessary deductions from your salary, for bookkeeping purposes, and in order to verify that the credit card has been used in accordance with our internal rules. The processing is based on the legal grounds that it is necessary for us to be able to fulfill our legal obligations.

3.10 Data regarding healthcare contribution

We process data related to our employees' healthcare contribution. Such processing may include which amount you as an employee has used or the place where you have a membership or treatment. The data is processed based on the legal basis that it is necessary for us to be able to perform our contractual obligations towards you as an employee and to be able to perform our legal obligations.

3.11 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 employees or contractors will be deleted once the employment is terminated, 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 employment or the contract.

6.1 Data which might be required to exercise our rights

As a general rule, we may save our employees' personal data for five months after the employment has expired, to the extent that the data is deemed relevant to be able to establish, enforce or defend against legal claims. The processing is carried out on the basis of 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 termination of employment or contract. The data is saved in order for us to be able to perform our legal obligations.

6.3 Pensions, etc.

Personal data needed for the payment of pensions/pension allocations is saved to the extent and if necessary for us to be able fulfil our contractual or legal obligations.

6.4 Data published on our website

Upon the expiry of an employment, the employee's email account and other personal data shall be removed from the website. This data will normally be removed within a week from the expiry of the employment or contract.

6.5 Data in business documents and the like

Personal data regarding a former employee 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.

6.6 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 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).

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.
