

DATA PRIVACY NOTICE

Dellner Group AB ("Dellner Group" or "we") collects and processes personal data when we interact with a number of different external parties and persons, for example if you apply for a job, if you are a business contact or if you visit Dellner Group.

Dellner Group protects your integrity and takes care to protect the personal data being processed. Dellner Group's processing of personal data is in accordance with applicable data protection laws, such as 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 Dellner Group collects, processes and shares your personal data. Furthermore, information is provided about how we handle an eventual data breach as well as information about your rights under the GDPR.

Please be aware that certain Dellner Group subsidiaries may have separate data privacy information that can be found on their webpages.

In this notice, the word "**process**" means any action taken with personal data, such as collecting, storing, using, sharing, or deleting it, whether done manually or by automated means.

HOW WE HANDLE YOUR PERSONAL DATA

Former Employees

Dellner Group processes personal data for former employees in order to fulfil our remaining contractual obligations that relate to the employment and to comply with applicable laws, such as employment and accounting laws.

The categories of personal data Dellner Group may process about former employees include:

- Identification and contact details (e.g. name, address, email address, phone number)
- Employment details (e.g. job title, department, employment dates, manager, work location)
- Compensation and benefits data (e.g. salary, pension contributions, bonus records, insurance coverage)
- Leave and absence records (e.g. vacation, sick leave, parental leave)
- Payroll and tax-related data (e.g. salary payments, tax withholding, payslips, bank details)
- Disciplinary or performance documentation (if applicable)
- Education or training paid for or arranged by Dellner Group
- Exit interviews or correspondence

Dellner Group applies different retention periods for different categories of personal data that is related to the ended employment. Your personal data will be saved as long as there is a legitimate purpose for Dellner Group to continue the processing and/or in accordance with the time period required by applicable law.

Job Applicants

The categories of personal data Dellner Group may process about job applicants include:

- Identification and contact details (e.g. name, address, email address, phone number)
- Position applied for
- Current employment
- Education
- Job experience
- Qualifications (e.g. language skills, computer knowledge and special skills)
- References
- Other information provided by you in your CV and/or cover letter
- Correspondence with Dellner Group during the recruitment process
- Results from knowledge tests or personality tests

Dellner Group processes your personal data to administer your job application and assess your skills and suitability for the position and to communicate with you during the recruitment process.

The legal basis for our processing is that it is in our legitimate interests to process your personal data to manage and conclude the recruitment process. It is also in a job applicants' interest to be able to apply for jobs at Dellner Group and to participate in a recruitment process.

Your personal data will be saved as long as there is a legitimate purpose for Dellner Group to continue the processing and/or in accordance with the time period required by applicable law.

Business Contacts

The categories of personal data Dellner Group may process about business contacts include:

- Identification and contact details (e.g. name, address, email address, phone number)
- Job title
- Role
- Work address

In the event your employer or assignor is subject to Dellner Group's due diligence process for business partners, additional personal data will be processed.

We collect the personal data directly from you or from the organization that you represent or in some cases from publicly available services or registers, authorities or institutions.

The purpose of Dellner Group's processing of your personal data is (i) to provide relevant information to you/your employer about Dellner Group's products and services, and (ii) to facilitate current and/or future engagements between Dellner Group and your employer.

Dellner Group's processing of your personal data is based on the legitimate interests pursued by Dellner Group. This means that Dellner Group is of the view that its interest in processing your personal data for the purposes listed above prevails the privacy violation that you are exposed to as a result of the processing. This conclusion from our balance of interest test is made especially due to the fact that (i) it is crucial for Dellner Group to process contact information to a representative of Dellner Group's business partners, and (ii) that the processing of your personal data is limited to the extent possible.

Dellner Group applies different retention periods for different categories of personal data that is related to business contacts. Your personal data will be saved as long as there is a legitimate purpose for Dellner Group to continue the processing and/or in accordance with the time period required by applicable law.

Facility Visitors

The categories of personal data Dellner Group may process about facility visitors include:

- Identification and contact details (e.g. name, address, email address, phone number)
- National ID number
- Passport number (if Swedish national ID number is not provided)
- Citizenship (if Swedish national ID number is not provided)
- Name of the organisation you represent on the day of the visit
- Duration of visit
- Entry log of our visit
- Title
- Car registration number (if you use the visitors' parking)
- Surveillance camera ("CCTV") recordings or images

The personal data is collected directly from you or from the organisation that you represent, or through the use of CCTV.

Dellner Group processes your personal data for the purposes to comply with national security legislation and to maintain safety and security at the facilities.

Dellner Group will process your personal data for the following legal reasons:

- in order to comply with national security legislation (e.g. security legislation or security protection agreements entered into with government authorities)
- when it is necessary in order to fulfil a contract with you or your employer
- when it is necessary to process your personal data for purposes that concern Dellner Group's legitimate interests and when the interest in processing the data is greater than your interest in the data not being processed (e.g. when processing is performed to maintain safety and security at the facilities)

Your personal data will be saved as long as there is a legitimate purpose for Dellner Group to continue the processing and/or in accordance with the time period required by applicable law.

Digital Visitors

You are free to explore Dellner Group's without providing any personal data about yourself.

Upon visiting our sites, we will ask for your consent to place cookies. Cookies are small text files that a website transfers to your hard disk or browser, which will then store the cookie on your hard drive. Cookies will tell us the time and length of your visit, the pages you look at on our sites, and the site you visited just before coming to ours. We will also record the name of your internet service provider. Cookies does not identify you as an individual. Only "Necessary" cookies are mandatory. If you change your mind, you can change or revoke your consent in relation to cookies.

When you visit dellnergroupp.com and register yourself through any form, we may request that you enter personal data about yourself. This is used to provide you with your requested information and may be used in further marketing programs.

Dellner Group processes your personal data for the purposes of enabling use of our services, such as subscription to our newsletters and press releases and participation in our webinars and other digital events.

The legal basis for the processing is that Dellner Group has a legitimate interest in providing services to our digital visitors such as subscriptions, registrations, develop our services and products, or get a quote on a business proposal.

Dellner Group applies different retention periods for different categories of personal data that is related to digital visits. Your personal data will be saved as long as there is a legitimate purpose for Dellner Group to continue the processing and/or in accordance with the time period required by applicable law.

Whistleblowing

Whistleblowing reports are likely to include personal data. Dellner Group is protecting personal data in accordance with applicable laws and the relevant contractual confidentiality obligations towards its employees and external parties.

Dellner Group processes your personal data to fulfil its obligations under the EU Whistleblowing Directive 2019/1937 and member state legislation implementing the directive (in Sweden; the Act on the Protection of Persons Reporting Irregularities 2021:890).

The below information is presented for the benefit of anyone who has made a report or who is the subject of a report.

Dellner Group may capture the following personal data and information: (i) your name and contact details (unless you report anonymously) and whether you are employed by Dellner Group; (ii) the name and other personal data of the persons that you identify in your report if you provide such information; and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

Sensitive personal data, such as information relating to an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, should not be submitted in a report unless essential for the reported issue, and will be erased unless deemed absolutely necessary for the investigation and it is legal to process such data.

Personal data which is manifestly not relevant for the investigation is deleted or anonymized when the report is processed. All personal data shall be deleted or anonymized within the time period required by applicable law.

Data Transfers Outside the European Economic Area

Dellner Group is a global organization with operations world-wide. In certain circumstances, Dellner Group may transfer personal data to countries or organizations outside the European Economic Area (EEA) that may not provide the same level of data protection as within the EEA.

When doing so we always comply with existing laws and regulations as well as decisions from the European Commission to ensure that your personal data is handled in a secure way. If your personal data is transferred out of the European Union this is done using appropriate transfer mechanisms including the relevant prior assessments and appropriate safeguards.

By using our services or providing us with your personal data, you consent to the transfer of your personal data as described in this policy. If you have any questions or concerns about the transfer of your personal data outside the EU, please contact us at info@dellnergroupp.com.

DATA BREACH

Data Breach Notification

In the event of a data breach, Dellner Group will promptly assess the breach's scope and severity. If it poses a risk to individuals' rights and freedoms, we will notify the relevant supervisory authority (in Sweden; Integritetsskyddsmyndigheten) within 72 hours. If the breach is likely to result in a high risk to individuals, we will also communicate it to the affected data subjects without undue delay, providing clear and concise information about the breach and the measures taken to address it. We maintain records of all breaches and encourage individuals to report any concerns about the security of their personal data to us immediately at info@dellnergroupp.com.

YOUR RIGHTS AND HOW TO GET IN TOUCH

Right to access the data

You are entitled to request more detailed information about how Dellner Group 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.

Right to rectification, objection, erasure and restriction

If your personal data is incorrect, incomplete or irrelevant, you may want to have them corrected or deleted. If you do not agree with a balance of interests that Dellner Group 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.

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 Dellner Group.

Right to data portability

To the extent that Dellner Group 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 Dellner Group in a structured, widely used and machine-readable manner format and is entitled to transfer these to another controller.

Right to complain

It is important for Dellner Group to make sure that you are confident in personal data processing. Dellner Group protects your personal integrity 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. In Sweden the data protection authority is Integritetsskyddsmyndigheten, and you can reach the authority on www.imy.se.

The controller of your personal data

Dellner Group AB, org. nr. 556444-4627, Teknikergatan 1, 781 70 Borlänge, is the controller of your personal data. This means that Dellner Group is responsible for processing your personal data correctly and in accordance with applicable privacy laws.

If you want to exercise any of your rights, please contact Dellner Group at info@dellnergroun.com.