

Privacy Policy

This privacy policy contains information about the processing of your personal data if you are a potential, existing or former client, employee to such client, business partner, vendor, job applicant or are someone else who interacts with us for business purposes

1. What is a privacy policy?

We take your personal data seriously because we know you do. Hence, we are committed to take fully responsibility to protect your personal data. We will only process your personal data only to the extent it is necessary for the purposes set out in this Privacy Policy and in compliance with all applicable legislation and regulations for the protection of personal data.

In our Privacy Policy we explain who is responsible for the personal data processing that takes place in our organization. We also describe which personal data about you is processed when we receive data about you or when you provide data to us in various situations, how we process the personal data, why we do it and on what legal basis we justify the processing. We also explain which external parties may be processing personal data about you. You also receive information about your rights when it comes to our processing of your personal data and about how you can proceed to exercise your rights.

2. Who is responsible for the processing of your personal data?

EQ Europe AB, with corporate identity number 559236-7295, is the controller for the processing of your personal data in relation to those who are a representative of a potential, existing or former client, employee to such client, business partner, vendor, job applicant or if you are someone else who interacts with us for business purposes.

In this text, EQ Europe AB is referred to as “we” and those who are any of the data subjects described above as “you”.

3. From where do we collect your personal data?

3.1 If you represent a potential, existing or a former client, business partner, vendor or are someone else who interacts with us for business purposes

We gain access to your personal data primarily directly from you or from the company or the organization you represent. Either if you are in contact with us on behalf of your company or your organization, or if you are designated by your employer as a representative of the company or organization that you represent. If we believe that you are representing a potential client, we may also obtain your personal data from the internet, public registers, or social media. If you interact with us via our website, personal data may be obtained from there.

3.2 If you are an employee to an existing or a former client subject to our services

We gain access to your personal data via our vendor that provide the platform for our tests where you have submitted data that may be considered as personal data.

3.3 If you are a job applicant

We have access to your personal data primarily because you apply for a job with us via someone who works for us, a general email address of ours, through our website or via a recruitment agency. Please note that we are not always the controller of your personal data if we gain access to your personal data when we have hired a recruitment agency to fill a position that we have advertised; in this case the recruitment agency is the controller. We may also access your personal data from social media such as, for example, LinkedIn, Facebook, Google+ or Instagram if we believe that you might be considered for a position that we have advertised.

4. What categories of personal data about you do we process?

4.1 If you represent a potential, existing or a former client, business partner, vendor, or are someone else who interact with us for business purposes

To create a new client, business partner or vendor relationship we process personal data as your name, your email address, your phone number, the company or organization which you represent, title and information you submit in your communication with us and any other personal data that emerges in communication with you. To manage the collaboration and to comply with the Swedish Accounting Act, we also process your personal data that appears on the invoice if you are quoted as reference on an invoice.

4.2 If you are an employee to an existing or a former client subject to our services

In connection to the services we provide, we process your personal data which have been provided by you through the test that have been submitted by you. Such personal data is inter alia name, personal identification number and e-mail address.

4.3 If you are a job applicant

In regards to job applicants we process personal data such as your name, your personal identification number, your postal address, your email address, your phone number and other personal data that emerges in communication with you such as, for example, gender, photographs, professional background such as your education and previous employers, as well as claims relating to salaries and benefits.

5. Why do we process your personal data, what is our legal basis to do so and how long do we store it?

5.1 If you represent a potential, existing or a former client, business partner, vendor, or are someone else who interact with us for business purposes

The purpose to process your personal data if you represent a **potential client, business partner or vendor** is to create a new client, business partner or vendor relationship.

The legal basis for processing your personal data for the stated purpose is EQ Europe's legitimate interest in contacting and communicating with and marketing ourselves to you as a representative of a potential customer, business partner or vendor who we believe may be interested in initiating a customer, business or supplier relationship (balancing of interests). We can also ask for your consent to be able to send marketing for a longer period than would otherwise have been possible.

The purpose to process your personal data if you represent an **existing or former client, business partner, vendor or someone else who interact with us for business purposes** we process your personal data to negotiate, initiate and manage the client, business or supplier relationship, send marketing, handle any complaints or legal claims and resume a former customer, business partner or vendor relationship.

The legal basis for processing your personal data in the matter to negotiate, initiate and manage the relationship is EQ Europe AB's legitimate interest of being able to manage the client relationship and the agreement with your company or organization and to communicate with you as a representative of our client, business partner or vendor. The processing of personal data on your company's or organization's invoice takes place in order to fulfil EQ Europe AB's legal obligations to store data in accordance with, for example, the Swedish Accounting Act.

In regards to be able to send marketing the legal basis for processing your personal data for the stated purpose is EQ Europe's legitimate interest in marketing ourselves to you as a representative of a company or organization that we believe may be interested in receiving news, information and other marketing from us (balancing of interests). We can also ask for your consent to be able to send marketing for a longer period than would otherwise have been possible.

To be able to handle complaints or legal claims the legal basis to process your personal data is EQ Europe AB's legitimate interest in being able to establish, exercise or defend a possible complaint or legal claim in which you are involved as the representative of our existing or former client, business partner or vendor (balancing of interests).

The legal basis to resume a former client, business or vendor relationship is EQ Europe AB's legitimate interest in trying to market ourselves to our former customers, business partners or suppliers (balancing of interests).

5.2 If you are an employee to an existing or a former client subject to our services

The purpose to process your personal data if you are an employee to an existing or a former client subject to our services is to be able to perform our services which includes evaluation of the data which have been submitted to you in order to be able to consult your employer on how to take adequate actions.

The legal basis to process your personal data in connection to the purpose stated above is EQ Europe AB's legitimate interests in being able to perform our services so that we are being able to evaluate the information that you have been submitted which may include personal data. Sometimes we process your personal data because you have given us your consent to process personal data where needed.

5.3 If you are a job applicant

The purpose of process your personal data if you are a job applicant is to be able to evaluate, negotiate and enter into an employment or consultancy arrangement or handle complaints or legal claims by you. We are sometimes also obliged to process your personal data and to share

this when we are audited or in order to combat, control or prove fraud and other criminal activities.

In order to be able to evaluate, negotiate and enter into an employment or consultancy arrangement with you, the legal basis for processing your personal is EQ Europe AB's legitimate interest in being able to achieve the stated purpose (balancing of interests).

To be able to handle complaints, objections, legal claims or to establish, exercise or defend a possible legal claim from you that you may exercise, the legal basis to process your personal data is EQ Europe's legitimate interest. (balancing of interests).

The legal basis to process your personal data for the purpose to combat crime, fraud or other criminal activities is that we have the legal obligation to process your personal data.

6. Who have access to your personal data, where is it kept and how long is it stored?

Your personal data will primarily be processed by EQ Europe AB. Although it may also be passed on to external recipients. These recipients only have access to your personal data in order to carry out their assignment and to meet their commitments to us. Nor do these recipients have the right to use the personal data for any other purposes than those described in this privacy policy. If we use a processor to process your personal data for us, we make sure that we have concluded what is referred to as a data protection agreement with them so that we can guarantee that your personal data will be processed correctly and securely. Your personal data is shared with, among others, the following recipients:

We share your personal data with our vendors such as, for example, vendors connected to the performance of our services as well as IT vendors in relation to our website, our e-mail and storage. Other vendors such as printing and postal services may also process your personal data. If you are a job applicant, these vendors may also be our recruitment agencies or vendors that provide services in the area of competence and personality testing.

If you would like to find out more about how and why your personal data is shared with these recipients, you can contact us via the contact details provided under *"Do you want to get in touch with us?"*.

We may use vendors that may process your personal data outside the EU/EEA. In cases where your personal data is transferred to another country and a country outside the EU/EEA, we make sure that there are appropriate protective measures in order to comply with the data protection regulations. We will never transfer your personal data outside the EU/EEA without guaranteeing the security and protection of your personal data.

We process your personal data for as long as it is necessary to fulfil the above purposes. This does not apply, however, if storage is required by law for longer than the purpose requires.

Other items of personal data that are not necessary in order to fulfil the above purposes but that you voluntarily disclose to us and for which you have given us consent to use will be

processed for as long as the data is required for its purpose, although never beyond the time when you withdraw your consent.

The processing of anonymized data, i.e., data that cannot be linked directly or indirectly to a natural person, is not covered by the limitations described in this privacy policy.

7. Are you subject to any profiling or automated decision making?

Profiling means the automatic processing of personal data that is used to assess certain personal properties in a natural person, in particular in order to analyze or predict, for example, this person's financial situation, personal preferences, interests and location.

If you are defined as a data subject in this privacy policy, you will not be the subject of profiling or automated decisions as described in the data protection regulations.

8. In what ways are you able to influence how we are processing your personal data?

You have certain rights in respect of the processing of your personal data; these are described in more detail below. To exercise your rights or submit any questions you might have about your rights, you are welcome to contact us via the contact details provided under "Do you want to get in touch with us?".

8.1 Access

You have the right to receive a confirmation of whether we are processing your personal data, and if we are doing so you also have the right to receive information about how we are processing this and to receive a copy of your personal data. To be more specific, this means that you have the right to receive information about why we are processing your personal data and how we performed a possible balancing of interests in order to process your personal data, which categories of personal data we are processing, which parties we are sharing your personal data with, how long we store your personal data and criteria for performing the assessment of the storage time, what rights you have, from which parties we receive your personal data (if we did not receive it from you) and whether the processing of your personal data includes any automated decision-making, so-called profiling, and whether your personal data has been transferred to a country outside the EEA, and in such cases how we guarantee the satisfactory security of your personal data. For any additional copies over and above those that you have the right to receive free of charge, we will make an administrative charge corresponding to the costs we incur in sending the additional copies to you.

8.2 Rectification

You have the right to the rectification of any incorrect personal data relating to you and to ask us to supplement any incomplete personal data.

8.3 Erasure (the right to be forgotten)

In certain circumstances you have the right to request the erasure of your personal data. Such circumstances exist, for example, if the personal data is no longer necessary for the purposes for which it was collected or processed, or if you withdraw your consent on which the processing was based and there is no other legal basis for the processing activity.

8.4 Restriction

You also have the right to request that we restrict our processing of your personal data. Such circumstances exist, for example, if you are contesting the correctness of the data or if the processing is illegal and you object to the personal data being erased but instead request a restriction in the use of the personal data.

8.5 Data portability

You have the right to ask us to transfer some of your personal data that we hold about you to another company or your organization in a structured, commonly used and machine-readable format (data portability). The right to data portability applies for personal data that you have submitted to us and where processing is based on your consent and is automated. You also have the right to transfer the personal data directly from us to another controller if this is technically possible.

8.6 Objection

You have the right at any time to object to the processing of your personal data that is based on a balancing of interests and specifically to our processing your personal data for marketing purposes. In certain cases, however, you do not have the right to object to processing on the basis of a balancing of interests (e.g. because we must store your personal data). This is the case if we can present binding, legitimate reasons that outweigh your interests, rights and freedoms, or if it is taking place in order to establish, exercise or defend legal claims.

8.7 Withdraw consent

You have the right to withdraw all, or part of consent given for the processing of your personal data. The withdrawal of your consent takes effect once the withdrawal has taken place.

8.8 Submit complaints

You also have the right to submit complaints in respect of our processing of your personal data; see more about this under “Do you want to get in touch with us?”.

9. Do you want to get in touch with us?

If you would like to exercise your rights as described above or have any other questions about how we process your personal data or want to get in touch with us please contact us EQ Europe AB, corporate identity number 559236-7295, either by phone +46 70-763 30 11, e-mail info@eqeurope.com or by post Banérgatan 47, 115 22 Stockholm.

If you believe that our processing of personal data is incorrect, you have the right to submit a complaint to the Swedish Authority for Privacy Protection “Integritetsskyddsmyndigheten” which is the supervisory authority in Sweden. More information is available at www.imy.se.