



**ITIVITI**

# **Data Protection Policy**

Itiviti Group AB



## Introduction

Itiviti Group adheres to applicable laws, respects the privacy rights, and is strongly committed to process personal information with high integrity.

Itiviti uses reasonable technical and organizational measures to ensure the integrity and adequacy of personal information.



## Collection

Itiviti processes personal information about its own employees. The personal information collected about the employees is necessary for the employment relationship. Collected information includes, but is not limited to, the employee's name, address, payroll and tax information, contact information of contact person in case of emergency, medical information that is crucial to absence data because of illness, and performance reviews.

Employees at Itiviti are encouraged to contact Human Resources for more specific information on what information is collected.

Itiviti collects contact information of representatives of customers and suppliers. Itiviti does not have access to any personal information collected by the customer or the supplier themselves, such as information of their customers and employees.

Itiviti only collects personal information from users through Itiviti's website if individuals provide information voluntary (such as users name, e-mail, address or telephone number). Users of Itiviti's website are kindly advised not to provide any information through the website if they do not want their information to be collected by Itiviti.

## Purpose

Itiviti acknowledges that many activities performed routinely in the employment context entail the processing of personal information of employees, sometimes of sensitive information. Personal information of employees may be collected for various reasons.

During the recruitment process, individuals applying for a job have to provide personal information to Itiviti, whom at the same time, usually process this information in order to assess the merits of the candidate. All candidates must give consent before any screening of the employee may take place. During the employment, personal information, including but not limited to, payroll and tax information, is necessary to process for the performance of the employment relationship. Monitoring or surveillance of employees is not carried out by Itiviti.

The customer or supplier information collected is limited to information that is relevant and necessary for the customer or supplier relationship.

Any personal information submitted through our website is used by Itiviti to provide support or services that the individual has requested.

Itiviti does not retain personal information longer than is necessary for the purpose for which it is collected.



## Recipients, Subcontractors and Transfers to Third Countries

Personal information may be transferred between the Itiviti Group AB and its subsidiaries. Itiviti's subsidiaries operate on behalf of Itiviti Group AB. Itiviti Group AB contractually binds all subsidiaries to comply with applicable laws and this policy when processing personal information.

Personal information may also be shared with subcontractors that process information on behalf of Itiviti. For example, Itiviti has an external payroll administrator that processes personal information of Itiviti's employees. Itiviti carefully chooses subcontractors, *inter alia*, based on information security. All subcontractors are contractually obligated to apply same degree of protection as Itiviti.

## Access

Individuals may have the right to access the personal information, which Itiviti has collected. All data subjects may have the right to modify any errors contained in that information.

## Contact Information

Itiviti Group AB, located in Stockholm, Sweden, is the primary controller of, including but not limited to, employees' personal information, customer information, supplier information and information submitted through the Itiviti's website.

All individuals whose personal information may have been collected by Itiviti can contact Itiviti's Chief Compliance Officer for further information regarding concerns or questions.

All individuals have the right to lodge a complaint to The Swedish Data Inspection Board in case of any violation or suspected violation of privacy laws committed by Itiviti.

## Applicability

This policy applies to all employees of Itiviti Group AB and its subsidiaries. In cases where national regulations cause difficulties regarding the implementation of or differs from the content of this policy, national regulations shall rule in those areas. Other parts of this policy shall still be valid.

## Owner

Chief Compliance Officer.