

Personal data policy

Internal Privacy Notice

Sweco Sweden AB

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DOCUMENT OWNER : GROUP PRIVACY OFFICER
Sweco AB

INTERNAL PRIVACY NOTICE

Sweco Sweden

1 INTRODUCTION

Sweco AB and its subsidiaries, Sweco Sweden (hereinafter "**Sweco**", "**we**" or "**us**") collects and processes Personal Data about you within the scope of your employment at Sweco. This internal privacy notice ("**Privacy Notice**") sets out which personal data that Sweco collects, and for which purposes the personal data is processed within the scope of your employment and/or assignment at Sweco.

The data controller for the processing of your personal data is the Sweco company in which you are employed, i.e. the Sweco company indicated as employer on your employment agreement or another company within the Sweco Group insofar and to the extent they process your data on their own behalf.

Throughout this Privacy Notice the term "processing" is used to cover all activities involving your personal data, including e.g. collecting, handling, storing, sharing, accessing, using, transferring and disposing of your personal Data.

The term "**personal data**" refers to any information relating to an identified or identifiable natural person.

2 CONTENT OF THIS PRIVACY NOTICE

For the purposes of facilitating the comprehension of this Privacy Notice, the Privacy Notice is divided into Sections.

- **Section 3** describes from which sources your data is collected by Sweco.
- **Section 4** sets out the purposes of Sweco's processing of your personal data, including the personal data items processed to achieve the purposes and the legal basis for our processing.
- **Section 5** describes the circumstances under which, and to which recipients, Sweco may disclose your personal data in order to achieve the purposes outlined in Section 4.
- **Section 6** described for how long we process your personal data and the rationale behind the retention periods that Sweco has established.
- **Section 7** lists all the rights that you may exercise as a data subject, in relation to Sweco's processing of your personal data.
- **Section 8** includes the contact information that you should use if you have any questions related to the processing of your personal data or if you wish to exercise any of your rights.
- **Annex 1** describes the categories of personal data processed by Sweco (as described in Section 4)

3 FROM WHERE DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data from:

- **Yourself**, which you submit to us so that we e.g. can pay salaries and other benefits, direct and distribute work as well as enabling you to communicate through our IT resources.
- **Next of kin and other emergency contacts**, in the event of an accident or other emergency situations.
- **Public authorities**, such as tax authorities, e.g. for the purposes of managing your salary and employment benefits and fulfilling legal obligations.
- **Banks**, insurance companies, as well as pensions and insurance administrators/advisers, for the purpose of managing your salary and employment benefits and to establish, exercise and defend legal claims.
- **Trade unions and other parties**, e.g. to fulfil legal obligations in connection with business changes or to establish, exercise and defend legal claims.

4 PURPOSES OF THE PROCESSING OF YOUR PERSONAL DATA

4.1 General administration of employment relationship

Sweco processes your personal data for the purpose of administrating your employment at Sweco, e.g. in order to enter into employment agreement with you, to be able to contact you, store basic information about you such as name, position and handling changes of position.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Employment data• Benefits data• Identity data (including personal id. no.)• Contact data• Organisational information• Skills data• Salary and remuneration data• Working hours administration and absence data• Health data• Trade union membership data• Citizenship (background check)• Criminal record (background check)• Social media (background check)• Verification of education	<p><i>Agreement.</i> The processing is necessary to fulfil the employment agreement with you.</p> <p>Exemption for special categories of data</p> <p>Special categories of personal data (such as health data and trade union membership data) will only be processed in case it is necessary to carry out obligations and exercise rights in the field of employment law, as well as to establish, exercise and defend legal claims.</p> <p>Background checks apply to specific positions and are carried out with the <i>consent</i> of employees for the collection of data and sharing of the results report with the employer through a highly encrypted and secure web portal.</p>

4.1.1 Managing day-to-day operations, including IT administration

Sweco processes your personal data for the purpose of managing the day-to-day operations within the scope of your employment, such as submitting offers to clients, managing work tools and access to IT systems and any other activities within the scope of your employment.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Employment data• Credentials	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in</p>

<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Contact data • Organisational information • Audio and video materials • Skills data including professional CV (not your recruitment CV) • Attendance and absence data 	<p>managing day-to-day activities within the scope of your employment with us.</p> <p><i>Legal obligation.</i> The processing is necessary to comply with legal obligations to which Sweco is subject .</p>
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4.2 Payment of salary and benefits and expense reimbursement

Sweco processes your personal data for the purpose of administrating the payment of your salary and benefits, including pension administration. This includes calculating and paying salary, managing of compensation and incentives as well as handling salary adjustments and sending pay slips. We will also process your personal data for purposes relating to administration of annual leave, pensions and insurance premiums, car fringe benefits and business expenses.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Employment data • Salary and remuneration data • Organisational information • Location data (no individual tracking) • Attendance and absence data • Contact data • Performance data • Benefits data • Health data 	<p><i>Agreement.</i> The processing is necessary to fulfil the employment agreement with you.</p> <p><i>Legal obligation.</i> The processing is necessary to comply with legal obligations to which Sweco is subject .</p>
	Exemption for special categories of data
	<p>Special categories of personal data (such as health data) will only be processed in case it is necessary to carry out obligations and exercise rights in the field of employment law, as well as to establish, exercise and defend legal claims.</p>

4.3 Carry out salary reviews

Sweco processes your personal data to carry out salary reviews. In connection with such review, we will document your achieved goals and your overall performance as well as communicating the new salary to you.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Salary and remuneration data • Performance data • Organizational information • Trade union membership 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to carry out salary reviews.</p>

4.4 Management of sick leave and other statutory leave of absence, including rehabilitation

Sweco processes your personal data in order to manage and administer your sick leave and other leave of absence (such as parental leave) to which you have statutory rights, including

allocation of work during your absence. Moreover, we will process your personal data to disburse payments and compensations following your leave of absence as well as to take necessary rehabilitation measures.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Contact data • Attendance and absence data • Salary and remuneration data • Organisational information • Employment data • Benefits data • Health data 	<i>Legal obligation.</i> The processing is necessary to comply with legal obligations to which Sweco are subject regarding amongst other things statutory leave of absence and rehabilitation.
	Exemption for special categories of data
	Special categories of personal data (such as health data) are processed to carry out obligations and exercise rights in the field of employment law.

4.5 Performance review and documentation of competence

Sweco will process your personal data in order to be able to review and evaluate your performance at Sweco (e.g. by carrying out performance appraisals) as well as to hold and maintain information about your competence, skills and goals. In connection with this, we will also process your personal data to assign you to duties relevant to your profile and competence, including for succession planning and promotion purposes.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Skills data • Feedback data • Performance data 	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to review and evaluate your performance at Sweco, including for business/succession planning purposes related thereto (e.g. to be able to assign you to work duties relevant to your profile and work experience).

4.6 Administration of your participation in trainings, events and meetings

Sweco will process personal data about you for the purpose of administrating your participation in trainings, events and meetings. This includes managing of relevant invitations, carrying out trainings and seminars, storage of and following up on training results and handling room bookings and food orders.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Skills data • Performance data 	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to ensure that employees attend trainings, events and meetings.
	<i>Agreement.</i> The processing is necessary to fulfil the employment agreement with you.

<ul style="list-style-type: none">Food preferences	<table><tr><th>Exemption for special categories of data</th></tr><tr><td>Special categories of personal data (such as information about allergies in connection with an event or meeting) are processed only if you have given your explicit consent. You have no obligation to provide such consent and you may withdraw your consent at any time by contacting your line manager.</td></tr></table>	Exemption for special categories of data	Special categories of personal data (such as information about allergies in connection with an event or meeting) are processed only if you have given your explicit consent. You have no obligation to provide such consent and you may withdraw your consent at any time by contacting your line manager.
Exemption for special categories of data			
Special categories of personal data (such as information about allergies in connection with an event or meeting) are processed only if you have given your explicit consent. You have no obligation to provide such consent and you may withdraw your consent at any time by contacting your line manager.			

4.7 General workforce planning, including mobility

Sweco will process your personal data for the purpose of general workforce planning, including assessing mobility and relocation preferences and needs across Sweco.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Identity data Contact data Location data Employment data Organisational information Skills data Performance data 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to conduct workforce planning, to manage mobility needs and your preferences in this regard as well as to administer relocations.</p> <p><i>Legal obligation.</i> The processing is necessary to comply with legal obligations to which Sweco is subject .</p>

4.8 Management of business travels

Sweco will process your personal data to plan and administer business travels and accommodation in connection with such travels. We will also process your personal data to produce statistics for business planning and to work out favourable agreements with hotels and airlines.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Identity data (including personal id. no) Contact data Organisational information Employment data Travel data and preferences Location data Gender data 	<p><i>Legitimate interest.</i> The processing is necessary to arrange and manage your business travels.</p> <p><i>Legal obligation:</i> The processing of driving logs is carried out to ensure that you, as a driver, are handled correctly for tax purposes. The employer does not track drivers live unless required by a legal authority.</p> <p><i>Agreement:</i> The processing is necessary to fulfill the management of business trips for you at IATA.</p>

4.9 Conducting internal investigations, including preventing and counteracting criminal activities and other violations

Sweco will process your personal data for the purpose of conducting internal investigations at Sweco in case of suspected disloyalty, policy breach, breach of law, etc. Such internal investigations may include scanning/monitoring of e-mail correspondence, user activity and

content on your work equipment to make sure our policies are followed, and to take actions in case of non-compliance. Note that Sweco only may access private correspondence/documents/activities (on your work equipment) in cases where a concrete suspicion of a serious crime or disloyal behaviour exists.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Salary and remuneration data • Incident data • Login data or other metadata • User generated information • Attendance and absence data • Your communication such as email, phone or chat records • Criminal data 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to prevent unlawful actions to be taken by employees within the scope of the employment at Sweco and to make sure our policies are followed.</p>
	<p>Exemption for criminal data</p> <p>In case any data about suspected or actual criminal activities will be handled in connection with an investigation, it will be processed only as necessary to establish, exercise and defend legal claims.</p>

4.10 Evaluate and follow-up on the business, e.g. related to business activities and employee well-being

We will process your personal data to evaluate and follow-up on our business activities, conduct employee surveys and to produce reports and statistics. Such follow-ups, surveys and reports may, amongst other things, relate to absence, staff turnover, foreign background and gender ratio and work-related incidents within Sweco. These activities are performed to e.g. highlight potential issues within our business and to take measures as necessary to rectify such issues and improve the business. Surveys (e.g., onboarding, offboarding, pulse and yearly surveys) and reports are normally produced on an aggregated level, i.e. no information in such documents could be related to you as an individual.

Sweco will process data derived from your use of your software tools, such as design software tools, for business improvement purposes. Such data is aggregated on team/department level. Data relating to your use of software tools will not be used to evaluate you or your individual performance.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Organisational information • Gender data • Employment data • Salary and remuneration data • Other information as necessary for the purpose • Health data • Data derived from use of software tools 	<p><i>Legitimate interest.</i> The processing is necessary to evaluate and follow-up on business activities and employee-wellbeing.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data (such as health data related to a work-related incident) are processed to carry out obligations and exercise rights in the field of employment law.</p>

<ul style="list-style-type: none"> Employee survey data (voluntary) 	
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4.11 Facilitating internal and external communication, including with emergency contacts

Your personal data will be processed to develop the brand of Sweco, e.g. by presenting certain staff on our digital channels, facilitate communication internally (between employees) and externally (between employees and external parties), including to communicate about business activities and changes. In the event of an accident or other emergency situation we may also collect information from your next of kin or other related persons with whom we communicate.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Identity data Contact data Employment data Audio and video materials Organisational information Your communication Relationship data Health data 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to enable business and emergency communication, both internally and externally.</p>
	Exemption for special categories of data
	<p>Special categories of personal data (such as health data in case of an emergency) are necessary to protect the vital interests of you as an individual, in case you are physically or legally incapable of giving consent.</p>

4.12 Fulfil legal obligations within the field of employment

We will process your personal data to fulfil various of Sweco's legal obligations within the field of employment. These obligations relate, amongst other things, to the areas of anti-discrimination, work environment, employee well-being, rehabilitation, right to work and trade union negotiations.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Identity data Organisational information Employment data Demographic data Salary and remuneration data Contact data Incident data Attendance and absence data Health data Trade union membership data Skills data Performance data 	<p><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations within the field of employment.</p>
	Exemption for special categories of data
	<p>Special categories of personal data (such as health data and trade union membership data) are processed to carry out obligations and exercise rights in the field of employment law.</p>

4.13 Document the business and its activities

Your personal data may be processed when we manage and keep our business-related documentation, such as board meeting minutes, notes, annual reports and supporting documents for decisions.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Your communication• Employment data• Identity data• Contact data	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to manage and keep business-related documents within our organisation.

4.14 Manage employee exits and offboarding

We will process your personal data to handle the offboarding process in case your employment at Sweco ends, e.g. to provide certificates of employment as well as to review and better understand employee retention and attraction rates (e.g. by employment exit interviews).

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data• Organisational information• Employment data• Exit/off-boarding data• Exit survey (voluntary)	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to handle our offboarding routines.

4.15 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
All data collected that are necessary to fulfil the purpose.	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.
	Exemption for special categories of data
	Special categories of personal data, including criminal data, are only processed to fulfil our legitimate interest in establishing, exercising or defending legal claims.

4.16 Fulfil legal obligations

Besides legal obligations within the field of employment, Sweco will process your personal data for the purposes of identifying and fulfilling legal obligations within the area of e.g. book-keeping, taxation and requirements under applicable data protection laws. This also includes reporting, registration and other legal obligations that occur, both domestically and internationally, when you conduct business trips or perform work in, or from, other countries

Categories of personal data	Legal basis
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All data collected that are necessary to fulfil the purpose.	<i>Legal obligation.</i> The processing is necessary to fulfil Sweco's legal obligations.
	Exemption for special categories of data
	Special categories of personal data are processed to carry out obligations in the field of employment law.

4.17 Manage and protect IT systems and services, including ensuring a safe workplace

In order to manage and protect our services, related IT systems and IT infrastructure, e.g. upon logging, monitoring, trouble-shooting, backup, change and problem management in systems and in connection with potential IT incidents, we process, to the extent necessary, your personal data. Moreover, we will process your personal data to ensure that no unauthorized individuals are given access to our workplace facilities (e.g. by using swipe-cards) and to monitor compliance with policies, guidelines and routines. Furthermore we monitor the usage of PCs, and Network resources to identify potential threats to our infrastructure.

Categories of personal data	Legal basis
All data collected that are necessary to fulfil the purpose.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and IT systems.

4.18 Managing personal benefits

We process your personal data in order to be able to provide and pay the benefits included in your employment and which are regulated in your employment contract, collective agreement and/or Sweco's policies and guidelines.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Organizational data • Private contact data • Contact data • Employment data • Salary and remuneration data • Benefits data • Tax related information (if stated by the employee), • Insurance data • Attendance and absence data • Personal payslip 	<i>Agreement.</i> The processing is necessary to fulfil the employment agreement with you.

4.19 Administrating of obligations when working in another country than your home office and obligations for foreign nationals coming to work in Sweden.

We process your personal data for the purpose of fulfilling legal obligations that apply if you are to work in a country other than the one where you have your regular workplace, as well as if foreign citizens are to come to Sweden and work.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Contact data• Salary and information data• Identity data• Employment data• Citizenship if other than Swedish	<i>Legal obligation</i> (to fulfil requirements in different countries)

5 DISCLOSURE AND TRANSFER OF PERSONAL DATA

Where necessary in order to achieve the purposes set out in Section 3, we share your personal data with other entities, authorities or actors. The categories of recipients mentioned in Section 5.1 will process personal data on behalf of Sweco in the capacity as data processors (i.e. such actors will only process your personal data in accordance with Sweco's instructions). The categories of recipients mentioned in Section 5.2 will process personal data in the capacity as data controllers, i.e. these recipients will determine the purposes and means of the processing without Sweco's involvement. Please note however that Sweco, regardless of the recipients' capacity, only will share your personal data with entrusted actors and only to the extent necessary.

5.1 Data processors acting on behalf of Sweco

In order to fulfil the purposes of the processing of your personal data and to be able run our business, we transfer personal data to external parties such as third-party service providers that we have engaged, as well as other partners. These parties provide services within the areas of amongst other things IT (such as data storage and management services), finance and HR (e.g. our HR management system). These external parties will act as data processors of Sweco and may only process your personal data in accordance with our instructions and not for their own purposes. Sweco is the data controller for the processing of personal data that these external parties carry out on our behalf. The purposes of the processing activities carried out by Sweco are outlined in Section 3.

5.2 Recipients that act as data controllers

Recipients	Purposes	Legal basis
<ul style="list-style-type: none">• Courts and arbitration tribunals• Employers' organisations• Trade union organisations• Public authorities• External advisers and investigators	In order to exercise, establish or defend legal claims, legal compliance and to uphold Sweco's Code of Conduct	To fulfil our <i>legitimate interest</i> to manage and defend legal claims, e.g. in relation to a dispute. To fulfil our <i>legal obligations in order to comply with applicable legislation and</i>

<ul style="list-style-type: none"> • Auditors • Insurance companies • Counterparties 		To fulfil our <i>legitimate interest</i> to uphold Sweco's Code of Conduct.
<ul style="list-style-type: none"> • Employers' organisations • Trade union organisations • Public authorities (including courts) • External auditors • Occupational health care providers 	To fulfil legal obligations in the areas of taxation, the field of employment (such as consultation obligations and work environment matters).	To fulfil our <i>legal obligations</i> .
<ul style="list-style-type: none"> • Travel agencies • Airlines • Other transportation companies • Hotels 	To facilitate your booking and carry out business travel, including accommodating your requests for travel arrangements and to meet regulatory requirements of visas and other cross border travel requirements.	To fulfil our <i>legitimate interest</i> of facilitating business travels.
<ul style="list-style-type: none"> • Potential purchasers or investors • External advisers 	Take necessary actions in connection with selling all or part of the business or in connection with a merger.	To fulfil our <i>legitimate interest</i> in being able to sell all or part of the business or in connection with a merger.
<ul style="list-style-type: none"> • Occupational health care providers 	Allow for health tests and checks of employees.	To fulfil our <i>legitimate interest</i> in being able to offer health test and checks.
<ul style="list-style-type: none"> • Banks • Pensions and insurance administrators/advisers • Insurance companies • Relocation partners 	Managing salaries, employment benefits and the employment relationship in general.	To fulfil the employment <i>agreement</i> with you.
<ul style="list-style-type: none"> • Social media and digital platform providers (e.g. Facebook, Instagram and LinkedIn) 	Facilitating external communication for e.g. brand development purposes.	To fulfil our <i>legitimate interest</i> in facilitating external communication.
<ul style="list-style-type: none"> • Banks • Clients and business partners 	Enable day-to-day business management.	To fulfil our <i>legitimate interest</i> in managing our day-to-day business activities and operations.
<ul style="list-style-type: none"> • Other Sweco group companies • Conference facilities 	To carry out group wide activities, events or analytics and reviews (e.g. salary reviews).	To fulfil our legitimate interest in being able to participate in group wide activities, such as benchmarking, events or reviews (e.g. salary reviews).

5.3 Appropriate safeguards for transfers of personal data outside of the EU/EEA

Should Sweco transfer or disclose your personal data to a recipient in a country outside of the EU/EEA (third country), Sweco will ensure that appropriate safeguards have been taken (such as the EU Commission's standard contract clauses, including other supplementary safeguards as necessary in each case) to protect the personal data.

You are, if so, entitled to request to receive a copy of any documentation demonstrating that appropriate safeguards have been taken in order to protect your personal data during a transfer to a third country.

If you would like to know more about the processing of your personal data and whether your personal data is transferred to a third country, please contact us on the contact details as set out below under section 8.

6 FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA

Sweco will retain personal data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by local law to which Sweco is subject. In general, most of the personal data we process will be processed during your employment. However, some personal data will be necessary to process even after your employment has ended. We are applying the following criteria to establish our retention periods: (i) as long as we have an ongoing employment relationship with you (or for a shorter period provided that the personal data is no longer necessary in relation to the purposes for which they were collected); (ii) as required by legal obligations to which Sweco is subject (such as employment and accounting obligations); (iii) as advisable in light of our legal position (such as applicable statutes of limitations) in order to establish, exercise and defend against legal claims; and (iv) as necessary to meet our legitimate business needs (such as for forecasting, planning, follow-up and documentation purposes). Please note that some basic employment data may be stored for an indefinite period of time by virtue of our legal obligations related to pension administration.

More detailed information about for how long Sweco will retain your personal data can be found in [Sweco's Data Retention Procedure](#), which you as an employee can take part of.

7 YOUR RIGHTS

Under applicable data protection laws, you have certain rights in relation to the processing of your personal data. We process your personal data to the extent necessary in order to fulfil your rights. If you have any questions about your rights, you can reach out to your local Privacy Officer. You can exercise your rights by filing an Individuals Rights ticket in the Service Portal/ Data Privacy on Insight.

You have, under certain circumstances, the right to exercise the following rights:

Access

You may request confirmation whether or not personal data is processed and, if that is the case, access your personal data and additional information such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing. If the request is made by electronic means the information will be provided in a commonly used electronic format if you do not request otherwise.

Object to certain processing

You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concerns your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary in order to manage or defend legal claims.

Rectification

You have at any time the right to have inaccurate personal data rectified, as well as, taking into account the purposes of processing, the right to have incomplete personal data completed which relates to you.

Erasure

You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected. However, we cannot delete your personal data if we e.g. are obligated under law to keep the data.

Restriction of processing

You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased. If the processing of your personal data has been restricted we may only, besides storing the data, process your personal data with your consent, in order to establish, exercise or defend legal claims or to defend rights of others.

Withdrawal of consent

You have the right to at any time withdraw your consent to processing of personal data to the extent the processing is based on your consent.

Data Portability

you may ask to receive a machine-readable copy of the personal data processed on the basis of your consent or on the basis that the processing is necessary in order to perform an agreement with you, and which personal data have been provided to Sweco by you (data portability) and ask for the information to be transferred to another data controller (where possible).

Complaints to the supervisory authority

You have the right to lodge complaints pertaining to the processing of your personal data to the competent local Data Protection Authority. The lead authority for the Sweco Group is the Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndigheten, IMY).

8 CONTACT INFORMATION

If you have any questions or concerns regarding the processing of your personal data, please reach out to your Local Privacy Officer. A list with contact details of Sweco's Privacy Officers is available at the Data Privacy page on Insight via this [link](#).

ANNEX 1

DESCRIPTION OF CATEGORIES OF PERSONAL DATA

Please see the table below for detailed information regarding which personal data (included in the categories of personal data set forth in section 3 to this Privacy Notice) that we process.

Category of personal data	Examples of personal data included
Attendance and absence data	Period worked, parental leave, annual leave, incl. number of days saved and remaining, absence due to sickness, leave of absence, other leave
Audio and video materials	Photograph, audio recording, video
Benefits data	Bonus, salary during statutory leave, pensions data, staff discount, right to annual leave, company cars and car fringe benefits
Contact data	Address, telephone number, e-mail address
Criminal data	Suspensions of criminal activities, criminal activities
Demographic data	Sex, marital status, citizenship, language, age, gender
Employment data	Date, form and period of employment, measurement of working hours, work duties, title, position, degree of employment
Exit/off-boarding data	Feedback and reviews, reasons for leaving
Feedback data	Grade, feedback, potential evaluation, performance assessment
Food preferences	Allergies, preferences
Health data	Medical records and certificates, disabilities, disorders, sickness, injuries, disease
Identity data	Employment number, personal number, user identity, registration number, IP address, signature, name, ID/visa/passport
Incident data	Workplace, security and personal data incidents, accidents, injuries or other incidents at work
Location data	Position, other geographic data
Login data	Time stamp, log entry
Organisational information	Employer company, employment status, operational department, geographical placement, cost centre, organisation, place of employment, security clearance
Performance data	Goals, fulfilment of goals, performance
Relationship data	Relationships, type of relationship, information about next of kin or other emergency contacts
Salary and remuneration data	Bank account, salary, form of salary, salary supplements, expenses
Skills data	Education, professional experience, courses, qualifications, supporting training documentation
Trade union membership data	Information relating to trade union membership

Travel data and preferences	Travel documents, preferences and requests
User generated information	Internet behaviour, information from IT logs
Your communication	Personal Data included in your communication, e.g. in e-mails

Document change Log

Date	Version	Material changes
22-12-2022	1.0	First version