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# SWECO ETHICS LINE PRIVACY NOTICE

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13 November 2020

## General

This notice explains how Sweco collects, uses and shares personal data for Sweco Ethics Line purposes. This includes any personal data relating to the person making a report, as well as personal data about those persons about whom a concern has been raised or those who have been identified as having information about the concern.

## Sweco controller

Sweco AB, Gjörwellsgatan 22, Box 34044 Se-100 26, Stockholm Sweden, is controller of personal data that is collected through Sweco Ethics Line.

## Personal data

Personal data that is processed through Sweco Ethics Line is depending on the data that is being provided by the person reporting through Sweco Ethics Line and might include:

Ethics line access code, Name, address and city data, Gender, (Function) Title, Nationality, Administration numbers/ employee numbers, (Mobile) phone number E-mail address, Characteristics of the incident, Measures taken, Investigation reports, Other data relating to the incident, Sound file, IP address and other technical data

Sweco does not search to collect sensitive data or criminal records, however sensitive data or criminal records can be part of the data provided to Sweco in which case Sweco will assess if Sweco is legally allowed to process this data and act accordingly.

## Purpose

Sweco will process personal data through Sweco Ethics Line only for the purpose of protecting Sweco's interest of compliance with Sweco's Code of Conduct. This includes:

- Administering the Sweco Ethics Line system
- Investigating suspected misconduct
- Follow up on completion of investigation of suspected misconduct
- Anonymous reporting to company management

## Legal basis

Sweco relies on its legitimate interests as the lawful basis for the collection and use of personal data through Sweco Ethics line.

## **Third parties**

Personal data will be shared with People Intouch B.V., Olympisch Stadion 6, 1076 DE, Amsterdam, The Netherlands, who is providing the platform for the Sweco Ethics Line on Sweco's behalf. People Intouch complies with the highest privacy and security standards. Sweco has entered into a Data Processing Agreement with People Intouch B.V..

We may also permit selected third party experts, such as forensic accountants, external lawyers or consultants, to access to your personal information for the purposes specified above. In such a case we will only share data to the extent necessary for that purpose and in compliance with applicable privacy legislation.

## **Cross Border Transfer**

Sweco does not transfer personal data outside the EEA through Sweco Ethics Line. If it becomes necessary to transfer your data outside of the European Economic Area Sweco will put in place appropriate safeguards in accordance with applicable legal requirements to ensure that personal data processed by or on behalf of Sweco receives protection equivalent to that provided by data protection regulations applicable in the European Economic Area.

## **Retention**

Sweco will only keep personal data for as long as necessary for the purpose mentioned above or to comply with legal obligations. Reports that have been found unsubstantiated, will be deleted immediately. Reports that are substantiated will be kept for as long as necessary for investigation, follow up and reporting after which the personal data will be deleted or anonymized as soon as possible but no later than 14 days after the case is closed.

## **Your rights**

You may at all times request if a report has been filed against you. If this is the case, you will receive an overview of the personal data that is being processed about you through Sweco's Ethics Line unless, it would seriously impede an investigation, in which case you will receive the overview as soon as this impediment is no longer present. If personal data proves to be inaccurate or incomplete, an accused person can request rectification or completion thereof. Under specific circumstances, you have the right to object, ask for restriction or erasure of your personal data.

## **Contact**

If you have a question or complaint about our handling of your Personal Data through Sweco Ethics Line, if you wish to exercise any of the above rights or if you have a complaint, please send an e-mail to [groupprivacyofficer@sweco.se](mailto:groupprivacyofficer@sweco.se). If this does not lead to a satisfactory response you may also contact Datainspektionen via [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se).