

Sweco Ethics Line Privacy Notice

General

This notice explains how Sweco collects, uses and shares personal data through Sweco Group's reporting channel for ethics incidents called Ethics Line. For more information about Sweco's local Ethics Line reporting channels, please visit the local Sweco website.

Sweco controller

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

Personal data

Personal data collected through Ethics Line may relate to the person making a report, as well persons about whom a concern has been raised or those who have been identified as having information about the concern.

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 will not directly collect criminal record data but may process it if needed. 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 and Supplier & Business Partner 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

Because it is necessary to comply with a legal obligation, given that whistleblowing systems are mandatory in most countries where Sweco is located.

For the purposes of our legitimate interests, more specifically to monitor compliance with our Code of Conduct and Supplier & Business Partner Code of Conduct. In this respect, we will always determine case-by-case whether our

interests are not overridden by the interests, fundamental rights and freedoms of the individuals involved.

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

Generally, Sweco does not transfer personal data outside the European Economic Area (EEA) through Sweco Ethics Line. However, Sweco has companies outside the EEA to which Ethics Line applies. It is therefore possible that the handling of a report requires that personal data is transferred to recipients in those countries. Sweco maintains appropriate safeguards to ensure that personal data transferred to countries outside the EEA receives protection equivalent to that provided by data protection regulations applicable in the EEA.

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 2 years after the case is closed.

Your rights

You may at all times inquire 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. If this does not lead to a satisfactory response you may also contact Integritetsskyddsmyndigheten (IMY) via <https://www.imy.se/>.