

# Privacy policy

This privacy policy tells you what to expect us, Systemverkstan No5 AB, 556687-7865, Kungsgatan 84 ÖG 112 27 Stockholm ("Systemverkstan"), to do with your personal information when you make contact with us, if you are a jobseeker, if you are a client or supplier to us, or if you are an employee or jobseekers to one of our clients. This policy will describe the categories of personal data being processed, what purpose we are processing it for, from where the personal data come from, how long we store it for, whether there are other recipients of your personal information, and your privacy rights.

## What is personal data?

Personal data is any information that relates to an identified or identifiable living individual. Examples of personal data are a name, a home address or a bank account number.

## What constitutes data processing?

Processing covers a wide range of operations performed on personal data, including by manual or automated means. Examples of processing are collection, recording, organization, structuring, storage, erasure or destruction of personal data.

## Who is responsible?

Systemverkstan is the Data Controller of the personal information we process, unless otherwise stated. If you are an employee at one of our clients, we are able to access your personal data if the client is in need of technical assistance in the system HERO. In those cases, we are a Data Processor and process your personal data according to existing Personal Data Agreement between us and our client.

You can always contact us at [info@systemverkstan.se](mailto:info@systemverkstan.se)

## How we may use your personal data and why

How we process your personal data depends on what type of relation you have with us.

If you are a designated contact person representing one of our clients, or a potential client

**This is how we process your personal data when concluding a business agreement:**

If you are a designated contact person representing one of our clients, we are saving your name, e-mail address, telephone number and address of the organization you represent. This is saved so that we can fulfill the business agreement, manage the client relationship, enable communication, maintain a client database and handle support matters. This is processed because we have a legitimate interest in being able to provide our clients with service and support and enable communication.

The information is processed during the time that there is a business relationship between us and the organization you represent. Your personal information will not be transferred to any other recipient.

Personal data is also sometimes found in agreements and invoices, and agreements and invoices are saved to administer good contract management and to fulfill legal obligations. The personal information that may appear in agreements and invoices are name, address of the organization, e-mail address, telephone number and role or function. We are processing the information because we have a legitimate interest in saving all contracts and invoices in order to be able to defend ourselves against various types of legal claims. After completing the assignment, the information is processed in archives for a period of 10 years in order to fulfill Systemverkstan's legitimate interest in defending itself against various types of legal claims. Financial information is archived and processed for a period of 7 years for regulatory reasons, in order to fulfill legal obligations.

The personal data we store about you is such information that you provide when contacting us, or data that any other representative of your organization has provided.

### **This is how we process your personal data when you contact us by e-mail:**

We collect your name and e-mail address as well as the information you provide in the e-mail when you contact us by e-mail. We need this to be able to get back to you.

How long we store your personal information depends on the reason you contact us. If you belong to one of our existing clients and contact us in a support matter, the information is saved during the time there is a valid agreement between us and the organization you represent. If you don't belong to one of our clients and you contact us by e-mail, your personal information will be saved until the matter is resolved or your question is answered.

Your personal data will not be transferred to any other recipient. We process the personal data because we have a legitimate interest in responding to incoming e-mail and being able to provide support to our clients. The personal information we store about you is such information that you provide yourself when contacting us.

## If you seek employment and wish to work with us

### **This is how we process your personal data when seeking employment:**

If you send us a spontaneous application by e-mail, we will process your personal data for a period of two years, but only if we have your consent for doing so. If we are advertising a vacancy, we may hire an external recruitment partner to assist in the recruitment process. You will then submit your personal data to the recruitment company, which in turn will provide us personal data on suitable candidates for the current position.

The personal data that we will process in the recruitment process is information you provide in your CV and personal letter such as contact information, educational background, professional experiences, and possibly contact information of persons you indicate as references. Your personal data will be stored for as long as is necessary for the recruitment process, and then for a further two years, in order to satisfy the rights of appeal that the applicant who is denied the job have.

We are processing personal data because we have a legitimate interest in connecting the right candidate with the right job and evaluate whether you are the right applicant for the position.

The legal basis for saving your personal data when you send us a spontaneous application is your consent.

We will not transfer your personal information to any other recipient. In cases where we use an external recruitment partner, you as an applicant will be informed about it.

We process personal information that you provide directly to us. We may also receive personal information about you from other sources, such as from persons you indicate as a reference.

## If you are a person of contact at some of our suppliers

### **This is how we process personal data when saving contact information to our suppliers:**

In order to fulfill the business agreement, we need to register contact information to a person of contact at our supplier. We are saving name, company email and telephone number. The information is saved to enable contact when needed and handle the contractual relationship and is stored as long as the business agreement applies. We process this information because we have a legitimate interest in enabling contact and handling the contractual relationship.

Personal data is also sometimes found in agreements and invoices, and agreements and invoices are saved to administer good contract management and to fulfill legal obligations. The personal data that may appear in agreements and invoices are name, address of the organization, e-mail address, telephone number and function. We process the personal data because we have a legitimate interest in saving all contracts and invoices in order to be able to defend ourselves against different types of legal claims. After the end of the contract period, information is processed in archives for a period of 10 years to satisfy Systemverkstan's

legitimate interest in defending itself against various types of legal claims. Financial information is archived and processed for a period of 7 years for regulatory reasons, in order to fulfill legal obligations.

The personal data we save from you as a contact person at one of our suppliers is the information that you or another representative from your company has provided about you.

## If you are a jobseeker or employed by one of our clients

### **This is how we process your personal data if you are a jobseeker or employed by one of our clients:**

Our customers are Data Controllers regarding the personal data that is processed in the HR-system HERO. In HERO, personal information such as name, contact information, position, salary information and CV is stored. Systemverkstan is a personal data processor for our customers and has signed a personal data processing agreement with all customers. These agreements contain instructions for the processing of personal data that we perform on behalf of our customers, and together we ensure that the processing of personal data takes place in accordance with current legislation. If a customer needs technical support, we have the possibility to see the personal data registered in the system while the support case is ongoing. We can only access the information in the system by connecting to the customer's server, and this only happens during an ongoing support case. We do not use sub-assistants to process your personal data. The system protects your data through technical security measures. This personal information is not used for any purpose other than troubleshooting or technical support. For more information, please see the privacy policy developed by your employer, or the organization you are looking for work with that uses the HERO system.

## Your privacy rights

You as a data subject have rights in respect of personal data we hold on you. You have the following rights;

### **Your right of access**

You have the right to ask us for copies of your personal information. This right always applies.

### **Your right to rectification**

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

### **Your right to erasure**

You have the right to ask us to erase your personal information in certain circumstances.

### **Your right to restriction of processing**

You have the right to ask us to restrict the processing of your information in certain circumstances.

### **Your right to object to processing**

You have the right to object to processing if we are able to process your information because the process is in our legitimate interests.

### **Your right to data portability**

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organization to another, or give it to you. The right only applies if we are processing information based on your consent.

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

Please contact us at [info@systemverkstan.se](mailto:info@systemverkstan.se) if you wish to make a request.

## The location of the processing

In cases when Systemverkstan is a Data Controller, your personal data will be processed within EU/EES. We will not transfer your personal data to third countries.

## How we protect your personal data

Keeping your personal data safe and secure is important to us. We use appropriate technical, organizational and administrative security measures to protect any information we hold from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We have agreement with a system supplier, Fortnox, for our HR and finance system, and ensure that your personal data is handled correctly and in accordance with the current agreement to maintain a high level of data protection.

## How changes to this privacy policy will be made

We are constantly working on improving and developing our services and product, so we may change this privacy policy from time to time. We will not diminish your rights under this privacy policy or under applicable data protection laws in the jurisdictions we operate. Please review this Privacy Policy from time to time to stay updated on any changes.

## Contacting us or the data protection authority

If you have any questions or concerns regarding our Privacy Policy, you can always contact [info@systemverkstan.se](mailto:info@systemverkstan.se). You can also lodge a complaint or contact the data protection authority.