

Datum	Utfärdat av	Godkänt av	Dokumentnamn	Dok. Nr	Rev
2018-04-04	K. Frostholt	J. Wackerfeldt	Policy_000A.doc	000 A	

# MMAB Employee Data Protection Policy

## 1. General information

This Employee Data Protection Policy ("Privacy Policy") describes how MMAB Group AB, org. No. 556925-9442, Box 16086, 200 25 Malmö, e-mail: sales@mmab-pcb.se, ("MMAB Group AB", "We") collects, uses, discloses and stores your personal information.

1.1 This policy applies to all employees working for:

- The head office of MMAB Group AB
- All branches of MMAB Group AB
- All staff and volunteers of MMAB Group AB
- All contractors, suppliers and other people working on behalf of MMAB Group AB

1.2 You should always be able to feel safe when working for any branch of head office of MMAB Group AB. We want to demonstrate with this Privacy Policy how we ensure that your personal information is processed in accordance with applicable privacy laws.

1.4 This policy explains what information we keep about our employees and how it is being used.

## 2. Personal Data Controller

MMAB Group AB is personally responsible for MMAB Group AB's processing of your personal data and is responsible for such processing in accordance with applicable laws and legislations.

## 3. When do we process your personal information?

3.1 In order to become an employee with MMAB Group AB, we need to keep certain personal information about you, stated in various laws, rules and legislations. This is all being done according to current laws and legislations.

3.2 MMAB Group AB collects and processes personal information about you when you become an employee, when working with us and also when you walk in and out of the office. The information collected from you at the time of employment and while working with us, is required to enter into an agreement with MMAB Group AB.

3.3 If you are an employee, you can update your information at any time by contacting any of our HR or Finance colleagues.

3.4 We may also collect and update your address information through third party services for address updating.

## 4. What personal data do we handle about you?

4.1 The personal data MMAB Group AB collects and process about you as an employee working for MMAB Group AB are:

- Employee number
- Employee date
- Name
- Last name
- Title
- Type of employment
- Salaries
- Union agreements
- Country of residence
- Gender
- Address
- Phone number
- Mail address
- Account number
- What bank you have
- Contact person in case of emergency
- Birthdata
- Days of absence/reason for absence
- Holidays/vacations
- Possibly your resume
- If you work full time or part time
- Car registration number (if you have company car)
- Username
- Passportinformation/Visa (If you travel through work)
- Video and Photos of you entering/exiting the building outside of office hours.

## 5. Why do we handle personal data about you?

5.1 MMAB Group AB processes your personal information for different purposes. Mainly, MMAB Group AB processes your personal information in order to:

- Comply with our obligations to you as an Employee, such as handling of salaries, taxes and pensions;
- Giving you the service you need for contacts with government, tax-offices and for declaration purposes, and also paying out your salaries;
- If you work as a salesman or as a representative for the company, your information might also be used in our CRM system for example to follow up sales, budget, and other important information.

## 6. The legal base for our processing of your personal data

6.1 MMAB Group AB bases the processing of your personal data on a number of legal bases. These are described in this section.

6.2 Among other things, we treat your personal information in order to fulfill the agreement with you as an employee to fulfill our obligations to you as an employee. Based on this legal basis, we also treat you as an employee, to fulfill our commitment to you as an employer.

6.3 Part of the processing of personal data we carry out is based on a so-called interest balance. This applies, for example, to the video and picture recording outside of business hours. This is being done to be able to resolve crime and burglaries, and will not be used for anything other than this. Other than this, we do not perform any treatment that constitutes profiling based on a balance of interest.

6.4 In some cases, MMAB Group AB may have a legal obligation to process your personal information. This applies, for example, to the processing of personal data

we perform in order to meet the requirements of the current Accounting laws and legislations.

## 7. Summary of our personal data processing

Purpose	Legal Basis	Categories of personal data	Retention
For you to become an employee.	Employment contract Legal Obligation	Employee number Employee date Name Last name Title Type of employment Salaries Union agreements Country of residence Gender Address Phone number Mail address Account number What bank you have Contact person in case of emergency Birthdate Days of absence/reason for absence Holidays/vacations Possibly your resume If you work full time or part time Car registration number (if you have company car) Passportinformation /Visa (If you travel through work) Username	As an employee we keep your information until further notice to be able to fulfill our obligations to you as an employee. More information about how long we keep your information after you quit working for us, you can read about in the Archive plan available on the intranet, or by your closest boss, HR or Finance department.
To be able to prevent crime happening again, we need to setup cameras in the areas most affected by crime which is the office section.	Balancing of interests	Video and Photos of you entering/exiting the building outside of office hours.	We keep these video/image footages for a total of three (3) days from when they were taken. Then they will be automatically deleted by the system. If you want to know more you can read about it in our documentation about interest weighing for camera surveillance.
We publish your pictures on our website / LinkedIn for business purposes to show something special that happens within our company	Consent/interest weighing	Pictures	It will be online as a part of history for the company to look back on, and also to show our customers, suppliers, and competitors who we are, and what we do.

## 8. Profiling

8.1 MMAB Group AB does not do any profiling on our employees.

## 9. How long do we save information about you?

9.1 Your personal information will only be stored as long as there is a need to save them to fulfill the purposes for which the data was collected in accordance with this Privacy Policy. MMAB Group AB may save the data if necessary to comply with legal requirements or to monitor MMAB Group AB's legal interests, such as if there is a legal process going on.

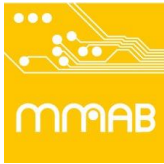
9.2 As an employee we keep your information until further notice to be able to fulfill our obligations to you as an employer. Please read more about how long we keep information in our Archive plan.

## 10. Who do we provide personal information to?

10.1 MMAB Group AB may disclose your information to third parties, such as MMAB Group AB's group company and other partners, as well as card and communication service providers. MMAB Group AB may also provide your information to companies that provide address updates services to ensure that we have the right address information for you.

10.2 Personal data may also be submitted by MMAB Group AB if it is necessary to comply with applicable legal requirements or requirements from authorities to utilize MMAB Group AB's legal interests or to detect, prevent or pay attention to fraud and other security or technical issues.

10.3 MMAB Group AB may transfer your personal data to countries outside the EU / EEA, if any of MMAB Group AB's suppliers or partners are located there and you are responsible within the company for any supplier/logistics functions. If



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## **MMAB Employee Data Protection Policy**

personal data are transferred to any country outside the EU / EEA, MMAB Group AB will take steps to ensure that personal data remain protected and also take the necessary steps to legally transfer personal data to non-EU / EEA countries.

**10.4** We will not sell your personal information to third parties unless we have your permission.

### **11. Change of privacy policy**

**11.1** MMAB Group AB has the right to change the Privacy Policy at any time. MMAB Group AB will, with reasonable notice, notify you of changes to the Privacy Policy. If you do not accept the changes, you are entitled to terminate the agreement with MMAB Group AB before the amended Privacy Policy comes into force. You can terminate the agreement by contacting MMAB Group AB.

### **12. Protection of your personal data**

**12.1** You should always be able to feel confident when you submit your personal information to us. MMAB Group AB has therefore taken the security measures needed to protect your personal data from improper access, change and deletion. For example, all information about customers and Account Holder is stored in an encrypted database that is protected by permission management and firewalls.

### **13. Your rights**

**13.1** MMAB Group AB is responsible for processing your personal data in accordance with applicable legislation.

**13.2** MMAB Group AB will, at your request or on its own initiative, correct, disassemble, delete or supplement information that is found to be incorrect, incomplete or misleading.

**13.3** You have the right to ask for

- Access to your personal information. This means that you are entitled to request a registry outline of the processing we conduct regarding your personal data. You are also entitled to receive a copy of the personal data being processed. You are entitled to once a calendar year, by written application, receive a registry extract from which personal data are registered about you, the purpose of the treatment and the recipients the information has been provided or to be disclosed. You also have the right to receive information on where the data has been retrieved if personal data have not been collected from you, the existence of automated decision making (including profiling) and the predicted period during which the data will be stored or the criteria used to determine this period. You also have the right to obtain information about your other rights listed in this paragraph in the registry extract.
- Correction of your personal information. We will prompt you to correct the incorrect or incomplete information we process about you as quickly as possible.
- Deletion of your personal data. This means that you are entitled to request that your personal data be removed if they are no longer necessary for the purpose for which they were collected. However, there may be legal requirements that we cannot immediately delete your personal data in, for example, accounting and tax laws. We will then end the processing done for purposes other than complying with the legislation.
- Limitation of treatment. This means that your personal information is marked so that they can only be processed for certain delimited purposes. For example, you may request a limitation when you consider your information incorrect and you have requested a correction. Meanwhile, the accuracy of the data is investigated, their treatment will be limited.

**13.4** MMAB Group AB will notify each recipient of the personal data provided in paragraph 10 above about any corrections or deletion of data and the limitation of processing of data.

**13.5** You are entitled to data portability. It implies the right to, under certain conditions, extract and transfer your personal data in a structured, widely used, and machine-readable format to another personally responsible person.

**13.6** You are entitled to object to personal data processing performed based on a balance of interest. If you object to such treatment, we will only continue treatment if there are legitimate reasons for treatment that weigh heavier than your interests.

**13.7** If you do not wish to process your personal information for direct marketing, you are always entitled to object to such treatment by sending an email to sales@mmab-pcb.se. Once we have received your objection, we will cease processing your personal data for such marketing purposes.

**13.8** You are entitled to lodge any complaints regarding the processing of your personal data to the Swedish "Datainspektionen".

**13.9** If an individual contacts the company requesting this information, this is called a subject access request. Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 30 days.

### **14. Cookies**

**14.1** We do not use cookies on our website, to ensure that we keep the smallest possible personal information about you as a customer.

### **15. Contact Information**

**15.1** Please do not hesitate to contact us if you have any questions about this Privacy Policy, processing your personal information or requesting a registry extract. Our contact information can be found below.

**MMAB GROUP AB**  
Box 16086  
200 25 Malmö  
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