Privacy and processing of personal data

How Industriarbetsgivarna processes your personal data

Updated 22 November 2021

Your privacy is important to Industriarbetsgivarna. We value data protection and always process your personal data responsibly. In the following information we describe **why** we process your personal data and **how** this processing takes place. We also describe **what rights** you have if we process your personal data. The processing may differ depending on who you are and what your relationship with us is.

The information provided here applies to all personal data that Industriarbetsgivarna processes. It is therefore important that you read the information and understand it.

We will review the information on an ongoing basis and adapt it to the processing we consider necessary. If the information changes, we will explain how the change affects the processing of your personal data.

What is personal data and what is processing of personal data?

Personal data is all information that can be used directly or indirectly to identify a living, natural person. This could be a name and personal identity number, but can also include e.g. images, email addresses, IP addresses and descriptions.

The General Data Protection Regulation (commonly referred to as "GDPR") applies in principle to all automated processing of personal data (in simple terms, all digital processing of personal data). In some cases, it also applies to manual processing of personal data. Collection, recording, structuring, storage, adaptation and transfer of personal data are all examples of processing.

Industriarbetsgivarna as data controller

In principle, GDPR applies within all kinds of activities and regardless of who carries out the data processing. It applies primarily to companies, associations, organisations and authorities.

Föreningen Industriarbetsgivarna ("Industriarbetsgivarna") is the Swedish Association of Industrial Employers, an umbrella organisation for five employers' associations representing various industries: forestry, steel and metal, mining, welding engineering and construction materials (Skogsindustrierna Arbetsgivareförbundet, Stål och Metall Arbetsgivareförbundet, Gruvornas Arbetsgivareförbund, SVEMEK and Byggnadsämnesförbundet or BÄF). Industriarbetsgivarna and the five associations are non-profit organisations and are therefore covered by GDPR provisions on the processing of personal data.

The employers' associations and their member companies are members of Industriarbetsgivarna. Industriarbetsgivarna is a member of Föreningen Svenskt Näringsliv ("Svenskt Näringsliv", the Confederation of Swedish Enterprise). Member companies of Industriarbetsgivarna are also member companies of Svenskt Näringsliv. Industriarbetsgivarna's purpose is implemented to a large extent through its wholly owned service company, Industriarbetsgivarna i Sverige Service AB, corporate identity number 556625-8389 ("Industriarbetsgivarna AB"). Industriarbetsgivarna and Industriarbetsgivarna AB are normally regarded as one and the same organisation. In the information below, therefore, Industriarbetsgivarna and Industriarbetsgivarna AB are referred to – individually and jointly – as Industriarbetsgivarna.

"We", "our" and "us" in this information means Industriarbetsgivarna.

For the processing of personal data that takes place within Industriarbetsgivarna's activities, Industriarbetsgivarna is the data controller unless stated otherwise.

For some processing, such as registers of members, we use systems that are shared with Svenskt Näringsliv and with other industry and employers' organisations that are members of Svenskt Näringsliv. The division of responsibility between us and Svenskt Näringsliv or the other organisation is then regulated in agreements: either in a data processing agreement, or in an arrangement between us for the protection of your personal data.

Contact us if you have any questions about how we process your personal data

If you have any questions about how we process your personal data or wish to exercise your rights as a data subject (see more on these rights below) you are always welcome to contact us at:

Industriarbetsgivarna Dataskydd [Data Protection] Box 5218 102 45 Stockholm Sweden

Email: <u>info@industriarbetsgivarna.se</u> Telephone: +46 8 762 67 55

Supervisory authority

The Swedish Authority for Privacy Protection ("IMY", formerly the Swedish Data Protection Authority) is the competent authority for monitoring application of the legislation on data protection. If you are not satisfied with the response you have had from us or believe we are acting incorrectly, you have the right to make a complaint to IMY. For more information see www.imy.se/en.

What categories of data subjects occur at Industriarbetsgivarna?

We normally process personal data belonging to the following categories of data subjects:

- Employees or former employees of Industriarbetsgivarna's member companies (in activities such as advice, dispute resolution, production of statistics, collaboration, work groups, board work, agreement committees etc.) and in certain cases also other individuals involved in our advisory and dispute resolution activities
- Contact persons at or for Industriarbetsgivarna's member companies

- Recipients of circulars, newsletters and similar information from Industriarbetsgivarna
- Politicians, individuals active in the public sector (government, region, municipality) or individuals at organisations and companies that Industriarbetsgivarna has an interest in contacting on matters related to Industriarbetsgivarna's and/or a member company's activities
- Those participating in Industriarbetsgivarna's courses, seminars, webinars, meetings, networks and events
- Contact persons at Industriarbetsgivarna's trade union counterparts and contact persons for any other parties that Industriarbetsgivarna has dealings with, as well as contact persons at other organisations with which Industriarbetsgivarna collaborates or with which Industriarbetsgivarna has contact
- Account users on and visitors to Industriarbetsgivarna's website (<u>www.industriarbetsgivarna.se</u>) and Industriarbetsgivarna's digital employers' guide (<u>www.industriarbetsgivarguiden.se</u>)
- Persons who communicate with Industriarbetsgivarna (including via email) or in services for communication (e.g. Microsoft Teams)
- Persons who, in the context of a recruitment process, seek employment, an internship or similar at Industriarbetsgivarna
- Separate information/a separate policy applies to employees of Industriarbetsgivarna

What personal data does Industriarbetsgivarna process, for what purposes and on what legal basis?

Industriarbetsgivarna normally processes the following categories of personal data for the following purposes on the following legal grounds.

Administration of membership, member services and advocacy (Industriarbetsgivarna's register of members and contacts)

In conjunction with membership of Industriarbetsgivarna we will process personal data in order to be able to administer the membership and communicate with member companies concerning the membership. We therefore need to be able to process personal data about you as a contact person at/within one of our member companies.

With a view to looking after our relationship with our member companies and improving our services and level of service, we may send surveys, evaluations and the like concerning our activities and our services to representatives and employees of our member companies. For carrying out surveys and evaluations we use contact details that can be found in our register of members. We adapt the mailings to the relevant target group, for example by using information concerning subscription to certain information from us. Where a relevant survey/evaluation is not carried out anonymously, this will be stated in the communication with you when the survey/evaluation is sent out. If the survey/evaluation is not anonymous, we will request your consent to the processing of your personal data.

As part of our work we also conduct advocacy activities in respect of politicians and other decision-makers, as well as collaborating with other interested parties on matters that are of importance for Swedish primary industry. For example, this could involve providing a response in the consultation process when new legislation is proposed or administering networks. In these contexts we may process personal data as part of our advocacy activities.

We use Svenskt Näringsliv's system called Tellus for keeping our register of members and contacts.

For our own processing of personal data in Tellus we are the data controller. In the case of those member companies that are also members of other organisations within Svenskt Näringsliv, the organisation concerned is the controller for its processing of personal data in Tellus. Svenskt Näringsliv is the data controller for its own processing of personal data.

Categories of personal data

- Your name
- Your work-related email address
- Your work-related telephone number
- Your role/position
- Corporate identity number (personal data if sole proprietor)
- Political views/affiliations (but only if you, as a data subject, have a political role)

Purpose of the processing

- Administration of membership of Industriarbetsgivarna (e.g. joining and leaving, as well as other administration) and administration of member matters (e.g. registration and monitoring of matters)
- To provide products and services that a data subject has requested or may otherwise be interested in (for example, newsletters and employer circulars)
- To evaluate our activities with a view to looking after our relationship with our member companies and improving our services and level of service to the member companies
- Contact and communication with politicians, decision-makers and other interested parties concerning matters that are of importance for Swedish primary industry and Industriarbetsgivarna's member companies
- Information exchange and collaboration with other organisations (e.g. other employers' and industry organisations) or relevant actors, including information exchange in digital channels on matters aimed at promoting the member companies' interests

Legal basis for processing

- The processing is necessary for achieving our legitimate interest of being able to administer membership and member benefits (including marketing of our products and services) and of having a structured approach to our member companies and relevant contact persons at the respective member companies in accordance with the agreement entered into between Industriarbetsgivarna and member companies
- The processing is necessary for achieving our legitimate interest of being able to evaluate our activities with a view to looking after our relationship with our member companies and improving our services and level of service to the member companies
- Where surveys, evaluations etc. of our activities and our services are not carried out anonymously, we only process your personal data if you have consented to the processing

- The processing is necessary for achieving our and our member companies' legitimate interest of being able to conduct advocacy activities in respect of decision-makers of importance for Swedish primary industry and other advocacy that serves our member companies' interests
- Information on political affiliation is processed only to the extent that a data subject has a political role and the data has been made public

Industriarbetsgivarna's statistics

We process personal data as part of our activities involving the pay statistics that Svenskt Näringsliv produces on behalf of its member organisations (for more information see <u>www.nstat.se</u>). The pay statistics are generated in a system, Näringslivets lönestatistik, where collection, processing and analysis of the statistics takes place. For the processing that takes place within Svenskt Näringsliv, Svenskt Näringsliv is the data controller. Where personal data is shared with Industriarbetsgivarna, we are the data controller.

Categories of personal data

- Personal identity number
- Data on pay and other remuneration (e.g. monthly salary, variable pay and taxable benefits)
- Employment data (e.g. profession classified by VY code, form of employment and standard working hours)
- Professional category (collective worker or salaried employee)

Purpose of the processing

- Advice to member companies
- Processing for our own analysis
- Documentation in negotiations with trade union counterparts

Legal basis for processing

- The processing is necessary for us to be able to perform a task in the public interest
- The processing is necessary for achieving our and our member companies' legitimate interest of having information on and a structure for wage formation, with a view to working for a well-functioning wage formation and regulatory system in the Swedish labour market

Industriarbetsgivarna's advisory and dispute resolution activities

As an employers' organisation we act as a representative of our member companies in negotiations with trade union organisations as well as in cases in courts and arbitration proceedings. We also act as an independent party in central negotiations and, in certain cases, in employment law disputes. Within the context of our role as an employers' organisation we also provide advice to our member companies.

In conjunction with our advisory, case management and dispute resolution activities we may process personal data about you if you:

- represent one of our trade union counterparts;
- are employed at one our member companies;
- were formerly employed at one our member companies;
- are another party, a representative or a witness in an employment law dispute or may in some other way be of significance for some circumstance in a matter or dispute.

The extent of the personal data processed varies. Only the personal data deemed necessary for the matter concerned is processed.

Categories of personal data

- Identity data (e.g. name and personal identity number)
- Contact details (e.g. email address and telephone number)
- Corporate identity number (personal data if sole proprietor)
- Employment data (e.g. role/position, employer, form of employment, length of employment and hours worked)
- Pay data (e.g. monthly salary, variable pay and benefits)
- Trade union membership
- Absence (e.g. sickness absence and parental leave or absence that has not been verified)
- Data concerning an employee's conduct or misconduct, and the measures taken by the employer
- Data associated with cases of discrimination and rehabilitation
- Other data that is necessary in order to conduct negotiations or administer legal proceedings

Purpose of the processing

- To give advice to our member companies and to be able to conduct negotiations and legal proceedings
- Work involving agreement negotiations, industrial disputes, and the application of the law and of collective bargaining agreements

Legal basis for processing

- The processing is necessary for achieving our legitimate interest of helping our member companies to be able to fulfil their legal obligations as employers
- The processing is necessary for achieving our and our member companies' legitimate interest of being able to represent our members in negotiations and in legal proceedings
- The processing is necessary for the performance of our contractual obligations to the member companies
- The processing is necessary for achieving our and our member companies' legitimate interest of negotiating on and entering into collective agreements and of administering our collective agreements and managing the process surrounding agreement negotiations

- The processing is necessary for our legitimate interest of meeting our obligations in our capacity as a party to our collective agreements
- The processing is necessary in order for us or our member companies to be able to comply with a legal obligation resulting from law and/or collective agreements
- The processing is necessary in order for us and our member companies to be able to fulfil obligations and exercise rights within employment law
- The processing is necessary for the establishment, exercise or defence of our and our member companies' legal claims

Industriarbetsgivarna's digital channels

We provide information about ourselves and our activities, the conditions in primary industry, relevant matters as well as investigative and development work at <u>www.industriarbetsgivarna.se</u>. We also provide and administer a digital employers' guide at <u>www.industriarbetsgivarguiden.se</u> which our member companies and contact persons there have access to via separate login details. Industriarbetsgivarna also provides information on the website <u>www.industrisirius.se</u>. Sirius is the parties' joint forum for collaboration within the pulp and paper industry. At central level Sirius is led by a joint board made up of representatives from Industriarbetsgivarna as well as from the trade union parties within the pulp and paper industry. Industriarbetsgivarna is responsible for the website that provides joint information from the parties about Sirius.

We also carry out statistical analysis associated with visits to our digital channels, with a view to streamlining and improving the relevance of our communications and the information we share. To protect your privacy, as far as possible we will de-identify personal data so that the data cannot be linked to a particular individual.

Categories of personal data

- Name
- Contact details (work-related telephone number, address and email address)
- Corporate identity number (personal data if sole proprietor)
- IP address and other technical data related to devices used and their settings
- Cookies (for more information about cookies read <u>here</u>)
- Photography and videos

Purpose of the processing

- To provide and market information to member companies and other interested parties
- To provide advice and support to our member companies
- To market our events, networks and training as well as other meetings
- To process statistics as a basis for analysing visit flows and registrations

Legal basis for processing

- The processing is necessary for achieving our legitimate interest of being able to provide an efficient level of service to our member companies
- The processing is necessary for achieving our legitimate interest of being able to restrict access to the information that only the member companies or other specific persons are to have access to

- The processing is necessary for achieving our and our member companies' legitimate interest of being able to conduct advocacy and opinion work that serves the members' interests
- The processing is necessary for achieving our legitimate interest of being able to market ourselves and our services, as well as our member companies' legitimate interest of being able to gain access to relevant offerings and relevant communications
- The processing is necessary for achieving our legitimate interest of being able to produce visit statistics for web pages and the employers' guide, with a view to being able to evaluate the services and develop them further
- The processing is necessary for achieving our legitimate interest of being able to use personal data to develop, improve, evaluate and streamline our activities

Industriarbetsgivarna's courses, meetings, networks and events

We hold courses and seminars (both physically and digitally) as well as other meetings to provide information on collective agreements, employment law, other relevant regulations, our work, news and reports. Participants must register with us, and in these contexts we need to process personal data in order to administer and arrange the meeting. We use Trippus, which is a tool for managing events, conferences, meetings and courses, for registering participants and for bookings for our meetings. After a meeting (primarily courses and seminars) we use the survey platform InSurvey as a tool for evaluating the meeting. Information about our processing of personal data is also provided when these tools are used. If you participate in a digital format via Microsoft Teams then your personal data (name, email address and image if you use the camera function) will be shared with other participants. At some of our physical meetings we take photos and record videos for our marketing. Information about this is also provided in connection with the meeting concerned.

Categories of personal data

- Name
- Contact details (work-related telephone number, address and email address)
- Corporate identity number (personal data if sole proprietor)
- Position and company
- Dietary requirements (if food is provided at the meeting)
- Results of evaluation
- Photography and filming/videos (separate information about the processing of personal data is provided in conjunction with meetings where we take photos or record videos)

Purpose of the processing

- Registration and administration of those registered for the meeting
- Communication with participants before and after a meeting
- Follow-up and evaluation of meeting held
- Publication of photos and/or videos from meeting held

Legal basis for processing

• The processing is necessary for our legitimate interest of being able to provide an efficient level of service to our member companies

- The processing is necessary for our and our member companies' legitimate interest of being able to hold a meeting
- The processing is necessary for our legitimate interest of being able to restrict meetings to member companies or other specific persons
- The processing is necessary for our legitimate interest of being able to market our courses, seminars, meetings and other events and for our member companies' legitimate interest of being able to gain access to relevant offerings
- Where dietary requirements are concerned, the legal basis is consent (which is provided in conjunction with registering)

Industriarbetsgivarna's communication and marketing

Industriarbetsgivarna's purpose is to promote the member companies' competitiveness and long-term profitability, to act for a good business climate based on entrepreneurship and for a well-functioning market economy, to safeguard and promote the member companies' shared interests as employers, and in particular to work for well-functioning wage formation and regulatory structures in the labour market. With a view to achieving these purposes and facilitating the member companies' operations we work actively to provide information about ourselves as well as news that concerns primary industry and our member companies, and to engage in other communication that we believe may serve our purposes. We also carry out statistical analysis of our communication and marketing in order to streamline the communication and improve the relevance of the information we provide. For our communication and marketing we need to process personal data. We use the platform Ungapped as a tool for communication and marketing, e.g. when sending out newsletters and employer circulars and for invitations to various seminars and meetings.

You always have the right to object to our marketing. You can do so directly in our mailings using the unsubscribe link or by contacting us (you will find our contact details above in this information under "Contact us if you have any questions about how we process your personal data").

Categories of personal data

- Name
- Contact details (work-related telephone number, address and email address)
- Corporate identity number (personal data if sole proprietor)
- Statistical data relating to visit flows, opening and reading statistics
- De-identified results of evaluations and other feedback associated with our services and products

Purpose of the processing

- To send out newsletters, employer circulars and other information
- To send out offerings concerning courses, meetings, networks, events and other services/products that we offer
- To generate analyses and statistics concerning use and interaction with us, e.g. responses to our mailings, opening and reading statistics related to mailings, results of evaluations and other communication/evaluation relating to our services and products

Legal basis for processing

- The processing is necessary for our legitimate interest of being able to provide an efficient level of service and relevant communication to our member companies
- The processing is necessary for our legitimate interest of being able to market our services and products, and for our member companies' legitimate interest of being able to benefit well from their membership

Legal obligations

Personal data has to be processed as a result of certain legislation that Industriarbetsgivarna must comply with, e.g. the Bookkeeping Act.

Categories of personal data

- Name
- Contact details (work-related telephone number, address and email address)
- Corporate identity number (personal data if sole proprietor)

Purpose of the processing

• Necessary in order to be able to comply with legal obligations set out in law or established by courts or through decisions by authorities

Legal basis for processing

• The processing is necessary in order to comply with legal obligations set out in law

Recruitment

If you apply for employment or an internship with us we will need to process your personal data within the context of our recruitment process.

Categories of personal data

- Name
- Identity data including personal identity number
- Contact details (telephone number, address and email address)
- Audiovisual material
- Skills data
- Data concerning trade union membership
- Data concerning references (letters of recommendation)
- Data concerning social circumstances

Purpose of the processing

- To carry out the recruitment process (receive and review your application documents, e.g. CV and covering letter, evaluate your application, communicate with you during the recruitment process and obtain references as agreed between us)
- To deal with and address legal claims in the event of a dispute

Legal basis for processing

- The processing is necessary in order to take measures before a possible contract of employment is entered into
- The processing of personal identity numbers is necessary in view of the purpose of the processing
- Any special categories of personal data, such as health data, are only processed by us if you voluntarily provide us with such data, in which case it is processed on the basis of your express consent or if it is necessary in order to deal with and address legal claims
- The processing is necessary for achieving our legitimate interest of dealing with and addressing legal claims, for example in the event of a dispute and legal proceedings

For employees of our member companies

For employees of our member companies we may also process personal data in ways other than as stated above. This is primarily linked to the employer's membership and applies to various contact persons. Data on contact persons may need to be processed in conjunction with management of the membership, in trade union negotiations, in employment law disputes and when giving advice to the member companies. Data concerning membership of various working groups, committees, boards and similar groups or associations, notices convening association meetings etc. may also be involved.

How do we process personal identity numbers?

As far as possible we avoid processing personal identity numbers. In certain cases, however, there is reason to do so, mainly because we need to have sure identification. Regarding the processing of personal identity numbers in the form of corporate identity numbers for sole proprietors, this processing is required where the company is one of our members because the corporate identity number comprises the personal identity number.

From what sources do we take personal data?

We obtain personal data about you as a data subject, for example when you contact us, when you register to receive our newsletter, when you attend one of our courses or meetings, when you order services and/or products from us or when you use our digital employers' guide. Show less

In addition to the personal data that you provide us with yourself, we may also collect personal data from third parties:

- from our member companies;
- from our union counterparts;
- from Bolagsverket (the Swedish Companies Registration Office);
- from external sites (in such cases this means published information and only in isolated cases where the processing is necessary for our legitimate interest of getting in contact with you on a particular matter).

Within the context of our advisory, case management and dispute resolution activities the personal data that we need to process about you may be obtained from a number of different sources, for example from you yourself, from our member companies, from your trade union organisation, from other parties that represent you, from an authority etc.

Who might we share your personal data with?

Processors

In some situations it is necessary for us to engage service providers in order to be able to perform our work and look after the member companies' interests. For example, we use various IT providers or providers of cloud-based tools for communication, for conference and meeting bookings and for course evaluations. Where such service providers gain access to personal data from us, the providers engaged are to be regarded as our processors. In these cases, we have a responsibility to enter into agreements with our processors and to give them instructions concerning how they may process the personal data that we provide. We check all the processors to ensure that they can provide sufficient guarantees regarding the security and confidentiality of the personal data. When processors are engaged this takes place solely for purposes that are compatible with our own purposes of the processing, and they undertake to only process personal data in accordance with our instructions.

Actors that are independently data controllers

We may share your personal data with other actors that are independently data controllers. Such actors may include our trade union counterparts, Svenskt Näringsliv, and other employers' and industry organisations along with their companies, to the extent required for the collaboration between the organisations to work. We may share your personal data with authorities and other actors where this is required by law or in order for Industriarbetsgivarna to be able to safeguard its lawful rights. We may also disclose personal data to third parties, e.g. the police, the Swedish Tax Agency or another authority, if it concerns the investigation of crime or if we are otherwise obliged to provide such data by law or on the basis of decisions by authorities.

When your personal data is shared with an actor that is independently a data controller, that organisation's information concerning privacy and personal data processing applies.

Other

The meetings (mainly courses and seminars) that we arrange in digital form are principally administered through the meeting platform Microsoft Teams. When you participate in a meeting (course, seminar, conference etc.) via Microsoft Teams, your personal data (name, email address and video if you use the camera function) will be shared with other participants.

Where do we process your personal data?

We always endeavour to have your personal data processed within the EU/EEA but sometimes this is not possible.

For some IT support the data may be transferred to a country outside the EU/EEA. This applies, for example, if we share your personal data with a processor which, either itself or through a subcontractor, is established or stores information in a country outside the EU/EEA. As data controller we are responsible for taking all reasonable legal, technical and organisational measures to ensure that this processing takes place in accordance with provisions applicable within the EU/EEA.

When personal data is processed outside the EU/EEA the level of protection is guaranteed either through a decision by the European Commission that the country in question ensures an adequate level of protection or through the use of what are known as appropriate safeguards. If you would like further information on these safeguards you are welcome to contact us.

How long do we keep your personal data for?

We never store your personal data for longer than is necessary for the purpose concerned. We have created erasure procedures to ensure that personal data is not stored for longer than is needed for the specific purpose. How long personal data is processed for varies depending on the purpose of the processing. We regularly review the personal data we process and erase data in accordance with the erasure procedures in effect. How long we may need to process the personal data for depends on the nature of the data, the purpose for which it is processed and other aspects of the situation, as well as, among other things, applicable legal requirements, limitation periods and our own and our member companies' legitimate interests. Legislation requires certain data within bookkeeping to be kept for at least seven years, for example, while data concerning special dietary requirements at meetings is deleted within a week or so of an event having ended.

What are your rights as a data subject?

As a data subject you have a number of rights under the data protection legislation in force. For how to exercise these rights see the paragraph "Exercising your rights" below. Here we list your rights as a data subject.

Right to obtain a copy of the data (right of access)

If you want to know what personal data we process about you, you can request access to the data. When you make such a request we may ask some questions to ensure that your request is handled efficiently. We will also take action to ensure that the data is requested by and given to the right person.

Right to rectification

If you discover that the personal data we process about you is incorrect or incomplete, you have the right to request that your personal data is corrected or supplemented.

In certain cases you can make corrections yourself, which we will then inform you about.

Right to erasure

In certain cases you can request that we erase the personal data we process about you. For example, if:

- the data is no longer necessary for the purposes for which it is being processed;
- you object to our assessment of overriding interest, where your reasons for objecting outweigh our legitimate interest;
- the personal data are being unlawfully processed;
- the personal data has been collected about a child (under 13 years of age) that you have parental responsibility for;
- the data was collected based on your consent and you wish to withdraw your consent.

If the processing is necessary in order for us to be able to comply with a legal obligation (e.g. bookkeeping, tax rules etc.) or to carry out a task in the public interest (e.g. statistics), the processing is still permitted. Likewise, the processing is permitted if we need the data in order to be able to establish, exercise or defend a legal claim.

If we are prevented from erasing your personal data we will block the personal data from being able to be used for purposes other than the purpose which prevents it from being erased.

Right to restriction of processing

In certain cases you have a right to request that our processing of your personal data is restricted. If you dispute that the personal data we process is correct, you can request the processing is restricted during the time we need to check whether the personal data is correct.

If and when we no longer need your personal data for the established purposes, our procedure is normally that the data is erased. If you need it to be able to establish, exercise or defend legal claims, you can request that we restrict our processing of the data. This means you can request that we do not clear and erase your data.

If you have objected to our assessment of overriding interest which we are using as a legal basis for a purpose, you can request that processing is restricted during the time we need to check whether our legitimate interest outweighs your interest in having the data erased.

Where processing has been restricted in accordance with one of the situations above, then other than actual storage of the data we may only process the data if you have consented to this, in order to establish, exercise or defend legal claims, or to protect another party's rights.

Right to object to a certain type of processing

You always have a right to object to all processing of personal data that is based on overriding interest. If we can demonstrate compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms or if it takes place in order to establish, exercise or defend a legal claim, the processing is still permitted. You also have the right not to receive direct marketing.

Right to data portability

As a data subject you have a right to data portability (i.e. a right to obtain your personal data yourself or to have it transferred to another data controller) in respect of the data that you provided to us yourself. This right applies only to data where the legal basis for the processing is consent or contract. Data portability is subject to transfer being technically possible and able to be carried out by automated means.

Right to withdraw consent

Where the processing is based on your consent, you may withdraw your consent at any time. We will then no longer process the personal data that is based on the consent, unless legal reasons oblige us to continue processing your personal data or we have another legitimate basis for the processing. Note that consent having been withdrawn does not affect the lawfulness of the processing that took place based on your consent before it was withdrawn.

Exercising your rights

If you want to request a copy of the data or to assert one of your other rights under the data protection legislation in force, you can make a request to do so. Such a request must be made in writing and signed personally by you. We will respond to your request without undue delay and at latest within 30 days. Download the <u>document</u>, answer the questions and sign it. Then send the completed document to <u>info@industriarbetsgivarna.se</u>. Where possible the email should be sent from the email address you are registered with at Industriarbetsgivarna.

How is your personal data protected?

We work actively to ensure that personal data is managed securely, using both technical and organisational safeguards to do so.