

# Privacy Notice – Staff

## 1 Introduction

Gränges (“**We**”) are committed to safeguarding the privacy of the personal data that we gather concerning our prospective, current and former employees (“**you**” or “**employees**”) for management, human resources and payroll purposes.

As an Gränges employee (or prospective employee), you understand and acknowledge that we collect, use and disclose your personal data in accordance with this Global Privacy Notice for Employees (this “**Notice**”).

## 2 Application of this Privacy Notice

This Notice applies to employees, prospects and any temporary employee who has a contract with Gränges (this includes fixed term workers, interims, etc.). The notice applies to personal data and to the use of that personal data in any form – whether oral, electronic or written.

This Notice is intended to describe the broadest range of our personal data processing activities.

This Notice gives effect to Gränges commitment to protect your personal data. References to “**Gränges**”, “**we**” and “**our**” throughout this Notice, depending on the context, refer to all national businesses in Gränges.

## 3 Personal data processed in Gränges

The legal basis related to processing personal data of the employee is mainly the contract between Gränges and the employee, but also national legal obligations eg. Arbetsmiljölagen, Skattelagstiftningen etc. The legal basis for prospective employees is legitimate interest; Gränges has the interest to find appropriate and competent employees when recruiting.

Much of the personal data we process is information that you knowingly provide to us. There may be instances in which the personal data that you provide to us is considered Sensitive Personal Data under the privacy laws of Sweden (eg. sensitive data meaning personal data like health data). We only process Sensitive Personal Data with your specific consent and to the extent permitted by applicable law.

## 4 Purpose with processing personal data

Depending on the applicable laws, we may collect, use and disclose personal data concerning employees or prospective employees in order to:

- Evaluate applications for employment including recruitment tests;

- Manage all aspects of an employee's employment relationship, including, but not limited to, payroll, pensions, taxes, benefits, corporate travel, reimbursable expenses, development and training, absence monitoring, communication, performance appraisal and other general administrative and human resource-related processes;
- Maintain sickness records;
- Protect the safety and security of Gränges staff and property (including controlling and facilitating access to and monitoring activity in secured premises and activity using Gränges computers, communications and other resources);
- Administer termination of employment and provide and maintain references;
- Comply with applicable laws (e.g., health and safety), including juridical or administrative orders regarding individual employees.

There are Closed Circuit Television (CCTV) cameras in operation within and around our manufactories, they are used for the following purposes:

- To prevent and detect crime;
- To protect the health and safety of Gränges staff;
- To manage and protect Gränges property and the property of Gränges staff

We may monitor Internet use and communications in accordance with applicable laws and Gränges IT Policy. We may retain certain personal data of employees after their employment ends for any residual aspects of the purposes set out above. We will only retain such personal data for as long as it is necessary and in all cases for no longer than permitted by Gränges formally defined storage time for relevant system and applicable law.

Unless otherwise stated, all personal data we request from you is obligatory. If you do not provide and/or allow us to process all obligatory personal data as requested, we will not be able to keep complete information about you, thus, affecting our ability to accomplish the purposes set out above.

## **5 Disclosure of your personal data**

In order to carry out the purposes outlined above, information about you will be disclosed for the purposes set out above to human resources staff, relevant line managers and other appropriate, authorized, persons in our organisation.

Like many businesses, from time to time, we outsource the processing of certain functions and/or information to third parties. When we do outsource the processing of your personal data to third parties or provide your personal data to third-party service providers, we oblige those third parties to protect your personal data in accordance with the terms and conditions of this Notice, with appropriate security measures.

We reserve the right to disclose any personal data we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal data collected and to process such personal data to comply with accounting, tax rules, regulations and any specific record retention laws.

## **6 Centralized data processing activities**

Like most businesses, we have centralized certain aspects of our data processing and human resources administration in order to allow us to better manage our business. That centralisation may result in the transfer of personal data from one legal entity to another.

If you are being considered for a position in a different country, some personal data concerning you will be transferred to the country where the job opening is located. Personal data concerning you may also be transferred to managers and/or human resources staff in other locations in accordance with applicable laws in order for them to be able to contact you with respect to applying for a different position. Whenever your personal data is transferred within Gränges, your personal data will be processed in accordance with the terms and conditions of this Notice and applicable laws.

## **7 Updating, deleting or accessing your personal data**

With some limited exceptions, you may enquire about the personal data we maintain about you by sending us a written request by letter or email (please see contact information in last section of this Notice). Please be sure to include your full name, current (or last) job title and place of employment within Gränges. We may not disclose data that you are not entitled to receive under applicable laws. Please note that, for excessive and repetitive requests, we will charge a fee based on administrative costs to provide you this information. We will let you know about the fee prior any action is taken to answer the request.

You may request to obtain information about the processing of your personal data. You may also ask to correct, to delete or to stop processing personal data that we hold about you. If we agree that the information is incorrect, or that the processing should be stopped, we will delete or correct the information.

It is assumed that regularly pruning routines (within reasonable time), defined in contract with the employee and/or formal system descriptions, is considered as a legitimate interest to Gränges, considering storage of the personal data until date of pruning. This means that when it comes to fulfilling the right of the employee to be forgotten the pruning routines shall stand strong and only in special cases the personal data shall be immediately deleted if that is requested.

## **8 Protecting your personal data**

The personal data that we collect from you is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls and other reasonable security measures. Where required under law, we will notify you of any loss, misuse or alteration of personal data that may affect you, so that you can take the appropriate actions for the due protection of your rights.

## **9 Contact information**

If you have any questions about this Notice, about the processing of your personal data as described herein, or any concerns or complaints with regards to the administration of the Notice, or if you would like to submit a request for access to the personal data that we maintain about you, please contact us by any of the following means:

- For applicants and former employees, by contacting the Gränges headquarter;  
privacy@granges.com
- For current employees, by contacting your line manager.

All requests for access to your personal data must be submitted in writing by letter or email. We may respond to your request by letter, email or any other suitable method.

Complaints can also be sent directly to the Supervisory Authority (Datainspektionen in Sweden). Please go directly to the Supervisory Authority's webpage for contact information; <https://www.datainspektionen.se/>