# GOT YOUR BACK™

# **Privacy Notice**

GOT YOUR BACK<sup>™</sup> cares about privacy and the protection of the personal data processed by us. In this notice we will describe the collection, usage, storage and sharing practices of personal data.

**GOT YOUR BACK**<sup>TM</sup> consists of different legal entities. This notice is issued on behalf of the group consisting of GotYourBack AB and all its subsidiaries, so when we write "GYB", "we" "us" or "our" in this notice, we are referring to the relevant entity in the group that has collected your data.

When we write "you" we mean you as a data subject in your role as a client, our client's employee or representative, a potential client or potential client's employee, collaboration partner, or other, such as beneficial owner, authorized representative, shareholder or associated party to one of our clients or potential clients. We also collect and process personal data on contact persons of suppliers and other external parties. Likewise, anyone who applies to work for us, communicates with us or signs up for newsletters, will provide us with personal data.

## DESCRIPTION OF DATA PROCESSING ACTIVITIES

We collect and process the following types of personal data: name, address, email address, telephone number and other contact information, date and place of birth, nationality and citizenship, employment details, copies of identity documents (such as passport, national ID card, driver's license, employee identification numbers, source of wealth, utility bills, bank statements, tax residency certificates, details of shareholdings and other assets which are legally or beneficially owned by the data subject; and details of people and organisations which may be connected to the data subject (family or otherwise).

The majority of the personal data processed by us is necessary for the performance of a contract or to comply with the request of the data subject prior to entering into a contract and in order to comply with our legal and regulatory obligations, such as know your customer obligations. We may further process personal data for the purposes of the legitimate business interests, such as administration of our business operations and systems, including IT and invoicing systems, and marketing of our services.

We collect personal data directly from prospective clients, clients, business partners and intermediaries for the purposes of entering into a service agreement and/or to meet certain legal requirements.

We also collect and process personal data from publicly accessible sources such as business registers, tax office registers, beneficial owner registers, registers held by commercial information providers such as information regarding sanction lists, beneficial ownership and politically exposed persons or other similar lists, and information collected from other GYB entities or other entities that we collaborate with.

#### Staff recruitment or engagement of consultants

We process personal data within the scope of recruiting staff, student workers, interns and engaging consultants. The data collected includes contact details, identification information, CV and personal letter, as well as information on education and work experience, including degree and employment certificates. We may also supplement personal data by obtaining information from other sources, e.g., search results using generally available search engines and records, industry newsletters and/or social media, as well as the applicant's current or previous employer's website. In some cases, we also collect and process results of tests performed during the recruitment process. Your personal data will be used to assess if you are qualified for the position you apply to, to verify your information, to conduct reference checks and to communicate with you.

#### Processing of personal data in conjunction with CCTV surveillance

For security reasons CCTV is in operation at our office. Processing of personal data takes place so we can prevent and investigate crime, and thereby enhance security for GYB's staff and visitors, and protect GYB's property.

The processing of personal data in conjunction with CCTV surveillance is based on our legitimate interest in maintaining security at our offices and protecting GYB's property. We consider that our interest in processing personal data for these purposes outweighs the individual's interest in having their privacy protected.

#### WHO HAS ACCESS TO THE PERSONAL DATA THAT WE PROCESS?

We have implemented appropriate technical and organisational measures to protect your personal data against loss, accidental and unlawful access and unauthorised disclosure. The number of persons with access to your personal data is limited. Only individuals associated with us that need to process your personal data in accordance with the purposes above have access to your personal data.

We share your personal data within the companies of our group in order to comply with legal requirements and contractual obligations.

We may also disclose data to competent authorities when we have a legal duty to do so, for example on the basis of money laundering legislation.

We also share your personal data with suppliers and partners that carry out services on our behalf or in other ways collaborate with us, such as IT suppliers, external advisors (such as audit firms) and other service providers. We may need to share your personal data with third party service providers with whom we cooperate, in particular suppliers of databases for verifications of individuals against economic or financial sanctions or trade, or any other applicable national legislation, within and outside of the EU/EEA (e.g. as relevant for the applicable sanction list), in order for us to comply with legal obligations under applicable money laundering regulation.

#### HOW LONG DO WE SAVE PERSONAL DATA

We will process and store the relevant personal data for the duration of our services or for the duration of the business relationship. We may also store the data for as long as it is necessary or required in order to fulfil legal, contractual or statutory obligations or for the establishment, exercise or defence of legal claims, and in general where we have a legitimate interest for doing so.

Personal data that we process in our relationships with suppliers and other external parties are saved for the period that is necessary so we can administer the contractual or business relationship, exercise our rights and perform our obligations in relation to the supplier or other external parties, or for as long as is required or permitted under applicable law. Personal data of job applicants are stored during the recruitment process and are then saved for a further maximum of six months after completion of the process, or for as long as is required or permitted under applicable law.

CCTV surveillance recordings are saved for three days. However, when specific material is required to take action in relation to a person who has been recorded in order to achieve the purpose of the recording, the material can be saved for as long as necessary to take that action.

### YOUR RIGHTS

You have the right

- to know what personal data we process about you
- to request that we rectify inaccurate or incomplete personal data about you
- to request that we erase your personal data to the extent that we have no legal and/or regulatory obligations to keep such personal information, or request that processing of the personal data be restricted,
- to object to specific processing of personal data, and
- in some circumstances, to receive the personal data you have provided in machine-readable form, and to transmit it to another controller.

Note that the above rights may be limited by applicable laws and regulations. In some cases, restriction or erasure of personal data may also prevent us from meeting our commitments.

If you have any questions or complaints about the way we process personal data or wish to request exercise of rights as described above, you are welcome to contact us, please see our contact details below.

In addition, you always have the right to file a complaint with the local supervisory authority, <u>Integritetsskyddsmyndigheten</u>.

#### CHANGES TO THIS NOTICE

We may change this notice from time to time. Please ensure that you review this notice from time to time to stay updated on any changes.

#### CONTACT US

The data controller is the relevant GYB entity which has collected personal data, the details of which can be found on our <u>contacts page</u>.

If you have any questions in relation to our processing of data, any complaint in relation to our processing of data or if you want to use any of your rights in relation to our processing of your data, please contact us at <u>info@gotyourback.se</u> or by regular mail to GotYourBack AB, Linnégatan 18, 114 47 Stockholm, Sweden.

Please click <u>here</u> to learn more about the cookies used on the GYB website and how to refuse the cookies.