

REGIN'S PRIVACY POLICY FOR RECRUITMENT

In this Privacy Policy for Recruitment ("**Policy**"), references to "Regin" "we", "us" and "our" will mean the limited liability company Regin or **Regin Controls Sverige AB** (for contact details, see "[Questions and queries](#)" below) where you have applied for employment, an internship, summer job or other form of employment or assignment (collectively, "you" if the context does not provide any other interpretation).

Since this Policy contains extensive information, you can use the table of contents below to easily navigate to the sections that interest you.

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Why do we inform you?

We know that the manner in which your personal data is processed is important to you. This Policy outlines in detail how we collect, process, use and transfer (collectively, "**process**") your personal data.

Personal data is information that relates to an individual who can be identified using that information. It does not matter whether the information can be linked to you on its own, or whether other information is needed to do so – the information in both cases is considered personal data. We process personal data based on several purposes. We cannot process your application without processing personal data. If we do not need your personal data, we will inform you, for example by marking information as optional. Common examples of personal data that we process in our day-to-day operations are names, contact details and information that you provide with your application. You will

find more detailed information about the data we process and the purposes for which we process it under "[Processing of your personal data](#)" below.

Who is the data controller?

Regin is the data controller, meaning that we determine how and why your personal data is processed. It also means that we are required to ensure that your personal data is only processed in accordance with this Policy and that we have a legal obligation to provide you with the information contained therein. If you have any questions, you can contact us using the contact details under "[Questions and queries](#)" below.

Where we have appointed a Data Protection Officer (DPO), you can contact our DPO using the contact details under "[Questions and queries](#)" below.

Processing of your personal data

What personal data do we process?

The personal data we collect can be divided into eight categories (i) Contact details, (ii) Personal information, (iii) Identity and background information; (iv) Sensitive personal data, (v) Information for recruitment management, complaints handling or performance monitoring, (vi) Use of our assets or services and communication with us; (vii) Security information and (viii) Any other information you provide as part of your application. We collect personal data directly from you in the first instance, but we also receive personal data about you in connection with your application from recruitment consultants if any, public sources (e.g. LinkedIn) and any other third parties (e.g. your references). We may also obtain data by virtue of the fact that you are on our premises or using our systems (for example, recording of information about the use of our IT equipment or information from security systems such as entry systems and CCTV) or taking various tests as part of the recruitment process.

The data we process and where we collect it is shown in the table below. Please note that the information we process about you may vary depending on, for example, the position you are applying for and the information you provide as part of your application and the recruitment process. Sometimes processing is also performed by a third party on our behalf (see "[Does Regin share personal data with third parties?](#)" below).

Category of data	Type of personal data	Collected from
Contact information:	<ul style="list-style-type: none"> Name Address E-mail Telephone number 	<ul style="list-style-type: none"> You
Personal information	<ul style="list-style-type: none"> Birth date Gender Next of kin If you are successful in the recruitment process: previous salary and salary offer, as well as other benefits, personal identity number and bank details 	<ul style="list-style-type: none"> You Recruitment consultant Your previous employer(s)

Identity and background data	<ul style="list-style-type: none"> • LinkedIn profile and other public information about you and your background • Experience, previous work and education • Information concerning ID document • Test results • Work permit or equivalent • CV and cover letter or other information you submit in your application • Details of your education, qualifications, results and certifications or other evidence of the same • Images and/or video recording • Application • Notes and decisions from job interviews • Preferences regarding pay and place of employment • Conflicts of interest • Background checks when relevant (please note that this may also include sensitive personal data, see specifically information regarding purpose for processing sensitive personal data) 	<ul style="list-style-type: none"> • You • Recruitment consultant • Your previous employer(s) • Public sources and registers
Sensitive personal data (see table below)	<ul style="list-style-type: none"> • Information about your health and any allergies or illnesses we should be aware of • Any background checks, such as credit checks 	<ul style="list-style-type: none"> • You
Information for managing recruitment, handling complaints or following up on performance	<ul style="list-style-type: none"> • Terms of employment offered • Any preferences regarding our processing of your personal data • Notes from job interview and related feedback • Any complaints and labour law issues 	<ul style="list-style-type: none"> • You
Use of our assets or services and communication with us	<ul style="list-style-type: none"> • User ID and password • IP address and identifier of devices you use • Information about our communication via telephone, e-mail and video calls if any • Logs of access to our systems 	<ul style="list-style-type: none"> • You • Generated through your contact with us or your use of our systems or other assets • Recruitment consultant
Security Information	<ul style="list-style-type: none"> • Information obtained via entry systems, CCTV or other security systems 	<ul style="list-style-type: none"> • You • Generated by virtue of your being on our premises or using our systems or other assets • Third party providing security services

In certain situations, we may request your explicit consent to process (specific types of) personal data. Under these circumstances, you may withdraw your consent at any time by following the instructions you were given when you gave your consent or via the contact details under "[Questions and queries](#)" below.

How do we process your personal data?

We use your personal data for several purposes. We must always have a lawful basis, in other words, a reason arising from law in order to process your personal data. Below is a summary of the purposes

for which we process your personal data and the associated lawful basis for the processing. Under certain circumstances, several lawful bases may be relevant to certain processing activities.

Purpose of processing	Lawful basis				
	Your consent	To implement an agreement with you or because you have asked us before entering into the agreement.	To fulfil a legal obligation	Our legitimate interests	It is necessary to protect interests that are of fundamental importance to you or another natural person
Recruitment activities					
a) Send you information about recruitments, application deadlines and other recruitment-related events and processes	✓				
b) Communicate with you and provide information about our vacancies, recruitment activities and processes and manage your application(s)	✓			✓ (we may wish to contact you regarding future services)	
c) Manage your application and assess your suitability for the role				✓ (we need to be able to assess your application)	
d) Consider your suitability for the position in question				✓ (we need to be able to assess your suitability for the position in question)	
e) Consider your suitability for any future vacancies	✓				
f) Plan and conduct interviews by telephone, video link or in person				✓ (we need to be able to manage the recruitment process)	
g) Communicate with you and provide you and the recruitment consultant, if any, feedback				✓ (it is important for us to be able to give feedback)	
h) See, assess and verify your experience				✓ (it is important for us to be able to assess your experience)	
i) Review and confirm any work permits			✓		

Purpose of processing	Lawful basis				
	Your consent	To implement an agreement with you or because you have asked us before entering into the agreement.	To fulfil a legal obligation	Our legitimate interests	It is necessary to protect interests that are of fundamental importance to you or another natural person
j) Carry out background checks (sensitive personal data may also be processed, see separate table below)	✓		✓	✓ (it is important for us to be able to check your suitability for the position)	
Successful candidate					
k) Present a job offer to you and enter into an employment contract with you		✓		✓ (it is important for you and us that we can present a proposal to you if you are successful in the recruitment process)	
l) Manage, administer and implement the technology system measures and processes necessary for you to start working for us		✓		✓ (it is important for us to be able to ensure that the technical prerequisites are in place so you can start working with us if you are successful in the recruitment process)	
m) Determine whether any changes are necessary for you to be able to perform your work if you are successful in the recruitment process (sensitive personal data may also be processed, see separate table below)	✓	✓	✓	✓ (it is important that we can make any necessary adjustments if you are successful in the recruitment process)	
Security					
n) Monitor, maintain and improve the security of our physical premises, networks and other systems and services		✓	✓	✓ (it is important for us to be able to guarantee security)	
o) Identify and authenticate candidates and other individuals			✓		

Purpose of processing	Lawful basis				
	Your consent	To implement an agreement with you or because you have asked us before entering into the agreement.	To fulfil a legal obligation	Our legitimate interests	It is necessary to protect interests that are of fundamental importance to you or another natural person
p) Identify, investigate and mitigate suspected misuse of our assets, systems and other services		✓	✓		
q) Ensure compliance with our policies and guidelines			✓	✓ (it is important for us that our policies and guidelines are followed and we need to be able to check this)	
Regulatory obligations					
r) Ensure a good working environment for our employees		✓	✓	✓ (we need to be able to secure the work environment for our employees)	
s) Ensure compliance with legal health and safety requirements			✓		
Our business activities					
t) Obtain and use feedback from our recruitment activities and the manner in which we select employees				✓ (it is important for us to receive feedback in order to continuously improve)	
u) Analyse recruitment strategy, processes and employee turnover				✓ (we need to be able to review and analyse our strategies and processes)	
v) Manage complaints, comprehensively investigate issues, assess appropriate management, mitigate actions and evaluate the final outcome				✓ (we must be able to deal with any complaints and take appropriate action)	

Purpose of processing	Lawful basis				
	Your consent	To implement an agreement with you or because you have asked us before entering into the agreement.	To fulfil a legal obligation	Our legitimate interests	It is necessary to protect interests that are of fundamental importance to you or another natural person
w) Administration linked to employees, comprehensive workforce planning and use of our premises				✓ (we need to be able to plan work and the use of our premises)	
x) Identify and assess our strategic business activities, resources and areas for development				✓ (it is important for us to continuously develop and improve)	
y) Implement, adapt and improve systems and processes, as well as develop and improve our business and recruitment process				✓ (it is important for us to continuously improve)	
z) Manage, plan and execute activities, projects and initiatives related to our business and recruitment process				✓ (we need to be able to manage the recruitment process)	
aa) Manage, update and maintain our technical infrastructure		✓		✓ (we need to be able to secure our technical infrastructure)	
bb) Analyse our recruitment-related targets and results				✓ (it is important that we can review and analyse our recruitment work)	
cc) Obtain feedback related to our recruitment and HR activities and processes for continuous development and improvement				✓ (it is important for us to receive feedback in order to improve)	
Miscellaneous					

Purpose of processing	Lawful basis				
	Your consent	To implement an agreement with you or because you have asked us before entering into the agreement.	To fulfil a legal obligation	Our legitimate interests	It is necessary to protect interests that are of fundamental importance to you or another natural person
aa) To deal with any dispute with you or comments or complaints in general				✓ (we need to process your personal data in order to handle a dispute with you)	

We may also process specific categories of personal data. According to applicable data protection legislation, more stringent security requirements are set for specific categories of personal data. A different lawful basis is also required to process such data. The table below sets out the various purposes for which we may process your sensitive personal data and the relevant lawful basis on which we process the data. In certain circumstances and for certain processing activities, more than one lawful basis may be relevant.

Purpose of processing	Lawful basis for processing specific categories of personal data We have the right to process your personal data because...				
	1. You have given your explicit consent to the processing	2. It is necessary to protect someone's fundamental interests or they are incapable of giving their consent	3. It is necessary for the establishment, exercise or defence of legal claims	4. It is necessary for reasons of substantial public interest	5. It is necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment law
a) Arrange meetings or events within or outside our premises	✓ (for your food preferences and access to the premises)	✓ (in the event of an accident on our premises)			
b) Carry out background checks, which may include credit checks where appropriate		✓ (when necessary for the role, we need to be able to ensure your suitability)		✓	✓
c) Handle any non-discrimination requirements and other potential disputes with you			✓		
d) Manage our health and safety obligations		✓		✓	
e) Determine if any changes are necessary to enable you to carry out your work if you are successful in the recruitment process		✓		✓	
f) Review and verify any work permits			✓		

Does Regin share your personal data with third parties?

Personal data will only be shared when necessary based on the purposes set out in this Policy. Your personal data may be shared with the group companies, partners or other third parties that you come into contact with during the recruitment process or that provide us a service that we use during the recruitment process.

Within the group

We may share your personal data with other companies within our group. However, we only share personal data within the group in a manner that is consistent with the information in this Policy and to the extent necessary. Sensitive personal data is typically not shared, and should this happen, it is only after a further check of the necessity and legality of such sharing has been carried out. Personal data is never shared with persons other than those for whom the data is necessary to perform their work.

We always ensure that those who receive personal data are bound by confidentiality obligations regarding, inter alia, your personal data.

Service providers

We engage third parties that provide us with certain services. Services involved are:

- i. IT support, cloud services and other IT-related services where the supplier helps us manage, for example, our website, document management systems, financial systems and other systems;
- ii. recruitment tools.

We have written agreements with all our suppliers that regulate how they may process personal data on our behalf and require that they guarantee an adequate level of security for your personal data.

Third-party access to personal data is limited and granted only in the light of the nature of the assignment, the need for knowledge, depending on job functions and roles. This means that we will never share your personal data with anyone who does not need it for any of the above purposes or to help us perform our tasks according to the same principles.

Disclosure of data to third parties

In addition to the above, in certain circumstances we may be required to share your personal data with third parties based on applicable law. These third parties are:

- i. administrative agencies (such as the Swedish Tax Agency and the Swedish Social Insurance Agency);
- ii. financial institutions;
- iii. insurers;
- iv. police, prosecutors, and
- v. external consultants.

Does Regin transfer personal data to countries outside the EEA?

We may transfer your personal data to a country outside the European Economic Area ("EEA"). Some of our suppliers or partners may be located outside the EEA or use personnel or materials/equipment outside the EEA, and your data may in such cases be processed outside the EEA. We have implemented appropriate safeguards with regard to the protection of your privacy, your fundamental rights and freedoms, as well as the exercise of your rights. If processing of your personal data will take place outside of the EEA, we will always take measures that, for example, ensure an appropriate level of data protection through EU standard contractual clauses based on the European Commission's Decision of 5 February 2010 or any decision which may replace it.

If you would like more information about the relevant regulations or have questions about the transfer of data to other countries, please contact us. See contact details under "[Questions and queries](#)" below.

How is your personal data protected?

Regin uses adequate IT security systems to protect the confidentiality, integrity and access to your personal data. In particular, we have taken appropriate security measures against illegal or unauthorised processing of personal data and against accidental loss or damage to personal data.

Access to your personal data is only granted to persons who need it in order to fulfil their work assignments.

How long does Regin store your personal data?

We will store your personal data for as long as we need it to fulfil the purposes for which it was collected (see above) and to comply with laws and fulfil legal obligations. This may mean that certain data is stored for longer than others. The length of time we store your personal data for is affected by the following for example (i) laws that we are required to comply with, (ii) if we have any legal proceedings between each other or any third party, (iii) the type of personal data we hold about you, and (iv) if you or a competent authority asks us to keep the data and there are reasonable grounds for doing so.

If you have any questions about the length of time we store certain data about you, you are welcome to contact us. For contact details see "[Questions and queries](#)" below.

Your rights and how you can enforce them

You have various rights that you can enforce, including the right to be informed about our processing of your personal data, i.e. you have the right to see this Policy.

If you have any questions, please contact us. For contact details see "[Questions and queries](#)" below.

Below is a summary of the other rights you have under the law. The table below also contains information about any conditions and restrictions on how the right can be exercised and how you practically exercise your right.

Your rights	Explanation of the meaning	Conditions to exercise your right
Right of access	You have the right to access the personal data we hold about you.	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, such as the privacy and confidentiality of other persons.
Right to data portability	You may have the right to obtain the data you have provided to us, and which is processed by us, in a commonly used machine-readable format.	GDPR does not establish a general right to data portability. This right only applies if the processing is based on your consent or on our agreement with you and when the processing is carried out by automated means (e.g. not physical documents). The right only affects personal data that was provided by you. Hence as a rule, it does not apply to personal data that we have generated.
Rights in relation to inaccurate or incomplete data	You may challenge the accuracy and completeness of the personal data we process about you. If it is found that the personal data is inaccurate, you are entitled to have the	This right only applies to your own personal data. When exercising this right, please be as specific as possible.

	inaccurate data removed, corrected or supplemented as appropriate.	
Right to object to or request restriction of processing of your personal data	You have the right to object to or ask us to restrict the processing of your personal data.	This right applies only if our processing of your personal data is expressly based on a so-called legitimate interest (see above under "How and why do we process your personal data?"). Objections must be based on grounds relating to your particular situation. This means that your justification for the objection or restriction request must not be too general.
Right to have personal data erased	You are entitled, on certain grounds, to have your personal data erased (also known as the "right to be forgotten"). This right means, for example, that you are entitled to demand that your personal data is erased if you think that the information we are processing is inaccurate, or the processing is unlawful.	There are various reasons why we may not be in a position to erase your personal data. This may apply (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, (iii) where we have to comply with legal archiving obligations, or (iv) where the personal data is necessary for the performance of our contract with you.
Right to withdraw consent	You have the right to withdraw your consent to any processing for which you have previously given that consent.	The exercise of your right to withdraw consent applies to future processing.

Questions and queries

If you have any questions or would like further information about our processing of your personal data or your data protection rights, including rights about access to data and correction of inaccurate data, please contact your Regin contact person or contact us via e-mail at info@regin.se or by post to AB Regin / Regin Controls Sverige AB, Box 116, 428 22 Källered (mark the letter with "Data Protection" so that the correct person can be reached).

If you have any questions or concerns related to how we process your personal data, we encourage you to notify us so that we can try to resolve this. If you believe that we are in breach of our obligations under applicable data protection legislation, you are always welcome to lodge a complaint with the Swedish Data Protection Authority (as of 1 January 2021, referred to as the Swedish Authority for Privacy Protection).

Changes to this Policy

We may make changes to this Policy. If the change entails a material change to the nature of the processing (e.g. expansion of the categories of recipients or introduction of transfers to a third country) or a change that may not be material in terms of the processing but which may be significant to or have an impact on you, the updated information will be provided to you well in advance of the change taking effect. We will send the changes to you via e-mail (if we have your e-mail address) to enable you to view and understand the changes. When notifying you of such changes, we will also explain what the likely impact of those changes on you will be. The latest version of this Policy is always available on our website.