

Privacy Statement

Kompetensvy AB

1. INTRODUCTION

1.1. Background

This personal data policy contains information about how personal data is processed by our company, Kompetensvy AB with organization number 559061–4151 (hereinafter referred to as "we", "our", "us"). We provide a cloud-based system (hereinafter referred to as the "System") whose purpose is to create a user-friendly and reliable register of the competence held by individuals connected to the System. This privacy policy covers all types of personal data, both in structured and unstructured data, regardless of where or how the personal data was collected. References to "you", "your", "your" refer to the data subject, whose personal data we process. In order to administer the System, employers, who need to have access to their employees' skills, have entered into agreements with us regarding the use of the System.

1.2 Processing according to this personal data policy

This privacy policy describes what kind of personal information we collect from you within the framework of the System, the purpose of the processing, how the information is used and who receives it, as well as the choices you can make regarding our use of your information. We also describe the measures we take to protect the information and how to contact us if you have questions about our handling of personal data. All processing of personal data is done carefully, in accordance with GDPR (and SCC if necessary) and we do not share the personal data with unauthorized persons. In addition, all processing takes place in accordance with the seven basic data protection principles.

1.3 Changes to the personal data policy

We reserve the right to change this personal data policy. If we update the privacy policy, we will inform you of changes that we consider important by placing a notice in the System's platforms and on our website, www.kompetensvy.se, where we will also have the most current version of this privacy policy available. We recommend that you periodically visit our website for updates.

1.4 Definitions **Website:** kompetensvy.se **System:** refers to the cloud-based system "Kompetensvy" provided by Kompetensvy AB. **Customer:** refers to a legal entity that enters into an agreement with Kompetensvy AB regarding the System or other services/products that Kompetensvy AB at any given time provides. **User:** means any natural person using the System. **Third party:** refers to someone other than the Customer, User or Kompetensvy AB. **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). All references in these Terms to the terms "personal data", "processing" (of personal data), "data subject", "personal data breach", "supervisory authority" and other GDPR-related terms not defined herein shall have the same meanings in this Privacy Policy as set out in Article 4 of the GDPR. **SCC:** Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for transfers of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

2. PROCESSING OF PERSONAL DATA

2.1 Data controller and processor Kompetensvy AB is the data controller for all processing of personal data carried out by us or on our behalf, and we are responsible for ensuring that the processing of personal data takes place in accordance with GDPR (according to the principle of accountability). Kompetensvy AB is responsible for the processing of User's personal data in connection with the registration of the user account. The user of the System or his/her employer is responsible for the information registered in the System. Kompetensvy AB processes personal data within the framework of this personal data policy. **NOTE:** The User and/or Customer is the data controller for the processing of personal data by the User and/or the Customer, which is beyond our control. The User and/or Customer is responsible for complying with GDPR in their personal data processing.

2.2 What information do we collect about you? The information collected about you within the framework of the System includes both such information as you have provided yourself to us or to third parties as well as such information that is collected automatically through your use of the System. We collect the information about you that you or your employer provide. We primarily process the following categories of personal data that we may have access to when you contact us, enter into an agreement with us or otherwise in connection with your use of the System: Identification data: first name, last name, photograph, social

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security number or similar identification number. Contact details: telephone number, e-mail address, address
Geographical information: place of residence. Demographic data: gender, job title, employer/client, work experience. Sensitive personal data: any sensitive personal data provided to us or registered in the System, for example: ethnic origin, sexual orientation, political opinions, religious beliefs or health (such as sick leave, disability, allergy, etc.), provided to us.

2.3 Purpose of the processing of personal data In accordance with the principle of purpose limitation, we only process personal data for specified, explicit and legitimate purposes. Furthermore, each processing is legally based and thus lawful, in accordance with the provisions of the GDPR. Below you can read more about the legal basis and purpose of the processing of personal data.

2.3.1 Features of the System We process your personal data within the System to create and maintain functions for authorization and competence checks in various industries. Legal basis for processing: Agreement

2.3.2 When you visit our website Our website uses cookies. We may receive information about your use of the Site, device identification, operating system, operating version, device ID, access time, configuration settings, time zone, country and other user information provided through, among others, web analytics and/or traffic measurement providers through cookies. The use of analytical and advertising cookies only takes place if you give your consent to it. You can revoke a given consent at any time and manage the storage of cookies yourself via your browser settings. Legal basis for processing: Consent.

2.3.3 When you send contact us We may contact you, and you may contact us, by email, telephone or social media and in such cases we will have access to your personal data that appears in connection with such contact. For example, we may have access to the following personal data belonging to you: first name, last name, telephone number, email address, social media user ID (if applicable) and other information that you provide to us. This data is processed by us so that we can know who we are talking to and to keep in touch in the case. Legal basis for processing: Legitimate interest. You can also contact us by sending us a mediation via the contact form available on the Website. This will give us access to the following personal data belonging to you: first name, last name, telephone number, email address, and the data you include in the message. This data is processed by us so that we can know who we are talking to and to respond to the message. Before the message is sent to us via the contact form, you give your active consent to our processing of your personal data in accordance with our personal data policy, by ticking a checkbox for approval. Legal basis for processing: Consent.

2.3.4 When we enter into a contract with a customer regarding the System We process personal data belonging to the customer's contact person and/or signatory, in order to fulfill the agreement. Personal data that we process belonging to the customer's contact person and/or signatory refers to, but not exclusively: first name, last name, telephone number, e-mail address. Legal basis: Agreement. We process and store invoices and other things that constitute accounting documents that we are obliged to process and store in accordance with applicable legislation, such as the Accounting Act (1999:1078). Accounting documents and supporting documents may in some cases contain personal data, such as contact information for a Customer Company's contact person and/or signatory. In such cases, the processing takes place only to the extent necessary for us to comply with our legal obligations and then we only process necessary personal data, as long as required by law (in accordance with the principle of storage minimisation). Legal basis for processing: Legal obligation.

2.3.5 When we process personal data as a data processor, on behalf of a data controller We may process personal data for which the customer or user of the System is the data controller, in accordance with the controller's instructions and on his behalf. Then we act as a personal data assistant according to GDPR. In such cases, we enter into a personal data assistant agreement that regulates our processing of personal data. Legal basis for the processing: Agreement.

2.4 Other purposes for our processing of personal data When a processing of personal data is based on Legitimate interest as a legal basis, our assessment is that the processing does not constitute an infringement

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of the data subject's right to privacy and integrity. We have come to this conclusion after having weighed up what the processing in question entails for the data subject's interests and right to privacy, on the one hand, and our legitimate interest in the processing in question on the other. However, we never process sensitive personal data on the basis of this legal basis. Below is a brief description of other purposes for our processing of personal data based on the legal basis "Legitimate interest"

2.4.1 Improve the user experience and develop the System We use the collected information to create user-friendliness and, if necessary, improve our interface or other parts of the System. The information processed for this purpose will normally be aggregated and anonymized, but it may also happen that the information, which is personal data, is needed to provide support to individual users with technical problems or the like.

2.4.2 Preventing abuse Competence View uses the information related to users' activities and technical data to limit various forms of abuse of the System and to prevent criminal activities. Misuse refers to, among other things, fraud, attempted unlawful use and other activities that are prohibited by applicable law, government regulation, industry agreement, terms of use or agreement.

2.4.3. Product development The purpose of the processing in this part is, among other things, to produce statistics that are used to improve and develop the System. This can be performed using analyses that can be performed by Kompetensvy itself, or by another company hired to perform the analysis.

3. WHO DO WE PASS YOUR INFORMATION ON TO?

Personal data that we process is not shared with unauthorized persons. In some cases, however, we may need to share personal data with someone else, such as authorities or data processors that we engage within the framework of our business, to fulfill our contractual and legal obligations, detect and prevent technical, operational or security problems, safeguard our legal interests and to provide, improve and maintain our services / System. Examples of service providers we hire are: Financial systems, Web developers, Editing systems, Cloud storage for documents/agreements, CRM systems, etc. We may share personal data that we process if it is necessary to prevent, detect, prevent or investigate criminal activity and to protect our interests and property.

In some cases, we may need to share personal data that we process with a hired service provider, who in such cases becomes a data processor to us in accordance with the provisions of the GDPR. Before we share any personal data, we enter into a data processing agreement with the personal data assistant in accordance with the provisions of GDPR (alternatively SCC if the personal data assistant is located in a country outside the EU / EEA). This is done to ensure safe and correct processing of personal data. If you want to know more about which service providers we have hired, you can contact our contact person for personal data matters to request an up-to-date overview.

4. YOUR RIGHTS UNDER THE GDPR

If we process your personal data, you have different rights under the GDPR regarding our processing of your personal data. We hereby inform you that some of the rights only apply in certain situations and only if it is

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legal and possible for us to carry out your request. You are welcome to contact us if you would like to invoke any of the above rights regarding your personal data that we process. We will do our best to comply with your requests and respond to your message without undue delay. Below is a description of your rights and how to exercise these rights.

4.1 Consent or balance of interests

Before we process your personal data, we will obtain your consent to the processing or carry out a so-called balance of interests in accordance with the Personal Data Act. A balance of interests means that the processing of personal data is only permitted if our interest in processing your data can be considered to outweigh your interest in privacy protection. You can withdraw your consent or object to our processing of your personal data at any time, in whole or in part. In such cases, your last explicit consent will continue to apply and we will only process data accordingly.

4.2 Request for extracts

You have the right, once a year, free of charge, to request an extract regarding which of your personal data we have registered. Such an extract also contains information about how this personal data is processed, for what purposes the personal data is processed and to which recipients your personal data has been disclosed. Requests for an extract regarding which of your personal data we have registered are made to Kompetensvy. The request must be in writing and signed by you as an applicant and sent to the postal address stated at the end of this personal data policy.

4.3 Request for rectification or erasure

You have the right to request that Kompetensvy, correct or delete information about you, unless this information is needed for your continued use of the identification system Kompetensvy or there is a legal obligation for us to store information for a certain period of time. Requests for correction or removal are made to the Competence View. The request must be in writing and signed by you as an applicant and sent to the postal address stated at the end of this personal data policy.

5. STORAGE PERIOD, ETC.

In accordance with the principle of integrity and confidentiality, we strive to store all personal data that we process within the EU/EEA. If personal data is stored in a country outside the EU/EEA, we shall ensure that such storage location ensures an adequate level of protection in accordance with the provisions of GDPR and SCC.

Personal data is stored as long as it is necessary to fulfill the purposes for which it was collected. When the personal data no longer needs to be stored for the purposes, they are either deleted (deleted) or anonymized (in accordance with the principle of storage minimisation).

We follow internal guidelines and procedures regarding erasure and logging to ensure that the storage of personal data takes place in accordance with GDPR. Personal data may be stored in encrypted files in our backup storage up to three (3) months after the personal data was deleted, before all encrypted backup-stored copies are permanently deleted.

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Personal data that we process in our capacity as a data processor, on behalf of a personal data controller, is processed within the time specified in the personal data assistant agreement.

Personal data that appears in accounting documents is stored for as long as required by the Swedish Tax Agency and the Accounting Act.

6. SECURITY MEASURES

The data collected about you is stored and processed in a safe and secure manner. We have established and documented procedures and measures to ensure user privacy, data availability and confidentiality with regard to applicable legislation.

We take and implement various technical and organizational security measures with a focus on the privacy of the data subjects. The measures are intended to protect against intrusion, misuse, loss, destruction and other changes that may pose a risk to privacy (in accordance with the principle of integrity and confidentiality).

For example, our databases, internal registers and systems containing personal data are password protected. Our databases/storage locations undergo backups at least one (1) time per day. We have also established various internal routines with instructions that must be followed by our employees in all personal data processing, to ensure secure personal data processing that takes place in accordance with GDPR.

We have also appointed certain specific individuals with permissions to passwords and systems containing personal data, to restrict access. All employees have also entered into a confidentiality agreement and thereby undertaken an obligation to observe confidentiality regarding, among other things, personal data processed within the framework of the business and the performance of the work. We also comply with the seven basic data protection principles in all processing of personal data. The principles are documented in internal procedures, which our employees have access to and which they follow in all processing of personal data for which we are the data controller.

7. PERSONAL DATA BREACHES

We comply with the provisions of the GDPR regarding handling, notification, follow-up and documentation of personal data incidents. We will report personal data breaches to the Swedish Authority for Privacy Protection (IMY) within 72 hours, and notify the data subjects affected by the personal data breaches, when required by GDPR.

8. QUESTIONS OR COMPLAINTS

If you have questions or concerns, or are dissatisfied with our processing of your personal data, you are always welcome to contact us. Below is our company details:

Kompetensvy AB.

Org. nr.: 559061–4151.

info@kompetensvy.se

Web: kompetensvy.se

You also have the right to contact the Swedish supervisory authority to submit a complaint. Name: Swedish Authority for Privacy Protection (IMY).

Phone: 08-657 61 00.

E-mail: imy@imy.se.

Postal address: Swedish Authority for Privacy Protection,
Box 8114, SE-104 20 Stockholm, Sweden.