

Information on Data Protection according to GDPR

- Supplier and their employees -

As controller within the meaning of the GDPR, we take the protection of personal data seriously and process it according to the legal regulations.

1. Controller in Terms of Data Protection

Controller is the company with which the customer contract has been concluded.

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- Aareon Norge AS - c/o Spaces Kvadraturen, Tollbugata 8, 0152 Oslo, Norge, e-mail: info@aareon.se

2. Contact with the Data Protection Officer

- For both companies: dataskyddsbud@aareon.com

3. Purpose and Lawfulness of Processing

Execution of the supplier relationship and fulfillment of contract according to Art. 6 Abs. 1 b) GDPR.

4. Data and Categories of Data

Suppliers and „Third Parties“ (as far as natural persons)	Name + name affixes (Mr/Mrs, academic title)
	Address
	Contact details (phone, fax, email)
	Date of birth
	Contract number, supplier number
	Bank account
	Contract data (content of the contract and data for contract execution)
	Creditworthiness data
	Skills
	Billing and payment data
	Data for identification of economic beneficiaries according to the Money Laundering Act, if applicable
	Data provided as part of a due diligence review
	Data collected a part of a contract partner check
	Communication data (email data, dialed numbers)
	Reporting of times worked on projects/trainings
	Personalized work results in various tools (ticket system, wikis, development systems, project management tools)
	Appointment management (calendar data)
Photographic picture	
Employees of Suppliers and „Third Parties“	Name + name affixes (Mr/Mrs, academic title)
	Address
	Contact details (phone, fax, email)
	Date of birth
	Details of previous contacts

	Data provided as part of a due diligence review
	Data collected a part of a contract partner check
	Skills
	Contents (tender documents, brochures, presentations, correspondence)
	Communication data (email data, dialed numbers)
	Personalized work results in various tools (ticket system, wikis, development systems, project management tools)
	Appointment management (calendar data)
	Photographic picture

5. Recipient and Categories of Recipients

Relevant employees of involved departments and associated companies, processors. Aareon uses Microsoft Office applications (e.g. Word®, Outlook®) and in Central Purchasing, systems for ordering and invoices from Coupa® with Kofax® and for payment of SAP®, where support can be provided with possible access to data from outside the EU/EEA (USA, worldwide). SAP® support can be provided from the EU/EEA and Switzerland, which is a secure third country with an adequacy decision by the EU Commission. Microsoft®, Coupa® and Kofax® are subject to EU Standard Contractual Clauses (SCC). For Microsoft Support, the SCC can be viewed in the Microsoft Trust Center.

Aareon is obliged to cooperate in the fight against terrorism and carries out a data comparison with EU/US anti-terror lists and in UK also the UK anti-terror lists (sanction screening). The comparison is performed regarding the supplier, not its employees. Aareon uses the AEB system for this purpose, for which support can be provided from outside the EU/EEA (UK, Singapore) if required. The UK is considered a safe third country in accordance with the EU Commission's adequacy decision, and EU standard contractual clauses apply to support from Singapore. In the case of international data transfer to or access from outside the EU, there are special risks for personal data (e.g. access by foreign intelligence agencies).

6. Storage Period

The data for contract fulfillment or sanction screening will be stored in compliance with the legal retention periods up to

- Sweden: 7 years
- Norway: 5 years
- Screening data from Sweden and Norway: 10 years

after termination of the supplier relationship or performance of the sanction screening. Data that is no longer needed will be deleted.

7. Data Subject Rights

Data subjects may request information from the controller on their personal data, are entitled to have that data rectified, erased or processing of it restricted, may revoke their consent to processing or oppose the processing based on a legitimate interest at any time for the future, and have the right to data portability and to lodge complaints with a supervisory authority.

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