

# Information regarding PwC's processing of personal data as a Personal Data Controller

In conjunction with the assignment, Öhrlings PricewaterhouseCoopers AB (Corporate Identity Number 556029-6740), respective PricewaterhouseCoopers AB (Corporate Identity Number 556067-4276), both referred to below as "PwC", will process a number of personal details for specific, defined purposes in its role as Data Controller. A Personal Data Controller is obliged to provide information regarding such processing.

## **1. Which personal details are to be processed, for what purpose and what are the legal grounds for such processing, and how long will the details be saved?**

### **1.1 Registration of contact individuals in the Client Register**

Prior to, and during, the assignment, PwC will process names and contact details of the Client's representatives in PwC's Client Register in order to be able to administer the assignment and perform the independence and anti-money laundering controls required by law and according to the risk management controls required of auditing firms. The legal grounds for this processing are comprised of the necessity to fulfill our obligations arising from the agreements entered into and from the laws; such as the Auditors Act (2001:883) and the Swedish Act on Measures against Money Laundering (2017:630). The legal grounds for the risk management controls are comprised of a consideration of interests whereby PwC's legitimate interest in being able to handle the risks in its operations motivates PwC's processing of personal data. The details that will be processed are names, personal identity numbers, addresses, telephone numbers and e-mail addresses to workplaces and possible details regarding the department in which the individual works and his or her position. The personal data will be saved for a period of twelve (12) months after the termination of the agreement in question. Details for measures against money laundering will be saved during a period of five (5) years; at that point in time the data will be erased.

### **1.2 Direct marketing**

During the assignment, PwC will process names and contact details of the Client's representatives for the direct marketing of PwC's services in PwC's CRM system. This processing is based on a consideration of interests in order to ensure PwC's legitimate interest in informing the client regarding PwC's products and services. PwC may provide information and make offers to the Client and its representatives via telephone, letter, e-mail, SMS and other similar communication channels used in electronic communication. The processing of personal data for this purpose will take place during the assignment and for a period of twelve (12) months after the termination of the assignment. The Client and its representatives have, however, the right to object to such processing at any point in time.

### **1.3 Business follow-up and statistics**

After the assignment has been concluded, PwC will process names and contact details for the Client's representatives with the support of a consideration of interests in order to ensure PwC's legitimate interest in executing the business follow-up and in producing statistics at an overall level, for example, in order to evaluate Client satisfaction. The processing will take place during the assignment and for a period of twelve (12) months after the termination of the assignment. The statistics are not, however, to be linked to the Client's representatives as individuals, which is the reason why the statistics do not comprise personal data and will, therefore, be saved for the time being.

### **1.4 Supervision and quality controls**

PwC is a registered auditing firm that operates under supervision and therefor is subject to regular quality controls. Within the framework of such supervision, personal data which PwC has already received and processed within the framework of an executed assignment can be processed, once again, but with the aim of controlling the quality of the already executed work. The legal grounds for this processing is comprised of the necessity to fulfill our obligations

according to the Auditors Act (2001:883). The data will be saved for a period of eleven (11) years, after which it will be erased.

### **1.5 Determine, enforce, alternatively, defend our legal entitlement**

PwC will store its working papers, including all personal data processed within the framework of the assignment, in its case management system, based on the consideration of interests. This is done to ensure PwC's interest in documenting the assignment. With a possible claim for damages, the archived personal data can be processed in order to determine or enforce a legal entitlement, alternatively in order to defend PwC against such an entitlement. The personal data will be saved for a period of eleven (11) years, after which it will be erased.

## **2. What is the source or sources of the compiled data?**

The names and contact details of the Client's representatives are obtained from both external address sources and from the Client itself. Other personal data is received from the Client within the course of executing the assignment.

## **3. Transfer of and access to personal data**

In order to fulfill the purpose of PwC's processing of personal data as stated above, PwC contracts, in certain cases, services and systems suppliers of IT who process personal data on behalf of PwC in PwC's execution of assignments. These services and systems suppliers are only allowed to process personal data according to PwC's express instructions and may not use the data for their own purposes. They are also obliged, according to the law and contractual agreements, to undertake the appropriate technical and organizational security measures to protect the data.

In certain cases, PwC can provide personal data to recipients other than those stated above in order to comply with applicable laws and ordinances, in response to a request or with an injunction from an authorized court or authority, and in order to ensure PwC's legitimate interest in determining, enforcing and defending its legal entitlement.

PwC may also transfer personal data to recipients in countries outside the EU/EEA region and who do not have the same level of protection regarding personal data as is found in the EU. In order to ensure that personal data is protected, PwC has entered into a data transfer agreement incorporating the EU Commission's standard contractual clauses with recipients, or which ensure that there are other applicable protection measures in place. The registered individual has the right to, at its request, receive a list of the countries to whom PwC has transferred personal data specifying the category of recipient, and he or she also has the right to receive a copy of EU's standard contractual clauses by contacting PwC. Refer to the contact details stated below.

## **4. Protection of personal data**

PwC's goal is to protect the personal integrity of individuals in this context, and to undertake all technical and organizational measures required to protect personal data and ensure that the processing of such data takes place according to the data protection legislation in effect and according to internal guidelines, policies and procedures for the processing of personal data. This implies that only those individuals requiring access to the data to execute their work duties will have access to it. A more detailed description of PwC's security measures is found in the attached sub-appendix.

## **5. The registered individual's rights**

### **5.1 Right to access (so-called register excerpts)**

The registered individual has the right to request receipt of a confirmation from PwC that PwC processes personal data pertaining to such a registered individual, and, in such cases, can request access to the personal data in the form of a so-called register excerpt.

### **5.2 Right to rectification of data**

If the registered individual believes that data referring to himself/herself is incorrect or incomplete, the registered individual also has the right to request rectification of the data.

### **5.3 Right to object to processing with the purpose of direct marketing**

If it is a question of processing of the registered individual's personal data for direct marketing purposes, the registered individual has the right, at any point in time, to object to such processing and request that the registered individual is de-registered in order to ensure that he or she no longer receives marketing material. This is achieved by informing PwC of such a request, for example, through clicking on the de-registration link in the distributed material.

### **5.4 Right to object to processing based on PwC's legitimate interests**

In addition to the above rights, the registered individual also has the right, to the degree allowed according to the applicable data protection legislation, to object to processing undertaken based on PwC's legitimate interests. However, PwC may continue to process the registered individual's personal data in spite of the fact that he or she has objected to such processing, provided that PwC has imperative reasons for the processing which outweigh the consideration of personal integrity.

### **5.5 The right to request limitation or erasure of data, alternatively, the right to object to processing and data portability**

Under certain circumstances the registered individual also has the right to request limitation or erasure of his or her personal data or has the right to object to the processing. Under certain circumstances the registered individual also has the right to receive a copy of the personal data, which he or she provided PwC, in a structured, generally usable and machine-readable format (data portability) for transfer to another Personal Data Controller.

## **6. Commitments on behalf of the Client**

The Client assumes the responsibility to further distribute this information to all representatives of the Client whose personal data may be processed by PwC according to points 1.1-1.3 above.

## **7. Contact in the case of questions**

With questions regarding the processing of personal data, please contact PwC at the following e-mail address [se\\_personuppgiftsombudet@pwc.com](mailto:se_personuppgiftsombudet@pwc.com) or via the postal address PwC, 113 97 Stockholm. The registered individual will also have the right to contact the supervisory authority (Swedish Data Inspection Authority) in the case of complaints.