

DEDICARE	Document name: Privacy Policy	
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	Issuer: Lia Sandström	Approved by: Krister Widström Date: 2018-05-29

Dedicare Privacy Policy

1. Introduction

Dedicare is a staffing agency and offers staffing and recruitment services. This document describes Dedicare's handling and processing procedures in relation to the collection and management of personal data. At Dedicare, we follow structured procedures to ensure personal data is dealt with in the correct, legal manner. We realise that data protection and privacy issues are a long-term responsibility, which is why we may update this text from time to time when developing our personal data processing procedures or adopting new personal data policies.

Dedicare AB, Ringvägen 100, 118 60 Stockholm, is the body responsible for processing your personal data. If you have any question relating to our personal data policy, you can contact us by telephone: 08-555 656 00 or via e-mail dataskydd@dedicare.se. Dedicare has also appointed an external Data Protection Officer from service provider Qnister. Contact details for our DPO are as follows: Niclas Nordström, Qnister AB, Tel +46 732 50 49 51, niclas.nordstrom@qnister.com

2. Personal data management

Personal information is any information that relates to an identified or identifiable natural person, such as, for example, name, address, telephone number and e-mail address.

Dedicare is to be responsible in its handling of personal data, whether for employees, customers, suppliers or other partners. Issues that affect the processing of personal data in various ways are found in all parts of our business. Such data is to be processed in a legal, correct and open manner in relation to the person registered. Dedicare is to be transparent concerning the information we process and shall ensure that the persons variously registered with us can effectively assert their rights. We work actively to limit storage and shall take all reasonable measures to ensure that the data stored is correct.

When you provide personal data to Dedicare, you shall feel safe. Processing of personal data shall occur in compliance with the provisions of Swedish privacy legislation and the data protection reform (GDPR), which comes into force within the EU in May 2018.

Dedicare processes your personal information when you search for vacancies, register your interest in employment with us or otherwise seek contact with us.

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3. Information gathered in the recruitment process

Create a profile and search for one or more vacancies to be searchable in Dedicare's CV database

Dedicare's recruitment and staffing operations are based on matching the right candidate with the right customer assignment. We therefore register and process personal data during the recruitment process to be able to present suitable candidates to the customer and do so in the capacity of personal data controller.

In order for Dedicare to be able to offer the job search function, we process the following information, including, but not limited to, your name, username, password and e-mail as well as personal information submitted through CVs and other application documents, including, but not limited to, contact information, ID number and information relating to education and date of birth. We may also request more information from you in order to be able to process your application for work, such as references, information on skills and professional certificates as well as extracts from IVO, HOSP and the tax register. We eschew information about candidates' health, ethnicity, religion, sexual orientation and any union membership.

Interviews, knowledge tests and taking of references

If you participate in interviews and undergo knowledge tests as part of the recruitment process, we collect additional information such as your answers to interview questions, knowledge skills and references from relevant sources. Note that prior approval must be obtained from referees before you provide their personal data to Dedicare. We may use third parties to carry out all or part of the recruitment process, in which case we ensure that such parties follow the guidelines in this document as well as our instructions.

Your correspondence with Dedicare

If you communicate with us via email, post or other form of communication, we may retain such communications and the information contained therein to use it to answer your request or deal with your complaint, inquiry etc. As always, if you want us to delete your personal data or otherwise to refrain from communicating with you, please contact us at dataskydd@dedicare.se

The personal data we process within the framework of our recruitment process is based on a balance of interests. Processing of such information is necessary to be able to respond to your request to participate in future recruitment processes within Dedicare.

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4. Data which we gather automatically when you visit our website

1. *log files*

When you use the Internet, usually from the browser in your mobile device or computer, certain information, so-called log files, is transferred. These are files that contain the computer's log, i.e. a chronological list of events and actions in the computer / mobile device. When you visit our website, the visit is stored in your log files. This information is anonymous and cannot be traced to you as a person.

2. *cookies*

Our website uses cookies, i.e. small text files that are stored on the visitor's computer and which can, among other things, save personal settings and make it possible to follow what the visitor does on the website. You can set your browser so that it does not save cookies or requests confirmation before a cookie is stored. In this way you can decide for yourself if you want to accept or reject cookies in each individual case. In addition, you can change the settings for cookies under settings in your browser. When you visit our website you will receive information about which types of cookies our website uses and how you can set up your browser for receiving them via a pop-up window at the bottom of the page. Information about these types of cookies is also available immediately below in the next paragraph.

3. *Our cookies*

Some cookies are necessary to be able to view the contents of our website and these cannot be switched off if you want to be able to access all the functionality on our website. These cookies do not store any information that can identify you as an individual. Some cookies are available to enhance your user experience when you visit our website. Cookies for the following purposes fall under this category:

Cookies for connection control (so-called session cookies), whose purpose is to identify and authenticate the user during the visit to the website. A session cookie contains a random 'key' (session ID), which is allocated to the visitor's device. Session cookies are used, for example, to set and remember certain user settings such as language or pre-filled forms, all to make it easier for you as a visitor.

4. *Third party cookies*

We use analysis cookies to be able to evaluate and maintain statistics on our visitors' general behaviour on our website. They record which external pages our visitors come from to our website, which search texts are used and which subpages are visited most frequently. Analysis cookies are set up and managed by third parties as described in the section below.

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5. *web analysis*

We collect statistical information concerning use of, and visitor flow to, our website. This information is collected to make our site as user-friendly and relevant as possible for you as a visitor. All the information collected for this purpose is aggregated at a general level and is anonymous.

Dedicare's website uses Google Analytics from Google as an analytical tool, Act-on as an opt-in tool, and LinkedIn and Facebook. By opt-in we mean the forms that the visitor can fill in to be contacted, subscribe to vacancies, receive newsletters and invitations and get access to content such as white papers, articles and videos. In the event of use, the user's email address linked to the IP address is registered so that Act-on may recognise it upon the next visit to our website.

We also make use of Facebook and LinkedIn on our website. For their part, both Facebook and LinkedIn make use of analysis cookies. Our cookies are thus intended to make it easier both for you as a visitor and for us. If you continue to use our website without changing your settings, we assume that you have no problems receiving our cookies.

The personal information that we collect automatically when you visit our website is based on the agreement that is entered into between us in connection with your application for a service/registration for vacant assignments.

5. **For what purpose is personal data collected?**

As explained above, we process your personal data in order to provide the staffing and recruitment service for which you approved the terms and conditions, to create a profile and render such data searchable for our recruiters, and in relation to interviews, knowledge tests, taking of references and your communication with us. We use this information to improve our services and service to you and to conduct analyses of service usage and performance with a view to improving the service, including service testing. We also process your personal data to maintain personal data security measures in order to prevent fraud and secure network and information security, including preventing unauthorised access and damage to electronic communications networks and computers.

The customer is in turn responsible for the processing of personal data that is transmitted during the recruitment process, e.g. through a submitted candidate profile.

The personal data that you submit as a candidate in connection with your application are never disclosed to third parties for commercial purposes.

Such information is processed on the basis of the agreement that is entered into between us in connection with your application for a service/registration for vacant assignments.

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6. How long is personal data stored?

In principle, we store your personal data as long as required in relation to the provision of our services or if we believe there is a legitimate interest in further storage.

When you apply for a vacancy or register your CV, we save your personal information related to the application for five years. We do not store any information whatsoever in relation to criminal records.

When you are employed with us, we will save your personal data during your employment period and for a further 7 years in addition to the current year after such employment is terminated. This is to be able to satisfy the Accounting Act and to meet the requirements of the tax authorities, among others.

7. IT security

Purchasing of IT services

When we procure IT services, such as software or operations and support, we must first carry out a risk and vulnerability analysis and then choose a solution or supplier based on the outcome thereof.

When engaging personal data support, we shall only engage those persons who provide sufficient guarantees in relation to carrying out appropriate technical and organisational measures in such a way that this treatment complies with the requirements of the law and ensures that the data subject's rights are protected. Considerations made in this respect, including documentation of the level of security etc., must be documented. Furthermore, a personal data support agreement shall be signed.

We avoid, wherever possible, the transfer of personal data to third countries but, when it is deemed appropriate or necessary, this may only be done after sufficient security measures have been implemented and documented.

Risk assessment

We shall undertake continuous risk assessment of the personal data processing that we carry out. We shall implement technical and organisational measures to achieve an appropriate security level relative to the risk. Risk analysis and decisions relating to measures are to be documented.

Authorisations

Authorisation instructions in writing must exist for all IT systems that contain personal data. The basic principle is that authorisation is to be given only to those persons who need access to the personal data concerned. Authorisations may be made stricter or more expansive depending on the sensitivity of the data concerned.

Incident management

All security incidents are to be documented in an incident management log, stating the circumstances surrounding the personal data incident, its effects and the corrective measures taken. 'Security incident' means an event that results in accidental or unlawful

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destruction, loss, alteration, unauthorized disclosure or unauthorized access to the personal data transmitted, stored or otherwise processed.

Where the law so stipulates, incidents must also be reported to the Swedish Data Protection Authority and the data subject respectively.

IT policy

We have adopted an IT policy in which our employees' approach to the IT environment is regulated in more detail.

Personal data processing register

Dedicare keeps a register of personal data processing in accordance with Article 30 of the GDPR. The respective system owners are responsible for keeping the register up to date in the event of any alterations.

Impact assessment

If the processing of personal data, especially using new technology and taking into account its nature, scope, context and purpose, is likely to lead to high risk to the rights and freedoms of natural persons, we shall, prior to the processing being carried out, and in accordance with the General Data Protection Regulations, carry out an assessment of the consequences of the planned processing activities in relation to personal data protection: A Data Protection Impact Assessment (DPIA).

Where the criteria fall short of an absolute requirement to undertake an impact assessment, we shall, where appropriate, carry out a simplified risk analysis. Such analysis then becomes a basis for the choice of technical and organisational security measures.

Integrated data protection and data protection as standard

We shall proactively evaluate the possibilities of implementing technical measures such as pseudonymisation and data minimisation in order to effectively live up to the requirements of the GDPR and protect the data subject's rights.

We shall also take appropriate technical and organisational measures to ensure, in the standard case, that only personal data necessary for each specific purpose of the processing is processed.

Training

Our employees shall receive relevant information and training in the processing of personal data in accordance with a separate annual training plan. If necessary, in-depth or targeted training will be provided to those persons who handle sensitive data. Participation in such training is to be documented.

Monitoring and internal auditing

Compliance with this policy is to be controlled by sampling and an annual internal audit. We shall continuously evaluate whether our data protection work lives up to the requirements of the legislation and undertake changes when necessary.

External data protection officer

Dedicare has appointed an external data protection officer from service provider Qnister AB. The data protection officer is to support Dedicare in our GDPR work and ensure that our internal processes have appropriate data protection measures in accordance with data protection legislation.

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8. Your rights

You have the right to receive information about the personal data we have stored about you. In addition, you may, under the provisions of the legislation, request correction of incorrect data, limitation of data or deletion of your personal data. You also have the right to object to that processing which is based on a balance of interests. Where processing based on a contractual relationship between us is concerned, you have the right to request that the data be transferred to another personal data controller (data portability).

You can always contact us to get help or information about your rights at dataskydd@dedicare.se or on 08-555 656 00. You also have the right to file a complaint with the Swedish Data Protection Authority.

9. Amendments to the privacy policy

We reserve the right to make amendments to our privacy policy at any time. The status may be ascertained by means of the date entry for this privacy policy at the beginning of this document.