

PRIVACY NOTICE

AFRY

Updated 16 April 2025

1 INTRODUCTION

This privacy notice provides information regarding how AFRY Group (“**AFRY**”, “**we**”, “**us**” or “**our**”) collects, processes, stores, and shares your personal data.

Throughout this privacy notice, the term “**processing**” refers to activities involving your personal data, such as collecting, handling, storing, sharing, accessing, using, transferring, and disposing of it. The term “**personal data**” refers to any information relating to an identified or identifiable natural person.

The personal data we collect, how we process it, our legal basis, retention period, and which group company acts as the data controller depend on the nature of your relationship to AFRY. To make the information more relevant to you, we have divided the privacy notice into sections that provide specific details based on the different roles you might have when we process your personal data (e.g., employee, customer contact, website visitor, etc.). Please refer to the sections relevant to you in 2-8 below.

We may update this privacy notice at our discretion at any time (the last update date is noted above). If significant changes are made, we will provide notice on our website before the changes take effect.

2 EMPLOYEES

2.1 Who is the data controller for the processing?

Each entity of AFRY Group processes personal data of their own employees as a data controller in the context of the employment relationship. Further, each company of AFRY Group processes personal data of all AFRY employees as a separate data controller in the context of client assignments and other common projects between the group companies.

2.2 From where do we collect your personal data?

We collect your personal data from:

- **Yourself**, which you submit to us so that we e.g. can pay salaries and other benefits, direct and distribute work as well as enabling you to communicate through our IT resources.
- **Emergency contacts**, in the event of an accident or other emergency situations.
- **Public authorities**, such as tax authorities, e.g. for the purposes of managing your salary and employment benefits, directing and distributing work and fulfilling legal obligations.
- **Banks, insurance companies, as well as pensions and insurance administrators/advisers**, for the purpose of managing your salary and employment benefits and to establish, exercise and defend legal claims.

- **Trade unions and other parties**, e.g. to fulfil legal obligations in connection with business changes or to establish, exercise and defend legal claims.

2.3 Purposes of the processing of your personal data

2.3.1 General administration of employment relationship

AFRY processes your personal data within the scope of the general administration of the employment, e.g. to enter into the employment agreement with you, to be able to contact you, store basic information about you such as name, position, etc., and handling changes of position. The needed information will slightly vary in different countries based on the local legislation.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal ID no.) • Contact data (including emergency contact information) • Employment data • Organisational data • Payroll/taxation data • Benefits data • Skills data • Health data • Trade union membership data • Professional information (AFRY CV) 	<p><i>Agreement.</i> The processing is necessary to fulfil the employment agreement with you.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data (such as health data and trade union membership data) are processed to carry out obligations and exercise rights in the field of employment law, as well as to establish, exercise and defend legal claims.</p>

2.3.2 Payment of salary and benefits and expense reimbursement

AFRY processes your personal data for the purpose of administrating the payment of your salary and benefits. This includes calculating and paying salary, managing of compensation and incentives as well as handling salary adjustments and sending pay slips. We will also process your personal data for purposes relating to administration of annual leave, pensions and insurance premiums, benefits and business expenses.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal ID. no.) • Contact data • Employment data • Organisational data • Payroll/taxation data (including driver logbook) • Benefits data • Attendance and absence data • Health data • Trade union membership 	<p><i>Agreement.</i> The processing is necessary to fulfil the employment agreement with you.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data (such as health data) are processed to carry out obligations and exercise rights in the field of employment law, as well as to establish, exercise and defend legal claims.</p>

2.3.3 Managing day-to-day operations, including IT administration

AFRY processes your personal data for the purpose of managing the day-to-day operations within the scope of your employment, such as managing work tools and access to IT systems, business planning, following up on the business, handling offboarding process, and any other activities within the scope of your employment.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Photo and other visual material • Contact data • Employment data • Organisational data • IT related data • Exit/off-boarding data 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing day-to-day activities within the scope of your employment with us.</p>

2.3.4 General workforce planning, including mobility and customer invoicing

AFRY will process your personal data for the purpose of general workforce planning, which includes allocating resources to client project and assessing mobility and relocation preferences and needs across AFRY, as well as to handle customer invoicing.

Additionally, workforce planning will leverage AI to optimise resource allocation, enhance project management, and streamline employee mobility and relocation processes within AFRY.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Location data • Skills data • Utilisation data • Performance data • Training related data • Professional information (AFRY CV), including photo • Employees on International Transfer data (such as work permit, assignment insurance, etc.). • Financial information for invoicing purposes (such as employee categories, category rates, salary rate, cost centre, required time, location, overtime). 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to conduct workforce planning, to manage mobility needs and your preferences in this regard as well as to administer relocations.</p>

2.3.5 Performance review and documentation of competence, including salary review

AFRY will process your personal data to review and evaluate your performance at AFRY, such as through performance appraisals. This also involves maintaining information about your

competence, skills, and goals. Additionally, we will process your personal data to assign you to duties relevant to your profile and competence, including for succession planning and promotion purposes. In conjunction with this, AFRY will carry out salary reviews, documenting your achieved goals and overall performance, and communicating the new salary to you.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Skills data • Feedback data • Training related data • Performance data • Salary and remuneration data 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in reviewing and evaluating your performance at AFRY, including business and succession planning purposes (e.g., to assign you to work duties relevant to your profile and work experience). Additionally, the processing is necessary for our legitimate interest to carry out salary reviews.</p>

2.3.6 Administration of your participation in trainings, events and meetings

AFRY will process personal data about you for the purpose of administrating your participation in trainings, events and meetings. This includes, *inter alia*, managing of relevant invitations, carrying out trainings and seminars, storage of and following up on training results and handling room bookings and food orders.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Training related data • Employment data • Organisational information • Skills data • Performance data • Food preferences 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to ensure that employees attend trainings, events and meetings.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data (such as information about allergies in connection with an event or meeting) are processed only if you have given your explicit consent. You have no obligation to provide such consent, and you may withdraw your consent at any time by contacting privacy@afry.com</p>

2.3.7 Management of business travels

AFRY will process your personal data to plan and administer business travels and accommodation in connection with such travels, including for safety and incident management. We will also process your personal data to produce statistics for business planning and to work out favourable agreements with hotels and airlines.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no) • Contact data • Employment data 	<p><i>Legitimate interest.</i> The processing is necessary to arrange and manage your business travels as well as providing necessary support to manage your safety</p>

<ul style="list-style-type: none"> • Organisational information • Travel data and preferences • Travel location data • User device data 	during international travels and support you in case of incidents.
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2.3.8 Conducting internal investigations, including preventing and counteracting criminal activities and other violations

AFRY will process your personal data for the purpose of conducting internal investigations at AFRY in case of suspected disloyalty, policy breach, breach of law, etc. Such internal investigations may include scanning/monitoring of e-mail correspondence, user activity and content on your work equipment to make sure our policies are followed, and to take actions in case of non-compliance. Note that AFRY only may access private correspondence/documents/activities (on your work equipment) in cases where a concrete suspicion of a serious crime or disloyal behaviour exists. When you use our whistleblowing service, AFRY Listen Up, personal data will be processed that is included in the report, as well as any supplementary data that may be collected to investigate the allegations. We may share your personal data to support disciplinary actions or legal proceedings or to submit a report to relevant authorities.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Salary and remuneration data • Incident data • Login data • User generated information • Attendance and absence data • Your communication • Potential data about suspected or actual criminal activities 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to prohibit unlawful actions to be taken by employees within the scope of the employment at AFRY and to make sure our policies are complied with.</p>
	<p>Exemption for criminal data</p> <p>In case any data about suspected or actual criminal activities will be handled in connection with an investigation, it will be processed only as necessary to establish, exercise and defend legal claims or support law enforcement action.</p>

2.3.9 Facilitating internal and external communication, including with emergency contacts

Your personal data will be processed to develop the brand of AFRY, e.g. by presenting certain staff on our digital channels, facilitate communication internally (between employees) and externally (between employees and external parties), including to communicate about business activities and changes as well as making offers to clients.

In the event of an accident or other emergency situation we may also collect information from your next of kin or other related persons with whom we communicate.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to enable business and emergency</p>

<ul style="list-style-type: none"> • Employment data • Organisational information • Professional information (AFRY CV) • Financial information for invoicing purposes (such as employee categories, category rates, salary rate, cost centre, required time, location, overtime). • Audio and video materials • Organisational information • Your communication • Relationship data • Health data 	<p>communication, both internally and externally.</p> <p>Exemption for special categories of data</p> <p>Special categories of personal data (such as health data in case of an emergency) are necessary to protect the vital interests of you as an individual, in case you are physically or legally incapable of giving consent.</p>
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2.3.10 Document the business and its activities

Your personal data may be processed when we manage and keep our business-related documentation, such as board meeting minutes, notes, annual reports and supporting documents for decisions.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Your communication 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to manage and keep business-related documents within our organisation.</p>

2.3.11 Ensuring the safety at AFRY's premises including camera surveillance in connection with our premise(s)

AFRY processes your personal data to ensure the safety at AFRY's premises through access and facility control. We may use camera surveillance in connection with our premise(s). Where camera surveillance is used, you will be informed about that by signs inside and/or outside the premises. AFRY uses camera surveillance to increase the security and to collect evidence in case of a security breach or crime committed in connection with our office premises.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Photo • Host • Time for entry and departure • CCTV 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in ensuring safety at our premises including being able to prevent and deter crime and other disturbances.</p>

2.3.12 Ensuring the smooth and data secure operation of AFRY's business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, inter alia, activities such as

logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.

2.3.13 Fulfil legal obligations

We will process your personal data to fulfil various legal obligations of AFRY within the field of employment. These obligations include areas such as anti-discrimination, work environment, employee well-being, rehabilitation, right to work, and trade union negotiations. Additionally, we will manage and administer your sick leave and other statutory leave of absence (such as parental leave), including the allocation of work during your absence. Moreover, we will process your personal data to disburse payments and compensations following your leave of absence, as well as to take necessary rehabilitation measures.

Beyond these employment-related obligations, AFRY will also process your personal data to fulfil legal requirements in areas such as book-keeping, taxation, and compliance with applicable data protection laws.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Organisational information • Employment data • Demographic data • Salary and remuneration data • Contact data • Incident data • Attendance and absence data • Health data • Trade union membership data • Skills data • Performance data 	<p><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations within the field of employment or to comply with legal obligations to which AFRY is subject, including, <i>inter alia</i> book-keeping and taxation.</p> <p>Exemption for special categories of data</p> <p>Special categories of personal data (such as health data and trade union membership data) are processed to carry out obligations and exercise rights in the field of employment law.</p>

2.3.14 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate

<p><i>All data collected that is necessary to fulfil the purpose.</i></p>	<p>interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data, including criminal data, are only processed to fulfil our legitimate interest in establishing, exercising or defending legal claims.</p>

2.4 Routines for storage and erasure

AFRY will retain the personal data as long as necessary to:

- fulfil the agreement which we have with you, e.g. to pay your salary and the related social security costs during and shortly after your employment;
- fulfil the purpose for which the data was initially collected, e.g. in case of international travelling to ensure we can correctly allocate the related costs shortly after the travel;
- by applicable laws, e.g. for the payment of pensions, holiday pay, the issuance of work certificates, service certificates and references to other employers and for accounting purposes;
- to be able to efficiently respond to possible claims from clients, business partners or similar which may arise during your employment and the applicable statutory period after the assignments where you have worked with us have been completed;
- by our internal policies e.g. regarding data security, ethics and compliance and data management; e.g. in case of access and facility control only for a very limited amount of time needed to ensure the security of our premises.

Please note that some basic employment data may be stored for an indefinite period of time by virtue of our legal obligations related to pension administration.

3 CUSTOMER CONTACTS

3.1 Who is the data controller for the processing?

Each company of AFRY Group processes personal data of all AFRY's customers as a separate data controller.

3.2 From where do we collect your personal data?

We collect your personal data from:

- **Yourself**, which you submit to us in your response to AFRY's marketing and via web forms.
- **Your Employer**, when you are designated as a contact person, communicate with us or is the reference person on an invoice.

3.3 Purposes of the processing of your personal data

3.3.1 Administration of customer relationship

Your personal data will be processed because we have a legitimate interest of administering the relationship with our customers and to be able to manage the overall cooperation and day-to-day activities, e.g. within the scope of delivering professional services when performing project management, planning of work, allocation of resources and business planning. This also includes processing within the scope of the execution of our commercial agreements.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data• Job title• Your communication	<i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in being able to administer our business contact relationships.

3.3.2 Handle customer invoicing

Your personal data will be processed because we have a legitimate interest to issue and process invoices and payments.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to have a reference person on the invoices we issue and to process such information that appears on invoices we receive.

3.3.3 Communicating with you

AFRY will process your personal data for the purpose of communicating with you e.g. when responding to questions or requests sent to us, e.g. via e-mail or phone.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data• Your communication• Incident data	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to responding to questions and requests sent to us, e.g. via e-mail or phone.

3.3.4 Conduct marketing activities

AFRY processes your personal data within the scope of conducting marketing activities, such as, sending you newsletters or inviting you to events (e.g. webinars or trainings).

Categories of personal data	Legal basis
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<ul style="list-style-type: none"> • Identity data • Contact data • Your responses to AFRY's marketing • Information provided by the client via web forms, e.g. during registration to AFRY's marketing event. 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to conducting marketing activities.
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3.3.5 Ensuring the safety at AFRY's premises including camera surveillance in connection with our premise(s)

AFRY processes your personal data to ensure the safety at AFRY's premises through access and facility control. We may use camera surveillance in connection with our premise(s). Where camera surveillance is used, you will be informed about that by signs inside and/or outside the premises. AFRY uses camera surveillance to increase the security and to collect evidence in case of a security breach or crime committed in connection with our office premises.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (national id) • Photo • Employer • Host • Time for entry and departure • CCTV 	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in ensuring safety at our premises including being able to prevent and deter crime and other disturbances.

3.3.6 Ensuring the smooth and data secure operation of AFRY's business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, *inter alia*, activities such as logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
All data collected that is necessary to fulfil the purpose.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.

3.3.7 Fulfil legal obligations

We will process your personal data where necessary in order to comply with legal obligations, e.g. accounting obligations.

Categories of personal data	Legal basis
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<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legal obligation.</i> The processing is necessary in order to comply with our legal obligations.
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3.3.8 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process or when investigating and preventing fraud, misconduct, infringements or other violations of legal rights and obligations), we may process your personal data.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.

3.4 Routines for storage and erasure

AFRY will store the personal data as long as required:

- to fulfil the agreement which we have with you or your employer during the agreement period and shortly thereafter;
- to ensure that all fees, tasks and resources are correctly allocated;
- to fulfil the purpose for which the data was initially collected, e.g. marketing related material will be deleted when we no longer consider you as a potential customer;
- by applicable laws, e.g. for accounting purposes;
- to be able to efficiently respond to possible claims from clients, business partners or similar which may arise during the contractual relationship and the applicable statutory period after the assignments where you have worked have been completed;
- by our internal policies e.g. regarding data security, ethics and compliance and data management e.g. in case of access and facility control only for a very limited amount of time needed to ensure the security of our premises.

4 PARTNERS AND SUBCONSULTANTS

4.1 Who is the data controller for the processing?

Each company of AFRY Group processes personal data of their own partners and subconsultants as a data controller in context of the co-operation agreements. Further, each company of AFRY Group processes personal data of all AFRY partners' and subconsultants' as a separate data controller in context of client assignments and other common projects between group companies.

4.2 From where do we collect your personal data?

We collect your personal data from:

- **Yourself**, which you submit to us by becoming a partner or entering a consultant agreement with AFRY.
- **Employees at AFRY**, if they recommend you as a partner or subconsultant.

4.3 Purposes of the processing of your personal data

4.3.1 General administration of partner and subconsultant relationship

AFRY processes your personal data within the scope of the general administration of the partner and subconsultant relationship, e.g. in order to enter into a partner or subconsultant agreement with you, to be able to contact you, store basic information about you such as name, contact data, etc., manage work tools and access to IT-systems, handling changes of position and drafting written references.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data (including personal ID no.)• Contact data• Consultant data• Organisational information• Networker Company data (when applicable), including VAT number, homepage, F-tax verification.• Benefits data• Performance, feedback and competence data• Contracted business section• Contract start and end date• Attendance and absence data• Hourly cost• AFRY contact person• Trade union membership data• Financial information such as: category rates, salary rate, supervisors, department, cost centre, status (active/inactive), contract type, section, required rime, location, bank account number for salary payments, flexi hours, overtime.• Payment/invoice related information such as: company and company no. payment and banking information, full name of the invoice approver, job title, remuneration ID.	<p><i>Agreement.</i> The processing is necessary to fulfil the employment or consultancy agreement with you.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data in relation to consultants are processed only if you have given your explicit consent. You have no obligation to provide such consent, and you may withdraw your consent at any time by contacting your manager.</p>

4.3.2 Managing day-to-day operations

We process your personal data for the purpose of managing the day-to-day operations within the scope of your consultancy assignment, such as expense reimbursement, managing of relevant invitations, carrying out trainings and seminars, following up on the business, handling offboarding process, and any other activities within the scope of your assignment.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Consultant data • Benefits data • Identity data (including personal id. no.) • Contact information • Organisational information • Performance, feedback and competence data • Audio and video materials • Attendance and absence data • Health data • Food preferences • Trade union membership data • Exit/off-boarding data • Payment data • Other information as necessary for the purpose 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing day-to-day activities, improve our business within the scope of your employment or assignment with us.</p> <p>Exemption for special categories of data</p> <p>Special categories of personal data in relation to consultants are processed only if you have given your explicit consent. You have no obligation to provide such consent, and you may withdraw your consent at any time by contacting your manager.</p>

4.3.3 General workforce planning, including mobility and customer invoicing

AFRY will process your personal data for the purpose of general workforce planning, which includes allocating resources to client projects and assessing mobility and relocation preferences and needs across AFRY, as well as to handle customer invoicing.

Additionally, workforce planning will leverage AI to optimise resource allocation, enhance project management, and streamline partner and subconsultant mobility and relocation processes within AFRY.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Organisational information • Location data • Skills data • Utilisation data • Performance data • Training related data • Professional information (AFRY CV) 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to conduct workforce planning, to manage mobility needs and your preferences in this regard as well as to administer relocations.</p>

<ul style="list-style-type: none"> • Employees on International Transfer data (such as work permit, assignment insurance, etc.). • Financial information for invoicing purposes (such as employee categories, category rates, salary rate, cost centre, required time, location, overtime). 	
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4.3.4 Management of business travels

AFRY will process your personal data to plan and administer business travels and accommodation in connection with such travels, including for safety and incident management. We will also process your personal data to produce statistics for business planning and to work out favourable agreements with hotels and airlines.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no) • Contact data • Employment data • Organisational information • Travel data and preferences • Location data • User device data 	<p><i>Legitimate interest.</i> The processing is necessary to arrange and manage your business travels as well as providing necessary support to manage your safety during international travels and support you in case of incidents.</p>

4.3.5 Partner and consultant database

If you do not have an active relationship with AFRY, AFRY still has an interest in keeping your personal data to contact you in the event of future assignments that suit your profile. You can also sign up for the database without applying for an assignment with AFRY.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • CV and cover letter • Identity data • Contact details • Contracted business section • AFRY information • Contract start and end date • Hourly cost • AFRY contact person 	<p><i>Consent.</i> The legal basis for the processing of data of a person registering to AFRY's Partner Network is consent given at time of registration in AFRY systems. You can withdraw your consent at any time.</p>

4.3.6 Conducting internal investigations, including preventing and counteracting criminal activities and other violations

We will process your personal data for the purpose of conducting internal investigations at AFRY in case of suspected disloyalty, policy breach, breach of law, etc. Such internal investigations may include scanning/monitoring of e-mail correspondence, user activity and content on your

work equipment to make sure our policies are followed, and to take actions in case of non-compliance. Note that we may only access private correspondence/documents/activities (on your work equipment) in cases where a concrete suspicion of a serious crime or disloyal behaviour exists. When you use our whistleblowing service, AFRY Listen Up, personal data will be processed that is included in the report, as well as any supplementary data that may be collected to investigate the allegations. We may share your personal data to support disciplinary actions or legal proceedings or to submit a report to relevant authorities. .

Categories of personal data	Legal basis
Any data relevant in the specific case, such as: <ul style="list-style-type: none"> • Identity data • Contact data • Employment data • Incident data • Login data • User generated information • Audio and video data • Attendance and absence data • Your communication • Criminal data 	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to prohibit unlawful actions to be taken by employees within the scope of the employment or assignment and to make sure that our policies are complied with.
	Exemption for special categories of data
	In case any data about suspected or actual criminal activities will be handled in connection with an investigation, it will be processed only as necessary to establish, exercise and defend legal claims or support law enforcement action.

4.3.7 Ensuring the safety at AFRY's premises including camera surveillance in connection with our premise(s)

AFRY process your personal data to ensure the safety at AFRY's premises through access and facility control. We may use camera surveillance in connection with our premise(s). Where camera surveillance is used, you will be informed about that by signs inside and/or outside the premises. AFRY uses camera surveillance to increase the security and to collect evidence in case of a security breach or crime committed in connection with our office premises.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (national id) • Photo • Employer • Host • Time for entry and departure • CCTV • Contact information 	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in ensuring safety at our premises including being able to prevent and deter crime and other disturbances.

4.3.8 Ensuring the smooth and data secure operation of AFRY's business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, *inter alia*, activities such as logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
All data collected that is necessary to fulfil the purpose.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.

4.3.9 Fulfil legal obligations

We will process your personal data where necessary in order to comply with legal obligations, e.g. accounting obligations.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legal obligation.</i> The processing is necessary in order to comply with our legal obligations.

4.3.10 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process, we may process your personal data.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.

4.4 Routines for storage and erasure

AFRY will store the personal data as long as required:

- to fulfil the agreement which we have with you or your employer during the agreement period and shortly thereafter e.g. to ensure that all fees, tasks and resources are correctly allocated;
- to fulfil the purpose for which the data was initially collected, e.g. in case of international travelling to ensure we can correctly allocate the related costs shortly after the travel;
- by applicable laws, e.g. related to accounting;
- to be able to efficiently respond to possible claims from clients, business partners or similar which may arise during the contractual relationship and the applicable statutory period after the assignments where you have worked have been completed;

- by our internal policies e.g. regarding data security, ethics and compliance and data management e.g. in case of access and facility control only for a very limited amount of time needed to ensure the security of our premises.

5 EMPLOYEE CANDIDATES

5.1 Who is the data controller for the processing?

Each company within the AFRY Group processes personal data of their own candidates as a data controller in context of the employment relationship. Further, other companies in the AFRY Group process personal data of candidates where relevant for the recruitment, e.g. when applying to international positions.

Candidates from Austria and Germany can also review details of local AFRY candidate policies on the respective country pages.

5.2 From where do we collect your personal data?

We collect your personal data from:

- **Yourself**, which you submit to us when you apply for the position at AFRY, (e.g. your CV and cover letter).
- **Publicly available sources**, e.g. when collecting information that you have published on professional network platforms such as LinkedIn.
- **Referees**, when the referee provides us with information about your suitability for the position that you have applied for with AFRY.
- **Employees at AFRY**, when the employee provides us with information about your suitability for a position at AFRY.
- **External recruiters**, that have been involved in the recruitment process and that have provided information about you to AFRY.

5.3 Purposes of the processing of your personal data

5.3.1 Managing the recruitment process

Your personal data will be processed by AFRY within the scope of the general management of the recruitment process. Processing activities included in this process are e.g. collection of your personal data, review of CVs and cover letters, conducting interviews, evaluating you as a candidate and communicating with you within the scope of the recruitment process.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Contact data • CV and cover letter (when required) and related data such as: photo, job title, work/project experience, education, language skills, professional association, publications. • Internal notes related to evaluating you as a candidate • Information provided by the referees and/or employees at AFRY 	<p><i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in carrying out the recruitment process to ensure that AFRY employs the most suitable candidates.</p>

<ul style="list-style-type: none"> • Assessment, feedback, competence and score data • Demographic data • Work permit documentation • Other data provided by the candidate in the application 	
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5.3.2 Job candidate vetting process

Within the scope of the recruitment, AFRY carries out vetting of potential employees. This includes obtaining references and verifying your experience and qualifications. Where permitted under national legislation, additional background checks may include credit and compliance checks, criminal background check and scanning of media reports, social media activity and other footprints on the internet.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Competence data • Credit scoring • Employment history • Company engagements • Compliance data • Activity on social media and the Internet 	<p><i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in carrying out background checks. By virtue of the sensitive and heavily regulated business operated by AFRY, it is important to AFRY to be able to ensure that its employees have passed the vetting process.</p> <p>It should in this context be noted that AFRY will not process any criminal data. Any criminal background checks will be subject to a manual process.</p>

5.3.3 Concluding the employment agreement

AFRY will process your personal data in conjunction with the signing of the employment agreement with you e.g. when collecting references. Your personal data will also be processed in connection with the employment agreement and upon the initiation of the onboarding process.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Contact information • Social security number • Organisational information, such as employer AFRY, employment status, operational department, geographical placement, cost centre, organisation, place of employment • Salary • Benefits data • References 	<p><i>Agreement.</i> The processing of your personal data is necessary in order for AFRY to take measures prior to entering into an agreement (the employment agreement) with you.</p>

5.3.4 Managing the candidate database and talent pool

To find suitable candidates for roles within our company, we process personal data about you as a previous candidate who has applied for other positions with us (if you have consented to this) or as a talent whose information we have obtained from you or from publicly available sources such as LinkedIn.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Contact data• Current role• Details from prior application, as referenced in 5.3.1 above (only for candidate database)	<p><i>Consent (candidate database).</i> The legal basis for the processing of data of personal data in the candidate database is consent given at time of registration of the prior application in AFRY systems or at or at the time the previous recruitment process concluded. You can withdraw your consent at any time.</p> <p><i>Legitimate interest (talent pool).</i> The processing of data in the talent pool is necessary in order to fulfil our legitimate purpose to find suitable candidates for roles within our company. You can opt out from the talent pool at any time.</p>

5.3.5 Evaluate and follow-up the recruitment process

AFRY processes personal data to create reports and statistics of e.g. the number of applications per position and which job boards are most effective etc.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Identity data• Information about which job boards that you used to apply for the position	<p><i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate purpose to evaluate and follow-up on the recruitment process.</p>

5.3.6 Ensuring the safety at AFRY's premises including camera surveillance in connection with our premise(s)

AFRY process your personal data to ensure the safety at AFRY's premises through access and facility control. We may use camera surveillance in connection with our premise(s). Where camera surveillance is used, you will be informed about that by signs inside and/or outside the premises. AFRY uses camera surveillance to increase the security and to collect evidence in case of a security breach or crime committed in connection with our office premises.

Categories of personal data	Legal basis
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<ul style="list-style-type: none"> • Identity data (national id) • Photo • Employer • Host • Time for entry and departure • CCTV 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in ensuring safety at our premises including being able to prevent and deter crime and other disturbances.</p>
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5.3.7 Ensuring the smooth and data secure operation of AFRY's business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, *inter alia*, activities such as logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
All data collected that is necessary to fulfil the purpose.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.

5.3.8 Fulfil legal obligations

Besides legal obligations within the field of employment, AFRY will process your personal data for the purposes of fulfilling legal obligations related to work permit checks, including storage of related documentation.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legal obligation.</i> The processing is necessary to fulfil AFRY's legal obligations.

5.3.9 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process, e.g. in relation to a discrimination claim.

5.4 Routines for storage and erasure

AFRY will store the personal data as long as required:

- to comply with your consent regarding storing your data to be taken into account for possible future open vacancies;
- to fulfil the purpose for which the data was initially collected, i.e. during the recruitment process;
- by applicable laws, e.g. regarding discrimination in recruitment process;
- to be able to efficiently respond to possible claims from clients, business partners or similar which may arise during the contractual relationship and the applicable statutory period after the assignments where you have worked have been completed;
- by our internal policies e.g. regarding data security, ethics and compliance and data management e.g. in case of access and facility control only for a very limited amount of time needed to ensure the security of our premises.

6 SUPPLIERS INCLUDING BUSINESS PARTNERS

6.1 Who is the data controller for the processing?

Each company of AFRY Group processes personal data of their own suppliers, including subconsultants, service providers and business partners as a data controller in context of the co-operation agreements. Further, each company of AFRY Group processes personal data of all AFRY suppliers, including subconsultants, service providers' and other business partners, as a separate data controller when co-operation with the said company is needed.

6.2 From where do we collect your personal data?

We collect your personal data from:

- **Yourself**, which you submit to us by entering agreements with AFRY or otherwise provide services to us.
- **Publicly available sources**, e.g. information that you have published on professional network platforms such as LinkedIn or that is published at your AFRY's website.
- **Your employer**, e.g. when your information is provided to us as a contact person or representative of your employer.

6.3 Purposes of the processing of your personal data

6.3.1 Administration of contractual relationship

Your personal data will be processed because we have a legitimate interest of administering the relationship with our service providers and similar business partners and to be able to manage the overall cooperation and day-to-day activities. This also includes processing within the scope of the execution of our commercial agreements.

Categories of personal data	Legal basis
<ul style="list-style-type: none">• Contact information• Identity data	<i>Legitimate interest.</i> The processing of your personal data is necessary in order to satisfy our legitimate interest in being able to administer our business contact

	relationships and facilitate e.g. day-to-day communications.
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6.3.2 Communicating with you

AFRY will process your personal data for the purpose of responding to questions or requests sent to us, e.g. via e-mail or phone.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Your communication • Incident data 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to responding to questions and requests sent to us, e.g. via e-mail or phone.

6.3.3 Invoice administration

AFRY will process your contact information for reference purposes when we are either issuing invoices to or receiving invoices from the company that you represent.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Payment/invoice related information such as: company and company number, payment & banking information, full name of the invoice approver, job title, remuneration ID: 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to have a reference person on the invoices we issue and to process such information that appears on invoices we receive.

6.3.4 Business planning and development, strategical reviews and statistical evaluation

AFRY processes your personal data in order to conduct business planning and development, strategical reviews and statistical evaluation.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data 	<i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to plan and develop our business as well as perform strategical reviews and statistical evaluation.

6.3.5 Ensuring the safety at AFRY's premises including camera surveillance in connection with our premise(s)

AFRY processes your personal data to ensure the safety at AFRY's premises through access and facility control. We may use camera surveillance in connection with our premise(s). Where camera surveillance is used, you will be informed about that by signs inside and/or outside the premises. AFRY uses camera surveillance to increase the security and to collect evidence in case of a security breach or crime committed in connection with our office premises.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (national id) • Contact data • Photo • Employer • Host • Time for entry and departure • CCTV 	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in ensuring safety at our premises including being able to prevent and deter crime and other disturbances.

6.3.6 Ensuring the smooth and data secure operation of AFRY's business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, *inter alia*, activities such as logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
All data collected that is necessary to fulfil the purpose.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.

6.3.7 Fulfil legal obligations

We will process your personal data where necessary in order to comply with legal obligations, e.g. accounting obligations.

Categories of personal data	Legal basis
<i>All data collected that is necessary to fulfil the purpose.</i>	<i>Legal obligation.</i> The processing is necessary in order to comply with our legal obligations.

6.3.8 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process or when investigating and preventing fraud, misconduct, infringements or other violations of legal rights and obligations), we may process your personal data.

Categories of personal data	Legal basis
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<p><i>All data collected that is necessary to fulfil the purpose.</i></p>	<p><i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.</p>
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6.4 Routines for storage and erasure

AFRY will store the personal data as long as required:

- to fulfil the agreement which we have with you or your employer during the agreement period and shortly thereafter e.g. to ensure that all fees, tasks and resources are correctly allocated;
- to fulfil the purpose for which the data was initially collected, e.g. to ensure that we buy sufficient type and number of services all the time;
- by applicable laws, e.g. regarding accounting;
- to be able to efficiently respond to possible claims from clients, business partners or similar which may arise during the contractual relationship and the applicable statutory period after the assignments where you have worked have been completed;
- by our internal policies e.g. regarding data security, ethics and compliance and data management e.g. in case of access and facility control only for a very limited amount of time needed to ensure the security of our premises.

7 SHAREHOLDERS AND SHAREHOLDERS REPRESENTATIVES

7.1 Who is the data controller for the processing?

AFRY AB is always the data controller regarding shareholder data.

7.2 From where do we collect your personal data?

- **Yourself**, which you submit to us e.g. when communicating with us.
- **AFRY share register**, we collect your personal data from AFRY share register when you are an owner of AFRY shares.

7.3 Purposes of the processing of your personal data

Communication and administration in relation to shareholders

We will process your personal data to communicate relevant shareholder information to you, such as updates on dividend payouts, shareholder resolutions and meeting invitations, (e.g. to the Annual General Meeting), and to administer these activities, as well as to answer questions from you.

Categories of personal data

Legal basis

<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Contact data • Number of shares and percentages of shares from the total amount • Number of votes and percentages of votes from the total amount • Other information needed to communicate with you, e.g. in relation to questions from you. • Food preferences 	<p><i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to communicate and send invitations to our shareholders, for example, in connection with arranging our Annual General Meeting and dividend payouts as well as to administer these activities.</p>
	<p>Special categories of personal data (information about allergies in connection with a meeting) are processed only if you have given your explicit consent. You have no obligation to provide such consent, and you may withdraw your consent at any time by contacting privacy@afry.com</p>

7.3.1 Fulfil legal obligations

We will process your personal data where necessary in order to comply with legal obligations, e.g. provide authorities or stock exchange with the information they require and to keep our share register.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (including personal id. no.) • Contact data • Number of shares and percentages of shares from the total amount • Number of votes and percentages of votes from the total amount • Other information needed to comply with the legal obligations. 	<p><i>Legal obligation.</i> The processing is necessary in order to comply with our legal obligations.</p>

7.3.2 Establish, exercise and defend legal claims

For the purposes of establishing, exercising and defending legal claims (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
<p><i>All data collected that is necessary to fulfil the purpose.</i></p>	<p><i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.</p>

7.3.3 Ensuring the safety at AFRY's premises including camera surveillance in connection with our premise(s)

AFRY processes your personal data to ensure the safety at AFRY's premises through access and facility control. We may use camera surveillance in connection with our premise(s). Where camera surveillance is used, you will be informed about that by signs inside and/or outside the

premises. AFRY uses camera surveillance to increase the security and to collect evidence in case of a security breach or crime committed in connection with our office premises.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data (national id) • Photo • Employer • Host (if applicable) • Time for entry and departure • CCTV 	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in ensuring safety at our premises including being able to prevent and deter crime and other disturbances.</p>

7.3.4 Ensuring the smooth and data secure operation of AFRY’s business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, *inter alia*, activities such as logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
All data collected that is necessary to fulfil the purpose.	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.</p>

7.4 Routines for storage and erasure

The shareholder data is stored as long as AFRY has a legal requirement to store it.

8 VISITORS TO OUR WEBSITE OR DIGITAL CHANNELS

8.1 Who is the data controller for the processing?

Each company of AFRY Group processes personal data received on their own website or digital channel as a data controller. Further, each company of AFRY Group processes personal data of visitors of websites or digital channels when co-operation with the said visitor is needed.

8.2 From where do we collect your personal data?

We collect your personal data from: yourself, which you submit to us or generate when you are browsing our digital channels, including your devices, when visiting our website.

8.3 Purposes of the processing of your personal data

8.3.1 Track your use of our website and our digital channels

When you are browsing the website or our digital channels, we will process your IP address and browser user agent string to track your activity. Your personal data is processed for this purpose to administrate and improve our website or digital channels, for our internal records and for statistical analysis.

Cookies give us information on your IP address and how and when you have used the website such as market site selection, AFRY web pages visited, etc. Please see more about our use of cookies in our Cookie Notice available at afry.com.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • IP address • Device type • User generated information • Website (page viewed, content consumed, etc). 	<p><i>Consent.</i> We only process your personal data using tracking features (cookies) if you have given us your consent to such processing.</p>

8.3.2 Communicate with you and respond to your questions or feedback

Where we offer you a possibility to communicate with us by asking questions or providing feedback regarding our services and our business or answering surveys, we will process your personal data when you submit a question, comment, feedback or any other message. The purpose of the processing is to be able to communicate with you.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Identity data • Contact data • Your communication 	<p><i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest to communicate with you, e.g. to develop our business.</p>

8.3.3 Send newsletter or marketing to you

We may also process your personal data to send you promotional materials or communications regarding services provided by entities within the AFRY Group that we believe may be of interest to you. Your consent for such marketing will be asked separately when you provide your personal information. You may at any time request that we discontinue sending you emails, or other communications generated in response to your provision of personal information.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Name • Email address 	<p><i>Consent.</i> We will process your personal data for this purpose if we have received your explicit consent to do so.</p>

8.3.4 Access to content and events

We are processing your personal data in case you want to gain access to specific content or attend a hosted event.

Categories of personal data	Legal basis
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<ul style="list-style-type: none"> • Identity data • Contact data • Your communication • Instagram-ID 	<p><i>Legitimate interest.</i> The processing is necessary in order to fulfil our legitimate interest in being able to carry out competitions and strengthening our brand and presence.</p>
	<p>Exemption for special categories of data</p> <p>Special categories of personal data (such as information about allergies in connection with an event or meeting) are processed only if you have given your explicit consent. You have no obligation to provide such consent, and you may withdraw your consent at any time by contacting your manager.</p>

8.3.5 Ensuring the smooth and data secure operation of AFRY's business

To manage and protect our services and related IT systems, maintain the secure and efficient use of internal information, and ensure the safety of business-critical information and other assets, we process your personal data as necessary. This includes, *inter alia*, activities such as logging, troubleshooting, backup, change and problem management in systems, and handling potential IT incidents.

Categories of personal data	Legal basis
<p>All data collected that is necessary to fulfil the purpose.</p>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and protecting our website, services and related IT systems.</p>

8.4 Routines for storage and erasure

AFRY will store the personal data as long as required:

- to fulfil the purpose for which the data was initially collected, e.g. regarding some essential cookies: during the session which the visitor browses afry.com;
- by our internal policies e.g. regarding data security, ethics and compliance and data management, e.g. back-ups will be stored for a relatively short amount of time to ensure the data security of afry.com.

Your personal data processed for sending newsletters and marketing material will be processed for this purpose until you opt-out from receiving newsletters or marketing material.

9 DISCLOSURE OF PERSONAL DATA

9.1 General

Where necessary in order to achieve the purposes of processing, we share your personal data with other actors. The recipients will process personal data on behalf of AFRY in the capacity as data processors (i.e. such actors will only process your personal data in accordance with AFRY's instructions) or in the capacity as data controllers, (i.e. such recipients will determine the purposes and means of the processing without AFRY's involvement) as appropriate. Please note however that AFRY, regardless of the recipients' capacity, only will share your personal data with entrusted actors and only to the extent necessary.

9.2 Data processors acting on behalf of us

In order to fulfil the purposes of the processing of your personal data and to be able run our business, we share personal data with external parties such as third-party service providers that we have engaged, as well as other partners. These external parties will act as data processors to AFRY and may only process your personal data in accordance with our instructions and not for their own purposes. AFRY is the data controller for the processing of personal data that these external parties carry out on our behalf. The purposes of the processing activities carried out by AFRY are outlined in each of the Sections 2–8.

9.3 Recipients that act as data controllers

Recipients	Purposes	Legal basis
<ul style="list-style-type: none">• Courts and arbitration tribunals• Employers' organisations• Trade union organisations• Public authorities• External advisers• Insurance companies• Counterparties	In order to exercise, establish or defend legal claims	To fulfil our <i>legitimate interest</i> to manage and defend legal claims, e.g. in relation to a dispute.
<ul style="list-style-type: none">• Employers' organisations• Trade union organisations• Public authorities (including courts)• External auditors• Occupational health care providers	To fulfil legal obligations in the areas of taxation, the field of employment (such as consultation obligations and work environment matters).	To fulfil our <i>legal obligations</i> . To fulfil our legitimate interest to share your personal data with public authorities, e.g., if the police authority requests certain information.
<ul style="list-style-type: none">• Travel agencies, airlines, transportation companies and hotels• Banks• Occupational health care providers• Social media and digital platform providers (e.g. Facebook, Instagram and LinkedIn)	To manage our day-to-day business activities including e.g. facilitate booking and carry out business travel, allow for health tests and checks, facilitating external communication, and in other ways enable day-to-day business management.	To fulfil our <i>legitimate interest</i> in managing our day-to-day business activities and operations by allowing for the recipient to provide relevant services to us.

<ul style="list-style-type: none"> • Potential customers or investors • External advisers 	<p>Take necessary actions in connection with selling all or part of the business or in connection with a merger.</p>	<p>To fulfil our <i>legitimate interest</i> in being able to sell all or part of the business or in connection with a merger.</p>
<ul style="list-style-type: none"> • Occupational health care providers 	<p>Allow for health tests and checks of employees.</p>	<p>To fulfil our <i>legitimate interest</i> in being able to offer health test and checks.</p>
<ul style="list-style-type: none"> • Banks • Pensions and insurance administrators/advisers • Insurance companies • Relocation partners 	<p>Managing salaries, employment benefits and the employment relationship in general.</p>	<p>To fulfil the employment <i>agreement</i> with you.</p>
<ul style="list-style-type: none"> • Customers 	<p>Sharing information necessary for customer to ensure compliance with relevant legislation, such as the Work Agency Act.</p>	<p>To support customers' legitimate interest in collecting the information necessary to ensure compliance with relevant legislation, such as the Work Agency Act.</p>
<ul style="list-style-type: none"> • Other AFRY group companies 	<p>To carry out group wide activities, events or reviews (e.g. salary reviews) and to facilitate intra-group communications, as well as contract management</p> <p>Employee candidates' application data is shared within AFRY's Human Resource function and its other business functions (e.g. line management in relation to specific positions) to determine how well the application fits the position the employee candidate have applied for, or possible future postings. Additionally, the application data will be viewed together with additional information that the applicant provides AFRY during the recruitment process (e.g. interviews, assessments, references). If applicant becomes an employee, the data is retained and used for personnel administration including the establishment of a personnel record or other employment related purposes.</p>	<p>To fulfil our <i>legitimate interest</i> in being able to participate in group wide activities, events or reviews (e.g. salary reviews) and to communicate within the group and to be able to manage contracts which involved our group companies.</p>

<ul style="list-style-type: none"> External recruiters 	Facilitating the recruitment process	Legitimate interest in being able to carry out an efficient recruitment process and ensuring that the best available candidates are employed by AFRY.
<ul style="list-style-type: none"> Reference persons 	Taking references before deciding to conclude an employment agreement.	Legitimate interest in being able to verify your competence and the information you have provided during the interview.
<ul style="list-style-type: none"> Public authorities Stock exchange 	Fulfil legal obligation.	Fulfil legal obligation to provide authorities or stock exchange with the information they require.
<ul style="list-style-type: none"> Courts Public authorities External advisers Counterparties 	Establish, exercise or defend a legal claim.	To fulfil our legitimate interest to manage and defend legal claims, e.g. in relation to a dispute.

10 WHERE WE PROCESS YOUR PERSONAL DATA

Personal data is shared between the AFRY companies where needed for our business purposes, in accordance with applicable data protection legislation. Personal data that is being processed electronically by AFRY will mainly be stored on servers located in EU/EEA. In case of local systems outside the EU/EEA, the personal data is usually stored in the respective country.

Since AFRY operates globally (please see our offices here; [AFRY Offices worldwide | AFRY](#)) and has customers and projects worldwide, personal data is transferred and processed by AFRY subsidiaries and trusted suppliers and business partners outside of EU/EEA in certain situations. The personal data is shared with third party service providers, such as IT service providers, subconsultants, lawyers and other external professional advisors. Personal data is shared with AFRY's business partners to the extent it is required for AFRY's fulfilment of any actual or potential contracts or if it is required by law or pursuant to any order of court or other competent authority or tribunal or by any applicable stock exchange regulations.

Any international transfer of personal data out from the EU/EEA will be subject to appropriate security measures and all reasonable steps to ensure that the personal data is protected and maintained in accordance with this Privacy Notice and applicable data privacy laws. This includes relying on a suitable mechanism for data transfer under Chapter V of the GDPR, including, inter alia, adequacy decisions and appropriate safeguards, and, where necessary, supplementary measures required. If you wish to receive a copy of the appropriate safeguards taken by us or information regarding where these safeguards have been made available, please contact us by using the contact details stated below.

11 YOUR RIGHTS

In accordance with applicable data protection legislation, subject to some conditions and exceptions, you for example have the following rights:

- The right to information about and access to your personal data;
- The right to withdraw consent;
- The right to have your personal data corrected or updated;
- The right to erasure of your personal data ('The right to be forgotten');
- The right to restriction of processing of your personal data;
- The right to object to certain processing of your personal data;
- The right to data portability.

Your rights can be exercised by sending an email to privacy@afry.com.

You have a right to lodge any complaints regarding AFRY's compliance with data protection laws with the appropriate supervisory authority.

12 CONTACT INFORMATION

In case of any questions regarding the privacy and security of the personal data that is being processed by AFRY, and which companies within AFRY are data controllers, please send an email to privacy@afry.com or contact our Data Privacy Office at:

AFRY AB

Att: Data Privacy Office

Group Legal

Frösundaleden 2A

SE-169 99 Stockholm

Sweden