



## Internal Privacy Notice

4C Group AB (publ) and its subsidiaries (“4C”) is committed to protecting your privacy. This Privacy Notice describes your rights, how to lodge a complaint and set outs how and why 4C process your personal data if you are an employee or other internal party of 4C such as a consultant, intern, subcontractor or a board member.

The General Data Protection Regulation (“GDPR”) is applicable to the 4C companies established in the EU/EEA and UK. Personal data may be processed by all 4C companies as joint controllers or by one 4C company as set out below. If the personal data is processed by joint controllers you will, as a data subject, have the right to exercise your rights by sending a request to one of the joint controllers of your choice.

### Processing

Categories	Categories of Data Subjects	Personal Data	Purpose	Legal Basis	Recipient of Personal Data	Source	Controller
Sales processes	Employees, consultants, interns and subcontractors	4C may process your name, title, email, phone number, reported hours and role in projects in sales material, invoices, contracts and internal systems for tracking sales processes.	Track and manage sales processes.	4C has a legitimate interest to track and manage our sales processes.	Customers and potential customer.  4C may share certain material such as invoices with auditors if required.	From you and internal systems.	Sales material: Joint controller  Other: The 4C company in the sales process
CV	Employees, consultants and subcontractors	4C may process your name, title, email, phone number and work experience in your CV.	Demonstrate consultants experience to customers.	4C has a legitimate interest to store CVs to demonstrate consultants experience to customers.	Customers and potential customers.	From you.	The 4C company in the sales process.
Marketing	Employees, consultants, interns, subcontractors and board members	4C may use your personal data such as name, title, contact details, photos and videos from events and delivery and profile photos in internal and external communication. 4C may post this personal data on 4C’s external website, LinkedIn,	Promote 4C’s services, promote 4C as an employer and internal and external communication.	4C has a legitimate interest to promote 4C’s services, promote 4C as an employer and to communicate internally and externally.	Customers and potential customers.	From you or when photo/video is taken.	External website/social media: 4C Group AB  Other: Joint controllers



		Twitter, YouTube, Facebook and Instagram.					
Delivery and project management	Employees, consultants, interns and subcontractors	4C may process your name, title, email, phone number and role in project in project material such as reports, presentations etc. 4C may further process your name, reported hours and revenue, targets, role in project, hourly rate, employment number and title in internal project management system.	Deliver projects to customers.  Internal planning, resource management and time reporting.	4C has a legitimate interest to manage and deliver projects to customers.	Customers and potential customers.	From you.	The 4C company delivering the project.
Internal documents	Employees, former employees, consultants, interns and subcontractors	4C may process your name, title, email, phone number, gender, office and employment start date and end date in internal documentation such as employee overview and organizational overview.	To keep track of employees and to get an organizational overview.	4C has a legitimate interest to keep track of employees and to get an organizational overview.		From you.	Joint controllers
Consultant and Employment Agreements	Employees and Consultants	4C may process your name, title, date of birth, personal identification number and salary details in your employment/consultant agreement.	To keep records of employees and consultants and agreed terms and conditions.	4C has a legitimate interest to keep records of employees and consultants and agreed terms and conditions.		From you.	The 4C company you are employed by/contracted by.
Performance and salary review	Employees	4C may process your personal data such as name,	Salary and performance review and	The processing is necessary for the calculation	4C may share salary details with	From you, your time report and feedback	The 4C company you are employed by.



		title, date of birth, employee number, line manager, role/seniority, targets, salary, employment start date and end date, reported hours and revenue and data about your performance for annual and semi-annual reviews and to calculate your variable salary.	calculation of variable salary.	of your salary according to your employment agreement. The processing is therefore necessary for the performance of a contract.	salary bench marking provider (solely position and salary).	from other employees.	
Benefits and pension	Employees	4C may transfer personal data such as name, address, email, date of birth, salary level, NHS number, personal identification number, name of beneficiary/beneficiaries and information about employment to benefit and pension providers.	Ensure your benefits and pension.	The processing is necessary to ensure your benefits and pension according to your employment agreement. The processing is therefore necessary for the performance of a contract.	Benefit provider.	From you.	The 4C company you are employed by.
Medical file	Employees	4C may process your medical file if needed to keep records of absence due to sick leave or if you have requested reasonable working adjustments due to a medical condition.	Keep records of absence due to sick leave or provide reasonable working adjustments due to a medical condition.	4C has a legal obligation to request medical files if employees are absent a certain period of time due to medical conditions and to provide working adjustments due to medical conditions.	Social Security Agency and Insurance Provider.	From you.	The 4C company you are employed by.
Salary	Employees	4C may process your salary details	To be able to pay salary.	The processing is necessary to		From you and from internal	The 4C company you are employed by.



		and account details to be able to pay salary.		pay salary according to your employment agreement. The processing is therefore necessary for the performance of a contract.		salary review process.	
Security clearance interview	Employees	4C may process personal data such as your name, national identification number, financials, personal relationships and potential criminal convictions for security clearance.	Security clearance is required for working with some of 4C's customers.	The security clearance is a legal obligation under the Protective Security Act.		From you.	4C Group AB or 4C Strategies AB (the 4C company you are employed by)
Passport	Employees	4C may process your passport details if required to book a hotel or a flight.	To book hotels or flights.	4C has a legitimate interest to process passport details if required for booking.	Flight/hotel company.	From you.	Joint controllers.
Events	Employees	4C may process information about your potential allergies.	To plan events, dinners and lunches.	4C has a legitimate interest to keep information about employees' allergies.	Potential supplier for events.	From you.	Joint controllers.
Book-keeping, reporting to tax agency and budget /forecast	Employees	4C may process your personal data such as name, employment number, social security number, salary details, vacation details, role/seniority, utilization target, planned hours and revenue per employee for book-keeping, reporting to	Book-keeping, reporting to tax agency and budget/forecast.	4C has a legal obligation to book-keep and report to tax agency.  4C has a legitimate interest to keep budgets and forecasts.	Tax agency and auditors.	From you, from internal systems and pension provider.	The 4C company you are employed by.



		tax agency and budget/forecast.					
Board meetings	Employees, consultants and board members.	4C may process your personal data such as name, title, job position, e-mail, phone number and e-signature in board minutes and for other board administration in the board portal.	Keep minutes at board meetings and administrate board work.	4C has a legitimate interest to keep minutes at board meetings and administrate board work.	Auditors or external counsel if required.	From you.	4C Group AB.
Insider list	Employees, consultants, subcontractors and board members	4C may process your name, date of birth/national identification number, phone number, address, role and info about why and how you have received inside information if you have received inside information.	Keep insider list of persons whom have received inside information.	4C has a legal obligation to keep an insider list according to the Market Abuse Regulation.	Financial Supervisory Authority on request.	From you.	4C Group AB.
Alumni network	Former employees	4C may process your name and email address if you are part of the alumni network.	Invite to events and communicate with alumni network.	Former employees are asked on the exit interview if they want to be part of the alumni network.		From you.	Joint controller.
Channels for communication and internal systems	Employees, consultants, interns, subcontractors, board members and candidates	4C may process your personal data such as name, user name, title, phone number, email, place of work, photos, video, location, IP address etc. if this personal data is revealed in emails, Teams messages or in other channels	Internal and external communication and to be able to use internal systems.	4C has a legitimate interest to process personal data for internal and external communication and for employees to be able to use internal systems.		From you.	Channels of communication: Joint controllers.  Other: The 4C company you work for.



		of communication.  4C may further process your log in details and contact details for internal systems.					
Recruitment - CV and application	Candidates	4C may process your personal data in CV and job application (work experience, education and photos) and your contact details (name, address, email address and phone number) if you are in a recruitment process for a position at 4C.	Manage and facilitate recruitment of new employees.	4C has a legitimate interest to manage and facilitate recruitment of new employees.		From you.	The 4C company in the recruitment process.
Recruitment - Background checks	Candidates (for UK)	4C may process your personal details (name, date of birth, phone number, email, passport details or other ID/national insurance number and proof of address), potential criminal records and financial information when conducting background checks.	Background check of candidate for job opening.	Candidate consents to the processing in portal.		From background check provider.	4C Europe UK Ltd
Recruitment - Psychometric tests	Candidates	4C may process your name, email, address and psychometric test results.	Psychometric test for candidates.	4C has a legitimate interest to perform psychometric test when recruiting.		From you.	The 4C company in the recruitment process.



Whistle-blowing	Employees, consultants, interns, subcontractors and board members	4C may process personal data such as your name, job title, job position, location, employer, relationship with the organization, e-mail address, telephone number and other personal data in whistle-blower reports.	To provide a whistle-blower channel to ensure a high level of business ethics within 4C.	4C has a legitimate interest to provide a whistle-blower channel to ensure a high level of business ethics within 4C. For some 4C companies, it is a legal obligation to have a whistle-blower channel.	4C might share personal data with third parties if needed for the investigation. For example, 4C will report to the police if a crime is committed.	From you or from reports.	The 4C company the report relates to.
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You have the right to withdraw your consent if the legal basis for the processing is consent. Your personal data will only be processed for as long as the processing is necessary for the purpose.

**Third Country Transfer**

4C may transfer personal data to other companies within 4C Group, including companies established in third countries. For certain processing, 4C may use third party suppliers that process personal data in a third country. 4C will ensure appropriate safeguards for any transfer to third countries. The transfer will either be based on an Adequacy Decision by the European Commission or Standard Contractual Clauses approved by the European Commission. Please reach out to our Data Protection Officer (contact details below) for more information about third country transfers.

**Data Subjects Rights**

- Access: You have the right to request a copy of the personal data 4C processes about you or information about the processing. There are some exceptions to this right, access may, for example, be denied if it would affect the rights and freedom of others.
- Rectification: 4C aims to keep your personal data accurate and complete. We encourage you to contact us if any of your personal data is not accurate so we can rectify this.
- Erasure, object and restriction: You have the right to object to the processing, request that we erase your personal data or restrict the processing of your personal data unless 4C has a legal basis for the processing that prevails your right of erasure, objection or restriction.
- Data portability: You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.

**Data Protection Officer**

If you want to contact 4C regarding the processing of your personal data, if you want to exercise your rights as described above or withdraw your consent, please contact 4C’s Data Protection Officer, at: [privacy@4cstrategies.com](mailto:privacy@4cstrategies.com) or by letter to 4C Group AB, Att: DPO, Vattugatan 17, 111 52 Stockholm, Sweden.



### Right to lodge a complaint

You have the right to lodge a complaint with a Supervisory Authority or seek remedy in court if you believe that your data protection rights have been breached. See contact details for Supervisory Authorities below.

<b>Sweden</b>
Integritetsskyddsmyndigheten <a href="https://www.imy.se/">https://www.imy.se/</a> +46 8 657 61 00

<b>Norway</b>
Datatilsynet <a href="https://www.datatilsynet.no">https://www.datatilsynet.no</a> +47 22 39 69 00

<b>UK</b>
The information Commissioner <a href="https://ico.org.uk/">https://ico.org.uk/</a> 0303 123 1113

<b>Finland</b>
Office of the Data Protection Ombudsman <a href="http://www.tietosuoja.fi/en/">http://www.tietosuoja.fi/en/</a> +358 29 56 66700