

Capacent Privacy Notice

Last updated: 23rd of May 2018

The purpose of this Privacy Notice (“Notice”) is to describe how Capacent in Sweden and Finland treat the personal information we collect. Capacent (collectively “we,” or “our”) take data privacy seriously. This Notice explains how we collect, share, and use personal information, and how you can exercise your privacy rights.

All information collected is managed according to the European regulation (EU) 2016/679 of the European Parliament and the local jurisdiction of the country we operate in.

This Notice does not cover any other data collection or processing, including, without limitation, data collection practices of other web pages to which we provide links on our Website.

To make it easier to navigate to the parts of this Notice that directly apply to you, we have divided the Notice into the Sections described in the hyperlinks below. While we encourage you to read the entire Notice, we strongly recommend that you review Section 1 (The Basics), Section 4 (General Information), and any other Section that applies to you.

We may update this policy from time to time, therefore we recommend you check it regularly, particularly if you send personal information to us. All updates will be available on our website.

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Section 1.0 The Basics

1.1 Key terms

In this Notice, the following terms have the meanings set forth below:

“Personal information” means any information, or combination of pieces of information, that could reasonably allow you to be identified.

“Client” means any of our clients and their employees who are looking to recruit our services.

“Candidate” means any candidate, applicant, or prospect who is considered, evaluated, or assessed by us or our representatives.

“Referee” means any individual who provides employment or personal references for a particular Candidate.

“Source” means any individual who helps to identify and provide market intelligence about a potential Candidate.

Section 2.0 What personal information do we collect

2.1 Data from clients

Information our Clients provide to us: We need to collect and use client information in the course of providing our services. Personal information, usually in the form of invoices and/or contractual agreements, are either directly collected from our client or through their service provider.

2.2 Recruitment

Information Candidates provide to us: If you are a Candidate, you may provide personal information to us, for example, when you upload your résumé into our Candidate Portal through our Website or communicate with us in any way in connection with the recruitment process. Further, as described below, we may obtain information about you from other sources.

As such, we will consider any information we collect directly from you as having been provided voluntarily. If, however, you are unwilling to provide us with certain requested information, please understand that this may limit our ability to consider you for the announced position.

The information we may collect for all Candidates typically includes:

- Contact details: such as your name, e-mail address, postal address, and telephone number.
- Résumé information: such as your contact details, employment history, educational history, professional qualifications, as well as languages and other skills and activities.

The information we may collect for all Candidates typically includes:

- Identification data: such as your civil/marital status, photograph, date of birth, gender, national origin, corporate identifier, national identifier (i.e., social security number or equivalent in your country).
- Lifestyle preferences and personality profile: such as community involvement and memberships, hobbies, social activities, and/or individual preferences, intellectual capacity, personality, behavior, executive competencies, and/or character traits.
- Financial information: to reimburse expenses incurred in connection with the recruitment process (e.g., travel, lodging and/or meal costs when attending an interview), we may collect certain financial information needed to document the expense and to reimburse you (e.g., bank account number and/or credit card number).
- Other information: such as your prior military service, performance history, details of any dependents, immigration status, and, any other relevant information you may choose to share with us.

Information we collect from third party sources about Candidates: We may collect any of the above personal information about you from publicly available sources, and third parties, including, under the following circumstances: (i) Sources and Referees may disclose personal information about you; (ii) our Clients may share personal information about you; and (iii) we may obtain information about you from publicly available third party sources (e.g., LinkedIn, news reports, press releases).

2.3 Seminars & Events

Information collected through seminars and events: We collect personal information such as name, phone number, title and email address when you sign up for our events. This type of information might also be provided to us by third party.

Section 3.0 How we use your personal information

3.1 Data from clients

There is a valid data processing agreement (DPA) between Capacent and the Client. This contractual agreement defines how data containing personal information should be handled between the parties. We use this information on behalf of our Client and solely for this purpose.

3.2 Recruitment

Capacent use the information provided to us in order to evaluate the Candidate for the announced position. Further, we may use this information to suggest other business opportunities within Capacent.

3.3 Seminar & Events

Personal information such as name, email address and phone number are collected in order to send invitations and updates to our shareholders. This type of information might also be collected from third party.

Section 4.0 Data collected via our website

4.1 What personal information do we collect

Certain parts of our Website may ask you to provide personal information voluntarily, for example, we may ask you to provide your contact details (like your name, email address, and phone number) to complete surveys, subscribe to marketing communications (like newsletters), submit inquiries, and/or otherwise communicate or interact with us.

Information we collect automatically: When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Such automatically collected information may include your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., country or city-level location) and/or other technical information. We may also collect information about how your device has interacted with our Website, including the pages or content accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and Similar Tracking Technology” below.

Social Media Widgets: Our Website includes social media features, such as social media widgets that link to a social media website or allow you to share website content. These features may collect your IP address, which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. Social media features, such as widgets, are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

4.2 How do we use your personal information

We typically use the personal information we collect through our Website in the usual course of our business for the following reasons: (i) to respond to a request that you sent us, such as a request for information about our Services; (ii) to administer, protect, and improve our Website and our Services; (iii) to better understand the preferences of our Website visitors; (iv) to compile aggregated statistics about Website usage; (v) to provide you with marketing and promotional communications (where this is in accordance with your marketing preferences); and/or (vi) for other business purposes such as data analysis, identifying usage trends,

determining the effectiveness of our marketing, and enhancing, customizing and improving our Websites, products and services.

4.3 Cookies and similar technology

Like many Websites, we use cookies or other similar technologies to collect and use personal information about you. Cookies enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another. The primary information usually collected through cookies is statistical and technical information about equipment, and visitor actions on our website, such as:

- Traffic data
- Location and IP address
- Communication data
- Operating System
- Browser

Section 5.0 How we share your personal information

We may share your personal information with the following types of third parties for the purposes described in this Notice:

- We freely share your information with our **group companies**. Your information is maintained on Capacent's database, which is secure and accessible only to the Capacent Group employees worldwide.
- We may share your information with any **competent law enforcement body, regulatory or government agency, court or other third party** where we believe disclosure is necessary as a matter of applicable law or regulation; to exercise, establish, or defend our legal rights; or to protect your vital interests or those of any other person.
- In the case of Candidates, Referees, and Sources, we may share your information **with Clients** who will need to process your information for the purposes we have described in this Notice.
- In the case of Candidates, we may share your information with **third parties** who we have retained to provide services such degree and/or license verification checks, to the extent that these checks are appropriate and in accordance with local laws.
- Similarly, for Candidates we may share your information with **Sources and Referees**.
- We may share your information **with third party service providers** (our Vendors) who perform functions on our behalf (including external consultants, business associates and professional advisers, such as lawyers, auditors, accountants, technical support providers, and third party travel agencies, outsourced IT and document storage providers).
- We may share your information with a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Notice.
- We may share your information with our **marketing partners** to send emails on our behalf.
- We may share information with any other person with **your consent**.

Please be assured that we do not sell your information to third party or use the information for purposes that are incompatible with those set forth in this Notice.

Section 6.0 Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update, or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the Section headed “how to contact us” below. When asked to remove a record from our database, Capacent will retain minimal personal information in order to prevent future contact, to keep a record of the information disclosed to our Clients and Candidates, and to preserve Capacent’s interests in accordance with any applicable legal requirements.
- In addition, if you are a resident of the European Economic Area, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information, or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the Section headed “how to contact us” below.
- You have the right to opt-out of **marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the section headed “how to contact us” below.
- Similarly, if we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you withdraw your consent to our Notice, you will not be able to be a part of any project or event at Capacent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Section 7.0 How to contact us

Please feel free to contact us with any comments, questions, complaints, or suggestions you might have regarding the information or practices described in this Notice.

You may contact us by sending a message to our email address below. You can also write to us using the details below:

Capacent Sweden

Email: privacy@capacent.se

Hamngatan 15

111 47 Stockholm

Sweden

Tel. +46 08 458 5350

Capacent Finland

Email: privacy@capacent.fi

Mannerheimintie 16

00 100 Helsinki

Finland

Tel. +358 20 7756000

For more information visit our website: www.capacent.com