

# External Privacy Policy

Approved by



**Per Wallentin, CEO Knowit Group**

Date

**12 June 2018**

## Table of contents

1	Introduction .....	3
2	Personal data.....	4
3	Data controller.....	4
4	Purpose and legal basis for processing of your personal data and storage period .....	5
4.1	Client contacts .....	5
4.1.1	Contact person for existing client .....	5
4.1.2	Contact person for potential client .....	6
4.2	Recruitment.....	7
4.2.1	Job applicant.....	7
4.2.2	Potential candidates identified by Knowit .....	8
4.2.3	Candidates in Knowit's network before 25 May 2018 .....	9
4.2.4	Personal references.....	10
4.3	Events, seminars and courses .....	11
4.3.1	Organizing events, seminars and courses.....	11
4.3.2	Marketing of future events, seminars and courses .....	12
5	Data processor.....	13
6	Your rights.....	13
6.1	Right of access (so-called register extract).....	13
6.2	Right of rectification.....	13
6.3	Right of erasure .....	13
6.4	Data portability .....	14
7	Complaints.....	14
8	How do we handle personal identification numbers?.....	14
9	How is your personal data protected? .....	14
10	Use of cookies .....	15
11	Updates to our Privacy policy .....	15

# 1 Introduction

Knowit AB (publ) is a consultancy firm that creates unique customer values by offering digital and cross-functional solutions from three business areas: Experience, Insight and Solutions. It is the capacity to combine competencies within IT, design and communication, and management consultancy that sets us apart from other consultancy firms. Within the framework of our operations, Knowit AB and the subsidiaries in the Knowit group process personal data. This is done mainly within client relationships, in recruitment processes and in connection with various events, courses and seminars arranged by Knowit.

We safeguard your privacy and take matters relating to data protection very seriously. In this Privacy policy, we describe the processing of personal data that is performed within the framework of our operations, the purpose of such processing, the legal basis for the processing, who we may share your personal data with, and your rights in relation to your personal data. In order for you to understand how your personal data are processed, we recommend that you read our Privacy policy carefully. If you have any questions relating to our Privacy policy, or wish to enforce the rights you have in relation to your personal data, you are always welcome to contact us at [dataprotection@knowitgroup.com](mailto:dataprotection@knowitgroup.com).

Per Wallentin  
Group president

## 2 Personal data

Personal data means any information that can directly or indirectly identify a natural person. Examples of personal data include a name, an address, a phone number and an e-mail address, but can also include information about IP numbers or photos combined with other data if the information can be connected to a natural person. Processing of personal data includes any operation which is performed on personal data, such as collection, recording, analysis, adaptation, storage or destruction.

## 3 Data controller

The party ultimately responsible for processing personal data is either a subsidiary in the group or Knowit AB. If you know which Knowit company is the data controller, you can always contact this Knowit company directly, and you can always contact us at [dataprotection@knowitgroup.com](mailto:dataprotection@knowitgroup.com).

Knowit AB, company reg. no. 556391-0354, with the address Box 3383, 103 68 Stockholm.

Knowit's corporate structure with subsidiaries is described in Knowit's annual report, which you can find on [www.knowit.eu](http://www.knowit.eu).

## 4 Purpose and legal basis for processing of your personal data and storage period

### 4.1 Client contacts

#### 4.1.1 Contact person for existing client

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
To be able to retain and develop business relationships with our existing clients	<ul style="list-style-type: none"> <li>• Communication via telephone or e-mail regarding our contractual commitments</li> <li>• Marketing messages for the purpose of communication and information</li> <li>• Invitations to seminars, events and courses</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Phone number</li> <li>• Job title</li> <li>• Correspondence between you and Knowit</li> <li>• Order history</li> <li>• Information on if you do not wish to be contacted by Knowit in certain cases, for instance regarding invitations to seminars, events and courses</li> <li>• Technical information on how you have interacted with us</li> <li>• IP address and browser settings</li> </ul>
<p><b>Legal basis for processing:</b> <i>Legitimate interest</i>                      The processing is necessary to fulfill Knowit's need to be able to retain and develop our business relationships.</p>		
<p><b>Storage period</b>                      For as long as the business relationship lasts, but personal data that are no longer current will be erased as soon as possible when the controller receives information on this.</p>		

#### 4.1.2 Contact person for potential client

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
To be able to build business relationships with new clients	<ul style="list-style-type: none"> <li>• Gathering of contact information through internal networks at Knowit, social media or from third parties</li> <li>• Communication by phone or e-mail regarding our services</li> <li>• Storage and analysis of potential clients</li> <li>• Communication of marketing information</li> <li>• Invitations to seminars, events and courses</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Phone number</li> <li>• Job title</li> <li>• Correspondence between you and Knowit</li> <li>• Information on if a client does not wish to be contacted by Knowit at all or if a client does not wish to be contacted by Knowit in certain cases, for instance regarding invitations to seminars, events and courses</li> <li>• Technical information on how you have interacted with us</li> <li>• IP address and browser settings</li> </ul>
<p><b>Legal basis for processing:</b> <i>Legitimate interest</i>            The processing is necessary to fulfill Knowit's need to be able to create new business relationships.</p>		
<p><b>Storage period</b>            Until the data are no longer needed to fulfill the aforementioned purpose or if a business relationship has not developed within 12 months from the initial contact; after that, the data are erased.</p>		

## 4.2 Recruitment

### 4.2.1 Job applicant

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
To enable handling of a job application, whether it is regard to a specific position or is a general application	<ul style="list-style-type: none"> <li>• Registration and handling of application</li> <li>• Job interview</li> <li>• Taking references</li> <li>• Testing (where applicable)</li> <li>• Communicating outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Phone number</li> <li>• Address</li> <li>• Job title</li> <li>• Gender</li> <li>• Date of birth</li> <li>• Image</li> <li>• Personal letter</li> <li>• Résumé</li> <li>• References given</li> <li>• Links to social media, such as LinkedIn</li> <li>• Correspondence between you and Knowit</li> <li>• Any results of tests performed as part of the recruitment process</li> <li>• Interview notes</li> <li>• Technical information on how you have interacted with us</li> <li>• IP address and browser settings</li> </ul>
<p><b>Legal basis for processing: Consent</b>            The processing is necessary to handle applications from you when you are applying for work at Knowit, and is based on the consent you give in connection with sending in your application.            We have no interest in gaining knowledge about memberships in trade unions, religious beliefs, sexual orientation, political opinions, medical diagnoses or conditions, or other information that is not relevant to recruitment. It is therefore important that you do not provide such special categories of personal data in connection with your application or in later communications in the recruitment process. We also ask you not to send your personal identification number in your application. A date of birth is sufficient. For certain positions, a background check is necessary. In such cases, this is handled with separate consent.</p>		
<p><b>Storage period</b>            The information is stored for up to 24 months (in Finland 60 months) after the end of the recruitment process, regardless of if the application leads to employment or not, in order to be able to investigate any accusations of discrimination during that period.</p>		

## 4.2.2 Potential candidates identified by Knowit

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
In order to be able to contact you regarding relevant career opportunities if you are a potential candidate	<ul style="list-style-type: none"> <li>Collection of potential candidates through internal networks and/or social media</li> </ul>	<ul style="list-style-type: none"> <li>First and last name</li> <li>E-mail address</li> <li>Phone number</li> <li>Address</li> <li>Job title</li> <li>Gender</li> <li>Date of birth</li> <li>Links to social media, such as LinkedIn</li> <li>Technical information on how you have interacted with us</li> <li>IP address and browser settings</li> </ul>
<p><b>Legal basis for processing: Legitimate interest</b>            In order to be able to contact potential candidates for employment at Knowit, we collect personal data through internal networks and searches in social media, such as LinkedIn. This collection is usually in the potential candidate's interest, as it can lead to a new interesting job and new career opportunities. If you are assessed as interesting to Knowit and you are interested in working for Knowit, the continued process is handled in accordance with Chapter 4.2.1 above.</p>		
<p><b>Storage period</b>            The information is stored for up to 24 months (in Finland 60 months) after the end of a recruitment process, regardless of if the application leads to employment or not, in order to be able to investigate any accusations of discrimination during that period. Personal data regarding people who state that they are not interested in being contacted in the role of potential candidate are erased immediately. However, the information that the person does not wish to be contacted will be stored for 24 months.            Personal data about a potential candidate that Knowit has gathered, but where Knowit has not begun processing the personal data, is erased within three months.</p>		



### 4.2.3 Candidates in Knowit's network before 25 May 2018

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
<p>To recommence, at a later date, a dialogue on potential opportunities within Knowit for you who applied for work here before 25 May 2018</p>	<ul style="list-style-type: none"> <li>• Review of past candidates' applications</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Phone number</li> <li>• Address</li> <li>• Gender</li> <li>• Image</li> <li>• Résumé</li> <li>• Date of birth</li> <li>• Links to social media, such as LinkedIn</li> <li>• Correspondence between you and Knowit</li> <li>• Interview notes</li> <li>• Technical information on how you have interacted with us</li> <li>• IP address and browser settings</li> </ul>
<p><b>Legal basis for processing:</b> <i>Legitimate interest in the cases where consent is lacking</i>          The processing is necessary in order to recommence a dialogue when you have formerly applied for work at Knowit, but this for some reason did not end in employment. This processing is usually in the potential candidate's interest, as it can lead to a new interesting job and new career opportunities. If you are assessed as interesting to Knowit and you are interested in working for Knowit, the continued process is handled in accordance with Chapter 4.2.1 above.</p>		
<p><b>Storage period</b>          The information is stored for up to 24 months after you have been informed that employment would not occur. In cases where consent has been given for a longer storage period, the longer storage period will be used.</p>		

#### 4.2.4 Personal references

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
In order to be able to contact personal references and perform thorough and well-founded recruitments	<ul style="list-style-type: none"> <li>• Contact by phone and e-mail</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Phone number</li> <li>• Job title</li> <li>• Employer</li> <li>• Technical information on how you have interacted with us</li> <li>• IP address and browser settings</li> </ul>
<p><b>Legal basis for processing:</b> <i>Legitimate interest</i>            The processing is necessary to fulfill Knowit's need to be able to perform thorough and well-founded recruitments.</p>		
<p><b>Storage period</b>            The information is stored for up to 24 months (in Finland 60 months) after the end of a recruitment process, regardless of if the application leads to employment or not, in order to be able to investigate any accusations of discrimination during that period.</p>		

## 4.3 Events, seminars and courses

### 4.3.1 Organizing events, seminars and courses

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
To be able to plan and perform events, seminars and courses.	<ul style="list-style-type: none"><li>• Receiving registrations to an event, seminar or course</li><li>• Planning and performing an event, seminar or course</li></ul>	<ul style="list-style-type: none"><li>• First and last name</li><li>• E-mail address</li><li>• Phone number</li><li>• Job title</li><li>• Invoicing information, where applicable</li><li>• Information on food preferences (in connection with seminars, events, courses, etc.)</li><li>• Technical information on how you have interacted with us</li><li>• IP address and browser settings</li></ul>
<b>Legal basis for processing:</b> <i>Consent in connection with registration</i> The processing is necessary to be able to plan and perform events, seminars and courses.		
<b>Storage period</b> Your personal data is stored from the time of your registration and until the event, seminar or course has been performed. After that, the personal data are erased as soon as possible.		

### 4.3.2 Marketing of future events, seminars and courses

<b>Purpose</b>	<b>Processing</b>	<b>Categories of personal data</b>
In order to be able to market future events, seminars and courses	<ul style="list-style-type: none"> <li>Information/marketing of a future event, seminar or course</li> </ul>	<ul style="list-style-type: none"> <li>First and last name</li> <li>E-mail address</li> <li>Phone number</li> <li>Job title</li> <li>Information on if you do not want to be contacted by Knowit for marketing purposes</li> <li>Technical information on how you have interacted with us</li> <li>IP address and browser settings</li> </ul>
<p><b>Legal basis for processing:</b> <i>Separate consent in connection with communication regarding an event, seminar or course which you have registered for and/or participated in.</i></p> <p>The processing serves to market and inform on future events, seminars and courses.</p>		
<p><b>Storage period</b></p> <p>If you are not a client of Knowit, your personal data will be stored for up to 12 months for marketing purposes. You can at any time contact Knowit and request not to be contacted for marketing purposes. This information will also be stored for 12 months.</p> <p>The storage period for Knowit's existing clients is regulated in Chapter 4.1.1.</p>		

## 5 Data processor

A data processor is an enterprise that processes personal data on behalf of Knowit and in accordance with our instructions. We have data processors that assists us with, for instance:

1. Economy services and invoicing
2. Support with tools for recruitment
3. Support with tools for evaluation and testing of candidates

When your personal data is shared with data processors, this is done only for purposes in line with the purposes for which we collected the information (e.g., to fulfill our commitments in accordance with contracts concluded, or to handle candidates in a recruitment process). We have written contracts with all data processors, through which they guarantee security for the data processed and commit to observing our security requirements and delimitations and requirements regarding international transfer of personal data.

We may also be obliged to share your personal data with authorities with the role of independent data controllers. If an authority is an independent data controller, this means that Knowit cannot govern how the information provided to the authority is processed. Independent data controllers that we may need to share your personal data with in accordance with legislation or on suspicion of crime include, Police and Tax Authorities. When your personal data are shared with an authority which is an independent data controller, the privacy policy and data processing of this authority will apply.

## 6 Your rights

### 6.1 Right of access (so-called register extract)

We are always open and transparent regarding how we process your personal data and if you want greater insight into which personal data we process regarding you specifically, you can request access to this data.

To ensure efficient handling of your request and that the information is being provided to the right person, we may need to request further information about you.

### 6.2 Right of rectification

You can request rectification of your personal data if the data are inaccurate. Within the context of the purpose stated, you also have the right to provide additional information in the case of any incomplete personal data.

### 6.3 Right of erasure

You can request erasure of personal data that relates to you and that we process, if:

- The personal data are no longer needed for the purpose for which they were collected or processed.
- You object to the balancing of interests that we have performed based on a legitimate interest and your reasons for objection outweigh our legitimate interest.
- You revoke your consent to processing that is based on consent and there is no other legal basis for the processing.

- The personal data are processed in an illegal manner.
- The personal data must be erased to fulfill a legal obligation by which we are encompassed.

Keep in mind that we may have the right to reject your request if there are legal obligations preventing us from immediately erasing certain personal data. These obligations may spring from, i.a., legislation on discrimination or bookkeeping. It may also be the case that the processing is necessary for our establishment, exercise or defense of legal claims. If we are prevented from acting on a request of erasure, we will instead block the personal data from use for other purposes than the purpose that prevents the requested erasure.

## 6.4 Data portability

In cases where our processing of personal data is based on your consent or the fulfillment of a contract, you have the right to request that the information that concerns you and that you have provided us with is transferred to another data controller. However, this is provided that the transfer is technically possible and that it can be performed in an automated manner.

## 7 Complaints

The national Data Protection Authority is the authority responsible for monitoring the application of the legislation. If you believe that Knowit is processing your personal data in an incorrect manner you can, aside from contacting us at [dataprotection@knowitgroup.com](mailto:dataprotection@knowitgroup.com) (which we hope you choose to do as a first resort), present a complaint to The national Data Protection Authority.

## 8 How do we handle personal identification numbers?

We will only process your personal identification number when this is clearly motivated given the purpose, required for secure identification, or there is another substantial reason. We always minimize the use of your personal identification number to the greatest extent possible. For this reason, you should not state your full personal identification number when registering or sending a job application to Knowit. In connection with applications, a date of birth is sufficient.

## 9 How is your personal data protected?

We use IT systems to protect secrecy, privacy, and access to personal data. We have taken special security measures to protect your personal data against unlawful or unauthorized processing (such as unlawful access, loss, destruction or damage). Only the people who actually need to process your personal data in order for us to fulfill our stated purposes have access to the data.

We do not sell any personal data to others and we do not share any personal data with anyone other than the Data processors with which we have entered into Data processing agreements, in accordance with Chapter 5.

## 10 Use of cookies

Cookies are small text files sent from our web server and stored in your web browser when you visit any of Knowit's websites like e.g. [www.knowit.eu](http://www.knowit.eu). The purpose of cookies is to improve your experience of our website. In your web browser, you can change the settings regarding how cookies may be used or to ensure that cookies are always deleted when you close your web browser. Please note that there are other web-based services that stop working if you block or delete cookies.

More information on how Knowit uses cookies can be found on any of Knowit's websites like e.g. [www.knowit.eu](http://www.knowit.eu).

## 11 Updates to our Privacy policy

We may come to make changes to our Privacy policy. The latest version of the Privacy policy in English is always available at [www.knowit.eu](http://www.knowit.eu). On our local web-sites you will be able to find the latest version of our Privacy policy in the local language. In connection with updates that are of significant importance for our processing of personal data or updates which are not of significant importance for processing, but which we assess may be of significant importance for you, you will receive information on all of Knowit's web-sites like e.g. [www.knowit.eu](http://www.knowit.eu) and by e-mail in a timely manner, before the update is made (when possible).