

## **Policy for processing personal data**

### **Introduction and purpose**

The purpose of this policy is to ensure that Coromatic handles personal data in accordance with the EU general data protection regulation, i.e. GDPR. The policy covers all procedures where personal data is processed and includes both structured and unstructured data.

### **Application and revision**

Coromatic Group AB is responsible for ensuring that the processing of personal data complies with this policy.

The policy shall be determined by the Coromatic Group AB at least once a year and updated when necessary.

Data Protection Officer (DPO) for each Nordic country, or a similar function (later to be decided) in the country, will be responsible for keeping the process around the annual update of the policy due to new and changed regulations.

This policy applies to all data subjects concerned by our business.

### **Organisation and responsibility**

The CEO has the overall responsibility for the content of this policy and that it is implemented and complied with by the business. The CEO may delegate the responsibility and implementation to the appropriate person within the company, which in this case is DPO/function in each Nordic country.

All employees are responsible for acting in accordance with this policy and what this policy want to ensure.

## Concept and abbreviations

Concept	Meaning
Personal data	Personal data is any kind of information that can be directly or indirectly connected to a person who is alive.
Data subject	The person concerned, i.e. the person who can be identified directly or indirectly by the personal data in a register.
Processing personal data	An action, or a combination of personal data actions (regardless if automated or not), such as collection, registration, organisation and structuring.

## Processing personal data

- Each personal data processing shall be in accordance with the following principles:
  - Lawful, fair and transparent processing
  - Purpose limitation
  - Data minimization
  - Accurate and up-to-date processing
  - Limitation of storage in the form that permits identification
  - Confidential and secure
- The work regarding mapping and documenting processing of personal data is initiated and continuous documentation will be carried out from now and on.
- Monitoring, follow-up and evaluating our processing of personal data will be done at least annually
- Any incidents (such as data breach or loss of data) relating to personal data that we process shall be reported without delay to DPO/function. And without undue delay, and at the latest within 72 hours, DPO/function will report the incident to the Data Inspection Board, and take further necessary actions in relation to the incident.
- Our requirement that personal data is handled according to GDPR should always be ensured in the procurement and development of IT solutions and services and will also be a part of the specifications and any agreements.