

Privacy Statement Kapsch TrafficCom AB

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1 Document Information

1.1 Document identification

This document is the External Privacy Policy for Kapsch TrafficCom AB (KTC AB).

1.2 Document Scope

This document is the policy regarding the processing of personal data in accordance with [GDPR] at KTC-AB.

1.3 Referenced documents

Alias	Identification	Reference
[GDPR]	REGULATION (EU) 2016/679	On the protection of natural persons with regard to the processing of personal data and on the free movement of such data,

2 *Privacy Policy*

Introduction

This Privacy policy applies to Kapsch's processing (collecting, storing, transferring etc.) of personal data.

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, for example by a name, an identification number, location data, online identifiers or one or more factors specific to the physical, physiological, generic, mental, economic, cultural or social identity of that natural person.

Processing of personal data

Kapsch is transparent with how and why personal data is collected and processed. Processing means any operation or set of operations on personal data or sets of personal data, such as collection, storage and use.

Kapsch mainly processes the following personal data:

- Name, social security number, contact details,
- Name and contact details of current business contacts,
- Name and contact details of previous business contacts,
- Name, social security number, image, application documents and contact details of jobseekers.
- Images of license plates,

Kapsch does not request sensitive personal data (special categories of personal data as defined in Article 9 GDPR). Kapsch will only process sensitive data in exceptional cases after having requested a consent, see section 2.2 recruitment below.

Collection of personal data

Kapsch primarily collects personal data directly from the data subject by personal meetings, e-mail and telephone contact. Kapsch also collects images of license plates when vehicles pass our test toll stations. In certain cases, the company collects data from publicly available sources and third parties such as contact lists or data from credit reporting companies. When the Company collects data from other than the data subject, the data subject is notified as soon as possible and no later than one month after the data was collected.

Kapsch stores photos from social events containing both current and former employees.

Purpose of processing

Kapsch only processes personal data for the purpose which it has been collected for in accordance with the following:

2.1 Enter into and maintain contractual relationships

Purpose and scope

Kapsch processes personal data in connection with the preparation of agreements (potential customers, suppliers or partners) as well as for administration and completion of agreements entered into (current and former customers, suppliers or partners). Personal data about business contacts are processed to maintain a contact list.

Legal basis

Processing of personal data is necessary for Kapsch to be able to submit tenders and fulfil commitments in accordance with Kapsch's agreements. The processing of contact person's data is based on Kapsch's legitimate interest to maintain business relations and communicate with the data subject.

You have a right to object to processing based on the controller's legitimate interest. Kapsch considers its interest for the processing described above to outweigh the data subjects' interest of protecting their personal integrity.

Data recipients

Kapsch may share personal data with Kapsch's processors, such as IT service providers. Kapsch's processors process personal data on behalf of Kapsch and according to Kapsch's instructions. Kapsch has written agreements with its processors.

Kapsch may transfer personal data to other Kapsch Group companies. Kapsch Group has companies that reside in countries outside the EU/EEA area. The company only shares personal data with companies in third countries that have an adequate level of protection or where there are special guarantees that the data and your rights are protected, for example through a special agreement or binding internal company rules.

Kapsch may share personal data regarding customers and contact persons with contractors, subcontractors and retailers for administrative purposes. In such case, the companies that receive personal data become controllers for the personal data. In this case it's the receiving company's privacy policy that governs its processing of your personal data.

Storage duration

The personal data will be processed solely for the intended purpose and for as long as the registered person is a business contact to Kapsch. Information about contact person's of past customers is kept up to one year from our last contact with the customer. Personal data in contracts will be kept for a minimum of ten years after the contract expires and will then be archived and deleted according to Kapsch's routines for thinning of data.

2.2 Recruitment

Purpose and scope

Kapsch processes personal data collected in connection with recruitment of employees.

Legal basis

The processing is based on Kapsch's interest to enter into and maintain employment contracts. Applicants who are not recruited are given the opportunity to consent to Kapsch's retaining their personal data for future

recruitment needs. The applicant may at any time withdraw such consent in which case the personal data will be deleted.

Data recipients

Kapsch may share personal data with Kapsch's processors, such as IT service providers. Kapsch's processors process personal data on behalf of Kapsch and according to Kapsch's instructions. Kapsch has written agreements with its processors.

Kapsch may transfer personal data to other Kapsch Group companies. Kapsch Group has companies that reside in countries outside the EU/EEA area. The company only shares personal data with companies in third countries that have an adequate level of protection or where there are special guarantees that the data and your rights are protected, for example through a special agreement or binding internal company rules.

Storage duration

Kapsch retains personal data for as long as the recruitment process is ongoing. Personal data for candidates who are not hired might be kept for future recruitment needs. Such data will be saved for up to [one] year after the recruitment process has ended. If consent is revoked the data will be deleted .

2.3 Development and improvement of the Company's products**Purpose and scope**

Kapsch processes images of license plates when evaluating Kapsch's products and deliveries.

Legal basis

The processing is based on Kapsch's legitimate interest of being able to develop and improve its products and systems, as well as for statistical purposes and quality management. Kapsch considers that its interest to process the data for this purpose outweighs the data subject's interest of not having his/her data processed.

You have a right to object to processing based on the controller's legitimate interest. Kapsch considers its interest for the processing described above to outweigh the data subjects' interest of protecting their personal integrity.

Data recipients

Kapsch may share the personal data with Kapsch's IT-service providers and other Kapsch Group companies.

Kapsch might be required to share information about a vehicle passing the test station in connection with criminal investigations or crime prevention. Personal information will only be shared with the police or other authorities if Kapsch is obliged to do so according to law, court order or a decision by a competent authority.

Storage duration

Kapsch will anonymise or delete the personal data used for this purpose as soon as possible and only keep aggregated data for statistical purposes. The personal data is normally not stored longer than six months from collection.

Data subject's rights

In accordance with applicable privacy laws, the data subject is entitled to request a registry extract with information about what personal data Kapsch processes regarding the data subject. In order to avoid unauthorized access to personal data, the request under this paragraph must be made in writing and be signed by the individual personally. Kapsch also has the right to demand that a registered person who want to exercise these rights can prove their identity.

At any time, the data subject is also entitled to request that Kapsch provide, correct, block or delete the data subject's personal data. In case Kapsch is required by law to continue with the processing of the personal data, the information can only be blocked for other use.

You also have the right to object to processing based on the controller's legitimate interest.

Information security and measures

Kapsch takes the necessary technical and organizational actions to ensure that processing is conducted in accordance with applicable law and this policy. Kapsch is certified according to ISO 27001.

Responsibility for personal data

Kapsch is responsible for processing and data controller. For any questions, comments or complaints regarding Kapsch's processing of personal data please contact us by email at: ktc.se.info@kapsch.net, or by mail at: Box 1063, 551 10 Jönköping, Sweden.

Data Protection officer

Kapsch has a Data Protection Officer (DPO) to monitor Kapsch's compliance with the [GDPR] and that we are processing personal data correctly. If you want to contact our DPO you can send an email to dataprotectionofficer-se@kapsch.net.

Supervisory Authority - Data Protection Authority

If you are not satisfied with Kapsch's processing of your data, you may submit a complaint to the supervisory authority, the Data Protection Authority.

On their website, www.datainspektionen.se, you can find further information on how to proceed.

3 *History*

Version	Date	Modification
A	2018-06-14	First release after review by CPO Kapsch AG
B	2018-07-05	Clarification of deletion of personal data
C	2018-11-13	Adaptation to Kapsch Web template. Approved by Kapsch CPO
D	2019-02-11	Chapter 2 Added text about photos from social events
E	2019-03-15	Chapter 2.3 Added that Kapsch is ISO 27001 certified
F	2020-07-09	Chapter 2.3 Added data recipient