

## PRIVACY NOTICE - SKANSKA CODE OF CONDUCT HOTLINE

### 1. INTRODUCTION

This privacy notice contains information about the handling of personal data pertaining to (i) the *reporter* and (ii) the individual who is the *subject* of the report (i.e. the person in breach).

### 2. DATA CONTROLLER

Skanska AB (publ) on behalf of the Skanska Group is the main data controller for the processing of your personal data.

### 3. WHAT PERSONAL DATA IS COLLECTED AND FOR WHAT PURPOSE

3.1 *Personal data pertaining to the reporter:* Your call-in details, recorded voice message, name or IP-address, will never be disclosed to Skanska unless you voluntarily submit such information in the report.

3.2 *Personal data pertaining to the person who is the subject of a report:* When a report is submitted, the report will in general contain the name, position/working relations and information about the suspected breach.

3.3 All information will be processed only to the extent necessary in order to investigate the suspected breach. The information will be processed with highest care and integrity. Only a restricted number of individuals that are responsible for the internal investigation of the report will have access to the personal data and the information in the report.

3.4 Please note that any information, including personal data, in the report may be transferred to the local Skanska operating unit (joint controller) where the alleged breach has been observed in order to be further investigated by the local Ethics Committee and that this may lead to **additional information being added to the matter being investigated**. Such information may include personal data pertaining to both the reporter and the person subject to the report.

### 4. LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA

The personal data is processed on the basis of a so called balancing of interests where Skanska's interest to identify serious ethical breaches or other unacceptable activities is deemed legitimate with regards to the potential risk that such breaches or unlawful activities may lead to severe reputational, financial or legal consequences for Skanska.

### 5. WHEN WILL YOUR PERSONAL DATA BE ERASED?

5.1 Skanska will erase the personal data within seven (7) years from completion of the investigation of the reported matter.

5.2 If it is clear, after an initial assessment of the Skanska Hotline report, that the matter has no merit or is not within the scope of ethical breach, the report will be deleted immediately.

### 6. RESTRICTIONS ON DISCLOSURE OF PERSONAL DATA

6.1 Skanska may engage other third parties to process personal data in order to further investigate the reported activities as mentioned in section 3.1. The performance of these

services may mean that Skanska's partners, both within and outside the EU/EEA, gain access to your personal data.

- 6.2 Should we transfer your data to external companies outside the EU/EEA, appropriate security measures have been taken, such as including the EU Commission's standard contractual clauses for data transfers (which are available at the EU Commission's website) in the agreements with the parties accessing personal data
- 6.3 Skanska may also disclose your personal data to the law enforcement, the applicable Tax Agency or other public authorities, if it concerns criminal investigations or if Skanska is required to disclose such data by law or administrative decisions.

## **7. CONTACT DETAILS AND YOUR RIGHTS IN CONNECTION TO THE PROCESSING**

For contact details and information about your rights according to the applicable data protection legislation, please go to [Skanska Group Data Processing Information](#)