

**PRIVACY NOTICE - SKANSKA CODE OF CONDUCT HOTLINE****1. INTRODUCTION**

- 1.1 The Skanska Code of Conduct Hotline is a system provided by Skanska Ab (publ) ("Skanska") to its employees, suppliers, customers and business partners who wish to report suspected violations of laws or regulations, or company policies related to e.g., financial, accounting, health & safety, fraud, and bribery matters ("reporter(s)").
- 1.2 The Privacy Notice for the Code of Conduct Hotline is applicable to Skanska and all its 100% owned subsidiaries as well as all its majority owned companies within the scope of applicability of GDPR. It is also applicable to external reporters.
- 1.3 This privacy notice contains information about the processing 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 AND DATA PROCESSOR**

- 2.1 Skanska on behalf of the Skanska Group is the main data controller for the processing of your personal data. You may always contact Skanska with any questions relating to this Privacy Notice or Skanska's processing of your personal data at the following address:

Skanska AB  
Att: Data Protection Manager  
Address: Warfvinges väg 25, 112 47 Stockholm  
Email: [dpm\\_absfs@skanska.se](mailto:dpm_absfs@skanska.se)  
Reg. no: 556000-4615

- 2.2 The Code of Conduct Hotline is operated by Skanska's third-party supplier People Intouch B.V. registered in the Netherlands. People Intouch is responsible for processing all messages received via the Code of Conduct Hotline and for transferring them to Skanska in accordance with Skanska's instructions. This means that People Intouch is, for these purposes, Skanska's data processor of personal data. The collected data processed by People InTouch is stored on servers in Amsterdam, the Netherlands and a backup is also stored in the Netherlands.

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

- 3.1 When a reporter calls the Code of Conduct Hotline via phone, People Intouch transcribes the message left and then erases the voice recording. Skanska is not able to hear the individual's voice and People Intouch will not attempt to trace the individual's caller ID. Similarly, if a message is sent via the Code of Conduct Hotline website, email addresses are not captured, and no attempt is made to identify a reporter. This means that unless the reporter chooses to identify him/herself, there is no way for anyone at Skanska to determine this individual's identity. This also means that Skanska will only process the personal data that the reporter voluntarily discloses about him/herself to Skanska.
- 3.2 When a report is submitted, the personal data processed will usually include personal data relating to the person who is the subject of the report such as the name and position/working relations, along with any additional data provided by the reporter or data that comes to light during the investigation.

- 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 and all materials and supporting documentation related to the report will be kept in a secure space with restricted access. 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 For the purpose of processing your report and conducting investigations, the personal data and other information in your report will be accessed by Skanska HQ Ethics & Compliance Office for evaluation. The information, including personal data, in the report are normally transferred to the local Skanska operating unit (and in that case as a joint controller) where the alleged breach has been observed in order to be further investigated by the local Ethics Committee and/or HR manager(s) 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. The information may also be disclosed to Skanska's internal investigators in the Internal Audit departments, or external specialists such as attorneys and forensic experts.

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

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

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

- 5.1 Skanska will erase the personal data within two (2) 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 3.4. 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. YOUR RIGHTS IN CONNECTION TO THE PROCESSING**

- 7.1 You have the right to request a copy of the personal data that we store about you. If you would like a copy of some or all your personal data, please send us an email or write to us at the contact details provided below. Please note that right of access

may be restricted in order to ensure the protection of the rights and freedoms of others involved in the report/investigation. In addition, personal data that is under investigation in a whistleblowing case may be exempt from the right of access because of its nature or because of the negative effect its disclosure is likely to have to the investigation.

- 7.2 You also have the right to ask us to correct or remove personal data you think is inaccurate. You may also have the right to have your personal data deleted and to have our processing of your personal data restricted in certain circumstances. However, the right to restriction only applies in certain circumstances. In addition, you may have the right to object to our processing of your personal data. Please note that we might not be able to fulfil your objection request in case we have a legal obligation or compelling grounds for the processing.

## **8. INFORMATION TO PERSONS SUBJECT OF A HOTLINE REPORT**

- 8.1 If a person is the subject of a report and an in-depth investigation is initiated, this person will be notified accordingly. This notification will occur as soon as there is no substantial risk of destruction of evidence and/or impediment of the investigation. The person in question will have the opportunity to present their views relating to the report. The person may also have a legal right to access information in the report. However, the right of access does not provide access to your identity or to documents as such, but to the personal data of this particular subject of the report that is included in the documents. See also statements above regarding restriction of access, which is assessed case by case. Your identity as a reporter (in case you have chosen not to be anonymous) can only be revealed in rare instances, e.g., if Skanska is required by law to provide courts or government agencies with information relating to the report.

## **9. QUESTIONS AND COMPLAINTS**

- 9.1 If you have any questions or concerns about the processing of your personal data, or would like to exercise your rights, you are welcome to contact Skanska's data protection manager at [dpm\\_absfs@skanska.se](mailto:dpm_absfs@skanska.se).
- 9.2 If you are of the opinion that we are processing your personal data in violation of data protection laws and regulations you have the right to lodge a complaint with your supervisory authority, see link for contact details: [National Supervisory Authorities](#)