

**Date of entry into force:** 2018-05-25

**Effective as of:** 2022-10-20

## 1. INTRODUCTION AND OBJECTIVES

This policy describes how Bonrec AB (“Bonrec” or “we”), as responsible for personal data, manage personal data related to customers (potential and existing), suppliers and candidates. Bonrec has the following organization numbers and contact details:

**Organization number:** 559001-4667

**Address:** Sandhamnsgatan 39, 115 28 Stockholm

**Telephone:** +46 73-552 92 49

**Website:** <https://www.bonrec.se/>

For any further questions or comments regarding this policy or management of personal data, please contact Bonrec at [info@bonrec.se](mailto:info@bonrec.se)

Bonrec strives to safeguard the individual’s integrity in all our contacts, customers as well as current networks and potential candidates, as to how Bonrec employees manage, store and protect personal information. We work in accordance with the general data protection regulation (“GDPR”), with supplementary national legislation, which came into force on May 25, 2018.

Bonrec has, prior to the introduction of GDPR, been working with high integrity in mind according to the Swedish Personal Data Act (“PUL” 1998: 204)

This policy explains how and why Bonrec collects and manages personal information about their potential and existing customers, suppliers, candidates, and employees (continue to refer to people whose personal information is treated under this policy as “you”). It also describes your rights to Bonrec and how you can enforce your rights.

### **What is covered by the term “personal data”?**

Personal information is any kind of information that can be linked directly or indirectly to a natural person who is in life. Examples of this are name, contact information, social security number, photo, mobile number or email address. In addition to the previous example, information that can identify you as a professional is also personal information. Thus, for example, your professional experiences, titles, companies where you are / have been working, board assignments, membership of professional organizations, education, grades from education and jobs, as well as language and other skills (briefly summarizing your CV) also include personal data.

## **2. TREATMENT OF PERSONAL DATA**

### **2.1 General**

This policy applies to all personal data processed by Bonrec and attributable to Bonrec's potential and existing customers / clients, suppliers (or their contact persons) or candidates. In all these relationships, Bonrec will collect, record, store, organize, process, compile, use, present, delete or otherwise process personal (including professional) information. As a reader of this policy, you only need to read the section of this section (2) that refers to the category you belong to.

### **2.2 Customers**

#### ***Potential customers***

Bonrec collects (from public sources, by sharing / registering information on the website, information from the website or through recommendations from people in our network) and stores personal information about you, as contact person or key person for your company or other type of organization. We collect personal information about you in the form of your name, your title / position within the company / organization, as well as your contact information, and register this information in our internal systems. We collect this information to inform you about, offer and market Bonrec and our services. Our reason for this processing of personal data is that after weighing up an interest we have concluded that the treatment appears to be justified for Bonrec to be able to market his services.

#### ***Customers***

If you choose to employ Bonrec for the performance of any of the services offered by Bonrec, we will treat your name, title / position within the company / organization, your contact details and any additional personal information (which we collect in connection with the conclusion of agreement), to the extent that we need to be able to complete the service agreement. This treatment is based on the fact that, after a balance of interests, we have found that it is justified for Bonrec to be able to fulfill its obligations in the delivery of requested services and to exercise its rights under the agreement.

#### ***Potential and current customers***

Your personal data will be dealt with internally within Bonrec, which entails processing within Policy and law. Furthermore, your personal data will be processed by our IT suppliers / personal data assistants who provide our databases and IT services. With these, we will enter into personal data assistance agreements and they will be bound to process the personal data according to GDPR.

Our processing of your personal data will cease if you have objected to our processing and we have not identified any support to continue it or when our purpose of processing your personal information ceases.

## **2.3 Suppliers**

Bonrec acquires and stores personal information about you, as a contact person for your company or other type of organization. Bonrec collects and stores the personal data because we need them for the implementation of the agreement with the company or organization you belong to. The treatment is based on the fact that Bonrec, after weighing up an interest, has concluded that it is entitled to Bonrec be able to live up to its obligations and use its rights under the supplier agreement.

Our processing of your personal data will cease when our purpose of processing ceases.

## **2.4 Candidates & Networks**

### ***Who are candidates?***

Candidates are persons whose personal data are processed by Bonrec because the candidate can be interesting for ongoing recruitments and future recruitments that Bonrec manages on behalf of their clients. With recruitment, the following are covered: executive search, candidate network, tip recruitment and interim recruitment.

### ***Collection of your personal data***

Your personal information may come from you directly (by submitting or registering your CV via the link on our website, the application for interest for a role via the website or directly to an employee at Bonrec or otherwise contacting us) or through us otherwise collect personal information about you (via people in our network or via publicly available channels such as social media or corporate and other websites).

When we collect personal data from sources other than directly from you, we will only collect and record such personal information that is relevant to the assessment of your suitability for a current service and potential future services. Which data is relevant is assessed on a case-by-case basis based on the customer's requirements and preferences. Personal data classified as sensitive will only be processed after obtaining a special consent from you regarding such treatment.

### ***Reason for our processing of your information***

In cases where our processing of your personal data begins by submitting your personal information to us all of our processing will be based on a consent from your side. Please note that we do not require that more sensitive information be shared which is not relevant to the services offered by Bonrec and we therefore encourage you not to share more information with us than necessary. In the other cases (when our processing of your personal data starts before we have been in contact with you, by collecting and registering personal information about you from another source than from you personally) our initial treatment takes place based on a balance of interests. In connection with this balancing of interests, we have considered that we have a legitimate interest in processing the personal data to be able to carry out our recruitment assignment in a good way and be able to present several good candidates. The personal data collected from other sources before we have been in contact with you will be limited and only aim to create an overview of your suitability for the service in question and these can be deleted at any time at your request.

### ***The scope of our processing and access to your information***

The longer your name remains in a recruitment process, the more we will refine and deepen our knowledge of you and ensure your qualifications for the current service and future services as part of our long-term career network. We do this by, for example: interviews over the phone and in person (both with you and any reference persons) which are then summarized by us; as well as mapping your education, qualifications and personal qualities in relation to the client's set requirements profile, as well as your personal thoughts of what you find is interesting and what future challenges in your career you are looking for. Then we will obtain in-depth references about your achievements and your way of working, which are also summarized by us. Information from interviews, references, and tests is saved only in accordance with the time it is relevant for the specific recruitments that they applied, with general information shared on long-term careers being saved longer. Please note that information about contact with us, participation and interest in roles is saved in order to provide the best possible relevant future contact with us as a career partner.

In addition to your personal data being processed by Bonrec employees who need access to them in order to fulfill our mission / purpose towards the customer and against you as a candidate and that your personal information is sent to our customers (as described above), your personal data will only be processed of our IT suppliers / personal data assistants who provide our databases unless you have given us special consent to other processing of your personal data. We will enter into personal data support agreements with our IT suppliers and they will be bound by processing the personal data according to GDPR.

### ***Continued processing of your data***

Provided you have given your consent, we will retain your personal information in our internal systems even after the recruitment process as a career partner and network. This is to be able to evaluate and contact you as a candidate for future recruitment assignments that fit your profile. However, we will delete such personal data that we deem specific to the previous customer and which we therefore have no reason to

keep, as mentioned above. Your personal data will remain until you withdraw your consent or our purpose with our processing otherwise it will cease. In addition to this, personal data that we assess have become out of date, and therefore will not be relevant in future recruitment processes, to be removed afterwards.

If you do not have an interest to keep in touch with us in your career, you need to inform that consent ceases after the contact. Your personal data will be deleted as soon as you cease to be a candidate (either by being awarded the relevant service, or by us and the customer moving on with other candidates) and there is no other reason for us to keep your personal information (e.g. to protect us from claims).

### **3. PROCESSING BASED ON CONCENT**

Regarding the processing of your personal data based on consent, you may at any time notify us that your consent, in whole or in part, ceases, by using the following e-mail address: [info@bonrec.se](mailto:info@bonrec.se). As soon as you announce that your consent is terminated and can certify in a reliable and secure manner your person, we will delete all your personal information that the revocation refers to.

### **4. INFORMATION SECURITY**

Bonrec takes appropriate technical and organizational measures to protect personal data against accidental or illegal destruction or accidental loss, alteration, unauthorized disclosure or access, especially if the processing involves the transmission of data on a network, and against any other illegal form of processing. The security measures taken to protect personal data will be proportionate to the risk of injury, given the type of protected data. We have high security on our work tools and systems and have an established IT policy for all employees to follow to ensure safe treatment and correct measures in case of any errors (such as loss of work tools).

### **5. YOUR RIGHTS**

#### **5.1 The right to access your personal data**

By certifying in a reliable and safe manner your person, you can request a copy of your information and check that the information is correct.

#### **5.2 Right to correction**

You have the right to correct an incorrect statement about you or supplement a task that is not complete.

### **5.3 The right to be deleted / forgotten**

You have the right to request deletion of your personal data if these are no longer necessary for our purpose behind the processing and we have no obligation to keep the data to any extent.

### **5.4 Right to limitation of processing**

You have the right to request that the processing of your personal data be limited if; (i) you consider that a personal data is incorrect and we need a certain amount of time to check this (the limitation will then take place while the check is being carried out); (ii) the processing has no legal basis or is no longer necessary for our purpose but you do not want your personal data to be deleted; (iii) you have objected to the treatment and we need some time to make such a check as referred to in the next paragraph (if so, the limitation will take place during the check).

### **5.5 Right to object**

You have the right to object to the processing of personal data that is based solely on a “balancing of interests”. In such objections, please state why the objection is being made and we will, after the objection, make a check if your reasons behind the objection outweigh the legitimate interest we support in our treatment. In cases where we have stated that your personal data is processed for direct marketing, you have the right to object to the treatment at any time and we shall then cease our treatment for this purpose.

### **5.6 Right to data portability**

Personal data that you have given us for processing under a consent from you or for us to be able to fulfill contractual obligations against you, you are entitled to receive for you to be able to transfer them to another person responsible for personal data. Alternatively, if it is technically possible, you have the right to request that we transmit them directly to such other data controller.

### **5.7 Right to lodge complaints with the supervisory authority (Data Inspectorate / future Integrity Protection Authority)**

If you consider that our processing of your personal data is in violation of applicable law, we ask that you first contact us using one of the addresses listed above, but you also have the right to file a complaint with the supervisory authority, that is, Data Inspectorate / future Integrity Protection Authority.

Bonrec Privacy Policy will be continuously updated. When this happens, it will be updated and dated on our website.

If you have any questions regarding this policy and about your details, please contact us as above.

