

Privacy policy for the processing of employees' personal data

We at Balder care about your privacy and are continuously working to improve the protection of your personal data. In this policy, we describe how we process your personal data when you are or have been employed by us.

The policy is divided into two documents. In this document, we describe our overall processing of your personal data and in [Appendix 1](#), you will find detailed information about how we process your personal data during and after your employment with us. For full information, this document must be read together with the detailed information in Appendix 1.

If you have any questions about our processing of your personal data or if you want to exercise your rights as described under the heading "Your rights in relation to our personal data processing", you are welcome to contact us at dataskydd@balder.se.

Data controller

The company in which you are employed is the data controller for the processing of your personal data the company does as your employer during and after your employment.

Personal data we process

The personal data we process within the context of your employment are those that you have provided to us in connection with your hiring and data that we collect throughout your employment. We will continue to process some personal data that you have provided to us during the recruitment process even after you have been hired by us.

We also process other, more technical, data about you such as what IT permissions you have, use or create when you use IT systems provided by us. In addition to this, we process personal data about you in unstructured material, which is such documentation or data that you or someone else at Balder has created and that you are mentioned in. It may also be email correspondence or other documentation where your personal data is found.

When necessary, we will process sensitive personal data such as data about your health and any trade union membership.

As our employee, you are obligated to provide certain personal data. This may be such personal data that is necessary for us to identify you, fulfil our obligations under your employment contract, or to contact you, such as your name and contact details. If we are not allowed to process such personal data, we will not be able to fulfil our obligations under your employment contract or comply with our legal obligations.

Appendix 1 contains detailed information of the personal data we process.

On what legal basis do we process your personal data?

We process your personal data because it is necessary as a result of your employment with us. Our processing is, among other things, necessary for you to be able to perform your duties and for us to be able to fulfil our obligations under your employment contract. We base our processing of your personal data on various legal grounds, namely:

- To fulfil our obligations under the **employment contract**;
- To fulfil the **legal obligations** we have as employer and a company;
- After we have made a **balancing of interests**, meaning we review the interests for and against our processing and we process your personal data when the processing is necessary for purposes relating to our legitimate interests; and
- In exceptional cases, we process your personal data after we have obtained your **consent** for the processing. If so, you will receive clear information about the purpose of the processing before deciding whether you want to consent or not.

We only process your personal identity number when it is clearly justified considering the purpose of the processing, when it is important for us to be able to make a secure identification, or otherwise when necessary for us to comply with requirements under special legislation.

Appendix 1 has detailed information about the situations in which we process your personal data.

If you would like to know more about how we have made our balancing of interests or object to our processing, you are welcome to contact us at the contact details provided above.

Who has access to your personal data?

We share your personal information with companies within our group and with our partners and suppliers in the manner described below.

- Your personal data will be shared with companies that we cooperate with and which in some cases have an independent responsibility as data controllers for the personal data they receive from us, such as insurance companies, banks, and audit firms.
- We share your personal data with companies that process personal data on our behalf, so-called data processors, such as companies that process salary, other compensation and employee benefits.
- To have a functioning IT system and to conduct our business efficiently, we share your personal data with our IT suppliers, who process your personal data on our behalf and according to our instructions.

If you would like more information about how we share your personal data, you are welcome to contact us at the contact details provided above.

Processing of your personal data outside the EU/EEA

The IT suppliers we use may transfer personal data outside the EU/EEA. This is done if the transfer is supported by the EU General Data Protection Regulation (GDPR). This means that the transfer can be based on, for example, European Commission decisions or standard contractual clauses with additional security measures.

If you would like more information about how your personal data is processed outside the EU/EEA, you are welcome to contact us at the contact details provided at the beginning of this Privacy Policy.

How long do we save your personal data?

While you are employed by us, we delete your personal data on an ongoing basis and based on different criteria or according to time limits set out in various legal requirements. This means that we save your personal data for different lengths of time depending on the purpose of the processing. When you terminate your employment with us, we continue to process some of your personal data. We do this, among other things, because in several situations we have an obligation or a need to continue processing your personal data.

For detailed information on how long we save your personal data during and after your employment, see Appendix 1.

Your rights in relation to our personal data processing

You have certain rights in relation to our processing of your personal data. To exercise your rights, you are welcome to contact us at the contact details provided above.

Right of access

You have the right to receive confirmation of whether we process your personal data and the right to access information about how the personal data is processed, such as the purposes of the processing and what categories of personal data the processing applies to. You also have the right to a copy of the personal data we process about you.

Right to rectification and right to object to processing

You have the right to have inaccurate personal data corrected without undue delay (for example, if you have changed telephone number) and the right to have incomplete personal data supplemented.

You can object to personal data processing based on a balancing of interests at any time. If we can demonstrate that our legitimate interests in the processing outweigh your interests and fundamental rights and freedoms or if our processing is for the determination, exercise, or defence of legal claims, we may continue our processing despite your objection.

Right to erasure (right to be forgotten)

You have the right to request erasure of your personal data if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing and there are no legitimate grounds for continuing our processing;
- the personal data have been unlawfully processed; or
- the personal data must be erased for compliance with a legal obligation to which we are subject.

Right to restriction of processing

You have the right to request that the processing of your personal data be restricted if:

- you dispute the accuracy of the personal data (however, the limitation only applies during the period we verify the accuracy of the personal data);
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- you need the personal data for the establishment, exercise, or defence of legal claims even though we no longer need the personal data for the stated purpose of the processing; or
- if you have objected to the processing and we have not verified whether our legitimate interest in processing your personal data overrides your legitimate interest in restricting the processing of your personal data.

Right to withdraw consent

If you have given your consent to a particular processing of your personal data, you can withdraw all or part of your consent at any time.

Right to data portability

You have the right, under certain conditions, to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format and the right to transmit these to another data controller (data portability).

Right to complain

You have the right to complain about our processing of your personal data to a competent supervisory authority. The competent supervisory authority in Sweden is the Swedish Authority for Privacy Protection (IMY).

The Privacy Policy was adopted by Balder on 29 October 2021.

Appendix 1: Detailed information about the processing of your personal data

In this appendix, we provide you with additional and more specific information about our processing of your personal data, including information about the purposes of the processing, the legal basis, and how long we store your data.

The policy is divided into two documents. The information in this appendix is only a supplement to the employee information document and must be read in conjunction with that document for complete information.

The tables below describe a retention period for each specific purpose. In some cases, we need to process your personal data for several purposes with different retention periods. In practice, this means that we can stop processing personal data for a certain purpose but continue to process them for another. For example, we cannot delete information that constitutes supporting documents, but continue to process and store the data for accounting purposes for about seven years.

Some of the personal data processing we describe in the tables below does not affect all our employees but only applies under certain conditions. For example, if you work in Balder's work clothes, we process information about who collected such clothes. If you have not collected such work clothes, you can simply ignore that information.

If you have any questions about our processing of your personal data, you are welcome to contact us at dataskydd@balder.se.

Data controller

The company in which you are employed is the data controller for the processing of your personal data the company does as your employer during and after your employment.

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Processing that generally applies to all employees

To administer the employment relationship and enable the performance of your job duties

Administer the employment contract and the employment relationship	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Personal data in the employment contract and any confidentiality undertakings (name, contact details, personal identity number, period of employment, form of employment, salary information, holiday allowance, benefits, and other conditions) • Information we received from you during the recruitment process (such as application documents in the form of CV, personal letter and certifications, interview notes, and information from your references) 	<p>The employment contract</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Enable you to perform your tasks and use our IT solutions	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Contact details • Title and role • Your photograph • Employment number • IP address • User information, user profile, network ID, permissions and the like 	<p>The employment contract</p>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

ID06 card	
Personal data being processed	Lawful basis

<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Your photograph • Profit centre 	<p>The employment contract</p> <p>Fulfil a legal obligation</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During the period you have an ID06 card</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Insurance	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Contact details • Period of employment • Form of employment • Information about salary and insurance fee 	<p>The employment contract</p> <p>Fulfil a legal obligation</p>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: Until January the year after your employment ended</p>	

Provide work clothes	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Type of work clothes and size 	<p>The employment contract</p>
<p>Retention period during employment: During the time we provide you with work clothes</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Your education and your skills	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Contact details 	<p>Legal obligation in accordance with work environment legislation to verify, in certain cases, that employees have the right skills for the job</p>

<ul style="list-style-type: none"> • Personal identity number • Information about your skills in the form of training you have registered for and training in which you have participated 	<p>Balancing of interests</p> <p><i>Our legitimate interest in following up and conducting our business activities and in demonstrating to our clients/customers that we can offer the right competence for certain jobs</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Throughout your employmentⁱ</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employmentⁱ</p>	

Salary and other payments

Hours worked and absence	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Hours worked • Absence and type of absence 	<p>The employment contract</p>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: Up to and including the calendar year following the calendar year to which the hours worked and the absence refer</p>	

Salary and other remuneration	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Address • Personal identity number • Bank account information • Information on salary and other remuneration • Payslips • Salary payments • Time sheets • Sickness absence • Sick pay • Holiday • Holiday pay 	<p>The employment contract</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

<ul style="list-style-type: none"> • Holiday allowance • Parental leave • Pension provisions • Tax rates and social security contributions 	
<p>Retention period during employment: Up to and including the calendar year that follows the calendar year to which the compensation refers</p> <p>Retention period after termination of employment: The data is processed for the full and final settlement of salary. After that, we do not store your personal data for this purpose after you have terminated your employment.</p>	

Attachment of earnings and reporting of garnishment and attachment to the Enforcement Authority	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Salary information • Garnishment and attachment 	<p>Fulfil legal obligations in accordance with provisions of the Enforcement Code</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: The data is processed for the duration of the matter</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Protect our legal interests (before and in connection with any dispute about salary payments and sick pay)	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Salary information • Sickness absence • Sick pay • Holiday pay • Holiday allowance • Parental leave • Attachment of earnings 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

Retention period during employment: Ten years after the origin of the claim, for example the day of the last salary payment[†]

Retention period after termination of employment: Ten years after the origin of the claim, for example the day of the last salary payment[†]

Health, sick leave, and rehabilitation

Occupational health services

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Contact details • Personal identity number • Information that you are seeking care and the reason for your visit 	<p>Fulfil legal obligations in work environment legislation</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During the ongoing matter. Thereafter, the personal data will be processed depending on the nature and duration of the illness</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Registration of sick leave to calculate and pay sick pay

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • Salary information • Sickness absence • Sick pay • Medical certificate 	<p>Fulfil legal obligations under the Sick Pay Act</p> <p>The employment contract</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During the current period of illness. Thereafter, the personal data will be processed depending on the nature and duration of the illness</p> <p>Retention period after termination of employment: We process your personal data to calculate, pay, and administer final sick pay, we regularly purge personal data and do not store personal data longer than up to and including the calendar year following the calendar year to which the sick pay relates.</p>	

Work adaptation and rehabilitation

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Sickness absence • Sick pay • Medical certificate, rehabilitation plan, documentation of measures taken and other documentation related to the rehabilitation 	<p>Fulfil legal obligations in accordance with applicable work environment legislation and the Swedish Work Environment Authority's regulations</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During the rehabilitation process, thereafter, personal data will be processed depending on the nature and duration of the illness</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Protect our legal interests

(before and in connection with a rehabilitation process and a potential legal dispute)

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Sickness absence • Sick pay • Medical certificate • Documentation in connection with measures taken in the rehabilitation process 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During the rehabilitation process, thereafter, personal data will be processed depending on the nature and duration of the illnessⁱ</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Holiday

Holiday pay and holiday allowance

(also applies to holiday pay based on parental leave and accumulated leave)

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name 	Fulfil legal obligations set out in the Annual Leave Act

<ul style="list-style-type: none"> • Bank account information • Period of employment • Form of employment • Information about your child's date of birth • Holiday pay • Holiday allowance • Accumulated leave • Parental leave 	<p>and the Parental Leave Act</p>
<p>Retention period during employment: Up to and including two years from the end of the leave year in which the employee would have received their holiday benefit or in which the accumulated leave was used</p> <p>Retention period after termination of employment: Up to and including two years from the end of the leave year in which the employee would have received their holiday benefit</p>	

Protect our legal interests (before and in connection with any dispute related to holiday)	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • Salary information • Sickness absence • Sick pay • Holiday pay • Holiday allowance • Accumulated leave • Parental leave 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Up to and including two years from the end of the leave year in which the employee would have received their holiday benefit or the accumulated leave was usedⁱ</p> <p>Retention period after termination of employment: Up to and including two years from the end of the leave year in which the employee would have received their holiday benefit or the accumulated leave was usedⁱ</p>	

Parental leave

Administer parental leave	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • The age of your child • Information about your salary • Holiday pay • Holiday allowance • Accumulated leave • Parental leave 	<p>Fulfil legal obligations under the Parental Leave Act</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Throughout your employment, we regularly delete personal information and do not store personal information beyond the calendar year following the calendar year to which the parental leave refers.</p> <p>Retention period after termination of employment: We process your personal data to finally calculate parental leave, we regularly delete personal data and do not store personal data beyond the calendar year following the calendar year to which the parental leave refers</p>	

Protect our legal interests before and in connection with a potential dispute over parental leave (actions due to termination and dismissal)	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • Information on salary and parental leave • Information and documentation linked to a termination or dismissal • Other information and documentation related to this 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Not relevant during employment</p> <p>Retention period after termination of employment: From two weeks up to and including one monthⁱ</p>	

Protect our legal interests before and in connection with a potential dispute over parental leave

(actions on other grounds than termination and dismissal)

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • Information on salary and parental leave • Other related information and documentation 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

Retention period during employment: From four months up to two years (for example, from the alleged harmful act or knowledge of the alleged harmful act, depending on the specific situation), in some cases longer¹

Retention period after termination of employment: From four months up to two years (for example, from the alleged harmful act or knowledge of the alleged harmful act, depending on the specific situation), in some cases longer¹

Pension

Pension provisions

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Bank account information • Hours worked • Period of employment • Form of employment • Pension provisions 	<p>Fulfil a legal obligation</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

Retention period during employment: Throughout your employment

Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment

Salary exchange

Personal data being processed	Lawful basis
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<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Salary • Pension provisions • Gross salary exchange 	<p>Balancing of interests</p> <p><i>Our legitimate interest in offering you the opportunity to exchange gross salary</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

<p style="text-align: center;">Protect our legal interests</p> <p style="text-align: center;">(before and in connection with a potential dispute about pension and pension benefits)</p>	
<p>Personal data being processed</p>	<p>Lawful basis</p>
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • Pension provisions • Other information and documentation related to this 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Ten years (calculated from the day when the claim can first be pursued)ⁱ</p> <p>Retention period after termination of employment: Ten years (calculated from the day when the claim can first be pursued)ⁱ</p>	

Benefits

<p style="text-align: center;">Gym membership card</p>	
<p>Personal data being processed</p>	<p>Lawful basis</p>
<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Gym membership card • Cost 	<p>Balancing of interests</p> <p><i>Our legitimate interest in offering you a gym membership card</i></p>

Retention period during employment: The data is processed to order a gym membership card, after which the personal data is not processed for this purpose

Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment

Car and fuel benefit

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Employment number • Personal identity number • Contact details • Bank account number • Registration number and information about the car you are using • Profit centre • Fuel card data • To what extent you bought fuel • GPS data for registration in journey log (see more in journal log tables) • Information if you have been involved in a road traffic accident and the circumstances surrounding the accident • Information about traffic-related fines 	<p>Balancing of interests</p> <p><i>Our legitimate interest in offering you a car benefit</i></p>

Retention period during employment: While you have car and fuel benefit

Retention period after termination of employment: Up to and including the calendar year following the calendar year to which the car and fuel benefit refers

Performance, evaluation and survey

Follow up on your work and your personal goals

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Your name • Your personal goals • Information from performance appraisals and information about you from your manager(s) 	<p>Balancing of interests</p> <p><i>Our legitimate interest in following up on your work and your personal goals</i></p>

Retention period during employment: Until the next performance appraisal (performance appraisals are carried out at approximately one-year intervals)

Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment

Employee surveys

Personal data being processed

- Data from the employee survey, in cases where it constitutes personal data

Lawful basis

Balancing of interests
Our legitimate interest in analysing and following up our operations and work environment

Retention period during employment: Up to and including the next employee survey (employee surveys are carried out at approximately one-year intervals)

Retention period after termination of employment: Up to and including the next employee survey (employee surveys are carried out at approximately one-year intervals)

The Rabalder app

The RaBalder app

Personal data being processed

- Name
- Gender
- Contact details
- Photograph
- Group affiliation
- Points and statistics on some of your achieved goals, sales and leasing processes and tasks performed (including information about your performance such as signed agreements)
- Other information that appears about you in the app (such as likes, comments, or other information that you or someone else writes about you)

Lawful basis

Balancing of interests
Our legitimate interest in following up and conducting our business activities, motivating our employees and, for educational purposes, keeping statistics on signed agreements

Retention period during employment: 14 months

Retention period after termination of employment: 3 months

Period of employment

Calculate employment and notice period	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Age • Period of employment • Form of employment • Notice period 	Fulfil legal obligations under the Employment Protection Act
Retention period during employment: Throughout your employment Retention period after termination of employment: Until you retire	

Calculate when a fixed-term employment form transitions to employment for an indefinite period	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Period of employment • Form of employment 	Fulfil legal obligations under the Employment Protection Act
Retention period during employment: Throughout your employment Retention period after termination of employment: At least five years (from termination of employment)	

Processing to conduct our business activities

Fulfil our accounting obligations	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Profit centre • Payslips • Information from the payroll system such as information on salary, benefits, sick pay, holiday pay, holiday allowance, parental leave, pension provisions, social security contributions, tax rates, attachment • Time sheets 	Fulfil a legal accounting obligation

<ul style="list-style-type: none"> • Information on compensation for travel expenses and other expenses • Other information needed for our accounting where your personal data appears 	
<p>Retention period during employment: Up to and including the seventh year after the end of the calendar year in which the financial year ended</p> <p>Retention period after termination of employment: Up to and including the seventh year after the end of the calendar year in which the financial year ended</p>	

Conduct our business	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Information in unstructured material, such as documents, minutes, and email messages 	Balancing of interests <i>Our legitimate interest in conducting our business activities</i>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: As long as the information is needed for us to be able to conduct our business activities</p>	

Processing to comply with work environment regulations

Systematic Work Environment Management	
Investigate, carry out, and follow up the activities to prevent accidents and ill health, follow-up of incidents, safety inspections, statistics and report workplace accidents, incidents and occupational illness, etc.	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Workplace • Position and profession • Sickness absence • Information about your health if you have suffered a workplace accident • Data in various health and safety documents such as participation in safety rounds, action plans, reports and analyses to improve the work environment, etc. • Other information and documentation necessary for our systematic work environment management 	Fulfil legal obligations under work environment legislation The processing of personal identity numbers is necessary with regard to the purpose of the processing

Retention period during employment: Throughout your employment

Retention period after termination of employment: As long as the data is necessary for systematic work environment management

Maintain and preserve various health and safety documents

Personal data being processed

- Health and safety documents (such as certificates, records of inspection, testing and examination) that contain information about you in the form of, for example, name and title

Lawful basis

Fulfil legal obligations in work environment legislation

Retention period during employment: Five years (from the day the document was issued)

Retention period after termination of employment: Five years (from the day the document was issued)

Distribute and manage health and safety responsibilities

Personal data being processed

- Documentation on the distribution of health and safety responsibilities, with information about your name and position

Lawful basis

Fulfil legal obligations under work environment legislation

Retention period during employment: During the period of liability

Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment

Eye examination and terminal glasses

Personal data being processed

- Name
- Disbursements
- Bank account information
- Information about your vision

Lawful basis

Fulfil legal obligations in accordance with the Swedish Work Environment Authority's regulations

Retention period during employment: During ongoing matter

Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment

Protect our legal interests

(before and in connection with matters, cases and disputes related to work environment and violation of the Work Environment Act)

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Workplace • Profession and position • Sickness absence • Information about your health if you have suffered a workplace accident • Data in various health and safety documents such as participation in safety rounds, action plans, reports and analyses to improve the work environment, etc. • Other information and documentation necessary for our systematic work environment management 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in matters, cases and disputes related to work environment and violation of the Work Environment Act</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

Retention period during employment: Up to and including ten years from the incident in question (for example, from the time the alleged crime was committed)ⁱ

Retention period after termination of employment: Up to and including ten years from the incident in question (for example, from the time the alleged crime was committed)ⁱ

Processing in compliance with discrimination regulations

Salary survey

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Gender • Salary • Work benefits 	<p>Fulfil legal obligations under the Discrimination Act</p>

Retention period during employment: Salary survey is carried out with a one-year periodicity and we need to save data for up to two years to carry out a salary survey

Retention period after termination of employment: Salary survey is carried out with a one-year periodicity and we need to save data for up to two years to carry out a salary survey

Protect our legal interests (before and in connection with any discrimination dispute)	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Documentation from disciplinary cases • Salary • Sickness absence • Sick pay • Holiday pay • Parental leave • Qualifications • Data from the recruitment process (such as CV, personal letter, etc.) and your qualifications 	Balancing of interests <i>Our legitimate interest in being able to present evidence in the event of a dispute</i>
<p>Retention period during employment: Two years and two months (after the alleged harmful act)ⁱ</p> <p>Retention period after termination of employment: Two years and two months (after the alleged harmful act)ⁱ</p>	

Processing in connection with business travel and expenses

Business travel	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Gender • Passport information • Card details • Profit centre • Information about your trip • Other information needed for your trip 	The employment contract

Retention period during employment: Personal data processed to calculate and handle the payment of travel expenses and other expenses is stored until the expense is handled and paid. Personal data processed to handle and administer business trips is stored for six months after the departure date. If you as an employee have created a profile with our booking provider, it will be deleted when you leave Balder or at the latest within two years of your most recent booking.

Retention period after termination of employment: Personal data processed to calculate and handle the payment of travel expenses and other expenses is stored until the expense is handled and paid. Personal data processed to handle and administer business trips is stored for six months after the departure date. If you, during your time as an employee, have created a profile with our booking provider, it will be deleted when you leave Balder or at the latest within two years of your last booking.

Calculation and payment of travel expenses and other expenses

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Name Bank account information Information about compensation for travel expenses and other expenses 	The employment contract

Retention period during employment: Until the disbursement is handled and paid

Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment

Processing regarding car pool, service vehicles, and parking

Car pool

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Name Personal identity number Contact details Date and time of use of the car Your bookings Registration number and information about the car you are using Profit centre To what extent you bought fuel Insurance information Congestion tax GPS data for registration in journey log (see more) 	<p>Balancing of interests</p> <p><i>Our legitimate interest in offering you the use of a car from our car pool</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

<p>in journal log tables)</p> <ul style="list-style-type: none"> • Information of if you have been involved in a traffic accident and the circumstances regarding the accident • Information about traffic-related fines 	
<p>Retention period during employment: During the time you use the service. Thereafter, we process the data for six months</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Service vehicle	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Registration number and information about the car you are using • Profit centre • To what extent you bought fuel • Insurance information • Congestion tax • GPS data for registration in journey log (see more in journal log tables) • Information if you have been involved in a traffic accident and the circumstances regarding the accident • Information about traffic-related fines 	<p>Balancing of interests</p> <p><i>Our legitimate interest in offering you the use of one of our service cars</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During the time you use the service. Thereafter, we process the data for six months</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Parking service	
Personal data being processed	Lawful basis

<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Registration number and information about the car you are using • Profit centre • Information about when and where you parked 	<p>Balancing of interests</p> <p><i>Our legitimate interest in offering you the use of a parking service</i></p>
<p>Retention period during employment: During the time you use the service. Thereafter, we process the data for six months</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Processing of photographs and video recordings

<p>Internal use of photographs and video recordings</p> <p>For example, to create an overview and understanding of the organisation, for educational purposes, to make organisational charts and use on the intranet, etc.</p>	
<p>Personal data being processed</p>	<p>Lawful basis</p>
<ul style="list-style-type: none"> • Name • Contact details • Title and position • Company affiliation and department • Photograph and video recording • Information from interviews or similar with you 	<p>Balancing of interests</p> <p><i>Our legitimate interest in conducting our business activities</i></p>
<p>Retention period during employment: Throughout your employment</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

<p>External use of photographs and video recordings</p> <p>For example in external communication, on the website, and in marketing</p>	
<p>Personal data being processed</p>	<p>Lawful basis</p>
<ul style="list-style-type: none"> • Name • Contact details • Title and position • Company affiliation and department 	<p>Balancing of interests</p> <p><i>Our legitimate interest in marketing ourselves and our business</i></p>

<ul style="list-style-type: none"> • Photograph and video recording • Information from interviews or similar with you 	
<p>Retention period during employment: During the marketing or as long as your data is available on the website or on the digital stairwell boards</p> <p>Retention period after termination of employment: During the marketing or as long as your data is available on the website or on the digital stairwell boards</p>	

Processing before and in connection with employment law measures

Employment law measures	
Plan, organise, supervise and follow up any employment law measures	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Trade union membership • Qualifications • Any documentation of disciplinary measures taken, such as reprimands, documents from discussions with the employee or other employee, transfer, termination or dismissal documents and other documented measures taken 	<p>The employment contract</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: During ongoing matterⁱ</p> <p>Retention period after termination of employment: We do not store your personal data for this purpose after you have terminated your employment</p>	

Protect our legal interests	
(before and in connection with any employment law matters and measures and disputes)	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Form of employment • Title • Trade union membership • Documentation from rehabilitation processes 	<p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

<ul style="list-style-type: none"> • Minutes from negotiations with trade unions • Documentation of disciplinary measures taken, such as reprimands, documents from discussions with the employee or other employees, transfer, and other documented measures taken 	
<p>Retention period during employment: Up to and including two years after the origin of the claim, for example from the alleged harmful act, knowledge of the alleged harmful act, termination of employment, depending on which law or provision is relevant¹</p> <p>Retention period after termination of employment: Up to and including two years after the origin of the claim, for example from the alleged harmful act, knowledge of the alleged harmful act, termination of employment, depending on which law or provision is relevant¹</p>	

Protect our legal interests, follow up compliance with the terms and conditions of the employment relationship and, in some cases, initiate legal proceedings	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Personal data in the employment contract and any associated confidentiality undertakings (such as name, address, personal identity number, period of employment, form of employment, title, salary information, holiday, benefits, and obligations) • Other information and documentation related to this 	<p>The employment contract</p> <p>Balancing of interests</p> <p><i>Our legitimate interest in being able to present evidence in the event of a dispute</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>
<p>Retention period during employment: Throughout your employmentⁱ</p> <p>Retention period after termination of employment: As long as necessary for us to follow up the terms and conditions of the employment contract (we will make an assessment every five years after termination of employment to evaluate whether the data is necessary)ⁱ</p>	

Communication with trade unions	
Negotiate and communicate with trade unions and otherwise fulfil our legal obligations towards trade unions	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Period of employment • Notice period • Trade union membership • Negotiation proposal and negotiation minutes (which may contain your personal data) 	<p>Fulfil legal obligations under the Employment Protection Act and the Employment (Co-Determination in the Workplace) Act</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing</p>

• Employer	
<p>Retention period during employment: As long as necessary for us to fulfil our legal obligations such as negotiating and following up with trade unions (assessment is made on a case-by-case basis based on the nature of the matter)</p> <p>Retention period after termination of employment: As long as necessary for us to fulfil our legal obligations such as negotiating and following up with trade unions (assessment is made on a case-by-case basis based on the nature of the matter)</p>	

Processing for purposes of identification, security, and surveillance

Camera surveillance	
For security reasons and for crime prevention and criminal investigation purposes	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Images and recordings from surveillance cameras 	Balancing of interests <i>Our legitimate interest in having camera surveillance for security reasons and for crime prevention and criminal investigation purposes</i>
<p>Retention period during employment: One month</p> <p>Retention period after termination of employment: One month</p>	
Entry and exit	
Give you access to our premises and facilities	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Key number • Tag number • Alarm code • Information from your Balder ID (name, title, photograph, and personal identity number) • Information from your ID06 card (such as name, personal identity number, contact details, and your photograph) • Logs with data on whether you are or have been in a certain room 	The employment contract Balancing of interests <i>Our legitimate interest in maintaining adequate security</i> The processing of personal identity numbers is necessary with regard to the purpose of the processing

Retention period during employment: Information regarding who holds each respective tag, data from your Balder ID, and data from your ID06 card is stored throughout your employment. Logs with data on whether you are or have been in a certain room are stored for 14 days.

Retention period after termination of employment: Information regarding who holds each respective tag, data from your Balder ID, and data from your ID06 card is stored for three months. Logs with data on whether you are or have been in a certain room are stored for 14 days.

Control and monitoring of the use of the Internet, email, and work equipment, such as computers, telephones, and tablets

Follow up any disloyalty and criminality and compliance with our internal guidelines

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Logs from the technological work tools you use and information on how you use them 	Balancing of interests <i>Our legitimate interest in maintaining adequate security and following up on any disloyalty and criminality, as well as compliance with internal guidelines</i>

Retention period during employment: The logging takes place continuously during your employment and history from logs is stored for two years from the event. (We only carry out these checks and access the logs when the need arises and you can read more about when and how we do this in our IT policy)ⁱ Internet browsing history is stored for three months.

Retention period after termination of employment: For two years from the incident. Internet browsing history is stored for three months.ⁱ

Journey logs

GPS in vehicles

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Name Information about how and where you have driven 	To fulfil legal obligations (including to the Swedish Tax Agency)

Retention period during employment: Up to and including the seventh year after the end of the calendar year in which the financial year ended

Retention period after termination of employment: Up to and including the seventh year after the end of the calendar year in which the financial year ended

Processing in connection with termination of employment

Termination of employment

Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Termination and dismissal documents (including 	The employment contract

information about you)	Fulfil legal obligations under the provisions of the Employment Protection Act The processing of personal identity numbers is necessary with regard to the purpose of the processing
Retention period during employment: Not relevant during employment	
Retention period after termination of employment: Two years ⁱ	

Employer's certificate	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Personal identity number • Contact details • Title • Period of employment • Form of employment • Other information needed to draw up an employer's certificate 	Fulfil legal obligations under the Unemployment Insurance Act The processing of personal identity numbers is necessary with regard to the purpose of the processing
Retention period during employment: Not relevant during employment	
Retention period after termination of employment: Two years	

Order of precedence and preferential right to re-employment	
Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • Name • Age • Period of employment • Form of employment • Title • Information about your education and your qualifications 	Fulfil legal obligations under the Employment Protection Act
Retention period during employment: During the time it is relevant to establish priority lists	
Retention period after termination of employment: Nine months (counted from termination of employment) ⁱ	

Settlement of any debt when you terminate your employment

Personal data being processed	Lawful basis
<ul style="list-style-type: none">• Name• Contact details• Information about your salary and debt	The employment contract
<p>Retention period during employment: Not relevant during employment</p> <p>Retention period after termination of employment: Until the debt is settled</p>	

The Privacy Policy was adopted by Balder on 29 October 2021.

ⁱ In the event of a legal dispute with you, we will process your personal data in connection with the dispute for a longer period of time than we have stated in the table, but not after the dispute has been finally settled.