

**Scandinavian Enviro Systems AB (publ)**  
**GDPR GROUP POLICY**

**Contents**

<b>Introduction</b> .....	1
<b>Compliance</b> .....	1
<b>Responsibility</b> .....	2
<b>Data Protection Principles</b> .....	2
<b>Incident Response</b> .....	4

## Introduction

Scandinavian Enviro Systems AB (publ) (“**Enviro**” or “**The Company**”) is committed to a policy of protecting the rights and privacy of individuals, in accordance with the General Data Protection Regulation (GDPR). GDPR contains provisions that the organisation will need to be aware of as data controllers, including provisions intended to enhance the protection of personal data.

GDPR requires that:

Enviro needs to process certain information about its staff, customer, suppliers, and other individuals with whom it has a relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff.
2. The day to day purchasing and sales of goods
3. The making or receiving of payments as part of day to day business
4. To contact you about a submission or request for information you have made.
5. In relation to any correspondence we receive from you or any comment or complaint you make about our products or services.
6. Complying with legal obligations and government including local government.

To comply with various legal obligations, including the obligations imposed on it by GDPR Enviro must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

## Compliance

All members of staff are responsible for ensuring that any personal information which they hold is kept securely and not disclosed to any unauthorised third parties. Enviro will ensure that all personal information is accessible only to those who have a valid reason for using it. Enviro will have in place appropriate security measures to protect information physically and electronically.

As a matter of best practice, other business partners and individuals working with Enviro and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies sign a contract which among other things will include an agreement to abide by this policy.

Consent as a basis for processing information although not always necessary is the best way to ensure that information is collected and processed in an open and transparent manner. Consent is especially important when Enviro is processing any sensitive information, as defined by the legislation. Enviro understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement.

Enviro also confirms consent cannot be inferred from the non-response to a communication.



This policy will be updated as necessary to reflect best practice in information management, security, and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

This policy applies to all staff of Enviro and its subsidiaries. Any breach of this policy or of the Regulation itself will be considered an offence and the company's disciplinary procedures may be invoked.

## **Responsibility**

Responsibilities under GDPR Enviro will be the 'data controller' under the terms of the legislation. This means it is ultimately responsible for controlling the use and processing of personal data. The company appoints a Data Protection Officer (DPO) to address any concerns regarding the data held by the company and how it is processed, held, and used.

The Management Team is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the company.

The Management Team is also responsible for ensuring that the Companies policy is kept up to date. Details of the Enviro's policy can also be found on their website

Compliance with the legislation is the personal responsibility of all staff at Enviro who process personal information.

Individuals who provide personal data to Enviro are responsible for ensuring that the information is accurate and up-to-date.

## **Data Protection Principles**

To comply with its obligations, Enviro undertakes to adhere to the eight principles:

- 1. Process personal data fairly and lawfully (the right to be informed)**

Enviro will make all reasonable efforts to ensure that individuals who are the focus of personal Identifying information (PII) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

The Company will ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed. Enviro will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained.

The Company will process the data for the specific and lawful purpose for which it was collected and not further process the data in a manner incompatible with this purpose. The Company will ensure that the reason for which it collected the data originally is the only reason for which it processes that data, unless the individual consents to any additional processing before it takes place.

Enviro undertakes not to disclose personal data to unauthorized third parties. Legitimate disclosures may occur in the following instances:

- Where the individual has given their consent to the disclosure
- The disclosure is required for the performance of a contract
- The disclosure is required by law

There are other instances when the legislation permits disclosure without the consent of the individual.

CCTV. There are some CCTV systems operating within Enviro for the purpose of protecting staff and property. Enviro will only process personal data obtained by the CCTV system in a manner which ensures compliance with the legislation.

## **2. Subject Access Rights (SARs) (the right of access)**

Individuals have a right to access any personal data relating to them which is held by Enviro. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

Any individual wishing to exercise this right should apply in writing to the Data Protection Officer.

Any member of staff receiving a SAR should forward this to the Data Protection Officer.

To ensure security we require you to prove your identity with two pieces of approved identification before any SARs request can be released.

## **3. Keep personal data accurate (the right to rectification)**

It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify the Company if a change in circumstances mean that the data needs to be updated.

It is the responsibility of the Company to ensure that any notification regarding the change is noted and acted on.

**4. Only keep personal data for as long as is necessary (the right to erasure)**

Enviro undertakes not to retain personal data for longer than is necessary to ensure compliance with GDPR legislation, and other statutory requirements.

This means Enviro will undertake a periodic review of the information held and implement a purge process as required.

Enviro will dispose of any personal data in a way that protects the rights and privacy of the individual concerned.

**5. Restrict the process of personal information**

Individuals have the right to prevent processing of information while that information is subject to corrective action

At any time, a person can request to know what information is stored and request action to rectify, block, erase or destroy inaccurate information while that process is underway

**6. Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.**

Enviro will not transfer data to such territories without the explicit consent of the individual. This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the EEA - so Enviro will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If Enviro collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

**7. The right to object allows an individual to prevent processing**

for purposes of:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- direct marketing (including profiling).
- processing for purposes of scientific/historical research and statistics.

**8. Rights in relation to automated decision making and profiling**

- automated individual decision-making (making a decision solely by automated means without any human involvement)
- profiling (automated processing of personal data to evaluate certain things about an individual).



## **Incident Response**

GDPR introduces a duty to report certain types of personal data breach to the relevant supervisory authority. Where feasible Enviro will do this within 72 hours of becoming aware of the breach.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, Enviro will also inform those individuals without undue delay.

This policy will be updated to reflect the General Data Protection Regulation (GDPR) May 2018.

For help or advice on any data protection or freedom of information issues, please do not hesitate to contact: The Data Protection Officer (DPO): Urban Folcker, CFO of Enviro.