

APPENDIX 3

TRAINING PROGRAM

1. General Information

Personnel at the Samres Group will be educated about GDPR at a level that ensures that they are sufficiently informed about the regulation to be able to follow it within the scope of their professional role. For this purpose, there are the following education packages:

1. The general GDPR education in Swedish
2. The extended GDPR education in Swedish for managers, team leaders and other key leadership positions that need extended education
3. The extended GDPR education in English for managers who do not speak Swedish but also for other personnel who find it difficult to comprehend the education in Swedish

The training program is part of Samres Group's onboarding process for new employees or existing employees who get a new position. The onboarding process consists of different activities, from practical activities (e.g., setting up a workstation) to mandatory training programs and educations (e.g., Samres GDPR training). During each employee's onboarding, regardless of whether they are part of a larger group or must undergo individual onboarding, time is scheduled in the onboarding program for the GDPR training. The education itself is flexible regarding number of students and frequency, see "Methods" under section 3 in this document, in other words training are made continuously for new employees and employees that need to be updated in the subject.

The Samres Group conduct yearly reviews of the status of GDPR knowledge among employees. Should there be a need for an employee to be updated on the subject, this is planned into the employee's individual development plan, and a refresher training is coordinated.

2. Content of the Education

The education package consists of five parts together with a closing sixth part, which is a trial to ensure that the student has understood the educational material.

1. Part 1:
 - a. Practical info
 - b. Objectives of the education
 - c. Dictionary of abbreviations and difficult words
 - d. What is the GDPR?
 - e. Differences between the GDPR and the PUL
2. Part 2:
 - a. What is personal data?
 - b. Principles relating to processing of personal data
 - c. Lawfulness of processing personal data

- d. Controller, processor, and Sub-processor
- 3. Part 3:
 - a. The rights of the Data Subject
 - b. Risk analysis
 - c. Security
 - d. Personal data breaches
 - e. Sanctions
- 4. Part 4:
 - a. Binding Corporate Rules
 - b. Data Processing Agreements
 - c. Policies
 - d. Routines
 - e. Responsibilities
- 5. Action plan at Samres Group
 - a. Changes
 - b. Discussion of different scenarios
 - c. Action plan
- 6. Trials
 - a. Test A is issued following the ordinary training according to the five parts of the education package. If approved level of knowledge, a diploma is given, and the employee is noted as GDPR educated on a GDPR education chart
 - b. Test B is issued following additional training according to calculated need if the student does not pass Test A. If approved level of knowledge is reached, a diploma is given, and the employee is noted as GDPR educated on a GDPR education chart

3. Methods, Materials and Competences

- 1. Availability:
 - a. The different educational packages are available via:
 - i. Intranet (SharePoint)
 - ii. General file collection
 - iii. One drive accounts for easy access for both students and tutors
 - b. The test in part 6 is not available until the student has completed part 1–5 of the education package
- 2. Methods:

- a. The education is either supervised by a tutor or taken unsupervised as tutorials
 - i. This ensures that the education can be performed at any point of time for any number of students
 - ii. The education can be performed either live at the office or remote through the web, which makes geographical placing unimportant
- 3. Materials:
 - a. Students:
 - i. PowerPoint slideshows with narrated video
 - ii. Handouts containing scripts of the PowerPoint slides
 - iii. Links to informational videos provided by the competent supervisory authority
 - iv. Links to internal information at the Samres Group such as policies, routines, and report tools
 - v. Links to self-tests connected to each part of the education to:
 - 1. ensure that the student is active during the education
 - 2. make sure that the student has understood the contents of that part of the education
 - vi. Extended guides to make the education more digestible for those who do not have Swedish as their native language
 - vii. Personal plan for compliance after the education that the employees share with their manager for follow-ups or discussions
- 4. Competences:
 - a. Tutors and managers:
 - i. Access to tutoring materials to help them lead the courses in the best possible way
 - ii. Authority to assign tests
 - iii. Access to the test answers
 - iv. Authority to correct tests
 - v. Authority to hand out diploma
 - vi. Authority to note employee as approved on the GDPR education chart

4. Monitoring and Update of the Education

- 1. The number of approved GDPR employees on the GDPR education chart is checked during every meeting with the data protection officer

2. The data protection officer is responsible to make sure to update the educational material in accordance with European Union and Member State law as well as in line with the guidelines from the relevant supervisory authorities

5. Other GDPR Educations

Business partners and customers may administrate GDPR education packages within the scope of their contract with the Samres Group.