

THE MATERIAL SCOPE AND TRANSFERS

Depending on the contract, the Samres Group can be either the controller or the processor. However, this appendix only describes the Samres Group as controllers.

1. Overview

The Samres Group has offices in five different countries, the approach to data protection must therefore be global. Personal data is processed and transferred due to administrative work related to the maintenance of the company, in order to perform the services and undertakings in agreements with business partners. The purpose of this appendix is to show the material scope; which categories of personal data we process, and for which purposes the Samres Group processes and transfers personal data as controllers. The majority of the personal data with Samres Group as controller is personal data about employees since the Samres Group in almost all business relations undertakes the role as processing contractors to a public principal who is the controller. This appendix however focuses only on the material scope and data flows of the personal data the Samres Group controls.

The Samres Group has following offices in the following locations:

Within EU/EES:

- Sweden, *Lund* (Headquarter), *Skövde* (production)
- Estonia, *Tartu* (production)

In Third Countries:

- Moldova, *Chisinau* (production)
- Senegal, *Dakar* (production)

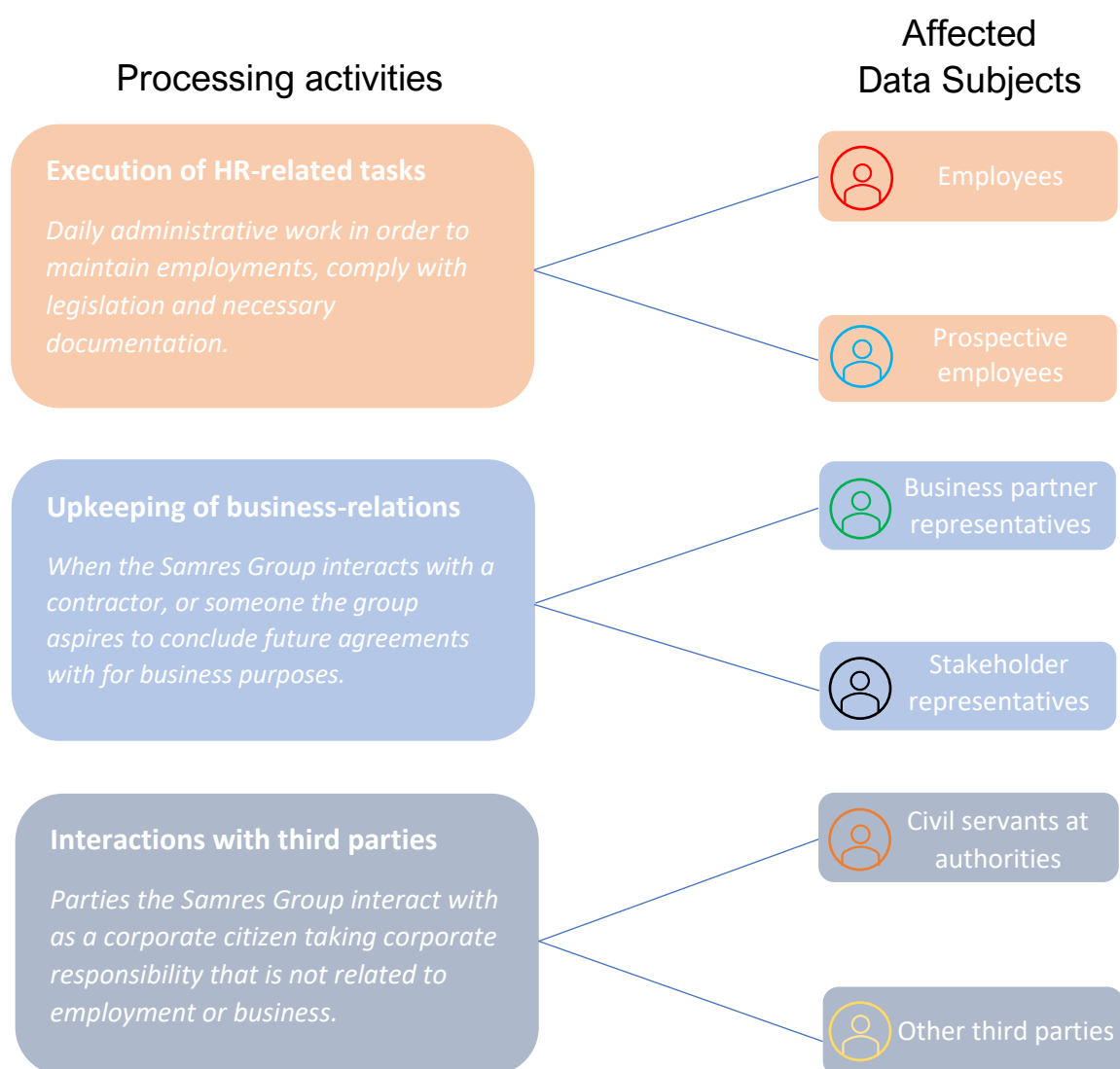
2. The Material Scope

The Samres Group processes a variety of different categories of personal data connected to a range of different data subjects. As controllers, the Samres Group reassures that there are valid purposes for all processing of personal data. The first section of this appendix clarifies which data subjects the Samres Group interacts with, which categories of personal data the Samres Group processes as controllers, and for which purposes the Samres Group processes personal data.

2.1 Data Subjects Affected (pt. I)

The purpose of the sketch below is to demonstrate that the Samres Group processes personal data that is connected to a range of different data subjects. The categorisation below identifies three types of situations under which the Samres Group processes personal data: performing HR-related work, upkeeping and maintaining business relations, and interactions with third parties. The latter includes various situations, and processing of personal data which is not related to the other two categories (i.e. HR and/or business relations). This last category includes i.a. all interactions the Samres Group is obliged to conduct by law, and is further described below.

Please note that data about the users (e.g., travellers) of the services we deliver on behalf of our business partners, is not processed as controller but as processor. Users are therefore included in our BCR-P and not in the BCR-C.



2.1.1 Data Subjects Affected (pt. II)



Employees

This category includes people employed by the Samres Group and consultants that perform work for us. The data is removed when the employment has ended. Employees are the main the category of data subjects whose personal data is processed by Samres Group as a controller.



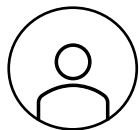
Prospective Employees

Data subjects who apply for listed jobs at our recruitment webpage. Our routine is to save data about applicants who have applied for listed jobs, i.e. not the persons who send in spontaneous job applications. This category also includes the data which is processed when an employee applies for a new position within the Samres Group.



Business Partner Representatives

We process personal data about the business partner representatives we interact with. Business partners are other companies and authorities we have commercial relations with that are recognized and governed by contracts.



Stakeholder Representatives

We process personal data about the stakeholder representatives that we interact with. These can represent other companies, interest groups, and authorities we interact with, but with whom we do not have any contractual relationship yet. When a contract is in place, the company, interest group, or authority is categorised as a business partner instead, and the category of data processed is thereby business partner representatives.



Civil Servants at Authorities

When we fulfil our corporate responsibilities, we process personal data about the civil servants we interact with. This includes both interactions we initiate, and interactions the civil servants initiate.















Other Third Parties

This category of data subjects includes all other parties which Samres Group may interact with. This includes interaction we initiate, but also interactions initiated by someone else. This category aims to cover all the interactions that cannot be placed under the other categories. Examples of data subjects under this category are office visitors, trainees, and journalists. The interactions that falls under this category tends to be temporary and the personal data that might be stored is never any sensitive personal data.

2.2 Categories of Personal Data













Which categories of personal data that is collected from the different data subjects varies since the purpose of the data processing differs between the data subjects. The Samres Group collects following categories of personal data from the different data subjects:

<u>Data subject</u>	<u>Category of personal data</u>
 Employees	 Personal data of employees (e.g., names, contact information, personal identity number, employment position, work schedule, rehabilitation plans, work evaluations, salary, etc.)
 Prospective employees	 Personal data of prospective employees (e.g., names, contact information, professional experience, other personal data that might be brought up during the recruitment-process, test scores, etc.)
 Business partner representatives	 Personal data of business partner representatives (names, contact information, their role in our business relations, and their activity within business relations)
 Stakeholder representatives	 Personal data stakeholder representatives (names, contact information, and the purpose of their relationship with the Samres group)
 Civil servants at authorities	 Personal data of civil servants (names and contact information)
 Other third parties	 Personal data of third parties (names and contact information)

As shown in this diagram, the Samres Group as controller is mainly collecting data about employees and prospective employees. Routines and policies on how personal data must be collected can be found at a shared IT-space all employees can access, however, collecting personal data is a task given to a group of people with the adequate qualifications and responsibilities. A few of these categories might include some sensitive personal data. Only a limited number of people are authorised to collect sensitive personal data.

2.3 The Type of Processing and its Purposes




The Samres Group processes data for various purposes, mainly business management and human resource administration. As controllers, the Samres Group is aware that we carry the responsibility to make sure that there is a legal basis for the processing of personal data. As mentioned at the previous page, personal data is collected for different purposes. The following categories of personal data are collected, used, and stored for the following purposes:

<u>Category of personal data</u>	<u>Purpose</u>
 Personal data about employees	 Data is used to perform personnel administrative tasks relating to payrolls, time reports, work scheduling, work information, competence development, staff management, work authorization, to fulfil our legal obligations as employers, workplace security follow-ups, workplace environment follow-ups and other similar matters
 Personal data about prospective employees	 Data is used to perform background checks and to evaluate the applicants' suitability for the job. The documents are used to decide who will proceed in the recruitment process. Then, the information gathered at an interview combined with references is used to decide who will get a job offer.
 Personal data about business partner representatives	 We use this data to maintain the business relation, and to know who we should contact if we have any questions or requests.
 Personal data about stakeholder representatives	 The data helps us to identify who we should interact with when we approach a new company or authority. This data helps us to build a relation to new potential business partners.
 Personal data about civil servants at authorities	 Data about civil servants is gathered to help us fulfil our legal obligations towards the government authorities. Keeping personal data about the civil servants who have been administrating our cases is a way for us to keep track of who we can contact at different authorities.
 Personal data about other third parties	 The purpose of processing is to communicate with and answer people who contact us for different purposes.

To ensure that these purposes are implemented and followed in the daily work, the purposes are communicated to employees through different policies and routines that everyone must follow. These policies and routines are available at the previously mentioned IT-space where other important news and information is posted. The policies and routines are revised yearly as a part of the yearly data protection audit.

3. Data flows

The IT-environment at the Samres Group is structured to give all employees access to personal data regardless of which office they work at, however on a strict need-to know basis. The purpose of this structure is to give employees access to the data they need to perform their daily tasks. However, this does not mean that all employees can access all data bases and process them. The level of responsibility an employee holds decides the scope of personal data it can access. Which responsibility each employee is given depends on their employment position. The Samres Group has three main types of responsibilities: group manager responsibility, manager responsibility, and employee responsibility. Group managers, e.g. the CEO and HR-chief, have responsibilities at a corporate group level and should therefore have access to all personal data about all the data subjects. Managers have responsibility for their group, and in some cases the principal to whom we have a service agreement, they therefore need access to personal data about their group members and the data subjects within the scope of the service agreement. Regular employees have responsibility to perform the work they are assigned, and they should thereof have no bigger access to personal data. A fourth type of responsibility worth to mention is the responsibility held by employees with special functions like accounting and scheduling. They need a wide access to personal data to perform their specialised task since these tasks are performed on a corporate level.

<u>Level of access</u>	<u>Access holders</u>	<u>Purpose of access</u>
<u>Level 1</u> Access to all personal data in the entire corporate group	 <u>Group managers</u>  <u>Employees with special functions</u>	Group managers should be able to control all activity within Samres Group at a corporate group level and can access all personal data mentioned in this appendix. Employees with specialised functions like scheduling and accounting needs this access since they are working towards the entire Samres Group.
<u>Level 2</u> Access to all personal data related to your group	 <u>Managers</u>	This access enables managers to perform managing responsibilities related to their group. The managers can access personal data about the employees in their group only, and personal data about data subjects within the scope of the service contract the group works for.
<u>Level 3</u> Access to personal data related to your tasks and yourself	 <u>Employees</u>	Employees only needs certain personal data to perform their daily tasks. They can also access their own personal data that Samres Group as employer has stored.

3.1 Data, Data Bases and Storage

The Samres Group stores data at data bases and storage systems located at internal and external data centres within EU/EES. Data collected locally is processed locally, but then always transferred to data centres within EU/EES for storage. No data is stored at bases outside EU/EES. These data bases are the IT-environment that employees can access in accordance with above. Data bases are never stored permanently on local devices, data can however be stored for a shorter period. If an employee at an office outside EU/EES accesses a data base, the data base is only available when the employee processes it. The access to the base is cut off when the employee completes the task or shuts down the computer device. The data bases can only be reached on either stationary computer devices at Samres Group offices, or mobile computer devices given out by Samres Group as an employer.

3.2 Third Country Transfers

Our IT-environment gives employees with the appropriate qualifications access to data they need to perform their work regardless of the geographical position of their office. The fact that employees outside EU/EES in theory can access and process personal data about data subjects that are EU/EES citizens is the main transfer of data in accordance with Article 47.2 in the GDPR. Transferring personal data is something the Samres Group aims to do in a scale not bigger than absolutely necessary, which is why most central functions are located within EU/EES. The access-system mentioned above enables the Samres Group to control which categories of personal data, and to which extent, the different offices that can access. There is only one exception where third country transfers to external data systems are considered necessary.

The Samres Group has employees in four different countries, two of them are third countries: Moldova and Senegal. With the purpose of taking corporate responsibilities, the Samres Group must report taxes to local supervising tax authorities. The Samres Group thereof transfers the requested personal data to the Moldovan and Senegalese tax authorities. The Moldovan tax authority only receives data about employees in Moldova, and the Senegalese tax authority only receives data about employees in Senegal. This example is the only scenario where the Samres Group transfers personal data to external data bases in a third country.