

# DATA PRIVACY POLICY

## Processing of personal data

### PURPOSE

We at OSTP take care of your privacy and you should be able to feel secure when entrusting your personal data to us. The purpose of this policy, based on current data protection legislation, is to make you aware of how we process your personal data. What we use them for, who may view them and under what conditions, and how you can safeguard your rights. It also gives instructions for what responsibility you have when provide us with your personal data.

### BACKGROUND

OSTP operates in a business-to-business environment that includes communication and information exchange with mainly customers, suppliers, other business relations, employee candidates and employees.

OSTP has an internet-based recruitment tool for open applications and job applications. The OSTP group uses this tool globally to conduct some of its recruitment activities and to provide job opportunities. The main reason why we process your personal data of future employees is to fulfil our obligations towards you during recruitment activities. Please find country specific contact information for vacancy in bottom of this message.

We may contact you during recruitment activities for more information.

### WHAT PERSONAL DATA DO WE PROCESS?

OSTP collects and uses personal data for a variety of legitimate business purposes, including establishment and management of customer and supplier relationships, completion of purchase orders, recruitment and

management of all aspects of terms and conditions of employment, communication, fulfilment of legal obligations or requirements, performance of operations according to contracts etc.

Processing of personal data requires legal basis. The most predominant legal bases for processing personal data within OSTP are:

- The fulfilment of a contract
- A legal obligation exists
- Legitimate interests pursued by OSTP
- Consent from the data subject

### **Company / organization representatives**

OSTP collects and stores information about you that we need to be able to maintain contact and exchange necessary information with you as a representative of an external company / organization.

The information we store includes name, position, address, e-mail address and telephone number.

The purpose of collecting the information mentioned above is mainly to ensure that contracts entered with our customers are adhered to in ongoing business. The contract is in this case our legal basis for the processing.

In cases where no contract has been entered into, we only process personal data with a low protection value. We process information in situations such as these to be able to handle potential business, inquiries of interest and perform follow-up of general issues. The purpose is to be able to develop, evaluate and improve our services. The legal basis for this processing is mainly a balance of interests.

Processing of personal data of external business contacts are sometimes also necessary in our finance function to fulfil our legal obligations.

## **Recruitment**

In connection with recruitments, OSTP collects personal data from applicants to assess suitability for the role. It includes name, postal address, e-mail address, telephone number, CV and any other personal information the applicant sends with the application. This processing of personal data is performed with a balance of interests as a legal basis.

Examples of personal data you need to provide us in the internet-based recruitment tool is what job that you endeavour, contact information, CV and personal letter. This information is needed in order to fulfil our obligations. We can also collect other personal data during recruitment process as for an example information obtained from interviews, examinations or employment references.

Information that you give without being requested to do so and which you provide voluntarily we will process only on the basis that we do not handle more personal data than that is necessary for the purpose, and we always endeavour to use the least sensitive information when sharing the information within OSTP group.

In our recruitment tool you as registrar of personal data is responsible for the data you register, that it is correct and not including information you are not prepared to share according to guidelines in this policy.

We also will contact you and request that you update your personal data on a regular basis so we can inform you about other job offers which may be of interest to you.

When you look for a vacancy and use our recruitment tool you will need to provide the personal data requested in the application. You will have the right on your own initiative to access, modify, supplement or update your personal data included in recruitment tool.

You always have the right to withdraw your consent at any time. In such case, we will no longer process your personal data or obtain new data. Note that withdrawing your consent means we are unable to fulfil any obligations we have towards you.

### ***Do we share your personal data?***

In the recruitment process your personal data may be shared among OSTP functions as Human Resources and other functions within OSTP Group, as well as third parties, necessary in the recruitment process. Third party can be a reference person you refer to or legal authorities etc.

Since OSTP is a company acting around the globe and the application is used globally in connection with recruitment processes within the OSTP Group, your personal data may be transferred across national borders to OSTP entities in other countries within and outside EU/EES. OSTP will take any security actions it deems appropriate to protect your personal data from unauthorized access. We also will comply with applicable rules for the data being collected and their use. Each local OSTP company will be responsible for management and confidentiality of your personal data.

## **RESPONSIBILITY**

OSTP has the responsibility to ensure that personal data always is:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed

- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

OSTP is a data controller, which means that we are responsible for the processing of your personal data and for ensuring that your rights are safeguarded.

## DATA PROTECTION

The protection of personal data requires that appropriate technical and organisational measures are taken to demonstrate a high and adequate level of data protection. OSTP has adopted internal and external data protection procedures, including an IT security policy, which must be adhered to by employees of OSTP.

OSTP will also take the necessary steps to enhance data protection compliance within the organisation. These steps include the assignment of responsibilities, awareness raising, and training of staff involved in processing operations.

In the recruitment process we ensure that your personal data are processed in a secure way, the basic condition is that only employees and other persons within the organisation who need the personal data to carry out their work duties have access to them. For sensitive personal data, we have setup authorisation controls, which means there is a higher level of protection for your sensitive personal data.

As user of the recruitment tool, it is your responsibility to ensure that the computer you are using for register your personal data is adequately secure and protected. Your personal data and any additional information submitted or obtained during recruitment process will be stored in Sweden at a third-party service provider. A contract with rules for handling personal data is set-up with the service provider in order to fulfil any legal requirements.

## DELETION OF PERSONAL DATA

Personal data shall be deleted when OSTP no longer has a legitimate purpose for the continuous processing or storage of the personal data or when it is no longer required to store the personal data in accordance with applicable legal requirements.

Detailed retention periods with respect to various processing of personal data are specified in OSTP retention rules.

## YOUR RIGHTS

If OSTP processes or stores personal data about the data subject, the data subject shall have the right to access to the personal data and the following information:

1. The purposes of the processing
2. The categories of personal data concerned
3. The purposes of the processing
4. Recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries
5. Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
6. The existence of the right to request from OSTP rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing

7. The right to lodge a complaint with a supervisory authority
8. Where the personal data are not collected from the data subject, any available information as to their source
9. The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

The data subject shall have the right to obtain from OSTP without undue delay the rectification of inaccurate personal data concerning him or her.

The data subject shall have the right to obtain from OSTP the erasure of personal data concerning him or her without undue delay and OSTP shall have the obligation to erase personal data without undue delay, if applicable.

The data subject shall have the right to obtain from OSTP restriction of processing, if applicable.

The data subject shall have the right to receive the personal data registered in a structured and commonly used and machine-readable format, if applicable.

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on a balancing of interests, including profiling.

Any request received from a data subject to exercise the rights in this clause is answered as soon as reasonably possible, and no later than 30 days from receipt. Requests shall be forwarded without delay to OSTP. OSTP will be supported by relevant stakeholders process the request to meet the reply deadline.

If you have any questions or concerns regarding our policy, want to correct or delete your personal data, please do not hesitate to contact us at [dpo@ostp.biz](mailto:dpo@ostp.biz)

Should OSTP still, in your opinion, fail in the ambition to fulfil your rights, you also have the right to submit a complaint to the Privacy Protection Authority IMY.

## COOKIES

According to the Electronic Communications Act, anyone visiting a web site with cookies will be given access to information that the site contains cookies and the purpose of using cookies. The visitor should also consent to the use of cookies. A cookie (or cookie) is a small text file that the website you visit requests to save on your computer. Cookies are used on many websites to allow a visitor access to various features.

We also use Google Analytics, a network analysis service provided by Google Inc. It is third party cookies we use to improve our services and to provide a statistical evaluation of our visitors' traffic. It is not possible to track the identity of individuals with these services. The information generated in this way can be transferred to a server abroad and stored there. You can prevent cookies from being stored by adjusting the settings in your browser. For more information, see [Google Analytics Privacy Policy](#).