

# Baltic Cable Aktiebolag – Privacy Policy

## 1. Scope of the privacy policy

- 1.1 Below, it is described how Baltic Cable Aktiebolag, company Reg. No. 556420-6026, with the address Gustav Adolfs Torg 47, 211 39 Malmö, Sweden (“Baltic Cable”, “us” or “we”), process personal data.
- 1.2 The protection of privacy is an issue that we prioritize. It is therefore important for us to protect your personal data and ensure that our processing of this data is conducted in a proper and lawful manner.
- 1.3 In this privacy policy, we explain which types of personal data we may process about you and for what purpose we process the data. We also detail what choices and rights you have in relation to such processing. We kindly ask you to carefully review our privacy policy and acquaint yourself with its content.
- 1.4 Please note that this privacy policy relates to processing of personal data for which Baltic Cable is the controller. This means that we are responsible for the processing of your personal data. It also means that you should turn to us with questions or remarks, or if you wish to enforce any of your rights in relation to our processing of your personal data.
- 1.5 The personal data processed by us are collected directly from you as the data subject, or from relevant public authorities (e.g. the Swedish Tax Authority (Sw. Skatteverket) and the Swedish Land and Cadastral Authority (Sw. Lantmäteriet)).

## 2. How we process your personal data

In this section, we describe how we process your personal data, our lawful basis for the processing and for how long we store the data.

### 2.1 Contacts at partners and suppliers and crossing agreement counterparties

If you are a contact at one of our partners or suppliers or a potential partner or supplier, or a contact at a counterparty to an infrastructure crossing agreement, Baltic Cable processes your personal data as follows.

Categories of personal data	Purposes
<ul style="list-style-type: none"><li>– Name</li><li>– Title</li><li>– Company</li><li>– E-mail address</li><li>– Telephone number</li><li>– Correspondence</li></ul>	<ul style="list-style-type: none"><li>– Administer and develop the relationship with the partner or supplier</li><li>– Initiate and develop a relationship with potential partners and suppliers</li><li>– Administer infrastructure crossing agreements.</li></ul>
<b>Lawful basis:</b> Legitimate interest: The processing is necessary to fulfil our legitimate interest of administrating our relationships with our contractors and suppliers, acquire new partners and suppliers and administering infrastructure crossing agreements.	

**Storage period:** We store your personal data above for as long as you hold the position of contact person for our partner or supplier. If we are informed that you have left your position as contact person for our contractor or supplier, we will only retain such personal data as we are obliged by law to keep or that we require in the continued business relationship (such as e-mail correspondence). In addition to the above, for contacts at counterparties to crossing agreements, we will only retain the personal data until the decommissioning of the relevant cable.

## 2.2 Property owners

If you are an owner of a property on which Baltic Cable have laid cables, we process your personal data as follows.

Categories of personal data	Purposes
<ul style="list-style-type: none"> <li>– Name</li> <li>– Company or property information</li> <li>– E-mail address</li> </ul>	<ul style="list-style-type: none"> <li>– To contact the property owners in case of an issue with the cable</li> <li>– Keeping a register of property owners to administer maintenance of the cables</li> </ul>
<p><b>Lawful basis:</b>            Legitimate interest: The processing is necessary to fulfil our legitimate interest of being able to efficiently and properly maintain our cables and reach out to all concerned parties in case of any issues with our cables.</p>	
<p><b>Storage period:</b> To fulfill the purposes stated above, we store your personal data until the decommissioning of the relevant cable.</p>	

## 2.3 Job applicants

Categories of personal data	Purposes
<ul style="list-style-type: none"> <li>– Name</li> <li>– E-mail address</li> <li>– Personal identity number</li> <li>– Telephone number</li> <li>– Correspondence</li> <li>– CV information</li> </ul>	<ul style="list-style-type: none"> <li>– Assessing candidates for employment</li> </ul>
<p><b>Lawful basis:</b>            Legitimate interest: The processing is necessary to fulfill our legitimate interest of correctly and efficiently assessing candidates for potential employment. We process personal identity number because it is clearly motivated to ensure correct identification.            Consent: We may process the personal data of job applicants for potential future job openings with the consent of the job applicant in question.</p>	
<p><b>Storage period:</b> We store the personal data of job applicants for the time the recruiting process is ongoing. Once the recruiting process is finalized, your personal data will be deleted. With your consent, we may however store your personal data for up to two years the purpose of future recruitment processes and job opportunities, or until such time as the consent is revoked by the applicant.</p>	

### 3. Storage of personal data

We store your personal data as long as necessary to fulfil the purposes of the processing. If your personal data is no longer necessary for us in order to fulfil the purpose of the processing, or if the processing for any other reason is no longer allowed, the data will be anonymized or deleted. Specific retention times are included in the tables above.

### 4. Recipients

4.1 The personal data that we collect may be shared with the following types of third parties:

- **Service providers:** We may use third parties to manage some aspects of our business operations, including the processing or handling of personal data. We may share your personal data with such third parties with regard to production, logistics, installation, maintenance, accounting, financial services, IT systems and other administrative functions. When we use such service providers or work together with other third parties we typically enter into data processing agreements, or make other relevant arrangements, to ensure that your personal data is transferred in accordance with this policy.
- **Authorities:** When we are required by law, we may share your personal data to public authorities such as the police or tax authorities when it is required by applicable law or regulation or in order to exercise or defence legal claims during a legal process.
- **Sale or transfer of business or assets:** Any information we have about you may be transferred or disclosed to a purchaser or prospective purchaser in the event of a sale, assignment, or other transfer of all or a portion of our business or assets. Should such a transfer occur, we will use reasonable efforts to ensure that the transferee uses your information in a manner that is consistent with this policy.

4.2 Personal data may be shared by a member of Baltic Cable's corporate group to another. Sharing of personal data between the Baltic Cable group companies (for example sharing with our parent company Statkraft Asset Holding AS in Norway) is carried out for the purposes of streamlining Baltic Cable's business operations and internal administration. The sharing of personal data is carried out on the basis of our legitimate interest to maintain an effective business structure.

4.3 Baltic Cable will share the personal data of property owners and others related to crossing agreements with [www.ledningskollen.se](http://www.ledningskollen.se) (a website run by the Swedish Post and Telecom Authority (Sw. Post- och Telestyrelsen)) for the purpose of administering infrastructure crossing agreements. For information on the Swedish Post and Telecom Authorities processing of personal data, we refer to their privacy policy.

4.4 Baltic Cable undertakes to transfer or process data outside the EU/EEA only when such transfer or processing is lawful under Articles 45-47 of the General Data Protection Regulation. To find out which appropriate safeguards that have been undertaken or to get information about how to get access to such information, contact [info@balticcable.com](mailto:info@balticcable.com).

## 5. Your rights

5.1 You have the right to receive confirmation on whether or not we process personal data concerning you, and in such cases get access to such personal data and also information regarding the personal data and how we process it.

5.2 You have the right to have inaccurate personal data that concerns you rectified by us without undue delay. Taking into account the purposes of the processing, you also have the right in certain cases to have incomplete personal data completed.

5.3 In certain circumstances, you have the right to have your personal data erased by us, for example if the personal data is no longer required to fulfil the purposes for which it was collected, or if the personal data has been unlawfully processed.

5.4 In some circumstances, you have the right to obtain restriction of the processing of your personal data. For example if you contest the accuracy of the personal data, you can also require that we restrict the processing of your personal data for such a period that enables us to verify the accuracy of the personal data.

5.5 You have the right to object to the processing of your personal data that is conducted on the basis of Baltic Cable's legitimate interest. In such an event, we must demonstrate compelling legitimate grounds that override your interests, rights and freedoms for the continued processing.

5.6 Under certain circumstances, you have the right to receive the personal data you have submitted to us that concerns you provided in a commonly used electronic form. You have the right to transfer such information to another controller (data portability).

5.7 Please contact us if you have views on our processing of your personal data. You also have the right to complain on the processing of your personal data by lodging a complaint to the Swedish Data Protection Authority (*Sw. Datainspektionen*).

## 6. Additions and amendments

We may make additions or amendments to this privacy policy. If we do so, we will publish the amended policy to our website. In such case, we kindly ask you to carefully review the updated privacy policy.

## 7. Contact us

If you wish to update, rectify or erase information we have about you, or to enforce your rights as described above, you are welcome to contact us at [info@balticcable.com](mailto:info@balticcable.com).