

# GDPR POLICY

This Policy applies to Image Systems AB and its subsidiaries.

## 1. BRIEFLY ABOUT THE GDPR DATA PROTECTION ORDINANCE

GDPR stands for General Data Protection Regulation. GDPR is the EU's new data protection regulation that came into force on 25 May 2018. The fact that it is a regulation means that it applies directly as a law and GDPR replaces our current Personal Data Act, PUL. The purpose of the GDPR is to strengthen individuals' right to their personal data and the individual's integrity. Something that changes the way our organization handles personal data on a daily basis. Personal information includes everything that can be used to identify a person, such as photo, address, IP number and e-mail address. The law applies, among other things, to which information may be registered, who has access to it and how long it may be stored.

Definition of the concept of personal data, Article 4 (1), the Data Protection Regulation: *'... Any information relating to an identified or identifiable physical person (hereinafter referred to as a registered person), whereby an identifiable natural person is a person who can be directly or indirectly identified specifically with reference to an identifier such as a name, an identification number, a location information or online identifiers or one or more factors which are specific to the physical, physiological, genetic, mental, economic, cultural or social identity, "*

### 1.1 Inventory of personal data

Within the Image Systems Group, personal data is used in the following processes:

#### 1.1.1 Euroclear's share owner's book

used to produce a ballot paper for a general meeting or to produce the largest shareholder for annual reports. The company saves this information in PDF format in a secure storage location. Euroclear is responsible for personal data.



### **1.1.2 Payroll management**

All payroll management takes place centrally in Linköping in the computer program Visma Lön, which only one person has access to. Salary specifications are sent via the App Visma My salary which is password protected or Kivra. All data is stored on a server at UCS. A List of Relatives is stored at the payroll department and on the Board portal TeamEngine and contains contact information for the next of kin. The responsible human resources manager and crisis group have access to these tasks.

With UCS and Visma, Image Systems has established a personal data assistant agreement. For pensions, Image Systems has established a personal data assistant agreement with Söderberg & Partners.

Regarding other insurances such as travel insurance, liability insurance, etc., Image Systems has established a personal data assistant agreement with Howden Insurance Brokers.

The personal data in the payroll system is also used in reporting to authorities such as the Swedish Tax Agency, the Social Insurance Agency and in exceptional cases to other authorities such as the police.

### **1.1.3 Customer processing & recruitments**

The company uses cloud based systems for CRM and newsletter distribution. This information includes; name, role/title, company, email address and telephone number. This information is used for telephone and e-mail contact with customers. As the company has no private customers but only companies as counterparties, all information refers only to the company and its representatives in their profession.

Application documents are usually received by email, these are saved by the responsible manager for recruitment, after completion of recruitment, this information is cleared from the company's system.

## **1.2 Thinning routine**

Image Systems has introduced a routine for thinning out personal data by:

Requirement to save exists according to / Requirement to delete by time limit:

- The Accounting Act's requirements for documentation 7 years + current year
- The tax legislation's requirement to save information 7 years + the current year
- Digital photographs of employees 3 years (from termination of employment)
- Surveillance film from burglar alarm installation is deleted when the hard disk is full, but no later than every 6 months.
- Visitor logs at reception 60 days
- Agreement with customers 3 years from agreement terminated



- Contract with employees 10 years from employment terminated

In addition, staff are regularly asked to clean their mailboxes and hard drives. In order to minimize the risk that personal data may be disseminated in an unauthorized manner.

### **Image Systems strives to always ensure maximum security for personal data**

The company must ensure that data protection is built into the IT structure. Both technical and organizational measures must be taken in accordance with Article 25. For example, personal data may be pseudonymised or encrypted.

### **1.3 Requirement to report data breaches**

The Data Protection Ordinance contains completely new requirements for informing about personal data incidents. By personal data incidents is meant, for example, data intrusion, which means that personal data may have fallen into the wrong hands.

The new rules entail both requirements in relation to the supervisory authority and in relation to those whose personal data are processed. According to Article 33, personal data incidents must be reported to the supervisory authority within 72 hours of the personal data controller (CEO) becoming aware of the incident. According to Article 34, personal data incidents must be reported to the data subject if the incident leads to a high risk to the person's rights and freedoms. Notification must be made quickly, but there is no absolute time limit as in relation to the supervisory authority. There is also an opportunity here to inform the public, in accordance with Article 34 (2) (c). This applies if the requirement to inform all concerned would be a "disproportionate effort".

**The CEO is responsible for this policy.**

## **2. APPROVAL AND REVISION**

This instruction was approved by the board of Image Systems AB on 07 May 2026.

The CEO is responsible for annually, at the statutory Board meeting, and in addition if necessary, updating and presenting the present Instructions for handling personal data in accordance with the EU Data Protection Ordinance to the Company's Board for approval.



### **3. PERSONNEL INFO IN PERSONNEL HANDBOOK AND WEBSITE**

#### **3.1 Briefly about the GDPR Data Protection Ordinance**

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#### **3.2 Processing of personal data**

Image Systems AB shall take all reasonable measures to ensure that the protection of personal integrity is strong within the company when suppliers and contractors are engaged. Personal information means name, address, telephone number, e-mail address, social security number and / or other information that can be traced to an individual living individual.

The principles we work by are that:

- The information must be processed in a legal, correct and transparent manner.
- The information shall only be collected for specific, explicitly stated and justified purposes.
- Only information that is relevant and necessary for the purpose is collected.
- The information must be correct and up to date.
- The information shall only be stored for as long as is necessary for the purpose or required by law, or other legitimate purpose.
- Processing of the data may only be done if it can be ensured that the processing takes place in a secure manner.
- The person responsible for personal data (Image Systems AB) must be responsible for and be able to account for compliance with the above points.

Processing of personal data includes any measure of handling - for example, collection, editing, archiving, transfer, storage.

#### **3.3 What personal data do we process and for what purpose?**

We process personal data when you register your participation in events, when you as a customer for support are registered in our case management system or when you ask to register as a recipient of our newsletter or other mailings. It may also happen that we are notified of your personal information via your contact person with us or your own



employer. The personal information we collect may, for example, include name, address, telephone number, e-mail address, position, which customer or supplier you are connected to.

As an employee of Image Systems, we handle personal data in order to fulfill the employment contract entered into.

**We may use your personal information for the following purposes:**

- inquiries and contractual issues.
- to send you our employee survey.
- to send you our Newsletter.
- to send an invitation to our events.
- to send you summer and Christmas greetings.

We save your information only for as long as it is required to fulfill the above purpose or as long as we are required by law to do so. Your personal data will then be deleted.

**Who has access to the personal data and where is it passed on?**

Your information is shared within the Image Systems AB Group and can be handled by third parties so that we can provide our services to you. Third parties can, for example, be companies that are involved in the operation and maintenance of our IT systems, companies that handle our employee survey or events. The suppliers who receive your personal data on our behalf must have signed a personal data assistant agreement that guarantees that they follow legal requirements and instructions provided by Image Systems AB on how the data is to be handled.

We do not pass on, sell or exchange your personal information for marketing purposes to third parties.

Image Systems AB may also disclose your personal information to third parties, such as to the police or other authority, in connection with the investigation of a crime or if Image Systems AB is otherwise obliged to disclose the information in accordance with statutory requirements or government decisions.

Your personal information is stored in our business system and case management system and is cleaned regularly (at least once a year) from outdated information or information that is no longer needed for us to be able to fulfill our commitments to you as a customer. The information we collect about you is stored in Sweden.

Image Systems AB has taken technical and organizational measures to protect personal data from loss, manipulation and unauthorized access. Technical measures include encryption, firewalls and 24/7 monitoring of the server park. Organizational measures include, among other things, restrictions on authorizations, the use of mobile bank IDs to gain access to personal data.



In order to achieve adequate privacy protection, it is important to work continuously with issues such as awareness, education and organization.

### **How is your personal data stored and protected?**

Your rights:

- request information about the registers with personal data Image Systems AB has about you.
- request information about how Image Systems AB processes and protects your personal data as well as the purpose and legal basis for the collection.
- request correction or deletion of your personal data (unless there is a statutory requirement for storage of the personal data, such as, for example, accounting rules, or other legitimate reason for storage).
- submit a complaint to the Data Inspectorate and request help with legal proceedings.