


Revision: A.00	EXTERNAL STAFF PRIVACY NOTICE	
Owner: Compliance Department	Document Ref: PL-CL-004 Date of last Revision: 2023-08-11	

EXTERNAL STAFF PRIVACY NOTICE

UMS SKELDAR (“we”, “our”, “us”) is committed to safeguarding all personal information we collect from individuals in the course of our business.

With this Notice we would like to inform the employees and contractors of our Suppliers (“external staff”, “you”, “your”), about the processing of your personal data in the context of the Agreement between the Supplier and UMS SKELDAR AG or UMS SKELDAR SWEDEN AB.

UMS SKELDAR processes data for specific purposes and within the applicable legal framework (the Federal Data Protection Act (FADP) in Switzerland and the European General Data Protection Regulation (EU GDPR) in Sweden).

1. Personal data that we collect

We collect information, provided by you or your employer, such as identification information (e.g., your name), title, position, professional history, experience, language skills and contact details.

If you work at our premises or access our systems, we could collect in addition the following information:

- Detailed identification information (e.g., address, office location, business telephone number, date and place of birth, picture, emergency contact details, ID card, passport details);
- Professional information (e.g., academic, professional and industry qualifications and certifications, contact details of references, previous employment dates, rank or seniority);
- Electronic identification data (e.g., login information, access right, badge number, IP address, online identifiers/cookies, logs and connection time, sound or image recording such as CCTV).

Only if permitted by applicable law, and where relevant, we may process special categories of personal data, for example health data (in case we should adjust your working environment as a result of a disability).

We could also collect data from publicly available sources such as LinkedIn profiles.

2. Purposes of processing

We process your personal data only for specific purposes and only if it is relevant to achieving those purposes.


In particular, we process personal data for:

- Selection and onboarding: for example, to determine the suitability of External Staff qualifications, to set up internal profiles, collect information required to complete the onboarding process;
- Staff administration: for example, to administer, plan and manage our personnel, suppliers and contractors, allocate costs, optimize performance and enhance quality;
- Training;
- Compliance and risk management: for example, to handle complaints, requests or reports, prevent and detect crime, including fraud or criminal activity, misuse of our products or services, security of our IT systems, architecture and networks, reply to any actual or potential proceedings, requests or enquiries of a public or judicial authority;
- Supporting and maintaining UMS SKELDAR technology: for example, to manage our IT resources, including infrastructure management and business continuity;
- Other purposes: for example, to ensure the security of the buildings, the safety of staff and visitors, as well as property and information, to prevent and if necessary, investigate unauthorized access to secure premises; to exercise our duties and/or rights in respect of you or third parties.

3. Bases for the processing

Depending on the purpose of the processing activity (see section 2 above), UMS SKELDAR processes your personal data according to the following grounds:

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According to FADP

- The processing is necessary to fulfil our contractual obligations towards you or your employer;
- The processing is necessary to safeguard the legitimate interest of UMS SKELDAR or a third party or to safeguard overriding public interests, without unduly affecting your interests or fundamental rights and freedoms;
- The processing is necessary to comply with legal or regulatory obligations;
- We have obtained your implied or explicit consent (for example, where permitted or required by law, in case you provide health data).

According to EU GDPR

- The processing is necessary to fulfil our contractual obligations towards you or your employer;
- The processing is necessary to comply with legal or regulatory obligations (e.g., for tax reporting or perform some of the activities related to staff administration, training and performance);
- The processing is necessary to protect the vital interests of the relevant individual or of another natural person, such as providing disability access to workplaces, where applicable;
- In some cases, necessary to perform a task carried out in the public interest;
- The processing is necessary for the legitimate interests of UMS SKELDAR, without unduly affecting your interests or fundamental rights and freedoms;
- In some cases, we have obtained your prior consent (e.g., if required by law), or processed with your explicit consent in case of special categories of personal data (e.g., data concerning health).

Examples of legitimate interests are: to prevent fraud or criminal activity, misuse of our products, resources or services as well as security of our premises, information, IT systems, architecture and networks; to reply to any actual or potential proceedings, requests or enquiries of a public or judicial authority; to benefit from cost-effective services, efficient solutions and subject matter expertise (e.g., we may use IT platforms offered by suppliers).

4. How we protect personal data

UMS SKELDAR has implemented adequate technical and organizational measures to protect your personal data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

All employees accessing personal information must comply with the internal rules and processes in relation to the processing of your personal information to protect them and ensure their confidentiality. Specifically, we restrict access to personal information about you to employees and service providers on the basis of the “need to know” principle.


5. Disclosure of personal data

Within UMS SKELDAR, members of our personnel process your data according to the purposes as above at section 2.

We share personal data with third parties: professional advisers and consultants (e.g., lawyers, tax accountants or recruitment agencies), or clients as part of you working on tasks involving those parties.

In some cases, we also share personal data with our suppliers, who are contractually bound to confidentiality, such as: IT systems providers, transport companies for work travel, training, communication service providers, other goods and service providers. Suppliers are required to comply with technical and organizational security measures.

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If required, we may disclose personal data to public authorities, regulators or governmental bodies, courts or party to proceedings where we are required to disclose information by applicable law or regulation, code of conduct or practice or to safeguard our legitimate interests.

We may disclose personal data to:

- potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger, or to acquire a business or enter into a merger with it.
- Public or private social security bodies.
- If required by laws or regulations, we may disclose data to any legitimate recipient.

Transfer of data to other countries

In case data is processed in other countries, we take measures in order to guarantee the protection of your data. We only transfer your personal data to countries with legislation which is considered to provide an adequate level of protection, or in absence, we rely on appropriate safeguards (e.g., standard contractual clauses) or another exception provided by local applicable law. In case you wish additional information, please contact our Compliance Department at: dataprotection@umsskeldar.aero.

6. How long we store personal data

We will only retain personal data for as long as necessary to reach the purpose for which it was collected or to comply with legal and regulatory obligations or internal policies requirements. In general, your personal data will be kept for 10 years, from the date you leave the company. In some cases, if data is no longer required or has become obsolete, it may be destroyed, for proportionality reasons, while the external staff relationship is still ongoing. In some cases, data may be retained for a longer time for legal or regulatory requirements or for compliance or risk management purposes.

7. Your rights

You have the right to access and obtain information about your personal data that we process. If personal information is incorrect or incomplete, you have the right to request the correction of data.

You have also the rights to object to the processing of personal data, request the erasure of data, restrict the processing of personal data and/or withdraw your consent to the processing where provided (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

UMS SKELDAR will fulfill your requests, as applicable under the FADP or EU GDPR, but these rights are not absolute as they do not always apply. If we do not comply with your request, we will explain why.

8. You can reach us under the following contact details

You can exercise the above rights or raise any questions by contacting our Compliance Department at: dataprotection@umsskeldar.aero

If you are not satisfied with our response, you can also raise a complaint with the data protection supervisory authority of the respective country.

Switzerland: <https://www.edoeb.admin.ch/edoeb/de/home/der-edoeb/kontakt.html>

Sweden: <https://www.imy.se/privatperson/utfora-arenden/>

9. Changes to your personal data

In the interest of keeping personal data up to date and accurate, in case of change to your personal data that we hold (e.g., address), please, let us know.

10. Updates to this notice

This Notice was last updated in August 2023. We will make available any future revision [here](#).

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