
LEXIQ AB' PRIVACY POLICY (updated per 2019-01-29)

1. PROCESSING OF PERSONAL DATA

Lexiq AB ("Lexiq", "we") is the Data Controller for processing of your personal data (the "Personal Data) that you provide us with by e.g. using the digital channels, such as our website or e-mail (the "Digital Channels"), or that we collect from you within the framework of our client assignments (with the exception for the Personal Data that we process as per instructions from our clients when we act as Personal Data Processor and according to the Data Processing Agreement) or in connection with your application for internship/employment.

This privacy policy (the "Privacy Policy") gives you with information on how we process Personal Data, so that you as a user and a Data Subject, can feel confident that Lexiq, as Data Controller, handles your information in an appropriate manner and complies with applicable regulatory frameworks on the legality of processing of personal data.. Below we describe how Lexiq processes your Personal Data and what rights you have, and how you can contact Lexiq in case you have any questions or want to exercise your rights.

Kindly keep in mind that we may process your Personal Data if you choose to use the Digital Channels and / or any of the products, tools, services or resources we provide (hereinafter jointly "the Services").

It is not necessary to provide us with any Personal Data to visit the Digital Channels or to use the Services, but if you do not

provide required information or explicitly consent to our processing of data when this is required, you may not be able visit all parts of the Digital channels or to access the Services.

2. PERSONAL DATA, PURPOSES AND LAWFULNESS OF PROCESSING

Personal Data is any information that relates to an identified or identifiable living individual. Different pieces of information, which together can lead to the identification of a particular person, may also constitute Personal Data.

The main purpose of the processing of your Personal Data is that we, as providers of the Services, shall be able to offer you the Services, information about the Services and market these to you. We collect and process your Personal Data only to the extent necessary to be able to provide the Services to you.

Collection and processing of your Personal Data is conducted solely with your consent or on the basis of an existing agreement with you or our legal obligations, when we i.e. must save the Personal Data according to i.e. accounting regulations.

Exceptions are made i.e. in cases where a prior consent is not possible to obtain due to practical reasons, but the processing of the data is permitted by law or we have a legitimate interest in processing the Personal Data i.e. for marketing purposes, follow-up of the Services or for defending ourselves against legal claims, according to a so-called balance of interests. Please find more information under section below.

The Personal Data is submitted to us by clients, their counterparties and their legal representatives and other parties or administrative authorities connected to the client assignment or job applicants or employees/contractors of our business partners or suppliers. The Personal Data that we process comprise name, personal identification number, contact details (phone number, e-mail, address), insurance details, financial information, billing information, information about the client's relatives or other individuals who are of relevance for the client assignment, CV with other relevant documents (work experience, letters of recommendation, personal letters, references, grades, certificates, other background information), image (when applicable), IP-address and information gathered through cookies in connection with website visits.

When you use Lexiq's Services and/or the Digital Channels your Personal Data is processed according to the following:

Personal Data in connection with client assignments

The Personal Data is processed by Lexiq in order to:

- perform and administer the Services and to communicate with the involved parties connected to the client assignment, maintain relations with clients by mail, e-mail, phone calls, to manage and administer invoice- and payment services (legal basis for the processing is contractual obligation);
- perform conflict of interests and background checks, to be able to comply with regulatory frameworks governing accounting and the measures against money laundering

and terrorism (legal basis for the processing is our legal obligation);

- exercise our rights and defend our rights in case of legal claims reached to us (legal basis for the processing is our legitimate interests).

Personal Data in connection with recruitment process

The Personal Data is processed by Lexiq in order to:

- evaluate your application for employment or internship, undertake measures prior entering an employment agreement or other relevant agreement (legal basis for the processing is legal obligation is legitimate interests);
- continue saving your application and Personal Data in the event if you would be considered as a candidate for future employments (legal basis for the processing is your consent);
- carry out our obligations and exercise our rights as employee in the area of employment (legal basis for the processing is legal obligation and legitimate interests).

Personal Data in connection with marketing activities

The Personal Data is processed by Lexiq in order to:

- market Lexiq's business, to communicate with clients in order to provide marketing information regarding our Services, events and seminars that might be of interest for Lexiq's clients (legal basis for the processing is your consent and our legitimate interests.)

Personal Data in connection with employees/contractors of the suppliers/business partners

The Personal Data is processed by Lexiq in order to:

- enable the undertakings under the agreement with the suppliers/business partners, such as to administer invoice- and payment services, to conduct deliveries, to communicate with the suppliers/business partners through their employees/contractors (legal ground: legitimate interests)
- be able to comply with regulatory frameworks governing accounting (legal ground: legal obligation).

Personal Data in connection with website visits (cookies)

The Personal Data is processed by Lexiq in order to:

- collect statistical information, such as the duration of your visit at the website, parts of the website that are visited and to study the behaviour at the website, so Lexiq can maintain and improve a good user experience at the website and to receive information about the website visitors, through information registration tools, e.g. Google Analytics (legal basis for the processing is your consent and our legitimate interests.) Kindly be aware that the default settings in most browsers is set to accept cookies automatically. You may change and customize your settings manually. We may not process your data if you change your settings. For more information regarding our

use of cookies, we refer you to our Policy for Cookies, *insert the link*.

3. SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data include information that reveals ethnic origin, political opinions, religious beliefs or information regarding trade union membership or information relating to health or sex. Health information can include information regarding illness, pregnancy or medical visits.

As a principle rule, Lexiq does not process any special categories of personal data within the framework of our Services. In case we still need to process such data, when it is necessary and relevant for the client assignment, we do it only after receiving an explicit consent from you or otherwise we are entitled to do so according to applicable regulatory frameworks governing the processing of personal data.

4. WHO HAS ACCESS TO THE PERSONAL DATA

Lexiq observes professional secrecy and confidentiality and we only share the Personal Data in certain cases. Beyond what is stated in this Privacy Policy, Lexiq will not share the Personal Data with any third party, unless disclosure of the Personal Data is not required by law, in connection with an ongoing legal, administrative or recovery procedure where you and we are parties.

When it is necessary and applicable, we share the Personal Data with counterparties and their representatives within client assignments, with e.g. client's insurance providers, banks, debt collectors or other clients' contacts according to the instructions and with authorities.

We hire suppliers/business partners for services in connection with our digital channels and the Services, such as invoicing services, cloud services, time registration services. The Personal Data is shared with these suppliers/business partners on our behalf, as processors (hereinafter the "Processors") and as per instructions from Lexiq and according to the Data Processing Agreement that Lexiq has entered with the Processors. We will always limit the Processors' access to the Personal Data and only share the Personal Data that is required to be able to offer you access to our digital channels and the Services. The Processors are obliged to process and to protect the Personal Data in accordance with applicable regulatory frameworks governing the processing of personal data.

5. HOW LONG LEXIQ PROCESSES AND STORES YOUR PERSONAL DATA

Your Personal Data will not be processed and stored longer than it is necessary with regard to the purposes of the processing, the legal obligations to us as a company (i.e. accounting regulations) and according to applicable regulatory frameworks governing the processing of personal data. We will also erase your Personal Data in a manner that follows from the above-mentioned applicable regulations.

6. TRANSFERS TO THIRD COUNTRIES

As a principle rule, we or the Processors will not transfer the Personal Data to third countries (e.g. a country outside the EU/EEA). In cases where we have to do it because of e.g. the fact that we use a digital service provider based in third countries, we only transfer the Personal Data if the country ensures a so-called adequate level of protection according to applicable regulatory frameworks governing the processing of personal data.

7. CHANGES IN THE PRIVACY POLICY

In case we need to change this Privacy Policy, we will announce it on our website www.lexiq.se.

8. RIGHT OF ACCESS BY THE DATA SUBJECT

You have the right to request and obtain (free of charge) information regarding which Personal Data (if any) is being processed by us about you (so-called extract from the register) and also get any incorrect information corrected. If you want to know if we process any Personal Data about you, you can send to us a written and signed request (for instructions, see below under section 16). When you send your request to us, you need to indicate specifically what kind of information you are interested in to receive (unless you are interested in receiving all Personal Data about you). In that way, we can provide you with information that is relevant to you. In case you send your request for an extract from the register to us several times, we may charge a fee or, in some cases, in accordance with statutory cases, refuse to comply with your request.

The extract from the register will be sent to you within 30 days from the time we received the request. If the extract is extensive and we need more time to complete it or if we for some reason cannot comply with your request, we will notify you.

9. RIGHT TO RECTIFICATION

In order to fulfill our obligations to always have accurate and relevant Personal Data, we work systematically with our records and update the Personal Data, where it is necessary. If you notice that the information, we have about you, is incorrect or inaccurate or if we lack important information, you have the right to without unnecessary delay get your information corrected or incomplete information completed. We normally correct simple data without consideration, but in other cases we may need to consider your request. We will not approve your request if it is impossible or requires a great deal of work. If you request it, we will also inform you about to whom the correction has been submitted to.

In case your Personal Data are changed at your request, we will inform the Processors, that the information about you has been updated.

10. RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

You have the right to at any time request that we delete your Personal Data if:

- they are no longer needed for the purposes for which they have been collected and for which we process them;
- we process the Personal Data on the basis of your consent and you have withdrawn it;
- we process the Personal Data for direct marketing and you have objected to a further processing of your Personal Data for this purpose;
- we process the Personal Data based on a balance of interests and there are no legitimate interests that outweigh your interest;
- we do not process the Personal Data in accordance with applicable regulatory frameworks governing the processing of personal data;
- it is required that Personal Data are deleted in order to fulfill a legal obligation; or
- otherwise there is another relevant legal basis for you to request erasure of the Personal Data.

However, we have the right to refrain from erasing your Personal Data if we need to retain these in order to fulfill a legal obligation or to be able to claim legal claims against you or defend ourselves against such.

If we receive your request regarding erasure, we will conduct an assessment in order to evaluate if there are reasons to erase your Personal Data. You will then be informed about our assessment. In case your Personal Data are erased at your request, we will inform the Processors, that the information about has been erased. However, we will not do this if it is impossible or requires a great deal of work.

11. RIGHT TO RESTRICTION OF PROCESSING

You have the right to request to have certain processing of your Personal Data restricted if:

- you have objected to the accuracy of the Personal Data, during the time that we had the possibility to check whether the Personal Data are correct;
- the processing is illegal and you have objected to have the Personal Data being erased and you have instead requested a restriction on their use;
- we no longer need the Personal Data for the purposes of the processing, but you need them to be able to determine, claim or defend legal claims; or
- you have objected to our processing in accordance with section 13 and your objection request is pending while awaiting our assessment in order to evaluate whether our legitimate interests outweigh your legitimate interests.

Restrictions of processing implies that the Personal Data will be marked, so that in future these Personal Data are only to be processed for certain limited purposes.

12. RIGHT TO DATA PORTABILITY

If you have submitted your Personal Data to us and we process them on the basis of consent or if the legal ground for processing is to fulfil a contractual obligation, you have the right to obtain your Personal Data, e.g. in order to transmit such to another Personal Data Controller or get our assistance to transmit the

Personal Data. The right to data portability does not apply when data portability is technically difficult to implement.

13. RIGHT TO WITHDRAW CONSENT AND OBJECT TO PROCESSING

You have the right to object to our processing of your Personal Data that we conduct on the legal basis of so-called balance of interest, according to applicable regulatory frameworks governing the processing of personal data. If so, you need to specify in writing which processing you object to. In such cases, we can only continue to process your Personal Data if we can show that our legitimate interests outweigh your legitimate interests.

If your Personal Data is processed for direct marketing purposes, you always have the right to object to the processing at any time.

14. RIGHT TO COMPLAIN

In case you have any complaints or objections as a result of our processing of your Personal Data, please contact us primarily, so that we can help you in the best possible way. Nevertheless, you have always the right to reach your complaints directly to the Swedish Data Protection Authority (Datainspektionen).

15. SECURITY, TECHNICAL AND ORGANIZATIONAL MEASURES

We undertake all appropriate technical and organizational security measures, that are required in accordance with

applicable regulatory frameworks governing the processing of personal data, to ensure a level of security appropriate to the risks and to protect the Personal Data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to processed Personal Data.

16. CONTACT DETAILS

If you wish to make a request in accordance with your rights stated above, such request must be made in writing and sent to us by e-mail at info@lexiq.se. Since it is important that we do not disclose your Personal Data to anyone else, a request must be made in writing, signed by you, scanned in and sent to us by e-mail. Attached to the request you must also send a signed copy of your valid ID document (passport or driver's license).

If you have any questions about this policy or our personal data processing, please contact us at info@lexiq.se.