### **Introduction and scope of this Privacy Notice**

This Privacy Notice is issued with reference to the specific personal data processed about individual end-users who have access to the website and/or services provided by PDQ Workholding (we or "PDQ").

PDQ is the data controller of all personal information that we process about you as an individual end user within the scope of this Privacy Notice.

The integrity of your personal data is vital for PDQ and its group, and therefore, we welcome the extra transparency and protection of your personal data that the US data privacy laws, the General Data Protection Regulation (GDPR) and any other applicable data privacy legislation requires.

# What types of personal data we collect

PDQ will collect the following information about you:

- 1. First and last name;
- 2. Your contact information, such as your telephone number, postal address and email address
- 3. The company/organisation that you work for/represent;
- 4. Location data (including your IP address).

In case of your job application, we will also collect and process the following personal data:

- 5. Your date and place of birth, age, gender, nationality, language proficiency, export control status (in case of your application for a job in PDQ);
- information about your education, such as your academic history, academic and vocational qualifications, skills and competencies (in case of your application for a job in PDQ);
- 7. Subject to any restrictions or limitations imposed by applicable law, information about your current role and compensation, such as your job position, job grade, employment status, salary and benefits, bonus and commission entitlements;
- 8. your CV/resume documents supporting your job application, including reference letters and transcripts;
- 9. information about your employment history;

- 10. information about your job application history with PDQ (if any);
- 11. any other information you voluntarily provide.

### Where we get it from

PDQ obtains personally identifiable information from you when you visit our webpage, when you apply to our job posting and/or when you communicate with us (including prompts/questions asked by you in the <a href="Request A Quote form">Request A Quote form</a>). The information may be volunteered by you or collected from cookies and/or other tracking software.

# Our legal grounds and purposes of processing

We will have a lawful basis for processing your information if processing is necessary for the purposes of legitimate interests pursued by us or by a third party. We make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours, unless we have other grounds to do so (such as your consent or where we are under a legal obligation). If you have any concerns about our processing please refer to the "Your Rights" section below.

We consider that it is **in our legitimate interests** to:

- 1. Identify you as an authorised end-user of our products/services;
- 2. Help you to navigate and use our products and/or services efficiently;
- 3. Identify and monitor any unauthorised use, or misuse, of our products and/or services:
- 4. Continually improve our products and/or services and keep them up-to-date; and/or
- 5. Send you promotional emails about our products and/or services.

You can opt-out of receiving our promotional emails at any time.

#### Who it is shared with

PDQ does not sell personal information to any other organization.

PDQ may share your personal information with the following types of organizations for the routine conduct of its business:

- 1. The members of our group;
- The customer on whose behalf you are acting:

- 3. Our IT service providers/partners;
- 4. Our third-party compliance/anti-piracy providers; and/or
- 5. Our marketing providers.

These businesses are only authorized to use the information provided by PDQ for specific purposes in line with this Privacy Policy. PDQ does not authorize third parties to use the information for any other purpose.

#### **International Transfers**

PDQ is a US-based company. Anyway, your personal data may be transferred to Sandvik entities located in Europe and to other Sandvik entities in the USA, and may also be transferred to other global territories such as India. However, we will only do so where:

- 1. The required country guarantees the treatment of personal data to the same standard as the EU (e.g. the UK);
- Appropriate safeguards have been put in place which meet the requirements of the Article 46 of the GDPR, for example, using the EU Commission's Standard Contractual Clauses for transfers of personal data to providers outside the EU or UK, together with any supplementary export measures; or
- 3. One of the exceptions for specific situations under Article 49 of the UK GDPR together with any supplementary export measures applicable to the transfer.

# Security

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected. We take appropriate technical and organisational measures to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

# **Retention of your information**

We will not retain your information for any longer than we think is necessary.

When determining the relevant retention periods, we will have regard for factors including: our contractual obligations (including the duration of those contractual obligations) in respect of the information in question; legal and regulatory obligations under applicable law; statutes of limitations under applicable law; our legitimate interests; (potential) disputes; and guidelines issued by relevant data protection authorities.

First and last name, contact information, company names and location data will be retained for the period of our contract with the customer on whose behalf you are acting.

The data provided in relation to a job application will be retained for a minimum period of 12 months, following which it is deleted or anonymized.

Where we have suspicions of unauthorised use, or misuse, of our products and/or services, we may retain such personal data for longer periods in connection with the pursuit or defence of legal claims.

# Your rights

Under data protection law, you have a number of rights concerning the personal information we hold about you. If you wish to exercise any of these rights, please make your request via the applicable data request forms available via Sandvik Personal Data Request Form: Personal data request. For additional information on your rights please see below.

- The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.
- 2. The right of access. You have the right to request certain information about, access to and copies of your personal information (if we are processing it). Please note that you are entitled to request one detailed summary of that personal information at no cost, but for any further costs we reserve the right to charge a reasonable fee based on administration costs.
- 3. **The right to rectification**. You are entitled to have your information corrected if it is inaccurate or incomplete
- 4. **The right to erasure**. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you. However, please note that this will not apply if we are required to retain the information for compliance with a legal obligation.
- 5. **The right to restrict processing**. You have rights to request that we stop using your personal information or limit the way in which we use it. When processing is restricted, we can still store your information, but will not use it further.
- 6. **The right to data portability**. You have the right to request that we return your personal information in an accessible and transferrable format, or that we send it directly to another company, where technically feasible;

- 7. **The right to lodge a complaint**. You have the right to lodge a complaint about the way we handle or process your information with your national data protection authority.
- 8. **The right to withdraw consent**. If you have given your consent to anything we do with your information (i.e. where we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. Please note this may impact our ability to provide services or to otherwise continue our relationship with you.
- 9. **The right to object to processing**. You have the right to object to certain types of processing where we use it for our legitimate interests or for marketing purposes.

#### **Contact details**

If you have any queries or requests concerning this Privacy Notice or how we handle your personal data more generally, <u>please contact our team.</u>