

**Transcom WorldWide**  
**Website Data Protection Notice**  
**Last revised 25 May 2018**

Transcom WorldWide AB – see below in Section 7 for Contact Information – "**Transcom**" or "**we**" or "**our**") and each of its affiliates and subsidiaries (collectively, "**Transcom Group**") take data privacy seriously. This Website Data Protection Notice ("**Notice**") informs the users of *www.transcom.com*, *careers.transcom.com* and *blog.transcom.com* ("**Website**") how Transcom as controller within the meaning of the General Data Protection Regulation ("**GDPR**"), collects and processes the personal data and other information of such users in connection with their usage of the Website.

Note that for other Transcom Group websites, other services or other relationships with users, suppliers or customers other privacy terms may apply. This Notice does not apply to third-party sites which may be linked to from this Website.

## Content Overview

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1. **Categories of Personal Data, Processing Purposes and Legal Bases – *What personal data do we process about you and why? What are the legal bases?***

- (i) **Usage Data:** In connection with your visit of the Website we will collect the following information: details on your browser (e.g., type, version, language); operating system and interface; website from which you are visiting us (referrer URL); webpage(s) you are visiting on our Website; date and time of accessing our Website and time zone difference; access status/HTTP status code, volume of data transferred, internet protocol (IP) address.

Purposes: Usage Data will be used to provide you access to the website and to maintain or restore the security of the Website, or to detect technical faults and/or errors in the transmission of electronic communications.

Legal basis:

- The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (e.g., affiliates or subsidiaries of Transcom Group), except

where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Art. 6(1)(f) GDPR). Such interests are to provide you with the website as requested by you and to achieve the other purposes as set out above. Additional information on this legal basis and the respective balancing of interest can be requested by contacting us using the details as set out in Section 7.

- The processing is necessary for the performance of a contract (e.g., the usage relationship) to which you are a party or in order to take steps at the request of you prior to entering into a contract (Art. 6(1)(b) GDPR).

**(ii) Online Form Data:** You may choose to send us comments, questions or similar feedback via online forms. You may then provide the following personal data about you: E.g., email address; name; address; information about your business or occupation; content of the feedback.

Purposes: Online Form Data will be used for answering your request and to provide you with the desired information, products or services or for other purposes which you have requested and ensure you are put in touch with the right Transcom employee and/or entity.

Legal bases:

- The processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract (Art. 6(1)(b) GDPR).
- The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR).
- The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (e.g., affiliates or subsidiaries of Transcom Group), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Art. 6(1)(f) GDPR). Such interests are to answer your request and to achieve the other purposes as set out above. Additional information on this legal basis and the respective balancing of interest can be requested by contacting us using the details as set out in Section 7.

**(iii) Newsletter Data:** If you request to receive our newsletter, we collect and process the following personal data about you: E.g., name; email address and request to receive marketing emails.

Purposes: Newsletter Data will be used for providing the newsletter and other marketing materials to the extent permitted by applicable law, and analyzing your interests for marketing purposes.

Legal bases:

- You have given your consent to the processing of your personal data for one or more specific purposes (Art. 6(1)(a) GDPR). If you have given your consent, you

can withdraw this consent at any time, by clicking the opt-out link in an email received or as set out in Section 5. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

- The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (e.g., affiliates or subsidiaries of Transcom Group), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Art. 6(1)(f) GDPR). Such interests are to achieve the purposes as set out above. Additional information on this legal basis and the respective balancing of interest can be requested by contacting us using the details as set out in Section 7.

## 2. **Consequences When You Do Not Provide Your Data – *What happens if you choose not to provide it?***

The provision of your personal data is generally not required by a statutory or contractual obligation. However, the provision of certain of your personal data is necessary to visit our Website, to enter into a contract with us or to receive our services/products or information as requested by you. In certain cases, the provision of your personal data is voluntary.

Not providing your personal data may result in disadvantages for you – for example, you may not be able to receive certain products and services or use the Website with all its functionalities. However, unless otherwise specified, not providing your personal data will not result in legal consequences for you.

## 3. **Categories of Recipients and International Transfers – *Who do we transfer your personal data to and where are they located?***

### (i) **Recipients**

You should expect that we will transfer your personal data to third parties for the processing purposes described above as follows:

- **Within Transcom Group:** Transcom and each of its affiliates and subsidiaries within the global Transcom Group listed on [www.transcom.com](http://www.transcom.com) may receive your personal data as necessary for the processing purposes described above. Depending on the categories of personal data and the purposes for which the personal data has been collected, different internal departments within Transcom receive your personal data. Moreover, other departments within Transcom have access to certain personal data about you on a need to know basis, such as the legal department, the finance department or internal auditing.
- **With data processors:** Certain third party service providers such as IT support providers, whether affiliated or unaffiliated, will receive your personal data to process such data under appropriate instructions ("**Processors**") as necessary for the processing purposes described above, such as Website service providers, customer care providers, marketing service providers, IT support service providers, or other service providers who support us in maintaining our relationship with you. The Processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data, and to process the personal data only as instructed.

- **Other recipients:** We may transfer – in compliance with applicable data protection law – personal data to law enforcement agencies, governmental authorities, judicial authorities, legal counsel, external consultants, or business partners. In case of a corporate merger or acquisition, personal data may be transferred to the third parties involved in the merger or acquisition. We will not disclose your personal data to third parties for advertising or marketing purposes or for any other purposes without permission.

Any access to your personal data is restricted to those individuals that have a need-to-know in order to fulfill their job responsibilities. Transcom will also disclose your personal data as required or permitted by applicable law to professional advisors, governmental authorities, and courts.

## **(ii) International transfers**

You should expect that the recipients above which will receive or have access to your personal data, are located inside or outside the European Economic Area ("**EEA**").

For recipients located outside of the EEA, some are certified under the EU-U.S. Privacy Shield and others are located in countries with adequacy decisions pursuant to Art. 45 GDPR. Other recipients are located in countries which do not adduce an adequate level of protection from a European data protection law perspective however we will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law.

With respect to transfers to countries not providing an adequate level of data protection, we will base the transfer on appropriate safeguards, such as binding corporate rules (Art. 46(2)(b), 47 GDPR), standard data protection clauses adopted by the European Commission or by a supervisory authority (Art. 46(2)(c) or (d) GDPR), approved codes of conduct together with binding and enforceable commitments of the recipient (Art. 46(2)(e) GDPR), or approved certification mechanisms together with binding and enforceable commitments of the recipient (Art. 46(2)(f) GDPR). You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 7 below.

## **4. Retention Periods – *How long do we keep your personal data?***

Your personal data will be retained as long as necessary to provide you with the services and products requested. Once you have terminated the contractual relationship with us, you have deleted your account, or the relationship with us has been otherwise ended, we will remove your personal data from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which Transcom is subject – e.g., taxation purposes).

Personal data will in principle be deleted 2 years after the last interaction and business contact between you and Transcom. However, we will retain your contact details and interests in our products or services for a longer period of time if Transcom is allowed to send you marketing materials. Also, we typically erase contracts, communications, and business letters containing

personal data, or we redact personal data from such documents, 10 years after their termination or creation, as such data may be subject to statutory retention requirements, which often require retention of up to 10 years.

We may also retain your personal data on a need to know basis only after the termination of the contractual relationship if your personal data are necessary to comply with other applicable laws or if we need your personal data to establish, exercise or defend a legal claim. To the extent possible, we will restrict the processing of your personal data for such limited purposes after the termination of the contractual relationship.

## 5. Your Rights – *What rights do you have and how can you assert your rights?*

**Right to withdraw your consent:** If you have given your consent regarding certain types of processing activities (in particular regarding the receipt of certain direct marketing communications), you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can withdraw your consent by writing to [Communications@transcom.com](mailto:Communications@transcom.com)

**Additional data privacy rights:** Pursuant to applicable data protection law, you have the right to: (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data; (iv) request restriction of processing of your personal data; (v) request data portability; and/or (vi) object to the processing of your personal data. Below please find further information on your rights to the extent that the GDPR applies. Please note that these rights might be limited under the applicable (local) data protection law.

(i) **Right to request access to your personal data:** As provided by applicable data protection law, you have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipients to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the personal data undergoing processing free of charge. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

(ii) **Right to request rectification:** As provided by applicable data protection law, you have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

(iii) **Right to request erasure (right to be forgotten):** As provided by applicable data protection law, you have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.

(iv) **Right to request restriction of processing:** As provided by applicable data protection law, you have the right to obtain from us and we may be obliged to restrict the processing of your personal data. In this case, the respective personal data will be marked and may only be processed by us for certain purposes.

(v) **Right to request data portability:** As provided by applicable data protection law, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those personal data to another entity without hindrance from us, where the processing is carried out by automated means and is based on consent pursuant to Art. 6(1)(a) GDPR or on a contract pursuant to Art. 6(1)(b) GDPR.

(vi) **Right to object:**

**Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we are required to no longer process your personal data. Such right to object especially applies if we collect and process your personal data for profiling purposes in order to better understand your interests in our products and services or for certain types of direct marketing.**

**If you have a right to object and if you exercise this right, your personal data will no longer be processed for such purposes by us. You may exercise this right by contacting us as stated in Section 7 below.**

**Such a right to object may, in particular, not exist if the processing of your personal data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.**

To exercise your rights, please contact us as stated under Section 7 below. You also have the right to lodge a complaint with the competent data protection supervisory authority in the relevant Member State (e.g., the place where you reside, work, or of an alleged infringement of the GDPR).

## 6. Cookies and other tracking technologies

This Website uses cookies and other tracking technologies. For further information, [please visit our Cookie Policy](#).

## 7. Questions and Contact Information

If you have any questions about this Notice or if you want to exercise your rights as stated above in Section 5, please contact us at [Communications@transcom.com](mailto:Communications@transcom.com)

**Transcom Group Data Protection Officer** can be contacted at:

**Kathrin Schürmann**

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