



PRIVACY POLICY

In Leading Insight's operations, we process personal data of different nature and for different purposes. For us, transparency is important and that we live up to the requirements imposed on organisations in accordance with EU Data Protection Regulation 2016/679 / EC ("GDPR") and we therefore want this policy to describe how we process personal data and why.

Who is responsible for personal data processing?

Leading Insight Europe AB, 559280-2721, is responsible for the personal data processed in connection with:

- Marketing
- Customer assignments
- Accounting
- Application for employment
- Our processing through cookies

Responsible person and contact information?

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What personal data can we process?

We process different types of personal data that vary depending on the purpose. For example, we process IP addresses when handling cookies and financial information for accounting purposes. Other information we may process is name, e-mail address, telephone number and other relevant contact information. We may collect information prior to a customer assignment, upon request for marketing or invitation prior to an event or request for employment with us.

In customer assignments, we process personal data in various types of work psychology forms that may have been answered in connection with a customer assignment. The forms generate data of a descriptive nature. An individual's or a group's characteristics are expressed in a standardized test score, the level of which is determined in relation to a relevant comparison group, a so-called norm group.

Our primary purpose in processing personal data?

Regarding our core business and our customer assignments, we process personal data in connection with selection processes when recruiting, so-called assessments and in connection with various types of development initiatives, such as leadership development, coaching, management audit, team development, lectures and development programs. Processing of this personal data is necessary for us to be able to carry out our assignments and thereby conduct our core business.

Legal ground for processing personal data?

The provision of personal data is not a statutory requirement but is a requirement that is necessary to enter into an agreement with us as a customer. If you do not provide your personal information to us, we will not be able to fulfill our agreement or fulfill our obligations in relation to you. Below you will find our legal grounds for different types of purposes.

- **Marketing**

When marketing or inviting to events, the processing of personal data is necessary for us. As we have a legitimate interest in this type of activity, we process personal data on the grounds of balance of interests. However, you always have the right to say no to direct marketing.

- **Development assignments**

In various types of development assignments, such as leadership development, coaching, management audit, team development, lectures and development programs, the processing of personal data is necessary for us. As we have a legitimate interest in this type of activity, which constitutes our core business, we process this personal data on the grounds of balance of interests.

- **Selection assignments**

In various types of selection assignments in recruitment, such as screening, second opinions, assessment centres or other forms of talent management services, the processing of personal data is necessary for us. As we have a legitimate interest in this type of activity, which constitutes our core business, we process this personal data on the grounds of balance of interests.

- **Accounting**

When accounting and invoicing, the processing of personal data is necessary for us. Processing of personal data is necessary according to the legal obligation under the Accounting Act.

- **Application of employment**

We process the personal data that candidates submit to us in their application documents. As we have a legitimate interest in being able to assess and consider the suitability of different candidates for a role as an employee or sub-consultant to Leading Insight, we process this personal data on the grounds of balance of interests.

- **Cookies**

We process personal data through cookies on our website. A cookie is a small file that is sent to your browser when you visit a website. This way, the website can save information about your visit and make the next visit easier and the website more useful for you. If users do not want to accept cookies, these can be blocked in the browser's settings. If cookies are not deactivated, their use is accepted.



Who gets access to personal data?

We will not disclose personal data to third parties except (i) by special agreement with the data subject, (ii) if it is necessary for us to be able to fulfill a statutory obligation or comply with government decisions or court decisions, or (iii) in that case we hire external suppliers * who provide services on our behalf, such as suppliers of various test tools used to carry out customer assignments.

How do we act in terms of security?

We take appropriate technical and organisational security measures to protect personal data against misuse, destruction and loss through accident or improper disclosure. If we hire an outside party to provide us with services that include the processing of personal data, so-called personal data assistant * (see point above), we will ensure that such a party in turn takes appropriate technical and organisational security measures and only processes personal data in that way which we have approved in advance.

How long do we process and store personal data?

When it comes to marketing, you always have an opportunity to unsubscribe from continued mailings with us at any time. If you unsubscribe, we will immediately cease our processing of your personal data for marketing purposes.

Personal data relating to our customer assignments and our core business is stored for a period of five (5) years from the completion of the assignment, or the longer period required by the nature of the assignment.

Personal data that we process for accounting and invoicing purposes is stored for a period of seven (7) years from the day they were booked in accordance with the Accounting Act.

Personal data processed for the application for employment is normally stored until the recruitment procedure has been completed and up to five (5) years thereafter for the purpose of filling future positions. You can revoke such consent at any time by contacting us.

How long we process your personal data regarding cookies varies depending on which cookie is set in your browser. Permanent cookies remain on your computer until you delete them or the expiration date has passed. Session cookies have no expiration date and are temporarily stored in your computer while you are on our website. When you close your browser, any session cookies disappear.

Your rights?

You can object to your data being processed for marketing purposes. Then we will stop processing your data. You also have the right to object to your data being processed for other purposes based on the grounds of balance of interests.

- **Right of access**

You have the right to request information about what personal data we process about you and how the data is processed.

- **Right to rectification**

You have the right to have incorrect information corrected without undue delay and ask us to complete incomplete information by providing us with correct information.

- **Right to deletion and restriction**

You have the right at any time to request the deletion of your personal data, for example if the processing is no longer relevant in relation to the purpose for which the data was collected or if you object to processing that takes place based on the grounds of balance of interests. You can also request that certain processing of your data be restricted, for example if you object to the accuracy of the data.

- **Right to data portability**

Under certain conditions, you have the right to have your personal data transferred in electronic format when this is technically possible.

- **The right to lodge a complaint**

If you have any complaints regarding our processing of your personal data, you have the right to submit complaints to the Swedish Authority for Privacy Protection, which is the supervisory authority regarding current personal data legislation, www.imy.se.