



## Data Privacy Notice

### Privacy notice in relation to Saab's Business Partner Due Diligence Process

This privacy notice explains how the Saab Group, (“we” or “Saab”), collects, uses, discloses, transfers and stores any Personal Data (as defined below) relating to you when a third party company is subject to Saab's Business Partner Due Diligence Process (the “DD-Process”). The DD-Process is performed when Saab is considering to enter into a cooperation with a potential business partner (for example suppliers of goods or services, joint venture partners, marketing partners, or counterparties in certain business transaction such as real estate), (“Business Partner”) and involves the processing of your Personal Data due to your capacity as either employed by the Business Partner or in any other way representative of the Business Partner (either as director, officer or owner, etc.).

#### Why do we collect your Personal Data and what do we do with it?

Saab has zero tolerance for corruption. You can find more information in relation to Saab's anti bribery and corruption policy on [www.saabgroup.com](http://www.saabgroup.com). The DD-Process is Saab's way to adhere to national and international anti bribery and corruption legislation, such as the Foreign Corruption Practices Act, the UK Bribery Act, and the relevant sections of the Swedish Penal Code (jointly referred to as the “ABC-legislation”). The purpose of Saab's processing of your Personal Data is strictly limited to conclude the DD-Process of a potential Business Partner in adherence of the ABC-legislation.

#### What Personal Data is collected?

The Personal Data collected by Saab includes name, nationality, citizenship, date of birth, ownership of shares, position or relation to the Business Partner, governmental/official relationships and/or positions (if any), and information about the existence of a conviction, charge, investigation or allegation with significance based on the ABC-legislation (“Personal Data”).

The Personal Data is collected (i) from the relevant potential Business Partner and (ii) from security companies that we cooperate with to conclude the DD-Process of a Business Partner.

#### What is Saab's legal basis for the processing of your Personal Data?

Saab's processing of your Personal Data is based on legitimate interests pursued by Saab. Saab's assessment is that our interest in processing your Personal Data for the purpose listed above prevails the privacy violation that you are exposed to as a result of the processing. This conclusion from our balance of interest test is made especially considering that it is crucial for Saab to process personal data as part of the DD-Process in order to fulfil our obligations under the ABC-legislation and that we strive to limit the processing of your Personal Data to the extent possible

#### Who do we share your Personal Data with?

Your Personal Data will be accessed by companies within the Saab Group as necessary for the purpose of performing the DD-Process in relation to a Business Partner, it will also be used by the security companies that we cooperate with in order to conclude the DD-Process. The security companies are located within the European Union and we have signed data transfer agreements with them in order to secure the safe and legal handling of your Personal Data. Your Personal Data may be transferred to a



third country (outside EU/EEA), in order to conclude the DD-process. In any such case the transfer will be made pursuant to an EU Model Clause Agreement which you can find at the European Commission's website<sup>1</sup>.

### **How long do we keep your Personal Data?**

Saab will store your Personal Data for the period that the Business Partner and Saab have a legally binding agreement, and thereafter for a period of 10 years after the agreement has expired, or 10 years after that Saab has made a payment to a Business Partner under a legally binding agreement. The 10-year retention period may be extended if specific circumstances are at hand.

After the period described above Saab will either permanently delete the Personal Data or make it anonymous such that it cannot be associated with or tracked back to you in any way.

### **What are your rights?**

If your Personal Data are incorrect or needs to be updated you may at any time request that we correct or update the Personal Data. You may also contact us if you no longer would like us to process your Personal Data, if you would prefer us to restrict our processing in any manner and if you want us to erase your Personal Data. We will then delete your Personal Data from our systems or restrict our processing of your Personal Data. In addition, you may receive a copy of the Personal Data relating to you and information regarding our processing of such personal data by applying to the controller in writing. In such case, we will provide your Personal Data to you in a commonly used data format.

If you have any questions regarding the processing of your Personal Data or wish to exercise any of the rights stated above, please write to us at the address provided below.

You have the right to lodge a complaint regarding how Saab processes your Personal Data to the relevant supervisory authority within your jurisdiction.

### **How can you contact the controller and exercise your rights?**

The controller for any Personal Data we hold about you is (i) Saab AB and, (ii) if a subsidiary within Saab initiates the DD-Process, that specific subsidiary company. This means that (i) Saab AB and (ii) the relevant subsidiary company involved in the DD-Process is responsible for the Personal Data being processed correctly and in accordance with applicable laws.

### **You can contact the controller here:**

- (i) Saab AB at the following contact information: Saab AB, SE-581 88 Linköping, with telephone number +46 13 18 00 00, and;
- (ii) You can contact the relevant subsidiary company involved in the DD-Process by acquiring the contact details from the person that provided you with this privacy notice, or
- (iii) The Data Protection Officer of the Saab Group can be contacted at [dpo@saabgroup.com](mailto:dpo@saabgroup.com)

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<sup>1</sup> [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)