

**PRIVACY POLICY**  
**Employees and contractors in production**

Version 1.2, updated March 5, 2019

**1 INTRODUCTION**

Anagram companies ("Anagram") processes certain personal data about you as an employee or contractor in Anagram's productions. The purpose of this privacy policy is for you, as an employee or contractor, to understand how Anagram handles your personal data during and after the employment or during or after the duration of the contract, and for you to feel secure that the processing is being carried out in accordance with the General Data Protection Regulation and other applicable personal data legislation. The privacy policy also describes your rights and how you can enforce them.

**2 WHO IS THE CONTROLLER OF PERSONAL DATA?**

Depending on which Anagram company within the Anagram group you are employed or contracted by this company is the controller the processing of your personal data that is carried out by Anagram or on behalf of Anagram.

Set forth below is the Anagram company's contact information.

Anagram Sverige AB, VAT SE556664535301

Anagram Live AB, VAT SE556878866401

Stortorget 6-8, 3rd floor, 222 23 Lund

Anagram Norge AS

Nedre Vaskegang 6, 0186 Oslo, Norway, 918 165 606

If you have any questions regarding Anagram's processing of your personal data, please contact Max Svahn at [gdp@anagram.se](mailto:gdp@anagram.se)

**3 TYPES OF PERSONAL DATA PROCESSED AND WHAT ANAGRAM USES YOUR DATA FOR**

Anagram processes the below listed data about its employees and contractors involved in its productions. Please note that all personal data listed below is not necessarily processed regarding every employee and contractor in the production. For instance, if you do not suffer from illness during the duration of your employment or contract, or if you do not incur expenses for which Anagram is to reimburse you, Anagram will not process those types of data about you.

**3.1 *Personal data for administration of employment or contract***

Name, role, employment number, personal ID number, address, telephone number, e-mail address, bank account information, duration of employment, data about your salary and benefits, tax tariff and pension, as well as data regarding time sheets, leave of absence, vacation, subsistence allowance and expenses incurred on behalf of Anagram are

processed for the purpose of administering the employment, which among other things includes making salary payments and pensions contributions.

For Anagram to be able to administer your contract and thereto fulfil its obligations under the contractor agreement, Anagram processes data regarding your name, function, duration of assignment, personal ID number (if sole proprietorship, Sw. *enskild firma*), address, email address, telephone number, data regarding remuneration as well as data regarding time sheets, leave of absence, subsistence allowance and expenses incurred on behalf of Anagram.

The legal basis for the processing is that it is necessary in order for Anagram to be able to fulfil its obligations as an employer according to the employment agreement and under employment law, the contract if you are a contractor (sole proprietorship), or on the basis of balancing of interests (if you as a contractor are working for a company).

### 3.2 *Data regarding leave due to illness, pregnancy or care of children*

Anagram processes data regarding leave due to illness, pregnancy, or care of children only for the purpose of administering any absence due to illness, pregnancy, parental leave or childcare and sickness certificate from the Swedish Social Insurance Agency, e.g. to calculate sick pay and investigate absence. The legal basis for the processing of these data is that the processing is necessary for Anagram to be able to fulfil its legal obligations and obligations under the employment or contractor agreement. The personal data may include sensitive data but may be processed because the processing is necessary for Anagram to fulfil its obligations under labour law. .

### 3.3 *Data regarding food allergies and food preferences*

During the production plenty of food and catering will be ordered and delivered. To avoid any accidents, and to ensure that you get food to your liking, Anagram might ask for information regarding possible allergies and food preferences. Your consent is required for Anagram to be able to process this data.

Data regarding your allergies and food preferences are processed under limited forms.

### 3.4 *Personal data that is communicated through Anagram's website and social media*

Anagram may publish your name, picture and contact information on Anagram's website to be communicated with clients and other parties who visit Anagram's website. In addition, your name, picture and video may be published on Anagram's website to market the productions of Anagram. The process is carried out on the basis of balancing of interests, in which Anagram's legitimate interest is to being able to communicate and market its productions to clients and other parties, for Anagram to ensure compliance with Swedish copyright law or pursuant to the employment agreement with you as an employee, or as a contractor (sole proprietorship) or with your employer (if you are contracted through a company).

Your name and picture may also be published on Anagram's social media channels. Prior to such publication your consent will be collected (should you not have given such consent through other agreements).

### 3.5 *Personal data for application regarding support for the production*

Anagram may, where necessary, process data from your resumé (particularly data regarding prior productions on which you have worked on) to raise economic support for the production from other organisations. The data is processed on the basis of balancing of interests, in

which Anagram's legitimate interest is that it is necessary for Anagram to carry out its business operations.

### 3.6 *Personal data that is communicated to the press, databases, etc.*

Your name, picture and video may be communicated to the press and movie and tv databases such as Svensk Film and IMDB. The data is processed on basis of balancing of interests, in which Anagram's legitimate interest is to communicate and market its productions and for Anagram to ensure compliance under Swedish copyright law.

### 3.7 *Data about your relative (ICE)*

Anagram processes name and telephone number for the person which you have listed as ICE contact, so that Anagram can contact the relative, in case you suffer an accident, acute illness, etc. The data is processed on the basis of balancing of interests, where Anagram's legitimate interest is to quickly contact your relative in case of emergency. This information will be deleted once your assignment or employment has expired, or when you choose to no longer list that person as your contact in case of emergency.

### 3.8 *Personal data about their employees which Anagram is obligated to process under the employment law*

Under employment law, Anagram is obligated to process certain data about their employees under certain circumstances. For instance, Anagram may be obligated to rehabilitate their employees, offer terminal glasses or report on accidents in the workplace and may therefore be forced to process data regarding the employee's health. Anagram may also have reason to process data regarding any warnings issued against the employee.

### 3.9 *Data in business documents and the like*

Your personal data may be found in Anagram's agreements, documentation of minutes, correspondence and business matters, etc. (for example, when you have represented Anagram). This type of information is saved to the extent and as long as necessary for Anagram to be able to conduct its business operations in a satisfactory manner. The processing takes place based a balancing of interests, where Anagram's legitimate interest is to be able to document its business transactions and conduct its business operations.

## **4 WHEN ANAGRAM IS NOT A CONTROLLER OF YOUR PERSONAL DATA**

### 4.1 *Health attestation in regards of production insurances*

For Anagram to insure its productions through so called production insurance, it is required that certain contractors and employees provide a so-called health attestation. The health attestation is made up of a form that is issued by the insurance company. For the processing of personal data regarding this attestation, the insurance company is the sole controller.

Filled out forms are sent to the insurance company and Anagram does not store or keep your information. By use of this procedure Anagram does not process the health attestation and is therefore neither the personal data controller or a processor for this data.

To access more information regarding the insurance company's processing your personal data, please contact the producer in charge.

### 4.2 *Occurrence of personal data in film and other material*

Your name and picture may occur in produced film or tv material. Anagram assesses that film and tv production falls within the scope of artistic expression, and therefore does not constitute personal data processing according to the General Data Protection Regulation

and other applicable personal data protection legislation. Furthermore, Anagram has an obligation to ensure and observe your rights under Swedish copyright law.

## **5 WHO WE MIGHT SHARE YOUR DATA WITH**

Anagram may transfer your personal data to distributors that provide services for Anagram, such as cloud service providers and the likes thereof. These recipients are only entitled to process your personal data on behalf of Anagram in conjunction with the performance of a service for Anagram. Anagram takes all reasonable legal, technical and organizational measures in order to ensure that your data is handled securely and with an adequate level of protection when transferring to, or sharing with, selected third parties.

In addition to your name and picture being shared in accordance with item 3.6 above, Anagram may also disclose your personal data to a public authority when Anagram is obligated to do so by law, for example the Tax Agency and the Swedish Social Insurance Agency. In the event all or part of Anagrams operations are sold, Anagram may transfer your personal data to a potential purchaser of the business.

## **6 WHERE IS YOUR PERSONAL DATA PROCESSED?**

Your personal data will be processed primarily within the EU/EEA, but may be transferred to countries outside of the EU/EEA if the service providers that process data on behalf of Anagram transfer the data to such locations. Anagram has taken appropriate protective measures in order to protect your personal data through the recipient of the personal data participates in Privacy Shield, or having signed an agreement containing certain standard contract clauses which ensure that your data is processed in accordance with the General Data Protection Regulation.

## **7 HOW LONG DO WE SAVE YOUR DATA?**

As a basic rule, Anagram processes your personal data as long as it is necessary for the purposes for which the data was collected. In paragraph 3 we have outlined, for certain processes, our deletion process. For events not outlined there, the general rule is that personal data regarding employees or contractors will be deleted once the employment or the contract expires, should the data no longer be deemed necessary. The types of personal data saved, and how long it is saved, may vary depending circumstances in each individual case. Set forth below is a summary of what types of data that are normally saved after the expiry of the employment or the contract.

### *7.1 Data which might be required to exercise Anagram's rights*

As a general rule, Anagram may save its employees' personal data for nine months after the employment has expired, to the extent that the data is deemed relevant to be able establish, enforce or defend against legal claims. The processing is carried out on the basis of balancing of interests, where Anagram's legitimate interest is to exercise its rights in accordance with above.

### *7.2 Salary details and other information that must be stored according to the accountancy law*

Anagram saves salary data, invoice details and other information that must be saved in accordance with Swedish accountancy law for several years after termination of employment or contract. The data is saved in order for Anagram to be able to perform its legal obligations.

### *7.3 Pensions, etc.*

Personal data needed for the payment of pensions/pension allocations is saved to the extent and if necessary for Anagram to be able fulfil its contractual or legal obligations.

#### 7.4 *Data published on Anagram's website*

Upon the expiry of an employment or contract, the employee's or contractor's email account and other personal data shall be removed from Anagram's website. This data will normally be removed within a week from the expiry of the employment or contract.

As regards marketing material for productions for which you have been part of, Anagram may save the data longer. The processing is based on balancing of interests, in which Anagram's legitimate interest is to be able to communicate and market its productions to costumers and other parties even after Anagram's relationship with you has ceased.

#### 7.5 *Data in business documents and the like*

Personal data regarding a former employees and contractors may be found from time to time in Anagram's agreements, documentation of minutes, correspondence and business matters, etc. This type of data is saved to the extent and as long as necessary for Anagram to be able to conduct its business operations in a satisfactory manner. The processing is based on a balancing of interests.

#### 7.6 *Miscellaneous*

Notwithstanding the aforementioned, Anagram may also save your personal data for a longer period of time where it is necessary to fulfil a legal obligation which requires processing according to applicable employment law legislation or other legislation, or in order for Anagram to be able to establish, enforce or defend against legal claims.

## 8 **YOUR RIGHTS**

You have certain legal rights which you can enforce against the Anagram. Set forth below is a summary of these rights. For complete information regarding your rights, please see [www.datainspektionen.se](http://www.datainspektionen.se) or the General Data Protection Regulation, sections 3–5.

- (a) **Right to access to/extracts from registers.** You are entitled to be informed as to whether Anagram is processing personal data about you. If it is, you are entitled to information regarding, among other things, which personal data is being processed, the purposes of the processing, which external recipients have access to your personal data, and how long we save your personal data.
- (b) **Right to data portability.** You have a right to a copy of the personal data which you have provided to Anagram, in a structured, commonly used, and machine-readable format. You also have the right to require that Anagram transfer this personal data to another controller of personal data. The right to data portability applies to personal data which is processed in an automated manner and which is based on your consent or on an agreement to which you are a party.
- (c) **Correction of erroneous data.** You have a right to require that Anagram correct erroneous or incomplete information about you.
- (d) **Deletion of certain data.** You have a right to require Anagram to delete your personal data under certain circumstances, for example where the personal data is no longer necessary for the purpose for which we collected it.
- (e) **Right to object to Anagram's processing of personal data.** You have the right, under certain circumstances, to object to Anagram's processing of your personal data.

- (f) **Right to restrict the processing of your personal data.** You have the right to require Anagram to restrict its processing of your personal data in certain circumstances. For example, if you have denied that your personal data is correct, you can request a restriction on the processing during a period of time which allows Anagram to verify whether the personal data is correct.
- (g) **Complaints.** If you have any complaints regarding Anagram's processing of your personal data, you are entitled to file such complaints with the Data Inspection Board.

If you would like to submit a request for a extract from the register, data portability, correction, deletion, objection or restriction, please contact Anagram at [info@anagram.se](mailto:info@anagram.se).

## 9 CHANGES IN THE PRIVACY POLICY

Anagram reserves the right to make changes to this privacy policy. Where such changes are made, notice will be provided in a way Anagram deems fit.

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