

# DYNAMO

## **Dynamo Consulting Privacy Policy**

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# Dynamo Consulting Privacy Policy

Dynamo values personal integrity and the protection of personal data. This means that Dynamo strives to only process personal data when necessary for specifically set goals. With the new General Data Protection Regulation (GDPR), the protection of individual's personal data will strengthen further. For Dynamo, this means that we have reviewed and reworked our routines to ensure that individual's rights are protected. In the text below, you will find an overview of how Dynamo processes personal data, what rights you have if we process personal data about you as well as information about where to turn if you have additional questions.

## Responsible Controller

Dyn4m0 Consulting AB, org. nr. 556787-2790, is the responsible data controller for the company's processing of personal data.

## Data Processors

In some cases, data processors may be used, i.e. companies that processes personal data on Dynamos behalf. When a data processor is being used, Dynamo will always before processing ensure that there is a set agreement between the parties that regulates how the data is to be processed.

## Where is data being processed?

Dynamo strives to process all personal data within the EU/EEA and that all Dynamos own IT systems are located in Sweden.

In cases where personal data is processed outside the EU/EEA, Dynamo will take necessary steps to ensure the level of protection meets the requirements set in GDPR and relevant national legislation. This means that actions such as using the EU Standard contractual clauses ("SCCs") and working through recognized organizations such as "Privacy Shield".

## Security

Dynamo protects personal data in multiple ways such as, antivirus protection, firewalls, minimizing data access and through employee guidelines. In addition, encryption is used to protect sensitive data. Dynamo is constantly working to maintain and improve the security of our IT environment.

## **How long do we save personal data?**

Dynamo never saves your personal data longer than what is necessary for each purpose. See the specified purposes for information how long personal data is stored in regards to that purpose.

## **Data subject rights**

### **Right of access**

Dynamo strive to always be transparent with how we process personal data. If you want a deeper understanding of what personal data Dynamo is processing regarding you, please contact us for a copy sheet of your personal data as well as other supplementary information.

### **Right to rectification**

In case any of your personal data that is being processed at Dynamo is inaccurate or incomplete, you always have the right to request that we correct or supplement the data.

### **Right to be forgotten**

You have the right to request that we stop processing personal data concerning you in the following situations:

- the personal data is no longer necessary in relation to the purpose for which they were collected or processed;
- the process was based on consent and you withdraw your previously given consent;
- the data is being processed based on legitimate interests pursued by the controller and you object to those interests; or
- the data is being unlawfully processed.

Dynamo has the right to deny your request if there are legal obligations that prevent us from immediately deleting your personal data. These obligations may be such as, mandatory legislation. It may also be that the treatment is necessary for us to determine, enforce or defend legal claims. Should we be prevented from deleting the personal data, we will instead block it from being used for purposes other than those preventing the requested removal.

### **Right to restriction of processing**

You are entitled to request that we limit our processing of your personal data. If you have an objection to the accuracy of the personal data we provide, you may request that the process is limited until Dynamo confirms the accuracy of the data. If we no longer need your personal information for the specified purposes, but you need them to determine, enforce or defend legal claims, you may request limited processing from Dynamo, meaning you can request that we do not delete your information during that period.

If you have objected to a process based on legitimate interest, you may request that treatment be limited during the time need to check if Dynamos legitimate interests outweigh your interest of getting the data deleted. If a process has been limited in accordance with any

of the above situations, we may only process the data to determine, enforce or defend legal claims, to protect someone else's rights or if you have given your consent.

## **Right to data portability**

If Dynamos right to process your personal data is based on consent or performance of a contract with you, you are entitled to request the information related to you, which you have provided to us, is transferred to another data controller (so-called data portability). A prerequisite for data portability is that the transfer is technically possible and can be done automatically.

## **Contact Dynamo**

If you have any questions regarding Dynamos processing of personal data, please contact us at [dataprotection@dyna.mo](mailto:dataprotection@dyna.mo).

# Purpose and legal basis for processing of your personal data and storage period

## Customer contacts

### Customer contact persons

Purpose	Processing	Categories of personal data
Developing business relationships with customers of Dynamo Consulting	<ul style="list-style-type: none"> <li>• Marketing messages for the purpose of communication and information</li> <li>• Invitations to events, courses and similar</li> <li>• Phone or email based communications regarding contractual discussions and commitments</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Phone number</li> <li>• Job title</li> <li>• Communications between you and Dynamo Consulting</li> <li>• Assignment history</li> <li>• Preferences regarding being contacted by Dynamo Consulting, for example related to invitations to events or courses</li> <li>• Information on your technical means of contacting us</li> <li>• In some cases, browser data and IP address</li> </ul>
<p><b>Legal basis for processing: Legitimate interest</b>            The processing is necessary to fulfill Dynamo Consulting's need to be able to retain and develop our business relationships.</p>		
<p><b>Storage period</b>            For the duration of the business relationship. Personal data that isn't current will be deleted at our earliest convenience whenever the controller is informed about this.</p>		

**Potential customer contact person**

Purpose	Processing	Categories of personal data
<p>To be able to build business relationships with new customers</p>	<ul style="list-style-type: none"> <li>● Gathering of contact information through internal networks at Dynamo Consulting, social media or from third parties</li> <li>● Communication by phone or e-mail regarding our services</li> <li>● Storage and analysis of potential customers</li> <li>● Communication of marketing information</li> <li>● Invitations to seminars, events and courses</li> </ul>	<ul style="list-style-type: none"> <li>● First and last name</li> <li>● E-mail address</li> <li>● Phone number</li> <li>● Job title</li> <li>● Communications between you and Dynamo Consulting</li> <li>● Assignment history</li> <li>● Preferences regarding being contacted by Dynamo Consulting, for example related to invitations to events or courses</li> <li>● Information on your technical means of contacting us</li> <li>● In some cases, browser data an IP address</li> </ul>
<p><b>Legal basis for processing: Legitimate interest</b>                      The processing is necessary to fulfill Dynamo Consulting’s need to be able to create new business relationships.</p>		
<p><b>Storage period</b>                      Until the data is no longer deemed necessary to fulfill the purpose of building the specific relationship in question, or if no relationship has been established within 1 year of first contact.</p>		

# Recruiting

## Candidates

Purpose	Processing	Categories of personal data
<p>To enable processing of job applications</p>	<ul style="list-style-type: none"> <li>• Registration and management of job applications</li> <li>• Interview</li> <li>• Contacting relevant references</li> <li>• When applicable, code tests, personality tests or similar</li> <li>• Feedback to applicants</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Home address</li> <li>• Job title</li> <li>• Gender</li> <li>• Date of birth</li> <li>• Cover letter</li> <li>• CV</li> <li>• Photo</li> <li>• Names of references</li> <li>• LinkedIn page and other relevant social media profiles</li> <li>• Test results</li> <li>• Notes from interview sessions</li> <li>• Communications between Dynamo Consulting and you</li> <li>• Information on your technical means of contacting us</li> <li>• In some cases, browser data and IP address</li> </ul>
<p><b>Legal basis for processing: Consent</b>            We need to process this data in order to handle your application process for any position, open or not, at Dynamo Consulting. The processing is based on consent given by you in conjunction with submitting your application. In cases where the hiring process involves additional checks, separate consent will be requested.</p>		
<p><b>Storage period</b>            We store data for up to 18 months after hiring for a position. In order to handle potential investigations into specific hiring processes, we keep this data regardless of whether your particular application leads to employment with Dynamo Consulting or not.</p>		



## Potential candidates as identified by Dynamo Consulting

Purpose	Processing	Categories of personal data
Getting in touch with you regarding career opportunities if we believe you could be a potential candidate	Discovering and selecting possible candidates via personal networks, recruiting tools or LinkedIn and other relevant social media.	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Home address</li> <li>• Job title</li> <li>• Date of birth</li> <li>• LinkedIn page and other relevant social media profiles</li> <li>• Information on your technical means of contacting us</li> </ul>
<p><b>Legal basis for processing: Legitimate interest</b> Dynamo Consulting gathers personal data through personal networks and social media tools in order to identify and contact candidates for employment.</p>		
<p><b>Storage period</b> We store data for up to 18 months in order to handle potential investigations into specific hiring processes. Personal data regarding individuals who aren't interested in being classified as potential candidates is deleted immediately, with the exception of their preference of not being contacted, which is stored for up to 18 months.</p>		

## References

Purpose	Processing	Categories of personal data
Contacting references given by potential candidates in order to better understand and assess candidates in ongoing hiring processes.	<ul style="list-style-type: none"> <li>• Telephone, e-mail and/or social media contact</li> </ul>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Job title</li> <li>• Employer</li> </ul>
<p><b>Legal basis for processing: Legitimate interest</b> We process this data in order to fulfill our legitimate need to carry out qualified, thorough recruiting processes.</p>		
<p><b>Storage period</b> We store data for up to 18 months after hiring for a position. In order to handle potential investigations into specific hiring processes, we keep this data regardless of whether your particular application leads to employment with Dynamo Consulting or not.</p>		