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Skanska Privacy Notice  
Contract Partners and Stakeholder Groups  
Version v5

**SKANSKA OY'S AND ITS SUBSIDIARY COMPANIES' CONTRAC PARTNER AND  
STAKEHOLDER GROUP REGISTER'S PRIVACY NOTICE**

<b>Register</b>	Skanska Oy's and its subsidiary companies' ("Skanska") Contract Partner and Stakeholder register.
<b>Controller</b>	<p>Skanska Oy and each subsidiary company as for its own Contract Partners and their Stakeholders ("Stakeholders").</p> <p>PL 114, 00101 HELSINKI Nauvontie 18, 00280 HELSINKI <a href="mailto:yritysturvallisuus@skanska.fi">yritysturvallisuus@skanska.fi</a></p>
<b>Contact person of the register</b>	<p>Sanna Pimiä</p> <p>PL 114, 00101 HELSINKI Nauvontie 18, 00280 HELSINKI <a href="mailto:yritysturvallisuus@skanska.fi">yritysturvallisuus@skanska.fi</a></p>
<b>Description of the processing activities</b>	<p>In this privacy notice we explain, how and to what purposes we process personal data of our contract partners, stakeholders and visitors of <a href="http://www.skanska.fi">www.skanska.fi</a> -internet page.</p> <p>You can also find information of how to use your rights as a data subject.</p> <p>Processing personal data refers to all the processing activities carried out by Skanska and/or it's partners such as collecting, processing and storing.</p> <p>Data in the register is processed to enable cooperation with various Contract Partners and Stakeholders and to comply with contractual obligations.</p> <p>We also process personal data for marketing purposes, targeted marketing, collecting feedback and improving Skanska's business activities..</p> <p>Based on personal data we collected we create profiles to be able to market and offer improved products and services to our customers' needs.</p>

<b>Purpose and legal basis of the processing</b>	<p>Skanska uses this register's data to:</p> <ul style="list-style-type: none"> <li>- Comply with contractual obligations between Skanska and its Contract Partners and Stakeholders (customers, suppliers (goods / services), subcontractors and their employees, consultants, etc.) and to maintain and improve business relations between parties</li> <li>- Pursue Skanska's legitimate interest</li> <li>- Manage Skanska's statutory obligations</li> <li>- On the basis of data subject's consent</li> </ul>
<b>Legitimate interest</b>	<p>The processing of data in the register is based on Skanska's legitimate interest to improve, market and offer its products and services and process personal data of its Contract Partners and Stakeholders regarding the following processing activities to:</p> <ul style="list-style-type: none"> <li>- Maintain business relations and related marketing</li> <li>- Collect feedback</li> <li>- Improve Skanska business, customer service, sales, marketing and related profiling</li> <li>- Optimize network visits on <a href="http://www.skanska.fi">www.skanska.fi</a> and target marketing</li> </ul>
<b>Consent</b>	<p>The processing of data in the register is based on a separate consent for the following processing activities:</p> <ul style="list-style-type: none"> <li>- Drug tests</li> <li>- Alcohol breath tests</li> <li>- Review of salary payroll information</li> <li>- Disclosure of Skanska eLearning course certificate to VastuuGroup Taitorekisteri service</li> <li>- Photographing of (a) data subject(s) and use of recordings (images, videos, voice recordings) according to a separate model agreement</li> </ul> <p>The data subject has a right to withdraw his or her consent by contacting the contact person of the register or representative of Skanska to whom the consent was given to.</p>
<b>Sources of personal data</b>	<p>The data is collected mainly from Stakeholders' representatives and, where subcontractors are concerned, also from the employees themselves.</p> <p>The data concerning qualification and orientation of employees is received from VastuuGroup Oy services.</p> <p>The employee basic data is also received from a public tax number register.</p>

	<p>Information regarding commercial bans and neglecting commercial activities, authorisations to sign and positions of authority regarding a company is received from the Trade Register, Asiakastieto Oy, VastuuGroup Oy and other similar sources.</p> <p>We use cookies on our website <a href="http://www.skanska.fi">www.skanska.fi</a> to collect different types of information. Some of this information is considered as personal data. This means, that we collect personal data also on <a href="http://www.skanska.fi">www.skanska.fi</a> through cookies.</p> <p>More information about our web sites and cookies can be found on <a href="https://www.skanska.fi/sivuston-kayttoehdot/">https://www.skanska.fi/sivuston-kayttoehdot/</a></p> <p>The data collected for marketing or feedback purposes is optional and data subject may only give the data he / she volunteers.</p>
<b>Groups of data subjects</b>	<ul style="list-style-type: none"> <li>- Customers, i.e. buyers/ B2B customers of Skanska (current and former contact persons and representatives of companies)</li> <li>- Subcontractors, i.e. suppliers of goods and services and other subcontractors (current and former contact persons / representatives of companies)</li> <li>- Employees of subcontractors (current and former) including consultants</li> <li>- Representatives of State and municipals, authorities, business partners, representatives of media, parties engaged in political activities, representatives of educational institutions, organizations, research institutes</li> <li>- Users of <a href="http://www.skanska.fi">www.skanska.fi</a> -pages</li> </ul>
<b>Groups of personal data</b>	<p>Personal data is any information that is related to an identified or identifiable natural person. For example, name, image, social security number, address, appearance, customer number, address and IP address are all personal data.</p> <p>Skanska stores data concerning the Stakeholders in the Register as follows:</p> <ul style="list-style-type: none"> <li>- First and last name, and the company name</li> <li>- Postal address of the company and the contact person</li> <li>- Commercial information of the company</li> <li>- Position (title) in the company</li> <li>- Connections to other companies</li> <li>- Email address</li> <li>- Telephone number</li> </ul>

	<ul style="list-style-type: none"> <li>- Images, videos and voice recordings stored according to a separate model agreement</li> <li>- Cookies and IP-addresses collected during the visit to <a href="http://www.skanska.fi">www.skanska.fi</a> -site</li> <li>- Other information provided to Skanska by data subject</li> </ul> <p>The following data is stored concerning employees of the Stakeholders:</p> <ul style="list-style-type: none"> <li>- First and last name</li> <li>- Employer name</li> <li>- Date of birth</li> <li>- Tax number</li> <li>- Nationality and home country</li> <li>- Email address and phone number</li> <li>- Job title</li> <li>- Type of employment</li> <li>- Access control information</li> <li>- Data regarding orientation and qualifications</li> <li>- Username and password for Skanska's project collaboration platform and other services</li> <li>- Images, videos and voice recordings stored according to a separate model agreement</li> <li>- Cookies and IP-addresses collected during the visit to <a href="http://www.skanska.fi">www.skanska.fi</a> -site</li> <li>- Other information provided to Skanska by data subject</li> </ul> <p>If the nationality of an employee working on a construction site is other than Finland, additionally the following data is stored:</p> <ul style="list-style-type: none"> <li>- Passport information</li> <li>- Legal basis of the right to work</li> <li>- Certificate of a posted worker</li> <li>- Name and telephone number of a representing person of the employer in Finland</li> <li>- Other data that is legally required</li> </ul> <p>We may also combine some of this data to perform processing activities such as targeted marketing.</p>
<p><b>Recipients or recipient groups of personal data</b></p>	<p>We may appoint external partners to perform tasks on our behalf, such as providing IT services or helping with marketing, administration of press releases, data analysis or statistics.</p> <p>The performance of these services may mean that our partners, both within and outside the EU/EEA, are able to gain access to your personal data. Companies that process personal data on</p>

	<p>our behalf must always sign an agreement with us so that we are able to ensure a high level of protection of your personal data even with our partners.</p> <p>The data is disclosed to VastuuGroup Oy based on data subjects' consent.</p> <p>Skanska may also disclose your personal data to third parties, for example the police or other public authorities, if it concerns criminal investigations or if we are otherwise required to disclose such data by law or public authority decision. Skanska will not disclose your personal data to any extent other than described in this section.</p> <p>Skanska is not selling to data to any other parties.</p>
<p><b>International transfers and disclosures of personal data</b></p>	<p>Special safeguards are taken with regard to partners outside the EU/EEA, such as signing agreements that include the standardized model clauses for data transfers adopted by the EU Commission and which are available on the EU Commission's website.</p> <p>The controller transfers data of Contract Partners and Stakeholders within the Skanska Group, also outside the EU and EEA.</p> <p>The collaboration platform Skanska offers to its partners and stakeholders is accessed by using Microsofts Multi-Factor-Authentication. The parameters related to access is processed in USA.</p> <p>Also, the data processed within the digitally generated reservations and sales is transferred to USA to generate reservation and sales confirmation e-mails.</p> <p>The data is transferred outside of EU- / EEA to USA for maintenance and support of Skanska's Customer Relationship Management system.</p> <p>Otherwise data will not be transffere or disclosed outside the EU and EEA unless the customer's or construction developer's fixed establishment is outside the EU or EEA territory.</p>
<p><b>Data subject's rights</b></p>	<p>According to GDPR legislation, the controller is responsible for processing your personal data. In a case you have questions or want to use any of you rights as a data subject, please reach out to a contact person of the register.</p>

	<p>The data subject has the following rights to:</p> <ul style="list-style-type: none"> <li>- Know that his or her data is collected and processed and the purposes the processing</li> <li>- Know what data has been collected about him or her and the period for which the data is stored</li> <li>- Have possible inaccurate data corrected</li> <li>- Have his or her data deleted, i.e., the right to be forgotten if there are no longer legal grounds for processing the personal data</li> <li>- Restrict the processing of his or her personal data for specific purposes</li> <li>- Oppose the use of his or her data on digital marketing or processing activities where legitimate interest is used as a legal basis of the processing.</li> <li>- Transmit the data from one register to another, where applicable</li> <li>- Receive information about a personal data breach directed towards the controller, if this poses a high risk to his or her rights and freedoms</li> <li>- Claim compensation for damages caused to him or her by the personal data breach</li> <li>- Lodge a complaint with a supervisory authority regarding the processing of his or her personal data</li> </ul>
<p><b>Data security</b></p>	<p>Skanska safeguards your personal data with a high level of security and has to this end taken appropriate technical and organizational security measures to protect your personal data from unauthorised access, amendment, dissemination or destruction</p> <p>The register is maintained in electronic form. The manual material is stored in a locked and access controlled space.</p> <p>The data stored in electronic form is protected by firewalls, usernames, passwords and other technical security measures.</p> <p>The rights to access the data are predefined and limited. The destruction of data is executed appropriately and with due care.</p>
<p><b>Data retention</b></p>	<p>Skanska retains personal data in accordance with the law.</p> <p>The data will be stored only for as long as necessary or defined by the explicit and legitimate purposes of the processing, described in this Privacy Notice. The data concerning the Stakeholders' representatives will be stored mainly for as long as cooperation between Skanska and the Stakeholder exists.</p>

Data concerning individual employees is stored mainly for 6 years after the completion of the construction site. Individual data may be stored for longer periods, if necessary, to comply with Skanska's contractual or statutory obligations.

Images, videos and voice recordings are stored for 5 years from the date produced.