

Privacy Notice for Embracer Learning

Your privacy is important to us at Embracer Group (publ) "Embracer" "we" or "us". This Privacy Notice describes how Embracer Group as a personal data controller, according to the definition defined in the EU General Data Protection Regulation (GDPR), collects and processes your personal data and other information about you.

Please note: Your employer will also process your personal data in relation to Embracer Learning. This is to enable follow-up and ensure that all employees have performed mandatory training. For more detail about your employer's personal data processing, please refer to the Privacy Notice supplied by your employer as it is not covered by this Privacy Notice.

PERSONAL DATA CONTROLLER

Embracer Group AB
Tullhusgatan 1B, SE-652 09, Karlstad, Sweden
Company registration number: 556582-6558

Please submit inquiries regarding personal data protection, privacy, and security matters using the contact information at the end of this notice.

DATA RESPONSIBILITY, DATA MANAGEMENT, AND DATA PROTECTION

Embracer Group is the controller of the personal data collected within this system. That means we decide which personal data is to be collected, how it should be processed, and for how long. Your personal data is also shared with your employer or operative group company, and they perform independent processing activities as a controller as well.

You, as an employee of Embracer Group, are super important to us. To ensure that we handle your data correctly, we have a privacy management program that sets the parameters for how personal data can be used, train our staff on the requirements of personal data processing, and ensure that we fulfill our legal obligations for the processing of personal data.

We have also ensured appropriate technical, organizational, and administrative security measures to protect your personal data from unauthorized access and other unauthorized processing.

PERSONAL DATA

Personal data is any information that can be directly or indirectly linked to a physical person. Within Embracer Learning, we process the following types of personal data.

- First and last name
- What operative group and entity you are employed at
- Email address
- Phone number
- Training information (such as what training you are enrolled in, if they are completed and, if relevant, with what score, and if any trainings are overdue)

WAYS WE PROCESS YOUR PERSONAL DATA

Registering an account

When you register an account with the system, we collect personal data from you to give you the correct access to the system. This is within our legitimate interest to ensure an accurate and secure learning environment.

Performing and administrating training

When you are taking training within Embracer Learning, we will process your personal data to supply the correct training to you and follow up that you have performed the training. In some trainings, we also record the score or degree of passing with which you completed the training.

We also process your personal data to remind you of training that is late or to inform you of other training-related information.

- Some training are mandatory to perform for Embracer Group to each employee; in those cases, we process your personal data out of a legal obligation
- For training that isn't legally required but still mandatory because of group policies or similar instructions from either the group, operative group, or entity, we consider it within the employment agreement for you as an employee and base the processing of personal data on that contract
- For training not deemed mandatory, we consider the processing to be within our legitimate interest of enabling you to receive the training you are interested in

THIRD PARTIES

Service providers

We use external service providers to process personal data on our behalf. These service providers provide services related to, for example, the website and IT support. External service providers may have access to and process your personal data but are still doing so under our responsibility. All external service providers are under contract to fulfill appropriate data protection standards.

Other recipients

Following applicable personal data legislation, we may transfer your personal data to Embracer Group companies, regulators, other public authorities, legal advisors, external consultants, and partners as required or necessary. In the case of a merger, sale of part or the whole company, or acquisition of companies, your personal data may be transferred to the third parties involved.

INTERNATIONAL TRANSFERS

We strive to keep your personal data stored and processed within the EU / EEA area and personal data only leaves the EU / EES if your employer is based outside of that area. If your personal data is required to be sent to a third country, we will take all necessary actions to ensure an adequate level of protection for personal data transmitted. This includes technical, organizational, and contractual obligations.

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We process data about you as an employee for as long as you are employed within the company and, if such exists, as long as required by statutory storage times.

YOUR RIGHTS

When we process personal data, you, as a data subject, have several rights. You can contact us at any time concerning these and if you wish to exercise any of the rights described below. We reserve the right to take appropriate protective and security measures to ensure that you are the person you claim to be when you contact us. If you cannot satisfactorily demonstrate your identity, we may not be able to meet your request fully.

Access to personal data

You have the right to know what personal data we process about you. If you wish to receive that personal data, you can get a compiled register extract from us that contains all the personal data we process about you.

Correction and deletion

If your personal data is incomplete or wrong, you have the right to have it corrected or supplemented. You also have the right to request that your personal data should be deleted. Please keep in mind that we may not be able to provide you with our services if you request to have your personal data deleted.

Restrictions to processing

Under certain conditions, you have the right to request that we restrict our processing of your data. This means that we mark the data so that we only process it for certain specific purposes in the future. We may not be able to provide you with our services if we restrict the processing of your personal data.

Right to data portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format.

Right to make objections

You have the right to object to the processing of personal data that is carried out to perform a task based on the legal basis of legitimate interest.

Right to lodge a complaint

If you feel we have not processed your personal data correctly, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection. You can read more about this on their website, www.imy.se

UPDATES TO THIS NOTICE

From time to time, we update this notice to reflect any changes in how we handle your personal data. Should we make significant changes to how we process personal data that we are obliged to notify you about or ask for your consent again, we will do so.

This privacy notice was last updated on 2022-11-24

CONTACT

Data Protection Officer

E-mail:

DPO@EMBRACER.COM

Mail:

Embracer Group AB
Att. Data Protection Officer
Tullhusgatan 1B, SE-652 09, Karlstad, Sweden