

Code of Conduct Data Processing Matrix¹

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<p>Identification details – e.g. name, title, personal identity number, and photo.</p> <p>Source: Directly from reporter or during the course of an investigation.</p>	To enable ASSA ABLOY to identify you in order to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to inform the ASSA ABLOY company concerned, the Code of Conduct Committee and the Intake Administrator about the outcome of the investigation.	Legitimate interest	Non-employees' personal data: For as long as a claim can be raised against ASSA ABLOY AB under applicable legislation or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
<p>Contact information - e.g. address, telephone number, email address, and fax number.</p> <p>Source: Directly from reporter or during the course of an investigation.</p>	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to inform the ASSA ABLOY company concerned, the Code of Conduct Committee and the Intake Administrator about the outcome of the investigation.	Legitimate interest	Non-employees' personal data: For as long as a claim can be raised against ASSA ABLOY AB under applicable legislation or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
<p>Employment contract details - e.g. terms and conditions of employment and type of employment.</p> <p>Source: ASSA ABLOY</p>	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or
	To enable ASSA ABLOY to inform the ASSA ABLOY company concerned and the Code of Conduct Committee about the outcome of the investigation.	Legitimate interest	
	To enable ASSA ABLOY to refute claims.	Legitimate interest	

¹ Version 1.0 – 2018

			relevant authorities.
<p>Work position details – e.g. job qualifications, educational background, former employers and performance information.</p> <p>Source: Directly from employee and ASSA ABLOY</p>	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	<p>Employees’ personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.</p>
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
<p>Work details – e.g. working time, work tasks, assignments, absences, work description, length of employment.</p> <p>Source: ASSA ABLOY</p>	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	<p>Employees’ personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.</p>
	To enable ASSA ABLOY to refute claims	Legitimate interest	
<p>Compensation and benefits related information – e.g. all compensation and other types of remuneration paid out to the employee</p> <p>Source: ASSA ABLOY</p>	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	<p>Employees’ personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.</p>
	To enable ASSA ABLOY to be able to refute claims.	Legitimate interest	
<p>Bank account details - e.g. bank account number, bank, and credit card number.</p> <p>Source: Directly from reporter or during the course of an investigation</p>	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	<p>Employees’ personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.</p> <p>Non-employees’ personal data: For as long as a claim can be raised against ASSA ABLOY AB under applicable legislation or if otherwise required by applicable legislation or relevant authorities.</p>
	To enable ASSA ABLOY to be able to refute claims.	Legitimate interest	

Absences and medical information - e.g. information regarding absences, medical information connected to, or affecting, the employment, e.g. sick leave or healthcare benefits or labour medicine doctor's certificates. Source: Directly from employee and ASSA ABLOY	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legal obligation/legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
Union membership Source: Directly from employee or trade unions	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legal obligation/legitimate interest	Employees' personal data: During the employment
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
Training records – e.g. information regarding assigned and completed trainings, e.g. code of conduct, antitrust, health and safety. Source: ASSA ABLOY	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
IT information – e.g. user names, passwords, computer log data, emails, entry access information. Source: Directly from employee and ASSA ABLOY	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities.
	To enable ASSA ABLOY to refute claims.	Legitimate interest	
Family information² – e.g. information relating to your family or household (name, address, personal identity number, and telephone numbers). Source: Directly from reporter or during the course of an investigation	To enable ASSA ABLOY to properly investigate and handle a suspected Code of Conduct violation and for the concerned ASSA ABLOY company to take remedial actions, including disciplinary actions.	Legitimate interest	Employees' personal data: During the employment, for as long as a claim can be raised against ASSA ABLOY AB under applicable legislation, or if otherwise required by applicable legislation or relevant authorities. Non-employees' personal data: For as long as a claim can be raised against ASSA ABLOY AB under applicable
	To enable ASSA ABLOY to refute claims.	Legitimate interest	

² If ASSA ABLOY collects information regarding your family or household members, you will be asked to contribute in the information process and information regarding the processing of personal data will be distributed to the relevant family members.

			legislation or if otherwise required by applicable legislation or relevant authorities.
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