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DATA PROTECTION POLICY

1 BACKGROUND AND PURPOSE

The purpose of this Data Protection Policy is to protect the rights of Eltel's employees, customers, partners, suppliers, contractors and other relevant third parties with respect to compliance with applicable data protection laws and to provide information on the rights of Eltel, as the data controller.

2 APPLICABILITY AND SCOPE

The policy is applicable for all entities and all employees within the Eltel Group.

3 POLICY STATEMENT

Eltel AB and its subsidiaries conduct business and/or have operations in Sweden, Finland, Norway, Denmark, Germany, Lithuania and Poland. The relevant Eltel entity that is the contractual counterparty is the data controller for the personal data collected under this policy (hereinafter "Eltel"). Eltel processes personal data that it may receive in its dealings with employees, customers, partners, suppliers, contractors and other relevant third parties for, *inter alia*, HR related purposes, contractual purposes, information purposes, billing purposes, service improvement and marketing purposes. Personal data may also be processed for other purposes as described herein. This Data Protection Policy will explain what kind of personal data that is processed, the purposes for which the personal data is used, how the personal data is processed and registered persons' rights in relation to the processing of personal data. All personal data is processed in accordance with this Data Protection Policy and the applicable data protection legislation.

Any questions about how Eltel collects, processes and stores personal data should be directed to local legal Eltel representatives in each respective jurisdiction as set out, in this policy.

4 DEFINITION OF PERSONAL DATA AND PROCESSING OF PERSONAL DATA

The term "**personal data**" is used to describe any information that may be used to identify, directly or indirectly, a specific individual. Examples of personal data are a person's first and last name, phone number, personal identity number, address, factors connected to the physical appearance and details of employment, CV, as well as a person's e-mail address, online username or identifier and IP address.

Processing of personal data is any operation or set of operations which is conducted in relation to personal data, whether or not it occurs by automatic means. Thus, processing include for example collection, recording, storage, adaptation or alteration, retrieval, transferring or otherwise making data available, combining data sets and deletion of data.

5 PERSONAL DATA PROCESSED BY ELTEL

Eltel processes personal data in order to be able to fulfil its legal and contractual obligations and in order to establish a safe and efficient administration of its business. More specifically, Eltel will only collect and process personal data as described in the below matrix and will only process such personal data to fulfil the purposes stated in the matrix. Personal data must only be processed in accordance with applicable legislation and what is considered good practice on the labor market, in order to fulfil the purposes set out in this Data Protection Policy and the matrices in Appendices 1 and 2.

6 HOW THE PERSONAL DATA IS HANDLED

Eltel will only process personal data for the purposes it was collected and as set out in the matrices. Further processing may occur if it is legal and compatible with the purposes for which the personal data were initially collected. Eltel has taken appropriate technical and organizational measures for the protection of the personal data to ensure that only authorized persons are given access to personal data. The organizational measures taken are e.g. policies, instructions, guidelines regarding the safety and security measures as well as log management and audit trail systems.

Eltel may need to provide personal data to relevant authorities (e.g. the police, social insurance agencies and the tax authority) based on mandatory law and in order to fulfil legal obligations.

Furthermore, due to the fact that Eltel is a part of a group of companies with business activities in several different countries, it will be necessary to transfer personal data to companies in the group outside of the registered person's own country that need to receive such personal data in order for Eltel to fulfil the purposes as stipulated in the matrices. This will always be subject to assessment according to local legislation or contractual requirements.

The personal data may also be transferred to and processed by companies within the EU/EEA which perform services for Eltel (data processors) in order for such companies to be able to perform the services requested by Eltel. Services which may be requested are, for example, the provision of infrastructure, insurance, administration and IT services. Only personal data that is necessary in order to fulfil such purposes will be provided to such parties. The data processors are obliged to act in accordance with Eltel's instructions and to implement appropriate technical and organizational measures for the protection of the personal data.

Eltel aims to process most of its personal data within the EU/EEA, however, at rare occasions, recipients of personal data may be located outside the EU/EEA (third country), mainly when we are using third-party data processors that will process data in a third country. Unless the European Commission has decided that a country ensures an adequate level of protection for personal data, Eltel will ensure that appropriate safeguards have been taken (such as the EU Commission's standard

contract clauses, including other supplementary safeguards as necessary in each case) to protect the personal data. In case personal data actually is transferred to third countries, more detailed information, as well as the applicable measure for each third country transfer will be available on request.

7 ACCESS TO INFORMATION

Personal data will only be available to authorized employees holding a position where it is necessary to process personal data to fulfil his or her tasks. These employees will only be granted access in accordance with the principle of least privilege, and will therefore only have access to personal data that is strictly necessary for the purpose of the processing. Accessibility, confidentiality and integrity of logs containing personal data will always be ensured.

8 DURATION OF PROCESSING AND DELETION OF PERSONAL DATA

Eltel will not store or process personal data for any longer time than what is necessary to fulfil the specific purposes set out in the matrices or otherwise in this Data Protection Policy or according to any mandatory applicable law. Accordingly, when the purpose has been fulfilled in relation to a specific type of personal data, Eltel will delete or anonymize the relevant personal data as soon as reasonably possible.

9 RIGHTS WITH REGARDS TO THE PERSONAL DATA

A registered person has the right to request access to the personal data relating to him or her. The right of access extends to information as to whether or not personal data concerning a person is processed, the relevant personal data being processed and the purpose of such processing. A registered person also has the right to rectify or complete personal data in case the personal data is inaccurate or incomplete.

Erasure of personal data may also be requested if the personal data, *inter alia*, is no longer necessary in relation to the purposes for which it was collected, if the processing is unlawful or the personal data has to be erased for compliance with a legal obligation in the European Union or in a registered person's own country to which Eltel is subject. This list is not exhaustive and questions regarding the processing should be directed to Eltel if a registered person would like his/her personal data to be erased. A registered person is also entitled to object to certain processing or request that the processing of the personal data is restricted if the registered person believes that the accuracy of the personal data could be questioned, if the registered person believes that the processing is unlawful or if the registered person believes that Eltel no longer needs the personal data for the purposes as stipulated in the matrix or in this Data Protection Policy.

However, please note that even if a registered person objects to certain processing, Eltel may still need continue such processing of personal data as necessary under applicable legislation, for example to be able to fulfil legal requirements or to fulfil contractual obligations. If a registered person has any complaints on how the personal data is processed, or would like more information in any regard, he/she may contact Eltel. A registered person is also entitled to lodge a complaint regarding the data processing with the relevant supervisory authority, i.e:

- Sweden: Integritetsskyddsmyndigheten – www.imy.se

- Finland: Tietosuojavaltuutettu – www.tietosuoja.fi
- Norway: Datatilsynet – www.datatilsynet.no
- Denmark: Datatilsynet – www.datatilsynet.dk
- Germany: Datenschutzinstanzen – www.datenschutz.de
- Lithuania: Valstybinė duomenų apsaugos inspekcija – www.vdai.lrv.lt
- Poland: Urząd Ochrony Danych Osobowych – www.uodo.gov.pl

A request to exercise individual rights with regards to the processing of personal data shall be sent by email to gdprforgetme@eltelnetworks.com.

Please note that we may ask a registered person to confirm his/her identity to ensure that we do not disclose personal data to any unauthorized person.

10 DATA PORTABILITY

If you request access to your personal data that has been provided by you and if such personal data is being processed by automatic means and is processed on the basis of consent or performance of a contract, you may request that the data is provided in a structured, commonly used and machine-readable format and you may also request that such personal data is transmitted to another controller, if technically feasible. A request to exercise such right to data portability shall be sent by email to the relevant HR Manager in each respective jurisdiction.

11 UPDATES TO THE DATA PROTECTION POLICY AND NON-COMPLIANCE WITH THIS DATA PROTECTION POLICY

In order to ensure compliance with the applicable data protection legislation, as amended from time to time, this policy may be amended by the Eltel at any given time. The applicable Data Protection Policy can always be found on eltelnetworks.com/dataprotection. Any breach of the Data Protection Policy shall be reported to Eltel. Any breach of this policy will be taken seriously and will result in necessary actions being taken. Eltel maintains a written plan and process for data protection incident handling.

A registered person should notify the Eltel of any changes of the personal data relating to himself/herself in order to facilitate for an accurate and secure processing of personal data. Please find below a list of all data controllers in the different jurisdictions.

Employees can also contact their respective jurisdiction’s HR Manager.

Data controller	Relevant country	Contact person	Data controller	Relevant country	Contact details and responsible person
Eitel AB	Sweden	Legal manager - Sweden	UAB Eitel Networks	Lithuania	Legal manager - Finland
Eitel Networks TE AB			Eitel Networks A/S	Denmark	Legal manager - Denmark
Eitel Networks Infranet AB			Fiber og Anlaeg I/S		

Eitel Group Oy	Finland	Legal manager - Finland	Eitel Networks AS	Norway	Legal manager - Norway
Eitel Networks Oy			Eitel Infranet GmbH	Germany	Legal manager - Denmark
Eitel Networks Pohjoinen Oy			Eitel Networks Poland S.A. S.A.	Poland	Legal manager - Poland

12 RESPONSIBILITIES

The Group General Counsel is responsible for any changes to this policy.

Local Heads of Legal and HR Managers are responsible for ensuring local compliance to this policy in their respective jurisdictions.

All employees, and Eltel counterparts are responsible for ensuring compliance to this policy as it applies to their operations.

In case any concerns arise, the Group General Counsel shall be consulted.

Any non-compliance to this policy shall be immediately reported by the party who identified the potential breach. Such can be done by directly contacting the Local Head of Legal and/or HR Manager in the applicable jurisdiction or by using the Eltel Whistleblowing system.

Eitel’s use of employees personal data described in this policy is a prerequisite for employment at Eltel. By entering into an employment agreement with Eltel employees confirm that they have been informed about how their personal data is processed by Eltel.

CU Heads of HR are responsible for the processing of employees Data. On a group level, the Eltel General Counsel is ultimately responsible for the processing of personal data of employees.

13 EXCEPTIONS

There are no exceptions to this policy.

14 REFERENCES TO ASSOCIATED DOCUMENTS

- Information Technology Policy
- Whistleblowing Policy

APPENDICIES

1 THE PERSONAL DATA PROCESSED BY ELTEL

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<p>Identification details - i.e. name, personal identification number, date of birth and nationality.</p> <p>Source: From data subject or the data subject's employer</p>	To enable Eltel to identify the registered person in order to fulfil all contractual obligations	Performance of a contract	During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel.
	To enable Eltel to fulfil all its obligations in relation to the contractual relationship. This includes processing of personal data for invoicing purposes, information/contact purposes, documentation of the services performed, recording transactions and planning and	Performance of a contract	
	To enable Eltel to manage an effective protocol in case of emergency situations and crisis	Legitimate interest	
	To enable Eltel to conduct credit ratings, ensuring confidentiality of commercially sensitive information and security vetting		
	To enable Eltel to administer and maintain personal records, to create employee, customer, partner, supplier, contractor and other relevant third party databases including information regarding services provided, services received		
	To enable Eltel to publish references on Eltel's, webpage and in external communication ¹		
	To enable Eltel to carry out surveys and evaluations in order to plan, organize and manage		
<p>Contact information - i.e. address, telephone number, e-mail address, fax number.</p> <p>Source: From data subject or the data subject's employer</p>	To enable Eltel to make contact in order to fulfil all obligations in relation to the contractual relationship.	Performance of a contract	During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel.
	To enable Eltel to administer and fulfil its obligations under mandatory law and regulatory and corporate governance obligations. This includes providing correct information to relevant authorities such as the tax agency, gathering information in relation to legal proceedings.,	Legal obligation	
	To enable Eltel to manage an effective protocol in case of emergency situations and crisis management	Legitimate interest	
	To enable Eltel to conduct credit ratings, ensuring confidentiality of commercially sensitive information and security vetting		
	To enable Eltel to administer and maintain personal records, to create employee, customer, partner, supplier, contractor and other relevant third party databases including information regarding services provided, services received and business opportunities		

	To enable Eltel to publish references on Eltel's, webpage and in external communication ²		
	To enable Eltel to carry out surveys and evaluations in order to plan, organize and manage the services to ensure the quality of work		
<p>HR data – work qualifications, prior work experience, test results, CV:s</p> <p>Source: From data subject or the data subject's employer</p>	To enable Eltel to offer and provide services to customer and partners and to participate in procurements	Legitimate interest	During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel.
	To enable Eltel to administer and maintain personal records, to create employee, customer, partner, supplier, contractor and other relevant third party databases including information regarding services provided, services received and business opportunities		
<p>Billing data - i.e. bank details, credit card numbers, and invoice information</p> <p>Source: From contracting party</p>	To enable Eltel to fulfil all its obligations in relation to the contractual relationship. This includes processing of personal data for invoicing purposes, documentation of the services performed and recording transactions.	Performance of a contract	During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel.
	To maintain accounting records and other economic records for book keeping purposes	Legal obligation	
<p>Assignment details - i.e. working time, work tasks, assignments, work description</p> <p>Source: Eltel</p>	To enable Eltel to adapt its organizational structure, workforce management, project time, and to schedule and monitor work time/resource planning	Legitimate interest	During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel.
	To enable Eltel to carry out surveys and evaluations in order to plan, organize and manage the services to ensure the quality of work		

<p>Communication data - i.e. correspondence with Eltel through email, telephone, fax or post and comments and reviews on surveys and reviews)</p> <p>Source: Eltel</p>	<p>To enable Eltel to ensure correct authorization, clearance and access to facilities and IT-systems and to monitor and ensure compliance with rules communicated regarding allowed use of the IT system and ensuring confidentiality of commercially sensitive information</p>	<p>Legitimate interest</p>	<p>During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel.</p>
	<p>To enable Elte to administer and maintain the contractual relationship</p>	<p>Performance of a contract</p>	
<p>Digital information data - i.e. personal data collected when using Eltel services and websites and applications including IP- addresses, browser data, traffic data, user patterns and logs related to use of Eltel's equipment (such as access logs)</p> <p>Source: Eltel</p>	<p>To enable Eltel to ensure correct authorization, clearance and access to facilities and IT-systems and to monitor and ensure compliance with rules communicated regarding allowed use of the IT system and to monitor and ensure compliance with the employment agreement, and ensuring confidentiality of commercially sensitive information and to investigate potential disloyalty towards Eltel,</p>	<p>Legitimate interest</p>	<p>During the length of the contractual relationship and as long as it is required under applicable book and file keeping regulations. and for as long as a claim can be raised against Eltel or by Eltel against the employee.</p>

^{1&2} Please note that marketing information will only be disclosed if Eltel has received consent for such disclosure.

2 THE PERSONAL DATA PROCESSED BY ELTEL IN RELATION TO ITS EMPLOYEES

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<p>Identification details - i.e. employee's name, title, personal identity number and photo.</p> <p>Source: Directly from employee</p>	To enable Eltel to identify you in order to fulfil all obligations in relation to you arising from the employment relationship	Performance of a contract	<p>During the employment. Name and identity number to be saved for as long as it is required under applicable book and personnel file keeping regulations or for as long as such information is necessary for the purposes of providing information regarding the employment in accordance with mandatory applicable laws</p>
	To enable Eltel to identify you and administer and fulfil its obligations under mandatory law including providing correct information to relevant authorities	Legal obligation	
	To enable Eltel to publish your name, photo (if applicable) and title on Eltel's intranet, webpage and in external communication	Legitimate interest	
<p>Contact information - i.e. address, telephone number (business), e-mail address, fax number (business).</p> <p>Source: Directly from employee</p>	To enable Eltel to make contact with you in order to fulfil all obligations in relation to you arising from the employment relationship.	Performance of a contract	During the employment and for as long as a claim can be raised against Eltel
	To enable Eltel to administer and fulfil its obligations under mandatory law and collective bargaining agreements such as handling payments, social security contributions, withholding tax, pension, sick pay, rehabilitation measures and to provide correct information to relevant authorities	Legal obligation	During employment and for as long as it is required under applicable book and personnel file keeping regulations
	To enable Eltel to manage an effective protocol in case of emergency situations	Legitimate interest	During the employment
	To enable Eltel to publish your business contact details on Eltel's intranet, webpage and in external communication		
<p>Employment contract details - i.e. terms and conditions of employment and type of employment</p> <p>Source: Eltel</p>	To enable Eltel to fulfil all obligations in relation to you arising from the employment relationship and the employment agreement	Performance of a contract	<p>During the employment and for as long as a claim can be raised against Eltel or for as long as such information is necessary to be kept for personnel file keeping obligations or for the purposes of providing information regarding the employment in accordance with mandatory applicable laws</p>
	To enable Eltel to refute claims from employees	Legitimate interest	
<p>Work position details - i.e. job qualifications, educational background, former employers and performance information</p> <p>Source: Directly from employee</p>	To enable Eltel to administer and maintain personal records, to schedule and create a competence database	Legitimate interest	During the employment or for as long as such information is necessary to be kept for personnel file keeping obligations or for the purposes of providing information regarding the employment in accordance with mandatory applicable laws

	To enable Eltel to facilitate for your development and for carrying out and follow up on performance reviews	Legitimate interest	During the employment
	To enable Eltel to publish competences on Eltel's intranet and in external communication	Legitimate interest	
Work details - i.e. working time, work tasks, assignments, absences, work description, length of employment Source: Eltel	To enable Eltel to adapt its organizational structure, workforce management, project time, equality of compensation and to schedule and monitor work time/resource planning	Legitimate interest	During the employment
	To administer different types of absences such as parental leave, study leave and military leave	Legal obligation	During the employment and for as long as a claim can be raised against Eltel or for as long as such information is necessary to be kept for personnel file keeping obligations or for the purposes of providing information regarding the employment in accordance with mandatory applicable laws
	To enable Eltel to administer and maintain personal records		
Compensation and benefits related information - i.e. all compensation and other types of remuneration paid out to the employee Source: Eltel	To enable Eltel to administer and fulfil its obligations under the employment agreement, collective bargaining agreements or individual agreement	Performance of a contract	During the employment and for as long as required under applicable book and personnel file keeping regulations. Information may otherwise be kept for as long as a claim can be raised against Eltel
	To maintain accounting records and other economic records for book keeping purposes	Legal obligation	
	To be able to refute claims from employees	Legitimate interest	
Bank account details - i.e. bank account number, bank, credit card number Source: Directly from employee	To enable Eltel to make salary payments and other types of payments to the employee based on the employment relationship, collective bargaining agreements or mandatory law.	Performance of a contract	Up until the last payment is due
Pension details – i.e. applicable pension scheme(s), age, years of service and entitlement to additional pension entitlements Source: Eltel	To enable Eltel to administer and fulfil its pension obligations under mandatory law, collective bargaining agreement or individual agreement	Performance of a contract	During the employment and for as long as a claim can be raised against Eltel
Absences and medical information - i.e. 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 Eltel	To enable Eltel to fulfil all obligations in relation to you in relation sickness benefits and to administer sick leave, other types of health services and in order to administer rehabilitation measures	Legal obligation	During the employment and for as long as it is required under applicable book and personnel file keeping regulations. Information regarding specific medical conditions shall be deleted as soon as such information is no longer needed for the employer to fulfil legal obligations
Union membership Source: Directly from employee or trade unions	To enable Eltel to ensure that Eltel adheres to applicable co-determination rules and other types of mandatory employment obligations, including consultation requirements	Legal obligation	During the employment and for as long as it is required under applicable book and personnel file keeping regulations

Data Protection Policy



General Counsel

8.12.2025

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<p>IT information - i.e. user names, passwords, equipment log data, emails, entry access information</p> <p>Source: Directly from employee and Eltel</p>	<p>To enable Eltel to ensure correct authorization and access to facilities and IT-systems and to monitor and ensure compliance with the employment agreement, and of internal policies and rules communicated regarding allowed use of Eltel's IT system that is vital for Eltel's business and to investigate potential disloyalty towards Eltel</p>	<p>Legitimate interest</p>	<p>For as long as necessary in order to investigate suspected violations of Eltel's internal policies and the employment agreement.</p>
	<p>To enable Eltel to maintain and manage a secure environment for Eltel's employees and Eltel's facilities</p>	<p>Legal obligation</p>	
	<p>To enable Eltel to manage an effective protocol in case of emergency situations</p>	<p>Legitimate interest</p>	
<p>Family information¹ - i.e. information relating to your family or household (name, address, personal identity number, and telephone numbers)</p> <p>Source: Directly from employee</p>	<p>To enable Eltel to verify and administer the employee's entitlements related to parenthood</p>	<p>Legal obligation</p>	<p>During the employment</p>
	<p>To enable Eltel to administer social security coverage of the employee's family members</p>	<p>Legal obligation Performance of contract</p>	<p>During the employment and for as long as it is required under applicable book and personnel files keeping regulations</p>
	<p>To enable Eltel to administer the employee's family members enrolments to non-compulsory benefit schemes operated by Eltel</p>		<p>During the employment</p>
	<p>To enable Eltel to conduct an appropriate background screening in a recruitment situation</p>	<p>Legitimate interest</p>	
<p>Recruitment information –i.e. past employers, financial information, credit ratings, personality tests and criminal records²</p> <p>Source: Directly from the employee or public sources</p>	<p>To enable Eltel to conduct fleet management, workforce management, invoicing and in order to avoid unauthorized use of Eltel's equipment and company cars as control measurement</p>	<p>Legitimate interest</p>	<p>During the recruitment process</p>
<p>Position data – GPS tracking solutions are used in Eltel's cars other vehicles³ and equipment</p> <p>Source: Eltel</p>	<p>To enable Eltel to secure a safe workplace, in order to protect Eltel's property and critical infra structure and for investigatory purposes</p>	<p>Legitimate interest</p>	<p>For as long as needed, however not longer than 6 months</p>

<p>Camera surveillance –i.e. Eltel uses camera surveillance solutions in their own premises⁴</p> <p>Source: Eltel</p>	<p>To enable Eltel to secure a safe workplace and take appropriate rehabilitation measures</p>	<p>Legitimate interest</p>	<p>30 days</p>
<p>Alcohol and drugs test –i.e. Eltel may ask their employee's to submit alcohol and drug tests⁵</p> <p>Source: Directly from the employee</p>			<p>For as long as needed to take appropriate actions</p>

¹ If Eltel collects information regarding your family or household members, you will be asked to contribute in the information process, however the family member will receive a written form to complete.

² Sensitive personal data and criminal records will only be processed if legally allowed and appropriate in each relevant jurisdiction. Please contact your HR Manager if you have any questions in this respect.

³ GPS tracking will only be used and the personal data will only be processed if legally allowed and appropriate in each relevant jurisdiction. Please contact your HR Manager if you have any questions in this respect.

⁴ Camera surveillance will only be used and the personal data will only be processed if legally possible and appropriate in each relevant jurisdiction.

⁵ Alcohol and drugs tests will only be used and the personal data will only be processed if legally allowed in each relevant jurisdiction. Appropriate safeguards regarding the tests will always be ensured. Please contact your HR Manager if you have any questions in this respect.