

## Code of Conduct Transfer of Personal Data Matrix<sup>1</sup>

Personal data type that will be transferred	The applicable countries involved in the transfer of personal data	Purpose and legal ground for the transfer of personal data	Safety measure(s) taken to ensure that the transfer of personal data complies with applicable law
<b>Identification details</b> - e.g. name, title, personal identity number, and photo.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the European Commission ("Commission") as stated in Article 46 of the General Data Protection Regulation ("GDPR").
<b>Contact information</b> - e.g. address, telephone number, email address, and fax number.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY AB to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Employment contract details</b> - e.g. terms and conditions of employment and type of employment.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Work position details</b> - e.g. job qualifications, educational background, former employers and performance information.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Work details</b> - e.g. working time, work tasks, assignments, absences, work description, length of employment.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Compensation and benefits related information</b> - e.g. all compensation and other types of remuneration paid out to the employee.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Bank account details</b> - e.g. account number, bank, and credit card number.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Absences and medical information</b> - 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.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.

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<b>Union membership</b>	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>Training records</b> - e.g. information regarding assigned and completed trainings, e.g. code of conduct, antitrust, health and safety.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.
<b>IT information</b> - e.g. user names, passwords, computer log data, emails, entry access information.	Sweden and other countries inside and/or outside the EU depending on where the suspected misconduct or Code of Conduct concern occurred, where the individuals involved are located and where the relevant entity has its registered office.	Legitimate interest to enable ASSA ABLOY to properly investigate and handle suspected misconduct or Code of Conduct concerns, and to take remedial actions, including disciplinary actions.	Standard data protection clauses adopted by the Commission as stated in Article 46 of the GDPR.

## 1. Relevant DPM

Each division has appointed DPMs. Contact details to the DPMs can be found on your division's intranet.

## 2. Authorized positions processing personal data

Code of Conduct Committee, Intake Administrator, HR department, and individuals assigned to conduct an investigation.

## 3. Supervisory Authority and contact details

See Schedule B.1