

# Privacy Notice Ericsson Pre-boarding Learning

## Privacy Notice

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# 1 Privacy Notice

This Privacy Notice applies to the processing of personal data of future employees ("Candidates") in connection with Ericsson's dedicated pre-boarding learning instance of Degreed. Degreed is an application used by the Ericsson Group to provide access to courses and learning content to the workforce and to candidates during the onboarding process. This Privacy Notice describes how we use and disclose your personal data, what your rights are and how you can contact us if you have any questions or concerns. Participation in Ericsson pre-boarding learning is voluntary.

In this Privacy Notice "**personal data**" means any information relating to an identified or identifiable individual.

## 1.1 Personal Data We Collect

The personal data we process in relation to the Service are:

- Name (First Name, Last Name, Full Name)
- Private email address
- Learning plan activity
- Courses attended

Your personal data will be accessed only by Ericsson personnel and authorized third parties on a need-to-know basis. For example, your contact point at Ericsson can access your personal data to provide services to you, and a tool administrator may have access to your personal data when ensuring that the Service is functioning properly.

## 1.2 How We Use Your Personal Data

Your personal data will only be used to:

- Ensure secure and private access to the pre-boarding learning instance of Degreed (name and private email address).
- Capture learning progress to evaluate which learning items are most visited by candidates (courses attended).
- Capture which learning content you engage with to determine the value of each content item for candidates (learning plan activity).
- Support an active engagement in learning prior to onboarding to Ericsson as an employee (learning plan activity).

We only process your personal data when we have a valid "legal basis" for processing. In relation to the Service, the legal basis for processing your personal data is:

- The processing of personal data involved is based on a legitimate interest (Article 6(1)(f), GDPR) that has been balanced with the rights and freedoms of candidates.



### 1.3 When We Share Your Personal Data

Your personal data can be shared between Ericsson Group entities where necessary to provide the Service to you.

We work with third-party service providers to provide the following services for us: Degreed (Degreed, 445 Bryant Street, San Francisco, CA 94107, USA) provides the Degreed cloud-based application, access to the application in terms of login, and provides services on the application in terms of technical support and technical implementation. These third parties will have access to or process your personal data as part of providing those services for us. We limit the personal data provided to these service providers to what is necessary for them to perform their functions on our behalf, and we contractually require them to agree to comply with applicable laws and to maintain the confidentiality of such personal data.

### 1.4 International Transfers of Your Personal Data

We may transfer your personal data to another Ericsson Group entity or to a third-party service provider in countries which may not have the same data protection laws as the country in which you initially provided the information, but we will protect your personal data as described in this notice. We may transfer your personal data to Ericsson Group entities across the globe. We comply with data transfer restrictions applicable to the processing of your personal data.

We rely on our Binding Corporate Rules (<https://www.ericsson.com/en/legal/privacy/controller-binding-corporate-rules>) when we transfer personal data between Ericsson Group entities outside of the European Economic Area ("EEA"). A list of Ericsson Group entities can be found at <https://www.ericsson.com/en/legal/privacy/privacy-policy>. When we transfer personal data from the EEA to our service providers outside of the EEA, we rely on adequacy decisions made by the EU Commission (where applicable) and/or the EU Commission's standard contractual clauses ("SCCs"). You can find a list of adequacy decisions issued by the EU Commission here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en) and the SCCs here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

### 1.5 Retention and Data Security

The personal data is retained for as long as you use the Service as a candidate. Upon onboarding to Ericsson (becoming an employee) your course completion and learning plan activity data will be migrated to an Ericsson internal instance of Degreed. Your private email address will be removed from the tool.

In case of you not joining Ericsson as an employee, after the end of your candidate status, your data related to Ericsson learning and your login and account granted by Ericsson will be removed from the Degreed application. Your user profile will remain in Degreed.

At that point Degreed (Degreed, 445 Bryant Street, San Francisco, CA 94107, USA) becomes controller of personal data and responsible. Users can at that point contact Degreed at <mailto:support@degreed.com> to have their profile deleted or to continue using Degreed with their personal email address. If a personal email address is not



registered, the profile will remain intact for 90 days at which time if the user has not contacted Degreed to provide a personal email address, the profile will be anonymized and unrecoverable. When information is removed, the information is deleted immediately from the Degreed production database and personal information will persist in previous database backups for at least 30 days.

We use physical, organizational and technical safeguards that are designed to protect the integrity and security of personal data.

## **1.6 Your Rights**

Where granted by applicable law, you have the right (i) to access, rectify, port, and erase the personal data that we have collected and retained about you and (ii) to restrict and object to certain processing of your personal data.

This includes the right to object to our processing of your information where we are pursuing our legitimate interests or those of a third party. If we process your information based on our legitimate interests or those of a third party, you can object to this processing, and we will cease processing your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons.

If you wish to exercise your rights or have any questions regarding the processing of your personal data, please contact us using the contact details set out in section 8 below.

You may also file a formal complaint with the competent supervisory authority.

## **1.7 Changes and Updates to this Privacy Notice**

If we make material modifications to this Privacy Notice, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address. Your continued use of the Service after the revised Privacy Notice has become effective indicates that you have read and understood the current version of this Privacy Notice.

## **1.8 How to Contact Us**

The entity responsible for processing, or “data controller” is Ericsson AB jointly with the Ericsson legal entity where you will be employed. In case you have any questions or concerns regarding the processing of your personal data, please contact the Ericsson Group Data Protection Officer by mail at Ericsson AB, Group Function Legal Affairs, 164 80 Stockholm, Sweden, or by email at [ericsson.group.privacy@ericsson.com](mailto:ericsson.group.privacy@ericsson.com).

You can find the Ericsson Binding Corporate Rules and more information on Ericsson Group privacy practices at <https://www.ericsson.com/en/legal/privacy>.