



INSTRUCTION FOR OPEN USE

Title

Management and protection of personal data



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Issue

2

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Classification Company confidentiality

COMPANY RESTRICTED

Classification Other

NOT CLASSIFIED

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1 Validity

The entire Saab Group.

2 Purpose

Saab is committed to data protection and to proactively address and correct business practices that lead to, or potentially could lead to, violations of individuals' privacy and breaches of applicable data protection and privacy laws.

Saab will always comply with data protection and privacy laws applicable where Saab operates. For companies established within the European Union (EU) and the European Economic Area (EEA) this means that they must comply with the requirements of the EU General Data Protection Regulation (GDPR) and any supplemental national laws. Companies established outside the EU and EEA must comply with national data protection and privacy laws applicable where they operate.

The purpose of this document is to set out the rules and procedures to be applied when processing personal data within Saab. Should applicable national laws conflict with this document the more stringent requirements prevail.

3 Key concepts

3.1 Personal data

Personal data are any information relating to an identified or identifiable individual. An individual might be able to be identified, directly or indirectly, in particular by reference to his name or social security number, an online identifier, location data, or to one or more factors specific to his physical, physiological, genetic, mental, economic, cultural, or social identity.

Examples of personal data are name, address, email address, phone number, IP address, gender, work title, CV, salary, interests, health information, marital status, and log-in details.

3.2 Processing

Processing is the legal term for handling personal data whether or not by automated means. It includes a variety of activities performed on personal data such as collection, recording, organisation, storage, adaptation, using, transmitting, and erasure.



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4 Principles for processing of personal data

Saab's processing of personal data shall always adhere to the following principles (the "Data Privacy Principles"):

- a) **Lawfulness, fairness and transparency:** The processing of personal data must be justified on a legitimate basis and it must be clear for the individual that personal data related to the individual are being processed, the identity of the entity doing that and for what purpose.
- b) **Purpose limitation:** To ensure that the purpose for the processing of personal data is specified, explicit and legitimate and that the personal data are not processed beyond this purpose.
- c) **Data minimisation:** To ensure that the personal data processed are adequate, relevant and limited to what is necessary for the purpose.
- d) **Accuracy:** To ensure that the personal data processed are accurate, kept up-to-date and to take every reasonable step to correct inaccurate data or erase it.
- e) **Storage limitation:** To ensure that personal data are not stored for a longer period than is necessary for the purposes for which the personal data are processed, which means that entities processing personal data must have visibility of its processing activities, established retention periods and/or periodic review processes.
- f) **Integrity and confidentiality:** To process personal data in a manner which ensures appropriate security and confidentiality of personal data and prevents unauthorised access (such as hacker attacks) or accidental loss of data.
- g) **Accountability:** Entities processing personal data must be able to demonstrate that they are in compliance with the obligations set out above.



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5 Saab processing personal data as a controller

5.1 Classify, mark, and handle information that contains personal data

In order to ensure a secure and correct processing, all personal data shall be:

- A. Classified according to [INF-0501](#)
- B. Marked according to [INF-0502](#)
- C. Handled according to [INF-0503](#)

5.2 Follow the Data Privacy Principles when processing personal data

In addition to the requirements in section 5.1, the Data Privacy Principles are a baseline requirement for all processing of personal data. It is the responsibility of (i) process owners (e.g. PM&T Owners or the like) or (ii) information owners to ensure that the principles are applied when personal data is processed.

Always reach out to a Data Protection Manager or the Group Data Protection Officer if you are uncertain on how to process personal data.

5.3 Deviation procedure

Any deviation from the procedures set out in section 5 shall be subject to the prior approval of the Head of Cyber Law and Data Privacy at Group Legal Affairs.

5.4 Immediately report all suspected data breaches or incidents

Data privacy laws often require that data breaches must be reported to the applicable authorities within a certain time frame. All suspected or confirmed data breaches or incidents must therefore be immediately [reported](#).

5.5 Speak up if you have any concerns in relation to personal data

Please [reach out and speak up](#) if you see something that you suspect violates applicable data privacy laws or Saab's internal rules for management and protection of personal data.



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6 Guidance and seeking advice

Further guidance on data protection compliance is available in Saab's [Data Protection Portal](#) which includes a selection of practical guidelines and templates. For questions on the processing of personal data seek advice from the relevant Data Protection Manager or the Group Data Protection Officer.

7 Change History

Issue	Date	Change
1	2018-05-23	First issue.
2	2024-02-16	Second issue.