

## APPENDIX 2 – MATERIAL SCOPE AND TRANSFERS

Depending on the contract, the Samres Group can be either the controller or the processor. However, this appendix only describes the Samres Group as processors.

### 1. Overview

The Samres Group has offices in four different countries, the approach to data protection must therefore be global. Personal data is processed and transferred due to administrative work related to business maintenance and to perform the services and undertakings in agreements with business partners. The purpose of this appendix is to show the material scope, which categories of personal data we process, and for which purposes the Samres Group processes and transfers personal data as processors. Most of the personal data that Samres Group processes as processor is personal data about the data subjects which we encounter when we perform our transport- and customer related services. Samres Group undertakes the role as processing contractors to a public principal who is the controller in almost all our business relations.

The Samres Group has following offices in the following locations:

Within EU/EES:

- Sweden, *Lund* (Headquarter and production), *Skövde* (production)
- Estonia, *Tartu* (production)

In Third Countries:

- Moldova, *Chisinau* (production)
- Senegal, *Dakar* (production)

### 2. The Material Scope

The Samres Group processes a variety of different categories of personal data connected to a range of different data subjects. As processors, the Samres Group reassures that we follow the purposes set up by the controller when we process their personal data. The Samres Group also reassures that we immediately inform the controller if we notice any unclarity or inaccuracy in the given instructions and purposes. The first section of this appendix clarifies which data subjects the Samres Group interacts with, which categories of personal data the Samres Group processes as processors, and for which purposes the Samres Group processes personal data.

**2.1 Situations where personal data is processed**

The Samres Group processes personal data that is connected to a range of different data subjects. The boxes below identify five services we provide as processors where we need to process personal data to fulfil our part of a business agreement. The data we process when we perform these services is data that the controller provides us with. The Samres Group needs to process data connected to various data subjects in order to perform these services. More information on the data subjects and the purposes behind the processing will be presented in the following pages.

## Processing activities

**School transportation service**

The Samres Group helps local authorities to organize transport to and from school for children that are entitled these services.

**Transportation services**

One of the Samres Group’s main fields of business are to plan and organize special public transport for people who cannot utilize the ordinary public transport.

**Electronic communication services**

The Samres Group provides call-centre services to authorities, and organize and offer interpreter-services on behalf of authorities to disabled people who need to make a phone call.

**Medical transportation services**

The Samres Group helps authorities to organize the transport of patients between places of treatment.

**Public transport services**

The Samres Group provides local public transport related services. Ticket sale services, information services, and other complementary services.

## 2.2 Data Subjects



### **Travellers and representative of travellers**

This category includes the users of the services we perform on behalf of our customers. Sometimes the user is unable to represent themselves, for example school kids, and therefore need someone who represents them. These people are included in this category of data subjects since we collect the same information from both travellers and their potential representers. The data is removed in accordance with the relevant personal data processing agreement.



### **Drivers and other transport-personnel**

We process data about drivers and other personnel that gets involved with the transport of our users. We only collect data from data subjects that are employed by a party that we have a personal data processing agreement with.



### **Administrative personnel at other companies and authorities**

We process personal data about administrative personnel at other companies and authorities we collaborate with. We only process data about data subjects we need to have an ongoing interaction with on a regular basis, and personnel that we can contact in case of emergency or in any other important situation where we need to interact with the company or authority we work with.



### **Other Third Parties**

This category of data subjects includes all other parties which Samres Group may interact with. This includes interaction we initiate, but also interactions initiated by someone else. This category aims to cover all the interactions that cannot be placed under the other categories. Examples of data subjects under this category are trainees, office visitors and journalists that interact with us on behalf of our customer. The interactions that fall under this category tends to be temporary and the personal data that might be stored is never any sensitive personal data.

**2.3 Categories of Personal Data**

Which categories of personal data that is collected from the different data subjects varies since the purpose of the data processing differs between the data subjects. The Samres Group collects following categories of personal data from the different data subjects:

<u>Data subject</u>	<u>Category of personal data</u>
 <b>Travellers and their representatives</b>	 Personal data of travellers and their representatives (e.g., names, contact information, address, travel history, personal identity number, medicinal conditions, personal health, etc.)
 <b>Drivers and transport personnel</b>	 Personal data of drivers and transport personnel (e.g., names, contact information, vehicle used, travel history etc.)
 <b>Administrators at companies and authorities</b>	 Personal data of administrators at companies and authorities (e.g., names, contact information, area of responsibility, position, etc.)
 <b>Other third parties</b>	 Personal data of third parties (e.g., names and contact information, etc.)

As shown in this diagram, the Samres Group as processor is mainly collecting data about the travellers and potential representatives. Routines and policies on how personal data must be collected can be found at a shared IT-space all employees can access, however, collecting personal data is a task given to a group of people with the adequate qualifications and responsibilities. A few of these categories might include some sensitive personal data. Only a limited number of people are authorised to collect sensitive personal data. Sensitive personal data is only processed when it is necessary in order to perform our services and undertakings in business agreements.

**2.4 The Type of Processing and its Purposes**

The Samres Group processes data for various purposes, mainly when we provide contracting parties with our services. As processors, the Samres Group is aware that we carry the responsibility to make sure that we follow the instructions from the controller when we process personal data. As mentioned at the previous page, personal data is collected for different purposes. The following categories of personal data are collected, used, and stored for the following purposes:

<u>Category of personal data</u>	<u>Purpose</u>
 <b>Personal data about travellers and their representatives</b>	 Data about travellers and their potential representatives is information we need to process in order to perform our various transport related services. The purpose of sometimes processing sensitive personal data is that we in some cases need to know medical conditions and other health-related data in order to meet the special need of some of the users of our customers' services.
 <b>Personal data about drivers and other transport personnel</b>	 Data is used to be able to communicate with the relevant drivers when they perform the transport. This data is also used when we make the travel schedule for the drivers and travellers.
 <b>Personal data about administrators and authorities and companies</b>	 We use this data daily when we perform transport services for our customers and need to communicate with other parties. We also gather this data with the purpose of knowing who we should contact if any urgent or other important situation arises.
 <b>Personal data about other third parties</b>	 The purpose of processing is to communicate with and answer people who contact us for different purposes.

To ensure that these purposes are implemented and followed in the daily work, the purposes are communicated to employees through different policies and routines that everyone must follow. These policies and routines are available at the previously mentioned IT-space where other important news and information is posted. The policies and routines are revised yearly as a part of the yearly data protection audit.

### 3. Data flows

The IT-environment at the Samres Group is structured to give all employees access to personal data regardless of which office they work at, however on a strict need-to know basis. The purpose of this structure is to give employees access to the data they need to perform their daily tasks. However, this does not mean that all employees can access all data bases and process them. The level of responsibility an employee holds decides the scope of personal data it can access. Which responsibility each employee is given depends on their employment position. The Samres Group has three main types of responsibilities: group manager responsibility, manager responsibility, and employee responsibility. Group managers, e.g. the CEO and HR-chief, have responsibilities at a corporate group level and should therefore have access to all personal data about all the data subjects. Managers have responsibility for their group, and in some cases the principal to whom we have a service agreement, they therefore need access to personal data about their group members and the data subjects within the scope of the service agreement. Regular employees have responsibility to perform the work they are assigned, and they should thereof have no bigger access

to personal data. A fourth type of responsibility worth to mention is the responsibility held by employees with special functions like accounting and scheduling. They need a wide access to personal data to perform their specialised task since these tasks are performed on a corporate level.

<u>Level of access</u>	<u>Access holders</u>	<u>Purpose of access</u>
<u>Level 1</u> Access to all personal data in the entire corporate group	 <u>Group managers</u>  <u>Employees with special functions</u>	Group managers should be able to control all activity within Samres Group at a corporate group level and can access all personal data mentioned in this appendix. Employees with specialised functions like scheduling and accounting needs this access since they are working towards the entire Samres Group.
<u>Level 2</u> Access to all personal data related to your group	 <u>Managers</u>	This access enables managers to perform managing responsibilities related to their group. The managers can access personal data about the employees in their group only, and personal data about data subjects within the scope of the service contract the group works for.
<u>Level 3</u> Access to personal data related to your tasks and yourself	 <u>Employees</u>	Employees only needs certain personal data to perform their daily tasks. They can also access their own personal data that Samres Group as employer has stored.

**3.1 Data, Data Bases and Storage**

The Samres Group stores data at data bases and storage systems located at internal and external data centres within EU/EES. Data collected locally is processed locally, but then always transferred to data centres within EU/EES for storage. No data is stored at bases outside EU/EES. These data bases are the IT-environment that employees can access in accordance with above. Data bases are never stored permanently on local devices, data can however be stored for a shorter period. If an employee at an office outside EU/EES accesses a data base, the data base is only available when the employee processes it. The access to the base is cut off when the employee completes the task or shuts down the computer device. The data bases can only be reached on either stationary computer devices at Samres Group offices, or mobile computer devices given out by Samres Group as an employer.

**3.2 Third Country Transfers**

Our IT-environment gives employees with the appropriate qualifications access to data they need to perform their work regardless of the geographical position of their office. The fact that employees

outside EU/EES in theory can access and process personal data about data subjects that are EU/EES citizens is the main transfer of data in accordance with Article 47.2 in the GDPR. Transferring personal data is something the Samres Group aims to do in a scale not bigger than absolutely necessary, which is why most central functions are located within EU/EES. The access-system mentioned above enables the Samres Group to control which categories of personal data, and to which extent, the different offices that can access.