

Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Information	1 (4)
Prepared By (Subject Responsible)		Approved By (Document Responsible)	Checked
ESGHVAV Vaibhav Singh E		GFLAQH [Lech Choroszuca]	
Document Number	Revision	Date	Reference
GFPL-19:002408 Uen	D	2024-03-13	



Privacy Notification - Acknowledgement of Code of Business Ethics

Privacy Notification:

Data controller for the acknowledgement information is Ericsson AB, 164 80 Stockholm, Sweden. Where applicable your employer is also controller of the personal information processed.

Your privacy is important to us, and you receive this privacy notification to let you know what personal data we collect when you acknowledge the Ericsson Code of Business Ethics (the Code). As part of your employment/engagement with Ericsson you are expected to acknowledge that you have read and understood the Code. It is our guiding framework and a tool to remain a trusted partner, to conduct business responsibly and to remind us that every action counts. The processing of your personal data is based on a legitimate interest to ensure that decisions and actions are ethical and in compliance with applicable laws and Ericsson steering documents

When acknowledging the Code, your name, Signum (Ericsson Identity), country, region, organizational unit, the e-mail address through which you received this invite and the date of your acknowledgement will be stored as final result in the CoBE Signing Tool. The data is also stored in Ericsson Analytics tools for reporting purposes. Your personal data will be accessed by Ericsson personnel on a need-to-know basis. Ericsson shares personal data with other Ericsson Group companies when necessary for the specific purposes of processing described in this Privacy Notification. The acknowledgement will be visible to your manager, People Function (HR), Compliance Officers and authorized IT support. The acknowledgement will be retained as part of your employment/assignment records and in accordance to local retention rules governing storage of employee records.

For respondents outside of the Ericsson network environment, acknowledging the Code is done through Netigate, a third-party provider. This service provider has signed a data processing agreement with Ericsson ensuring protection of your privacy. The data from Netigate is finally stored in CoBE Signing Tool. After the re-signing campaign ends, the personal data is purged after a period of 30 days from Netigate systems. No profiling or automated decision making occurs in the acknowledgement process.

Exceptionally, we may disclose your information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government subpoena or warrant, to cooperate with law enforcement or other governmental agencies or to otherwise establish, defend or exercise legal claims. We also reserve the right in exceptional circumstances to disclose your personal data that we believe is necessary to take precautions against liability or to protect ourselves, our property, or others from fraudulent, abusive, or unlawful uses or activity.

Since Ericsson Group is present around the globe, personal data may be transferred across international borders to Ericsson entities in other countries. We may rely on our Binding Corporate Rules approved by the European data protection authorities in accordance with the GDPR to transfer personal data intra-

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group in accordance with this privacy notice. A copy of our Binding Corporate Rules is available through [this link](#).

We may also rely on all modules of the EU Commission's Standard Contractual Clauses available [here](#) or other appropriate safeguards under the GDPR as well as the UK Addendums to the EU Standard Contractual Clauses and other appropriate safeguards under the UK data protection law.

For more information about how we transfer personal data outside of the country where you are located, you may contact us as specified at the end of this document.

Subject to applicable data protection laws, you may have the following rights in relation to your personal data:

- **Right to access your personal data.** You have the right to obtain confirmation on whether Ericsson processes personal data about you and receive a copy of such data as well as information on how we process your personal data.
- **Right to rectification.** You have the right to rectify any inaccurate personal data we process about you or have any incomplete personal data about you completed.
- **Right to erasure.** You have the right to have your personal data deleted if (i) the personal data has been unlawfully processed; (ii) we no longer need such data for the purposes of the processing; or (iii) the processing is based on consent and you withdraw your consent, and we have no other legal basis for processing the data. However, Ericsson will not delete your personal data if Ericsson has a legal obligation to retain the data, the personal data is still necessary for the purposes of processing, or if Ericsson's legitimate interests override your interests.
- **Right to restriction.** You have the right to restrict our processing of your personal data where you believe that the personal data we process is inaccurate or our processing is unlawful. You may also restrict our processing if Ericsson no longer needs the personal data, but you want us to store the data for the establishment, exercise, or defense of legal claims. You may also require us to restrict the processing of your personal data for the period when we assess your right to object to the processing of your personal data.
- **Right to object.** You have the right to object to our processing of your personal data when we rely on our legitimate interests or those of a third party, or if we in an exceptional case perform tasks in public interest. If you object to our processing, we will cease processing your personal data and erase the data, unless we can demonstrate compelling legitimate grounds for the processing overriding your interests, or if the data is needed for the establishment, exercise, or defense of legal claims. You always have the right to opt out of receiving direct marketing from us.
- **Right to information.** You have the right to receive transparent information about how we process your personal data.

We will not discriminate against you based on your exercise of any of the rights described above. Please note that a number of these rights only apply in certain circumstances, and all these rights may be limited by law. 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 below.

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If you have questions regarding the Code and acknowledgement, please talk to your manager. In case you need support to access or correct your personal data or if you have privacy related questions, please contact [HR Direct](#).

If you have any questions or a complaint pertaining to your personal data, and for respondents with no access to HR Direct, you can contact a local Data Protection Officer in your country. You can find the respective contact details [here](#). You can also contact the Group Data Protection Officer by mail at Ericsson AB, Group Function Legal Affairs, 164 80 Stockholm, Sweden or you can send an e-mail to ericsson.group.privacy@ericsson.com.

If you have further concerns about the processing of your personal data, you may also file a formal complaint with the competent supervisory authority in your country or the [Swedish Authority for Privacy Protection](#).

For additional information about the rights that may be available to you if you live in certain US states, please see below.

If you reside (and depending on where you reside) in the United States, you may also have additional legal rights with respect to your personal data. This Privacy Policy provides a description of such rights and how you may exercise them if they apply to you. Please note that these rights are not absolute, and that in certain cases, we may decline your request as permitted by law, including in the event you reside in a state that does not currently grant you these rights. For purposes of this section, “personal data” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (or household, as applicable), each as defined by the relevant U.S. state law, and “sell” and “share” have the definitions provided under applicable U.S. law. The laws of certain U.S. states, as applicable, may grant some or all of the following rights to consumers who reside in those states:

- The right to request that we confirm whether we process data about you and give you access to that information;
- The right to request information about personal data that we have collected in the 12 months preceding a request – including the categories of information collected, disclosed for a business purpose, and sold/shared, the source of that information, the business purpose of that collection and any selling/sharing, the categories of third parties with whom that information is disclosed or sold/shared, and the specific personal data collected about that particular customer which information is provided in the table below;
- The right to receive requested information in a readily usable format if provided electronically;
- The right to request that we delete any personal data about the consumer that we have collected (although we may be entitled to retain some information for certain purposes);
- The right to update or correct any personal data which is out of date or incorrect; and
- The right to be free from discrimination based on your exercise of your privacy rights.

To exercise your Privacy Rights under this Privacy Policy, please contact us via email using the contact details set out in above in this Privacy Notice. Please use the subject line “U.S. Privacy Right Request” and tell us which right you wish to exercise in the text of the email. You may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

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In addition, you may have the right to appeal our decision regarding a request related to these rights by contacting us using the information provided. When you submit a request or launch an appeal, we will limit our collection of your information to only what is necessary to securely fulfil your request or process your appeal. We will not require you or your authorized agent to pay a fee for the verification of your request or appeal.