# **Privacy Policy**

# 1 Introduction

Your personal integrity is important to us. We always want to be transparent about how we process your personal data so that you feel safe when sharing your personal data with us. In this privacy policy you can read about how we process your personal data.

We may make changes to this privacy policy. The latest version of the privacy policy is always available on our website, nrwa.se/about-nrwa/privacy-policy/.

Please note that this privacy policy does not apply to personal data that you provide to any of our partners (for example by clicking on a link to one of our partners in connection with an offer). We take no responsibility for the processing of personal data carried out by our partners.

You are always welcome to contact us regarding any questions you may have about how we process your personal data via e-mail at info@handelsradet.se.

# 2 Who is responsible for your personal data?

Handelsrådet, org. no. 802407–6468, is the data controller for the processing of your personal data.

# 3 What personal data are we collecting?

We may collect various types of personal data about you in connection with you visiting our websites, subscribing to our newsletters, participating in our events or in seminars or when you otherwise are in contact with us. The personal data we collect about you varies depending on how you interact with us.

The following are examples of the personal data we collect about you during the aforementioned occasions:

- Name,
- Contact details, such as address, e-mail address and telephone number,
- User data (e.g., which websites you visit/have visited and where on the websites you click/have clicked),
- IP-address,
- Correspondence with us (e.g., personal data that you provide in connection with contact with us).

# 4 Personal data collected from other sources

In addition to personal data that you yourself provide to us or personal data that we have collected based on your interaction with our services, we may also collect personal data from other sources. In the tables below you can see what personal data we collect from you as well as from what source.

Source for collection	Type of personal data
Partner, e.g., conference organizer.	Contact details, e.g., name, e-mail, address and/or title.

# 5 Why we process your personal data and how long we store your personal data

#### Purpose and legal basis

The personal data that we have collected about you and that you have provided to us is used for various purposes. In this section, we explain why we use your personal data, give examples of the processing which we perform to fulfill the purposes and what legal basis on which we base the processing on.

#### **Retention period**

Generally, we store your information as long as the information is necessary to fulfill the purposes for which we collected your information. The information may also be stored for the time required by applicable law. It is important for us that you are aware of how long we store your personal data. In the tables below, we clarify for how long your data is stored

#### 5.1 Marketing and communication

For you to be able to take part of the latest news about our organization, e.g., about our courses, seminars, events, research grants and scholarships, we may market and send communication in various channels, e.g., in our newsletters. We need to process your personal data in order to send marketing communications to you.

Please note that you always have the right to object to our marketing communications. You can do this directly in the communication we send to you through the provided unsubscribe link or by contacting us (you find our contact details at the top of this privacy policy).

Examples of processing activities performed for the purpose	• We send direct marketing communications via e-mail, post, or text message or by sending your or newsletter. The direct marketing can, for example, concern news or invitations to courses, seminars, events, or similar activities.
Legal basis	<ul> <li>We process your personal data based on our legitimate interest in being able to send direct marketing about our organization, e.g., about our courses, seminars, events, research grants, scholarships, etc.</li> <li>If you are subscribed to our newsletter as a private individual, we process your personal data based on your prior consent. You have the right to revoke your consent at any time.</li> <li>If you no longer wish to receive direct marketing from us, you can always unsubscribe from our communications in the respective channel.</li> </ul>

Recipients of personal data	<ul> <li>Supplier for e-mail and text message communication</li> <li>Printing and distribution companies</li> </ul>
Retention period	Whichever comes first of (1) you object to our marketing or alternatively (2) you unsubscribe from our newsletter.

### 5.2 Courses, seminars, events, or similar activities

We arrange courses, seminars, events, or similar activities. We will process your personal data in connection with this.

Examples of processing activities performed for the purpose	<ul> <li>We register your participation in courses, seminars, events, or similar activities.</li> <li>We communicate with you before and after a course, a seminar, an event, or a similar activity. In these cases, we may send confirmation of registration, information that you need to know about concerning the course, seminar, event, or similar activity, questions, or evaluations.</li> <li>We share lists of participators with, for example course- or seminar lecturers.</li> </ul>
Legal basis	Our legitimate interest in being able to administer and carry out courses, seminars, events, or similar activities.
Legal basis for allergies	If we offer food in connection with our courses, seminars, events, or similar activities, we will ask for your prior consent.
Recipients of personal data	<ul> <li>Lecturers</li> <li>Companies assisting us with administration or evaluation</li> <li>Exhibitors at our events</li> <li>Website provider</li> </ul>
Retention period	The personal data is stored for a period of, at the longest, 18 months after the completion (including any evaluation) of the course/seminars/event.

#### 5.3 **Providing service**

We will do our best to provide you with the best possible service in all of your contact with us. You will find our contact details at the bottom of this privacy policy. We need to process your personal data to handle your case.

Examples of processing activities performed for the purpose	<ul> <li>We communicate with you and answer the questions you send to us.</li> <li>We investigate your complaints and support requests. A request for support may, for example concern technical support.</li> </ul>
Legal basis	Our legitimate interest in being able to assist you with questions or complaints related to our services or our business.

Recipients of personal data	• E-mail systems
Retention period	Personal data is stored for a period of, at the longest, 12 months from the receival of the question.

#### 5.4 Providing services in our digital channels

We process your personal data so that you can use our digital services (for example, our website).

For this purpose, we may use strictly necessary cookies. Read more about which cookies we use in our consent tool. You will find the information under "Show details" (Sw: "Visa detaljer").

Examples of processing activities performed for the purpose	• For our digital services (for example, nrwa.se) to function technically and to be able to delivery functions that you request access to.
Legal basis	Our legitimate interest in being able to provide our digital services. Note that necessary cookies are always active and do not require your consent.
Recipients of personal data	Website provider
Retention period	See our consent tool for how long strictly necessary cookies are stored.

#### 5.5 Fulfill legal obligations

We may need to process personal data in case of certain legal obligations. Some of these acts require that we process personal data.

Examples of	We may be required to process your personal data to fulfil legal
processing	obligations in accordance with requirements in laws, judgements, or
activities	government decisions, such as obligations under the Bookkeeping Act
performed for the	(1999:1078) (Sw: Bokföringslag) or the Act on Measures against Money
purpose	Laundering (2017:639) ( <i>Sw:</i> lag om åtgärder mot penningtvätt och finansiering av terrorism).
Legal basis	To comply with legal obligations according to applicable law.
Recipients of personal data	Governmental authorities
Retention period	Personal data is stored for the time necessary to fulfill the relevant legal obligation or in accordance with applicable legal requirements. For example, there is a legal obligation in the Bookkeeping Act that we need to store certain information regarding the relevant transaction for 7 years.

### 5.6 Develop and improve our business and our services

To develop and improve our business and our services, we may use personal data to produce statistics or similar data.

For this purpose, we may use cookies for statistics and analysis. Read more about which cookies we use in our consent tool. You will find the information under "Show details" (Sw: "Visa detailse").

Examples of processing activities performed for the purpose	<ul> <li>We produce data for the purpose of evaluation of the services that we use linked to our business. Depending on the result of the analyses, we may take measures that affect the choice of service providers, marketing channels or the user- friendliness of our services.</li> <li>We produce data for the purpose of improving IT-systems to improve company security and for visitors in general.</li> </ul>
Legal basis	For our use of analytics cookies, our legal basis is your consent. For other personal data processing, we rely on the following legal basis: Our legitimate interest in being able to use personal data to develop, improve, evaluate, and in general optimize our business.
Recipients of	Tools for analysis
personal data	Website provider
Retention period	It is difficult for us to in advance determine how long your personal data will be stored for this purpose. We have instead implemented routines to continuously examine whether your personal data still is necessary for this purpose. We will remove personal data which we have not used for a period of 5 years because as we, in such cases, no longer consider your personal data to be necessary.

# 5.7 Security work and to prevent abuse or prevent and investigate crime

For your and our employees' safety, we actively work with safety on our website. We may process your personal data to fulfill this purpose.

Examples of processing activities performed for the purpose	<ul> <li>We investigate and prevent fraud or other violations of the law.</li> <li>We take measures to prevent spam, phishing, harassment, attempts of unauthorized login to user accounts or other measures which are prohibited under our terms of use.</li> <li>We take measures to protect and improve our IT environment against attacks and intrusions.</li> </ul>
Legal basis	Our legitimate interest in providing secure services that may prevent attempts of unauthorized access or unauthorized use of our services.
Recipients of personal data	Website provider

Retention period	Personal data is stored for a time of, at the latest, 1 year after collection.
	If we suspect misuse of a service or that a crime has been committed,
	we will save the information for the time necessary to establish, exercise
	or defend our (our third parties') legal claims.

### 6 How we share your personal data to other companies

In some situations, it is necessary for us to disclose your personal data to other companies. This may be the case when we hire other companies to assist us administer our events, analytics tools, or website providers. We may also share your information with exhibitors and lecturers at our events. These companies are to be regarded as data processers to us and are only allowed to process your personal data in accordance with our instructions.

We may, additionally, share your personal data with other companies who will be independently responsible for their processing of your personal data. We share your personal data with the following companies which are independently responsible for personal data, i.e., data controllers:

• Our founding organizations, i.e., Fremia, Handelsanställdas förbund, Svensk Handel and Unionen.

Detailed information on categories of recipients who may access your personal data can be found in the tables under point 5.

# 7 Third country data transfers

We must sometimes transfer your personal data to countries outside of the EU/EEA. This may be the case when we share your personal data to other companies in accordance with points 5 and 6. We only disclose your personal data to countries outside the EU/EEA if there are sufficient guarantees that your personal data is handled in a proper manner. Your personal data is transferred to the following countries: USA, Chile, Singapore, and Taiwan.

To protect your personal data when we transfer it, we enter into agreements with the recipient of your personal data which includes the European Commission' standard contractual clauses. You can get a copy of the safeguards by contacting us.

# 8 Remember your rights!

You have certain rights when we process your personal data. Below follows a review of your rights, what they entail and **how you exercise your rights**.

Your right of access:	We strive to be transparent with how we process your personal data. If you want to know more about the personal data that we process about you, you have the right to request access to your personal data. If we receive a request for access, we may ask for additional information to ensure that we disclose the personal data to the right person.
Your right to rectification:	You can request that we correct your personal data if we do not have your current information of or if the information we process is incorrect.

Right to erasure or restriction of processing:	You have the right to request that we delete your personal data or that we restrict our processing of your personal data if, for example, you believe that your personal data is being processed in violation with applicable law.
Your right to object to our processing (including the right to object to <i>direct</i> <i>marketing</i> ):	You have the right to object to our processing (for example the processing based on our legitimate interests). If you object to processing of your personal data for direct marketing, your personal data may not be processed for such. If you object to our direct marketing, we will stop sending all forms of direct marketing communications to you.
	If you still would like to receive our communication in certain channels, you do not have to object to all types of marketing. In such cases, you can choose to only receive offers from us in the channels of your choice, e.g., via e-mail but not text message.
Your right to withdraw your consent	Have you given your consent to any processing we preform? In such a case, you have the right to withdraw your consent at any time. When you withdraw your consent, we will not collect new information about you for the purpose that your consent was the legal basis for. We have, however, the right to process the personal data which we have collected about you before you withdrew your consent. If there are no other legal basis that require us to store the information, we will delete the information.
Your right to data portability	You can request that the information you have provided be transferred to another data controller (so-called data portability). This applies to the processing we preform based on our agreement with you or processing for which you have given your consent.
Your right to lodge a complaint to a supervisory authority	If you believe that we handle your personal data incorrectly, you also have the right to submit a complaint to the Swedish supervisory authority, Swedish Authority for Privacy Protection (Sw: <i>Integritetsskyddsmyndigheten</i> ,

How do I exercise my rights? You are welcome to contact us if you would like to exercise any of your rights or if you have questions about how we process your personal data. You can reach us via e-mail at info@handelsradet.se.