



Personal Data Privacy Policy

Rev. No.	Rev.Status	Date	Author	Checked by	Approved by
0	GU	2019-10-25	AnO	DaL	AIB

List of revisions

Rev. No.	Rev. Status	Date	Scope of revision	Author	Section/Page
0	GU	2019-10-25	First issue	AnO	All

Privacy Policy

Your privacy is important to us and we are responsible for the personal information you provide us with. This policy describes how we process, store and manage your personal data both when you are a customer with us and partly when you apply for a job with us.

It also describes your rights and how you can enforce them. It is important that you read and understand the privacy policy and feel secure in our processing of your personal data.

Responsible for handling personal data

Ales Bragée is the personal data controller for the processing of personal data described in this policy.

If you have any questions or would like to access any of your rights, you can reach us at:

Email: info@elpanneteknik.com

Address: Lilla Bommen 1

Postal code and city: 411 04 Göteborg

Phone: +46-(0)31-150 530

How do we access personal data?

In addition to the information you provide to us yourself, or which we collect from you in connection with becoming a customer with us, contacting us or seeking employment with us, we may also collect personal data from another, so-called third party. The information we collect from third parties is as follows

- Address information from public registers to make sure we have the right address information to you.

Credit rating information from credit rating agencies, banks or information companies.

What personal information do we process?

The following categories of personal data might be processed about you.

- Contact information such as name, address, e-mail address, telephone number
- Identity information such as social security number, organization number
- Financial information such as bank account numbers and other bank-related information
- Work-related tasks such as employment information, applications, CV, personal letter

How do we process your personal data?

We process your personal information primarily to fulfill our obligations to you. Our starting point is not to process more personal information than is necessary for the purpose, and we always strive to use the least privacy-sensitive information.

Below is information about different types of personal data processing that we might use.

Provide and execute agreements on services / goods

We process personal data in order to fulfill our agreement and provide services / goods to you. We process personal information for our administration and invoicing of the services / goods, for credit information purposes, to handle complaints and claims, to help you with questions about your service / product when you contact our customer service and otherwise to exercise our rights and fulfill our obligations under our agreement with you. The personal data we handle in this

processing are contact information, identity-related personal data and financial personal data.

Accounting

We process your personal data in order to fulfill the statutory obligations that are incumbent on us, such as the Accounting Act's requirements for filing accounting material. The personal data we handle in this processing are contact information, identity-related personal data and financial personal data.

Marketing

We process personal data to enable marketing of goods / services to you and to enable the sending of newsletters for the services / goods you are generally interested in and information about the company. Furthermore, to enable the invitation to events in the area of your interest. The personal information we handle in this processing is contact information.

Before hiring

We process your personal data when you apply for vacancies or report your interest in employment with us. The company processes your personal information to assess your application and complete the recruitment process. The personal information we handle during this process is contact information and identity-related personal data.

[What legal basis do we have for our personal data processing?](#)

We process your personal data in order to administer and provide agreed service / product. When it comes to processing personal data to fulfill requirements such as the Accounting Act or the tax legislation, the legal basis for processing is a legal obligation. For the marketing and pre-employment treatments, the legal basis is our legitimate interest. This means that we believe that our interests in processing your personal data for these purposes listed above outweigh the privacy violations that you are subject to, as a result of the processing. This assessment has been made especially considering that we believe the treatment will be beneficial to you. Regarding personal data in connection with job applications that have no connection with a recruitment process or completed recruitment process, we will only save your personal data for possible future recruitment needs if you have specifically agreed to this.

[How long do we store your personal information?](#)

We store your personal information if you are a customer with us and up to 12 months thereafter. Some personal data is stored for a longer period, for example, in order to fulfill the requirements of the Accounting Act and the tax legislation. When the purposes of the treatments are fulfilled and the storage time has expired, your personal data will be erased safely or anonymized so that it is no longer possible to link them to you.

[About cookies](#)

A cookie is a small text-based data file that a web server requests to save in your browser. By generally sending the content of the cookie back with each request to the current website, it is possible for the server to keep track of the visitor's preferences, behavior or identity (as far as is known).

We use the following cookies on our website:

- Session cookies (a temporary cookie that expires when you close your browser or device).
- Durable cookies (cookies that remain on your computer until you remove them, or they expire).

- Third-party cookies (cookies set by a third-party website), which we use primarily for analytics, such as Google Analytics.

The cookies we use are intended to improve the services we offer. Cookies give the website a better functionality and make it easier for you as a user. We also use cookies to collect and analyze behavioral data based on your use of the website and services in order to improve the user experience and enable individualized communication and messages to you as a user. We also use cookies to be able to direct relevant marketing to you.

How can you manage cookies?

You can change your browser usage and scope of cookies at any time. You can then choose to block all cookies, only accept certain cookies or delete cookies when you close your browser. If you choose to block or delete cookies, it may mean that some services may not be used, or the website may not function properly in all respects.

Who do we share personal information with?

Our ambition is to not disclose the data of the data subject to third parties if the data subject has not consented to it or if it is not necessary to fulfill our obligations under contract or law. In cases where we disclose personal data to third parties, we ensure that personal data is processed in a satisfactory manner.

- **Service Providers**

To fulfill the purposes of our processing of your personal data and to fulfill the requirements we owe as a company, we share personal data with companies that provide services to us. These companies may only process personal data in accordance with the personal data access agreement signed with the company and according to the instructions they receive in connection therewith. They may not use your personal data for their own purposes and are required by law and agreement to protect your personal data. A service provider may not share your personal information with any third party or subcontractor without our consent.

- **Agencies**

We can provide the necessary information to authorities if we are required by law to do so. This information may include your personal information. In connection with a legal dispute, it may be relevant to also transfer information that may contain personal data to other parties to the dispute.

How is your personal data protected?

We protect your personal data through a combination of technical and organizational solutions. We have taken special security measures to protect your personal information from illegal or unauthorized access. We work out procedures and routines to ensure that your personal data is handled in a secure manner. Only those people who need to process your personal data for their duties have access to them.

Your rights

As registered with us, you have the following rights:

- You have the right to request an extract of the register where you can see what personal information, we have about you.

- You have the right to request correction if we have incorrect or incomplete personal data registered about you.
- You have the right to have your personal data deleted under these conditions:
 - The data is no longer needed for the purpose they were collected.
 - If the information is saved with your consent and you withdraw the consent.
 - If the treatment is based on a balance of interests and there are no justifiable reasons that outweigh your interest.
 - If the personal data has been processed illegally.
 - If deletion is required to fulfill a legal obligation.
 - If you object to treatment for direct marketing purposes.

The right to have personal data deleted does not apply if we are required by law (e.g. the Accounting Act) to retain the data.

- You have the right to data portability (the right to have your personal data transferred) provided that the legal basis is consent or agreement and what you can obtain is personal data relating to you, which you yourself have provided or generated by your actions / activities.
- You have the right to request that the processing of your personal data be restricted. However, if you request a restriction on your processing of personal data, it may mean that we cannot fulfill our possible obligations to you during the time that the restriction applies.
- You have the right to object to a personal data processing that has a balance of interests as a legal basis. For us to continue with the current treatment, we need to be able to show a compelling, justifiable reason for the treatment that outweighs your interests, rights or freedoms. Otherwise, we may only process the information in order to establish, exercise or defend legal claims.
- You always have the right to object to your personal data being used for direct marketing. If there is an objection to direct marketing, personal data may no longer be processed for such purposes.

If you are not satisfied with the response you have received from us, you have the right to submit a complaint to the supervisory authority.