

# **Integrity Policy**

This policy was adopted on 14 March 2018 and applies with effect from 25 May 2018 in situations where Swedish Fundraising Control processes personal data. Last updated on 20 January 2021.

#### Personal data

Personal data means information that can directly or indirectly be referred to a physical person. Swedish Fundraising Control, Box 55961, 102 16 Stockholm with organisation number802009-5108 is personal data controller for the processing of personal data that is collected by us or submitted to us, regardless of whether this occurs by post or digitally by email or via the website. Swedish Fundraising Control's aim is to protect the integrity of all those who provide us with their personal data. This personal data policy describes how we collect, process, store, give out and protect your personal data. All processing of personal data is done according to the provisions of the General Data Protection Regulation (GDPR).

#### **Contact**

If you have any questions about how we process personal data, you can contact our data protection officer by e-mail <u>info@insamlingskontroll.se</u> or telephone 08-783 80 60.

### How we collect personal data and what data we collect

Information that is collected from the organisations' representatives and auditors

We process personal data for the purpose of checking that members and deputy members of the board of the organisation comply with the requirements in our standards for 90-accounts. For example, we check credit information that board members and deputies have submitted so as to ensure that they are not bankrupt or subject to a prohibition against engaging in business activity and that they do not have a poor payment record or unpaid taxes. This processing is necessary so that we can comply with our mandate to check organisations that are granted 90-accounts. The data processed consists of personal ID number, name, address, telephone number and e-mail address, as well as credit information. Credit information is destroyed immediately after the checks have been performed. Other information is kept for up to three years after the organisation has closed its 90-account, so that we are able to monitor the organisation's reporting during this time. In the case of withdrawn 90-accounts, the information is kept for seven years after the decision, so as to ensure that the board members of the withdrawn organisation do not return as board members of another organisation with a 90-account.

We process personal data for the purpose of checking who the authorised signatories of the organisation are, for example to check that the organisation is being represented by authorised persons. This processing is necessary so that we can comply with our mandate to check organisations that are granted 90-accounts. The data processed consists of personal ID number, name, address, telephone number and e-mail address. The information is kept for up to three years after the organisation has closed its 90-account, so that we are able to monitor the organisation's reporting during this time. In the case of withdrawn 90-accounts, the

information is kept for seven years after the decision, so as to ensure that the board members of the withdrawn organisation do not return as authorised signatories of another organisation with a 90-account.

We process personal data for the purpose of communicating with the organisation, for example by sending information to the organisation's representative/contact person or investigating any complaints. This processing is necessary so that we can comply with our mandate to check organisations that are granted 90-accounts. The data processed consists of name, address, telephone number and e-mail address. The information is kept for as long as the person concerned is a contact person for the organisation.

We process personal data for the purpose of communicating with the organisation about the financial investigation, for example with questions to the contact person about financial matters. The data processed consists of name, telephone number and e-mail address. This processing is necessary so that we can comply with our mandate to investigate the organisation's financial reporting. The data is kept until the financial investigation is completed.

We process personal data for the purpose of checking that the organisation's auditor complies with our requirement to be authorised by the Swedish Inspectorate of Auditors and for communication with the auditor regarding the checks on the organisation. This processing is necessary so that we can comply with our mandate to investigate the organisation's financial reporting. The data processed consists of personal ID number, name, telephone number and email address. The data is kept for as long as the auditor has an assignment with an organisation with a 90-account.

The grounds for the registration of personal data are the agreement that the representatives of the organisation entered into with Swedish Fundraising Control in signing the last page of the application for a 90-account, application to extend the validity of a 90-account or amendment notification. In doing so, the organisation's representatives agree that Swedish Fundraising Control may perform checks on the organisation, to comply with Swedish Fundraising Control's standards and instructions and to comply with the rules set by Nordea and Bankgirot for 90-account holders. We must perform this personal data processing in order to be able to fulfil our mandate to check the organisation.

You are informed that the organisation cannot be granted a 90-account or retain its 90-account if the personal data is not given to us.

Data that is collected by personal contact

We process personal data for the purpose of being able to answer questions and investigate any complaints, for example for communication in a case. The processing is necessary to meet our and the person's justifiable interest in having questions and complaints investigated. The data processed consists of name, address, e-mail address and telephone number . The data is kept until the case is closed.

We process personal data for the purpose of being able to organise information seminars at which we can offer participants refreshments, for example. The processing is necessary so that we can perform our assignment for those who have registered for the seminar. The data processed consists of name, organisation, e-mail address and information about any special

diet. Information about name and organisation is used in a list of participants that is handed out at the seminar. The data is saved until the fee for the seminar has been paid, a maximum of 60 days, and the invoice details are kept according to current bookkeeping rules.

We process personal data for the purpose of sending out information via our newsroom on MyNewsdesk, for example press releases to journalists and other who have registered as newsroom followers. The processing is necessary to meet the justifiable interest of ourselves, journalists and others who have registered as followers in having information about organisations with 90-accounts. The data processed consists of name and e-mail address. The data is kept until the person ceases to be a newsroom follower or until we query, every other year, whether they no longer wish to receive information.

## Data that is collected from using our digital services

Cookies are small text files consisting of letters and numbers that are sent from our web server and saved on your web browser or device. The cookies we use are normally to improve the services we offer on our website. We use cookies for general analytical information regarding your use of our website. The processing is necessary to meet the justifiable interest of ourselves and the users in improving the experience and use of the website and, for example, to be able to analyse how many visit the site.

#### Transfer of personal data to third parties

The personal data is only used by Swedish Fundraising Control for its internal use and is not given to any third parties; see Swedish Fundraising Control's confidentiality policy.

This does not mean that we cannot use personal data processors who process the personal data on our behalf in accordance with a written personal data processor agreement, for example to save data on a server.

Swedish Fundraising Control uses a number of different IT services and IT systems in its activities. Personal data is stored and processed in some of these. Some systems are installed locally with us and only our staff have access to these. In these cases there is no transfer to any third party. Some systems however are cloud-based or installed at a supplier, which means that we transfer personal data to the supplier.

#### **Right to request information**

You have the right to access your personal data that is processed by Swedish Fundraising Control, which is done by sending us a written and signed request. You also have the right to correct personal data.

You have the right to have your personal data erased. Note that if you are a board member, deputy board member, authorised signatory or auditor, such erasure means that you can no longer perform this task or that the organisation cannot keep its 90-account.

There is also the right to request restriction of the personal data and to have the personal data moved to another personal data controller.

The Swedish Authority for Privacy Protection is responsible for monitoring the application of legislation and the data subject has the right to make a complaint to the Swedish Authority for Privacy Protection.