

# Privacy policy

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## Contact details of the data controller

Söderberg och Partners Förmåner AB (org. nr. 556797-0594)

Söderberg & Partners  
Box 7785  
103 96 Stockholm

08-451 50 00

[info@soderbergpartners.se](mailto:info@soderbergpartners.se)

If you are our contact person at a customer company that has hired us for their benefits management, we are the data controller.

If you are an employee of a customer company that has hired us, your employer is the data controller and we are a personal data processor. Any questions about the processing of personal data should then be addressed to your employer.

## Categories of personal data

**Employment information** – Information related to your employment, such as your professional position and the employer you represent.

**Cookies** – A small text file with information about your settings and preferences that is saved in your browser when you visit the website.

**Identity data** – Data used to identify you, such as your name and date of birth.

**Contact information** – Information used to contact you, such as your email address and phone number.

**Social security number** – Information such as social security number and coordination number (if applicable) used to securely identify you. In some cases, we use national ID number and passport number, when necessary.

## Our processing of personal data

Our processing of personal data depends on the relationship you have with us. You can read more about how we process your personal data by clicking on the respective heading below.

## Benefits management through your employer

Your employer is the data controller for the processing. Please contact your employer for more information.

## Contract management and collaboration

In order to enter into an agreement with the company or organization you represent, we need to process your personal data. We do this in order to be able to take preparatory measures before entering into a contract and simplify communication with the company or organization you represent.

What personal data do we process?

Employment information, identity information in the form of your name and your contact information.

Is the data required or is it voluntary?

It is voluntary to provide the information we process about you.

From which sources do we obtain your personal data?

The data is collected directly from you or from the company or organization you represent.

For what purposes do we process your personal data?

*Enter into an agreement with the company you represent*

We process your identity data, contact details and employment information for the purpose of carrying out preparatory measures for entering into a contract and to enter into an agreement with the company you represent.

*Performance of agreements and ongoing contact*

We process your identity information, contact information and employment information for the purpose of fulfilling the agreement with the company you represent, including keeping in contact with you and informing about news about our services.

On what legal basis do we process your personal data?

We have a legitimate interest in processing your personal data in order to manage and fulfill our contractual relationships with customer companies.

Who are the recipients of your personal data?

In order to be able to administer our customer agreements, we disclose information to the companies that store our contract and communication documents for us. In addition, your contact information may be shared with selected partners for marketing purposes, provided that you do not object. See more under the section on our processing regarding marketing and under the section on the right to object.

Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (<https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing->

[till-tredje-land/adekvat-skyddsniva/](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)). You can read more about the European Commission's SCC here ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)).

How long is your personal data stored?

We process your data for as long as it is necessary with regard to the purpose of the processing. If the company you represent has entered into an agreement with us, we save the agreement and information about the fulfillment of the same for at least ten years after the contractual relationship has ended in order to be able to defend ourselves against any claims in connection with the agreement.

Automated decision-making

We do not perform automated decision-making based on your personal data.

Marketing

We may market our services to you through, for example, telemarketing, newsletters and event invitations. Our website also uses cookies which are created when you log in to one of our websites. This processing is completely voluntary and can be objected to at any time.

What personal data is processed?

Within the framework of our marketing, we may process your employment information, your identity data and your contact information. If you participate in an event we organize, we may also process information about allergies, if you provide it to us.

Of the above information, we only use those that are necessary for the type of marketing we carry out.

Our websites and applications use cookies. A cookie is a small text file with information about your settings and preferences that is saved in your browser when you visit the website. When we use cookies, we process information about your IP address, your browsing habits and your visit history. For more information about the cookies we use see (<https://www.soderbergpartners.se/en/about-us/personal-data-cookies/cookies/>)

If you want to be placed on our block list where you make it clear that you no longer want any direct marketing communication from us, we may process the types of contact information that you choose to put on the block list.

Is the data required or is it voluntary?

It is up to you whether we may use your personal data to market our or our partners' services. You can find more information on how to object to us using your personal data for marketing purposes under the heading **Right to object**. In addition, you can always choose whether you want to allow our website to place cookies, which are not necessary for the website to work, in your browser or not.

Providing information about allergies or other food preferences is voluntary after consent has been obtained and your consent can be revoked at any time. However, a revoked consent means that we can no longer accommodate your possible wishes regarding allergies or food preferences.

From which sources do we collect your personal data?

We collect information directly from you, other companies that your employer and/or the company that you represent is a customer of and with which we cooperate, as well as from external address providers.

For what purposes do we process your personal data?

#### *Telemarketing*

We process your identity data and contact information in order to market our services and enable contact with you.

#### *Event*

We process your identity data and contact information for the purpose of producing guest lists and providing information to you about events that we are planning and/or that you have accepted. We also process information about any allergies, in cases where you provide them to us. We will then obtain your specific consent for this processing.

#### *Newsletter*

We process identity data (name only) and contact details (e-mail address only) for the purpose of sending you newsletters. We send out newsletters to you who have chosen to subscribe via our website and to you who are a customer provided that you do not object to this. For more information about the newsletter, see [here](#).

#### *Contact form*

We process identity data (name only) and contact information for the purpose of contacting you in the case you want to be contacted. The purpose of the processing is for the appropriate person or department to be able to help and respond to what you want help or information about.

#### *Block list*

We process the contact information or contact information that you choose to put on the block list in order to live up to our legal obligation to have an internal marketing block list.

#### *Cookies*

The purpose of our processing of personal data derived from cookies is to improve your user experience on our website. This is done through follow-up of web statistics to improve the website's content, appearance and functionality. The purpose is also to ensure that our website works, to analyze visitor statistics and to be able to provide relevant marketing and relevant offers to you through web advertising. In order for us to be able to target marketing and offers that are relevant to you as a visitor, we sometimes make selections based on your browsing habits and visitor statistics on our website. It may then happen that some visitors receive offers that others do not receive, based on so-called profiling.

To read more about specific cookies and their use, please see our Cookie Policy (<https://www.soderbergpartners.se/en/about-us/personal-data-cookies/cookies/>).

On what legal basis do we process your personal data?

We have a legitimate interest of marketing our services. In our balance of interests, we have taken great care that you who receive the marketing should not be surprised or unduly disturbed by our marketing. We also have a legitimate interest of analyzing data in order to improve your user experience on the website.

We carry out targeted marketing and profiling based on your consent when you have approved marketing cookies. If you have consented to marketing cookies, you can withdraw your consent to these at any time. Read more about how to change cookie settings under "Manage cookie settings" and in our Cookie Policy which can be found here <https://www.soderbergpartners.se/en/about-us/personal-data-cookies/cookies/>

If we process information about allergies or other food preferences before an event, we will, via each event's registration form, collect your consent first. If you have given your consent, you have the right to withdraw your consent at any time. However, a revoked consent means that we can no longer accommodate your possible wishes regarding allergies or food preferences.

For the block list, our legal basis is the fulfillment of our legal obligation to have a functioning block list.

Who are the recipients of your personal data?

Information about you is disclosed to companies that help us with our marketing or our events.

Your contact information may also be shared with selected partners for marketing purposes, provided that you do not object.

Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (<https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsiva/>). You can read more about the European Commission's SCC here ([https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)).

How long is your personal data stored?

We save your information for as long as necessary depending on the type of marketing we carry out. Regarding telemarketing, events and the contact form, we store your personal data for a maximum of six months, or until you decline further contact. Once you have chosen to subscribe to our newsletter, we will retain your data for as long as you have subscribed to the newsletter.

Please see our cookie policy for information on the storage period regarding cookies <https://www.soderbergpartners.se/en/about-us/personal-data-cookies/cookies/>.

Automated decision-making

We do not perform automated decision-making based on your personal data.

## Your rights

### What rights do I have and how do I use them?

If we process personal data about you, you have a number of rights under the GDPR that you can use. If you are unsure whether we process information about you, you also have the right to receive information about whether we do or not. See the list below where we describe in more detail your rights and how you should go about using them.

### Right of access

You have the right to receive confirmation of whether we process personal data about you and in such cases to access your personal data (also called "register extract"). You also have the right to receive a copy of your personal data being processed. You have the right to receive a register extract free of charge showing what personal data is registered about you, the purposes of the processing and the categories of personal data to which the processing relates.

If you wish to receive a register extract, you can apply for this by submitting the application form [that you find here](#).

### Right to rectification

You have the right to request that any incorrect information about you be corrected and also demand that we limit our processing of your personal data while we investigate your request. You also have the right to request a supplement to any incomplete information we hold about you.

If you wish to have information corrected, you can request this by submitting the application form [that you will find here](#).

### Right to erasure ("Right to be forgotten")

Under certain conditions, you have the right to have the information we process about you deleted. You have the right to have your personal data deleted if:

- the personal data are no longer necessary for the purposes of the processing,
- you withdraw your consent on which the processing is based,
- if you have objected to the processing that is supported by a balance of interests and we are not considered to have a legitimate interest in continued processing that outweighs your interest,
- if the processing is for direct marketing purposes and you object to the processing of the data,
- the personal data have been unlawfully processed, or
- if deletion is required to comply with a legal obligation.

We are not always able to comply with a request for deletion. For example, there may be legal requirements that require us to retain the personal data or if we need the information to be able to fulfill an agreement with you.

In case you wish to have information deleted, you can request this by submitting the application form [that you find here](#).

### Right to restriction

You have the right to request that our processing of your personal data be restricted. A restriction can be made for several reasons.

- If you dispute that the personal data we process about you is correct, you can request a restricted processing while we check whether the data is correct.
- If the document is unlawful and you object to the erasure of the personal data and instead request a restriction of use.
- If you have objected to a processing that is based on a balance of interests that we have used as a legal basis for a purpose, you can request a restricted personal data processing while we work to assess whether our legitimate interests outweigh your legitimate interest.
- If we as a controller no longer need the personal data for the purposes of the processing but you need them to be able to establish, exercise or defend legal claims.

If a restriction occurs, we may only, in addition to storing the data, process the data for the establishment, exercise or defence of legal claims, to protect someone else's rights or because you have given your consent. If you have had the processing of your personal data restricted, we will inform you before the restriction of processing ends.

In case you wish to have information restricted, you can request this by submitting the application form [that you find here](#).

#### Right to object

You have the right to object at any time to our processing of your personal data based on a balance of interests as a legal basis (legitimate interest) including profiling. Continued processing of your personal data requires us to show a legitimate interest that outweighs your interest in the processing in question. Otherwise, we may only process the data for the establishment, exercise or defence of legal claims.

You also have the right to object at any time to processing carried out for direct marketing purposes, including profiling to the extent that it is related to such direct marketing. If you have objected to processing for direct marketing purposes, we may no longer process your data for such purposes.

If you wish to object to our use of your personal data, you can request this by submitting the application form [that you can find here](#).

#### Right to Data Portability

In some cases, you have the right to have your personal data transferred in electronic format to another data controller (so-called "data portability"). This assumes that the transfer is technically possible and can be done in an automated way. The right to data portability applies to data that you have provided to us and that we process on the basis of performance of a contract or consent as legal bases.

If you wish to have data portability of your data, you can apply for this by submitting the application form [available here](#).

## How is your data protected

We pursue a very ambitious information security programme. This means, among other things, that we have strong technical measures that protect all our information, such as firewalls and intrusion protection. In addition, we work with access control, which means that personal data is not accessible to more of our employees than is necessary for each employee to be able to perform their work. Finally, we impose at least as high security requirements on the suppliers who process personal data on our behalf.

## Questions & Complaints

If you have questions or concerns regarding our personal data management that cannot be answered by this page, you are welcome to contact your advisor, our switchboard (08-451 50 00), or email [info@soderbergpartners.se](mailto:info@soderbergpartners.se).

We have appointed a Data safety representative who works to monitor compliance with the rules on the protection of personal data. Our Data Protection Officer can be reached via [dataskyddsbudet@soderbergpartners.se](mailto:dataskyddsbudet@soderbergpartners.se).

If you think that we process information about you in a way that violates the Data Protection Regulation, you can primarily contact us through one of our communication channels above. If, after handling by us, you do not feel satisfied, you have the right to file a complaint with the Swedish

Authority for Privacy Protection, which is responsible for the supervision of personal data processing in Sweden. The Swedish Authority for Privacy Protection can be reached via [www.imy.se](http://www.imy.se).