

# PRIVACY POLICY

---

*Type of document: Policy*

*Approved by: The Palme Center Board 2018-05-30*

*Responsible for document: Secretary General*

*Latest update: 2020-06-10*

*Latest review: 2021-02-03*

---

The Palme Center is committed to protecting your privacy. This policy explains how we collect and use your personal information. It also describes your rights with respect to your personal data. The privacy policy is the basis for how we handle personal data and aims to provide clarity, security, and guidance on how we comply with the GDPR data protection regulation that all EU countries must address.

The Palme Center is responsible for the processing of personal data. It is essential that all such processing is carried out in a legal and correct manner that minimises the risk of infringement of the privacy of the data subject's personal integrity. Responsibility means that data is:

- collected for specific, explicit, and legitimate purposes
- adequate, relevant, and not too comprehensive
- correct and up to date
- not stored longer than necessary
- treated in a safe manner.

## WHAT IS PERSONAL DATA AND WHAT IS PROCESSING OF PERSONAL DATA?

Personal data is all kinds of information that can directly or indirectly be attributed to a natural person who is alive. Some examples are name, contact information, Swedish personal ID number, photo, IP addresses, information on education, e-mail correspondence, information on choices made and personal preferences, movement patterns on the Internet, purchase, and payment history.

Processing of personal data is everything that is done with personal data. Any action taken with personal data constitutes processing, whether automated or not. Examples of common processing are acquisition, registration, organisation, structuring, storage, treatment, transfer, and deletion.

We will process different information about you depending on the relationship we have with you, whether you, for example, participate in our project activities or are employed by us. This policy describes what information about you we process and for what purposes.

## FROM WHAT SOURCES DO WE RETRIEVE YOUR PERSONAL DATA?

In addition to the information you give to us yourself in connection with your project involvement, your donation, your employment or when you contact us on other matters, we may also retrieve information from public registers such as SPAR if this is necessary for good

registry maintenance (that is to say, when it is important that you are you and that no one else receives your mailings or that you are not reached by them). We may also, based on a mobile phone number, access your name or in another way supplement your data. Sometimes we get personal data from other sources, and then we tell you where we have acquired them from.

## **LEGAL BASIS, STORAGE OF PERSONAL DATA AND DELETION OF PERSONAL DATA**

There must be a legal basis for all processing. The Palme Center's processing of personal data is done in accordance with applicable law and means that the data is not kept for longer than is necessary for the purpose specified. We will keep your data for as long as you have a relationship with us, for example while involved in a project or as a donor and for a time thereafter depending on the purpose. For marketing purposes, information older than three years is not used. Some information may be retained for longer when required by other legislation. If you are in contact with us in your professional role or are otherwise involved in our business, your personal information may be contained in records, memos, as a reference in invoices or the like.

## **WHO CAN WE SHARE YOUR PERSONAL INFORMATION WITH?**

In order to fulfil our commitments to you, we sometimes need to share your personal information with other organisations or companies, such as IT providers, printers and salary contractors. In these cases, we make an agreement with these organisations on how they can manage the data. Unless specifically specified in the annex to this policy, the transfer of personal data will not be made to third countries (non-EU/EEA countries) or international organisations.

## **WHAT ARE YOUR RIGHTS AS A REGISTERED PERSON?**

You have certain rights under Swedish data protection legislation. If you wish to exercise any of your rights, please contact us.

- Access to your personal data – you have the right to receive confirmation of whether we are processing your personal data and a statement of what data is being processed
- Request correction – you have the right to have incorrect data corrected
- Request to be deleted – under certain circumstances you have the right to have your data deleted
- Object to processing that is based on our legitimate interest and against processing for direct marketing – you have the right to object to the processing of your personal data or to limit processing
- Right to data portability – you have the right to require personal data to be transferred from us to another company, authority, or organisation. This right is limited to information provided to us by you.

In the event that we receive a request for any of the above, we may ask for additional information to ensure the effective handling of your request and that the information is

provided to the right person.

Please be aware that we may have the right to refuse your request if there are legal obligations that prevent us from immediately deleting certain personal data. It may also be that treatment is necessary for us to establish, assert or defend legal claims.

## ABOUT COOKIES

A cookie is a small text file saved on the site visitor's computer. There are two types of cookies, persistent and session cookies. Persistent cookies save a file for a specified time while session cookies are temporarily stored in the computer's memory and disappear when the browser is closed.

When you visit our website, we may collect information and data about you by using cookies. Our website contains cookies for the purpose of generating web statistics, mapping user behaviour, and managing login. If you do not agree to cookies, you can block them in your browser's security settings. Your browser can also be set to alert you whenever a website attempts to set a cookie on your computer. When cookies are blocked, some parts of the website may be less effective.

## HOW IS YOUR PERSONAL DATA PROTECTED?

Your privacy is important to us, which is why we focus on security. The Palme Center takes steps to protect your data in accordance with the Data Protection Regulation and established information security guidelines. This means that we have data protection procedures and rules to protect your personal data against unlawful or unauthorised processing, such as sending your data securely and ensuring that staff only have access to the data they need to perform their work.

## WHO IS RESPONSIBLE FOR THE PERSONAL DATA WE COLLECT?

The Palme Center (corporate registration number: 802013-1333), address Box 836, 101 36 Stockholm, is the personal data manager for the organisation's processing of personal data.

## WHAT DO I DO IF I HAVE QUESTIONS OR COMMENTS?

Contact us if you have questions about how we handle your personal information, want to know what information we have stored about you, or if you want anything changed or deleted.

E-mail: [info@palmecenter.se](mailto:info@palmecenter.se)

Phone 08-677 57 70

Postal address: Olof Palmes Internationella Center, Box 836, 101 36 Stockholm

The Palme Center is committed to protecting your privacy. Should you believe that we have processed your personal data incorrectly, please contact us first so that we can resolve the issue. However, if you are still not satisfied, you can contact the Swedish Data Protection Authority, which is the regulatory authority.

# WHAT PERSONAL DATA DO WE PROCESS FOR WHAT PURPOSE?

## When you participate in project activities

As a grant intermediary organisation, it is the responsibility of the Palme Center to ensure that intermediary funds are used in accordance with agreements and applicable legislation. In order to fulfil this responsibility, the Palme Center records necessary information about project organisations and responsible project actors in these organisations. We use your personal information to:

- know which organisations and people are involved and responsible for which projects and to be able to keep in contact with them on a regular basis during the project.
- be able to establish responsibility.
- send out information about project work, for example about application and accounting processes, meetings, training courses, etc.
- send invitations to project-related seminars and other events organised by the Palme Center.

## Personal data processed

- Name
- Affiliation
- Role in projects
- Contact details (e.g. address, email, and phone number)

## Legal basis for processing

*Fulfilment of agreements and legitimate interest.* This collection of your personal information is required in order to fulfil our obligations under agreements with financiers and project actors.

## Storage period

During the duration of the project until the final report of the project has been approved by our financiers (normally one year after its last year of operation).

## When you participate in fundraising

We process personal information to inform you about our activities and current promotions, to recruit and maintain donors and to administer gifts. For this we need, for example, to be able to:

- manage donor questions and update contact information
- analyse donor behaviour and donor profiles for marketing purposes
- conduct market research
- generate statistics

## Personal data processed

- Name, gender, Swedish personal ID number

- Type of donor (monthly donor, one-time donor, etc.)
- Contact details (address, email, and phone number)
- Bank account details (for monthly donors)
- Past donations, how they were paid and for what (promotions, purposes)

### Legal basis for processing

*Fulfilment of agreements, consent, and legitimate interest:* This collection of your personal information is required in order to fulfil our obligations to you as a donor, for example to administer donations.

### Storage period

Retention of personal data with *the fulfilment of agreements* is valid for as long as the term of the contract runs. *Consent* is valid until the donor revokes that consent. *Legitimate interest* as basis is valid up to 36 months after the last donation.

### When you subscribe to newsletters

To inform about our operations, we send out electronic newsletters and other publications.

### Personal data processed

- Name
- Contact details (address, email)

### Legal basis for processing

*Fulfilment of agreements and legitimate interest:* This collection of personal information is required in order to fulfil our obligations to you as a subscriber to our newsletters and for mailing of invitations to seminars and other activities.

### Storage period

Until the subscriber terminates the subscription or termination of continued invitations has been notified.

### When you are employed

#### Personal data processed

In order to fulfil our obligations and to safeguard rights under employment contracts and related applicable collective agreements and regulations, the Palme Center will process the personal data of employees in the form of:

- name, address, photograph, Swedish personal ID number, contact details and contact details of a relative
- duration of employment, form of employment, position, union membership
- payroll and tax data, bank account
- work time, absence/reasons for absence, health
- Information about training and experience, including CV, grades and references, development, behaviour, and accomplishments

- other personal data necessary and relevant for the Palme Center to administer the employment relationship.
- Information and notes from performance reviews and information from evaluations (where you are evaluated and evaluate other employees)
- Technical information such as your IP address, network traffic, and log files
- Information that may emerge in connection with the investigation of mismanagement and/or irregularities, such as sexual harassment

The processing of personal data that is considered sensitive – such as health information in connection with sick pay administration and rehabilitation – is carried out restrictively and in compliance with confidentiality. The information comes from the employee themselves, the authorities or has been generated during employment by the Palme Center or its partners.

### Legal basis for processing

Personal data processing is carried out in order for the Palme Center to be able to fulfil the employment contract and the collective agreements applicable to the employment relationship (such as payment of salary and pension); to fulfil obligations under law (such as labour and tax laws); and to make a balance interests (such as allergies/dietary requirements, contact details of relatives and contact details on the website).

### Storage period

The personal data of employees will be processed for as long as it is necessary for the Palme Center to fulfil its obligations under the employment contract and collective agreements (for example, to pay wages), to defend itself against labour law claims (for example under the Employment Protection Act) and to fulfil obligations under law (for example, the Accounting Act). The Palme Center shall regularly dispose of personal data that is no longer required, for example when employment has terminated or because potential labour law requirements have been expired.

### Recipients of personal data

#### *Internal recipients*

The data is used by internal officers who deal with matters relating to personnel, finance, IT, and other administration necessary for the employment relationship, as well as managers and, where appropriate, board members.

#### *External recipients*

The data may be released to the Palme Center's partners who administer pay runs and signed insurance contracts (wage contractors, insurance companies and occupational pension choice centres), pay sickness or parental benefits (the Swedish Social Insurance Agency or insurance companies), monitor employees' rights (trade union counterparts), draw up payroll statistics (including Statistics Sweden), carry out membership surveys, carry out membership mailings and similar measures.

Personal data may be processed by external parties charged with performing specific tasks (including providing computer systems) such as time reporting, scheduling, wellness grants, website, e-mail, telephone, switchboard, business health care, employee surveys, credit/debit cards and the like. The Palme Center will ensure that these external parties handle personal data in an adequate manner. Since the external party is not itself responsible for personal data,

but only handles personal data on behalf of the Palme Center, we will ensure that personal data processing agreements are drawn up. The personal data processor may only use your personal data for the purposes we designate.

In some cases, the Palme Center is obliged by law to provide personal data of employees to public authorities (e.g. payroll and tax data for the Swedish Tax Agency or the Swedish Social Insurance Agency).

## When you are a job seeker

### Personal data processed

In order to administer, manage, organise and plan activities, fulfil its obligations and safeguard its rights under the relevant collective agreements and regulations, the Palme Center will process the personal data of applicants in the form of:

- name, contact details, Swedish personal ID number
- application documents including CV
- references specified in the application process
- any test results or work samples
- other personal data necessary and relevant for the Palme Center to administer the recruitment process

Personal data from applicants who are not called to an interview will be deleted immediately when the advertisement is deleted. Personal data from candidates who are called to an interview is kept for two years under the Swedish Discrimination Act.

## CHANGES TO THE PRIVACY POLICY

The policy is adopted annually and published on the website. If we change the policy in a way that is substantially different from what was stated when we collected your personal data, we will notify you of these changes and, if necessary, request your consent to the processing of your personal data.

## OWNERSHIP AND FOLLOW-UP

The content of this policy is reviewed and adopted annually by the Board of the Palme Center. The Secretary General is responsible for ensuring that the policy and related documents are known and complied with in operations and that follow-up of compliance with the policy is conducted annually.