

Privacy Policy

Information on how we process your personal data

1. Introduction

This Privacy Policy (the “**Policy**”) describes how Tällberg Foundation, reg. no. 883201-4644 (“**Tällberg**”, “**we**”, “**us**” or “**our**”), at the address c/o Privacy Policy, Box 5216, SE-102 45, Stockholm, Sweden, process your personal data when you visit and use our website or come into contact with us because of our business, services and activities – usually because you represent a customer, supplier or a partner to us.

We are responsible for the processing of your personal data as described in the Policy in the capacity of data processor. If you would like to know more about our processing of your personal data, you are welcome to contact us, e.g. via the address above or via our email address: info@tallbergfoundation.org

It is important to us that you feel comfortable with our processing of your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes in the Policy, the new version applies from the time it is published on our website. At the top of the page, you can see when the last changes to this Policy were made.

2. How we collect your personal data

The personal data we process relating to you is mainly collected from you when you visit and use our website or when we come into contact with you – e.g. via email, telephone or personal meetings, conferences, conventions or similar occasions. In some cases, e.g. if you are one of our business contacts, we may also collect your personal data from a third party, usually from the company you represent.

3. How we process your personal data

3.1. Introduction

We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This inter alia means that we need to have a legal basis for the purposes for our processing your personal data, which in our context generally mean one of the following legal bases.

Performance of a contract – the processing is necessary in order for us to be able provide our services to you or otherwise perform a contract between us (this applies if you conduct your business in a sole proprietorship), or to take steps at your request prior to entering into a contract.

If you are acting on behalf of someone else, e.g. in the capacity of representative of a company (which is usually the case), our processing is carried out with reference to our legitimate interest balanced against your interests or fundamental rights or freedoms, where our legitimate interest is to conclude and perform the contract with the company you represent.

Performance of legal obligations – the processing is necessary in order to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are sub-

ject to court orders or decisions by other authorities, which require us to process your personal data.

Legitimate interests – the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, provided that they are not overridden by your interests or fundamental rights or freedoms (in which case our processing is not allowed based on such legitimate interests).

Consent – the processing is carried out with reference to your prior consent, where we are inter alia responsible for clearly informing you of what processing you consent to and your right to withdraw your consent in relation to our continued processing.

Below, we explain more about the categories of personal data we process, for what purposes we process them and what legal bases we rely on when processing your personal data, including for how long your personal data is stored with us.

3.2. To maintain and improve our websites

Purposes of the processing

Collect and analyse statistics regarding the web traffic on our websites (eliassongloballeadership.org and tallbergfoundation.org) as well as other technical information generated through website visits, in order to maintain and improve their functionality, user experience, and in order to discover and counteract errors, breaches and incidents.

To do this we use third party analytics-services. The statistics we produce and the analysis we carry out by using these services are based on aggregated data and other de-identified or anonymized data.

Legal basis: Legitimate interest, where our legitimate interest is to collect information to maintain and improve the functionality, content, and security of our website. Collection of information by the [use of cookies](#) and similar technologies is carried out based on your consent, unless they are strictly necessary in order for you to be able to use our website in appropriate manner. For more information on how we use cookies and similar technologies, please see our cookie policy, available [here](#).

Storage period: We collect and store information on how visitors interact with our website for no longer than two (2) years. In most cases, the collected personal data is however converted to aggregated data (anonymized data) before the said time period, in connection with our production of statistics.

Categories of personal data

The personal data relating to you that we process include:

- IP-address
- Other technical information generated through visits on our website, such as the type of technical device that you have used, web browser, visited pages as well as the time of the visits (browser information, time zone at the place from which you visited our website, other web traffic information)

3.3. To process job applications

Purposes of the processing

When you apply for a job with us or otherwise communicate your interest for such a job, we may collect, store and otherwise process personal data relating to you.

Categories of personal data

The personal data relating to you that we process include:

- First and last name
- Contact details such as email address, telephone number, location and address,
- Personal identification number (or other information on date of birth),
- Gender,
- Job applied for or office and job of interest,
- Information in personal letter,
- CV and merits and other documents provided,
- Information furnished by reference persons,
- Test scores, notes and summaries of interviews and discussions during the recruitment process, as well as summaries and analyses relating to you by recruitment consultant or other service provider engaged in connection with the recruitment.

Legal basis: The processing is carried out on the basis of our legitimate interest of efficient and correct recruitment processes. If you have consented to that personal data may be processed for future recruitments, personal data may be processed for that purpose, which processing is then carried out on the basis of such consent.

Storage period: We store your personal data as long as needed to carry out the recruitment process and we review our need to store or delete your personal data periodically, which usually occurs on a two (2) year basis. If you have consented to that personal data may be processed for future recruitments, such data may be stored for two (2) years after you gave the consent (or until the consent is revoked). Despite the above, we may store data for as long as a job seeker not employed can take legal actions in respect of the recruitment (see further Section 3.11 below).

3.4. To administrate your participation in our networks

Purposes of the processing

To allow you to become part of our networks, e.g. by registering with us on our websites, and to administer the networks and the contact list.

Categories of personal data

The personal data relating to you that we process include:

- First and last name
- Contact details such as email address, telephone number, location and address
- Where applicable, professional title and information regarding the company you represent

Legal basis: The processing is necessary to conclude and perform a contract with you or, if applicable, the company that you represent.

Storage period: We store your personal data as long as you participate in our network or as long as you we expect that to want to continue being part of our network, and we review our need to store or delete your personal data periodically, which usually occurs on a two (2) year basis.

3.5. To maintain, develop and provide you with our activities

Purposes of the processing

Administration and communication regarding our activities, such as, conferences, workshops, conversations and other events, competitions, and nominations for the Eliasson Global Leadership Prize of the Tällberg Foundation.

This e.g. includes administration of payment for participation and communication to notify you regarding our activities.

If you make a donation or payment online, your card information is not held by us. It is collected by our third party payment processors, who specialize in the secure online capture and processing of credit/debit card transactions.

Legal basis: The processing is necessary to conclude and perform a contract with you or, if applicable, the company that you represent. The processing of attendance data and biography is based on legitimate interest, where our legitimate interest is to collect information to maintain and develop our activities and to present the participants to other participants.

Storage period: We store your personal data as long as it is necessary to provide you with the relevant activity, and no longer than two (2) years from the time that you last took part in one of our activities.

We may however need to store your personal data for a longer time for other purposes, e.g. if we need to take measure in order to establish, exercise or defend legal claims. We may also need to store your personal data for a longer time in order to fulfil our legal obligations, e.g. relating to book keeping according to the Swedish Accounting Act (see further Section 3.11 below).

Categories of personal data

The personal data relating to you that we process include:

- First and last name
- Contact details such as email address, telephone number, location and business address
- Maintaining a list of which activities you have attended
- Where applicable, professional title and information regarding the company you represent
- Where applicable, maintaining a biography of you or the company you represent
- Where applicable, payment and billing details

3.6. To create, maintain and develop potential business relationships

Purposes of the processing

Contact and communication with you for the purposes of responding to your inquiries and, where applicable, creating, maintaining and developing our business relationship with you or the company you represent.

This includes, among other things, regular administration and communication regarding our customer-partner- and supplier agreements and communication via email about our business, services and our activities (see Section 3.9 below).

Legal basis: Legitimate interests, where our legitimate interests are to respond to your inquiries and create and thereafter maintain and develop a business relationship with you or the company you represent.

Storage period: We store your personal data for a period of six (6) months after the data was collected. If a business relationship is established between us and you or the company you represent during this time, we will however continue processing your personal data in accordance with Sections 3.7-3.9 and 3.11 below.

We may however need to store your personal data for a longer time for other purposes, e.g. if we need to take measure in order to establish, exercise or defend legal claims. We may also need to store your personal data for a longer time in order to fulfil our legal obligations, e.g. relating to record keeping according to the Swedish Accounting Act (see further Section 3.11 below).

Categories of personal data

The personal data relating to you that we process include:

- First- and last name
- Contact details such as email address, telephone number, location and business address
- Professional title and information regarding the company you represent
- Information that you otherwise provide us in our communications with you

3.7. To maintain and develop existing business relationships

Purposes of the processing

Contact and communication with you in your capacity as a representative of one of our existing customers, partners, suppliers or other business contacts, in order to maintain and develop our business relationship with you or the company you represent.

This includes, among other things, regular administration and communication regarding our customer, partner and supplier agreements and communication via email about our business, services and our current activities (see Sections 3.8 and 3.9 below).

Legal basis: Legitimate interest, where our legitimate interest is to maintain and develop our business relationship with you or the company you represent.

Storage period: We only store your personal data for as long as we have a business relationship with you or the company you represent and during the time relevant for the abovementioned purposes. We review our need to store or delete your personal data periodically, which usually occurs on a two (2) year basis.

We may however need to store your personal data for a longer time for other purposes, e.g. if we need to take measure in order to establish, exercise or defend legal claims. We may also need to store your personal data for a longer time in order to fulfil our legal obligations, e.g. relating to book keeping according to the Swedish Accounting Act (see further Section 3.11 below).

Categories of personal data

The personal data relating to you that we process include:

- First and last name
- Contact details such as email address, telephone number, location and business address.
- Professional title and information regarding the company you represent
- Information that you otherwise provide us in our communications with you.

3.8. To conclude and perform contracts

Purposes of the processing

Administration and communication in order to conclude or perform contracts between us and you, or the company you represent.

This includes, among other things, invoicing and regular handling, following up and documentation of matters relating to contracts, including the receiving of donations.

Categories of personal data

The personal data relating to you that we process include:

- First and last name
- Contact details such as email address, telephone number, location and business address
- Professional title and information regarding the company you represent
- Information that you provide us in matters relating to our contractual relationship with you or the company you represent, e.g. questions and feedback on contracted services

Legal basis: The processing is necessary to conclude and perform a contract with you or the company that you represent. If you are acting on behalf of someone else e.g. in the capacity of representative of a customer, partner or supplier to us, our processing is carried out with reference to our legitimate interests, where our legitimate interests are to conclude as well as perform the agreement with the company you represent.

Storage period: We process and store your personal data for as long as we have a business relationship with you or the company you represent, but, no longer than two (2) years from the last time we were in contact with each other due to our business relationship.

We may however need to store your personal data for a longer time for other purposes, e.g. if we need to take measure in order to establish, exercise or defend legal claims. We may also need to store your personal data for a longer time in order to fulfil our legal obligations, e.g. relating to book keeping according to the Swedish Accounting Act (see further Section 3.11 below).

3.9. To send newsletters and other marketing messages

Purposes of the processing

To administer and send marketing messages via email for the purposes of providing information about our business, services and activities.

Categories of personal data

The personal data relating to you that we process include:

- Email address
- First and last name

Legal basis: We send marketing messages via email to you if you have registered for them and thereby consented to receiving them. If you have not registered for marketing messages, we only send such messages via email to you if the content is relevant in relation to you or the company you represent, e.g. if you have registered for one of our activities, made a donation to us or are one of our business contacts. Our marketing then occurs with reference to a legitimate interest, where our legitimate interest is to be able to market our business, services and activities.

Storage period: We process and store your personal data to send marketing messages via email to you as long as you have not opted out from receiving further messages. Such opt-out can be done at any time by using the link for opt-out provided in our messages.

3.10. Use of photographs or videos with your image

Purposes of the processing

To use photographs or videos with your image, taken at our events, conferences, conventions or similar, or that you have provided to us, in our publications, invitations, brochures, promotions, newspapers, magazines, websites and other media.

Categories of personal data

The personal data relating to you that we process include:

- The image of you
- Where applicable, first and last name

Legal basis: Legitimate interests, where our legitimate interests are to market ourselves and our services and provide photographs or videos on our website and in connection with our events.

Please contact us in writing and share with us a photograph of you if you do not want us to use your image as set out above.

Storage period: We store your personal data during the time relevant for the abovementioned purposes and we review our need to store or delete your personal data periodically, which usually occurs on a two (2) year basis.

3.11. To fulfil legal obligations or to establish, exercise or defend legal claims

We may process your personal in order to fulfil our legal obligations as set out in e.g. law or other legal statutes which apply to us, or if we are subject to court orders or decisions by other authorities which require us to process your personal data

We may also process your personal data so that you, or the company you represent, we ourselves, our any relevant third party can establish, exercise or defend its legal claims, e.g. in connection with an ongoing dispute.

4. Security measures

We have taken measures to ensure that your personal data is handled in a safe way. For example, access to systems where personal data is stored is limited to our employees and service providers who require it in the course of their duties and who are informed of the importance of maintaining the security and confidentiality of the personal data we keep. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure or misuse. We also monitor our systems to discover vulnerabilities in order to protect your personal data.

5. How we share your personal data

Access to your personal data is limited to persons who require such access for the purposes described in Section 3 above. Your personal data may therefore be shared with the following categories of third party recipients:

- a) Companies within our group: We may share your personal data with other companies within our group. If we share your personal data with other companies within our group, we will ensure that the personal data continues to be processed in line with this Policy.
- b) Service providers: We use third party service providers to manage parts of our business operations. We may share personal data with such third parties in order for them to supply e.g. IT services or other administrative functions. When we use such service providers, we enter into data processing agreements and take other suitable measures to ensure that your personal data is processed in line with this Policy.
- c) Our partners: We cooperate from time to time with external parties in order to improve our services and business. These parties either process your personal data as data controllers according to their own terms and policies for handling personal data, or as our data processors according to our instructions. In the latter case, we enter into data processing agreements and take other suitable measures to ensure that your personal data is processed in line with this Policy.
- d) Public authorities: We may share your personal data with public authorities such as the Swedish Police or the Swedish Tax Agency when it is required by e.g. applicable law or other legal statutes or decision by court or authority in order to fulfil the legal obligation specified therein.

6. Where we process your personal data

We strive to always process your personal data within the EU and EEA. However, due to the international nature of our business, services and activities, we or our service providers may sometimes need to transfer personal data to countries outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is in accordance with applicable data protection legislation before the it occurs, e.g. by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission, or by ensuring appropriate safeguards based on the use of standard contractual clauses that the European Commission has adopted and other appropriate measures to safeguard your rights and freedoms.

You may access a list of the countries that the European Commission has decided provide an adequate level of data protection at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en.

You may access the European Commission's standard contractual clauses at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

7. Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them.

Please note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights where applicable. We also ask you to note that we may need more information from you in order to e.g. confirm your identity before proceeding with your request to exercise your rights.

To exercise your rights or request information about them we ask that you contact us, which is most easily done via email: info@tallbergfoundation.org.

7.1. Right of access

You have the right to obtain a confirmation as to whether or not we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.

7.2. Right to rectification

You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.

7.3. Right to erasure

You have the right to obtain that we erase your personal data without undue delay in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- Our processing is based on your consent and you withdraw your consent to the relevant processing;
- You object to processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
- The processed personal data is unlawfully processed;
- The processed personal data has to be erased for our compliance with one or more legal obligations.

7.4. Right to restriction

You have the right to obtain that we restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- The processing is unlawful and you oppose erasure of the personal data and request restriction instead;
- The personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defense of legal claims;
- You have objected to the processing of the personal data which we carry out based on a legitimate interest, pending the verification whether your objection overrides our or another party's legitimate interest to continue with the processing.

7.5. Right to object

You have a right to object to our processing of your personal data when it is based on our or another party's legitimate interest. If you object, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms in order to be allowed to continue with our processing.

7.6. Right to data portability

If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible.

We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

7.7. Right to withdraw consent

If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

8. Complaints with the supervisory authority

In Sweden, the Swedish Authority for Privacy Protection (*Sw.* Integritetsskyddsmyndigheten) is the authority responsible for monitoring the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact us so that we can review your concerns. You may, however, file a complaint with the Authority for Privacy Protection at any time.
