

Privacy Policy

Background

Your personal integrity is very important to us at Tengbom (Tengbomgruppen AB, reg. no. 556329-9113, in Sweden and its subsidiary Tengbom Oy, reg. no. 2046265-8, in Finland) and we would therefore like to be open and transparent about our processing of personal data.

Purpose

The purpose with this Policy is to safeguard that we are processing personal data in compliance with the General Data Protection Regulation (GDPR) and to clearly communicate how we process personal data, what we use personal data for and on what legal basis we base our processing.

Controller of personal data

Tengbom is in its capacity of controller responsible for the processing of personal data that takes place within the scope of Tengbom's business. This means that Tengbom is responsible for such processing being compliant with GDPR and that it is carried out in a way that safeguards the personal integrity of the natural persons concerned.

Definitions

Personal data:

Personal data means information relating to an identified or identifiable natural person (i.e. a human being) such as e.g. name, address, date of birth, social security number, account number and payment card numbers.

Processing of personal data:

A measure or combination of measures with respect to personal data – irrespective of if they are automated or not – such as collection, registration, storage, organisation and structuring.

Controller:

An entity that alone or jointly with others decides the purpose and means of processing of personal data.

Data subject:

The person to whom the personal data is related, i.e. the natural person that directly or indirectly can be identified by the registered personal data.

Personal data assistant:

A third party that processes personal data on behalf of a Controller.

Processing of personal data

Within Tengbom, all processing of personal data is governed by the following principles:

Lawfulness

We process all personal data lawfully, fairly and in a transparent manner, i.e. we safeguard that personal data is processed for specified, explicit and legitimate purposes that have a legal basis.

Purpose limitation

Our processing shall be adequate, relevant and not to extensive in relation to the purposes for which the personal data is processed.

Data minimisation

We only process personal data on legal basis, for explicit and legitimate purposes and to the extent such processing is necessary for these purposes.

Accuracy

Personal data processed by us shall be accurate and updated. All reasonable measures shall be taken to safeguard that personal data that are inaccurate in relation to the purposes for which they are processed are deleted or corrected without undue delay.

Storage limitation

We do not keep personal data in a form which permits identification of the Data Subjects for longer than necessary in relation to the purposes for which the personal data is processed.

Security

We process personal data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

Personal data processed by Tengbom

Contact Details: name, address, e-mail address, telephone and mobile number, title

Confidential data: date of birth, social security number, bank and account number

Miscellaneous: photographs and so-called user generated content

Collection of personal data

Depending on the purpose, we collect personal data in different ways.

- Data collected in connection with application for vacancies, recruitment and employment
- Data registered in connection with visits at Tengbom offices or other contacts with us
- Data registered in connection with Tengbom carrying out assignment for clients
- Data registered in connection with Tengbom buying goods or services
- Data provided directly by a natural person
- Data provided upon visit on our website
- Data collected from official records
- Data registered in connection with signing up for seminars or other events arranged by us or when signing up for newsletters or other mailings
- Data registered upon receipt of answers to surveys or inquiries

Information to candidates, senior executives and employees

Consent is obtained from candidates for the processing of personal data that takes place within the scope of the recruitment process. Our senior executives and employees are provided with separate information about the personal data pertaining to them that we are processing, how we process such personal data within Tengbom's business and for what purposes and on what legal basis such processing takes place.

Information to our clients, suppliers and other interested parties

We process personal data related to contact persons for clients, potential clients, suppliers and other interested parties to carry out and administer our assignments and to market Tengbom's business and services.

We also process personal data related to contact persons for suppliers and other parties that we cooperate with within the scope of Tengbom's support functions and other business, in order to administer the cooperation and to meet our obligations in relation to them.

The legal basis for the above processing of personal data is that it after a balancing of interests is necessary for the above stated purposes of the legitimate interests pursued by us.

The personal data above is to some extent also processed within the scope of Tengbom's accounting and reporting. The legal basis for such processing is that it is necessary for compliance with a legal obligation to which Tengbom is the subject.

If we process personal data based on consent, specific information will be provided before such consent is obtained.

Transfer of personal data

We will not transfer personal data to a third party, except when (i) there is specific agreement to do so between Tengbom and the data subject, (ii) if it is necessary in order to fulfil a legal obligation or to comply with a decision by a public authority, (iii) it is necessary in order to enable us to carry out our assignments or (iv) if we rely on external service providers or suppliers that acts on our behalf. In cases where we rely on data processing assistants for processing data on our behalf, we enter into data processing agreements that safeguards adequate and secure processing of the personal data. If we transfer personal data to countries outside EU/EEA, we certify that legal basis for the transfer is in place and that adequate security measures have been taken, such as e.g. to include the EU commission's standard contractual clauses for data transfer in the agreements we enter into with parties gaining access to personal data.

Retention of personal data

We retain personal data for as long as it is necessary to fulfil the purpose with the processing or for as long as we are obliged to retain the data according to law, regulation or decision by public authority.

In assignments contact persons of clients, suppliers and other parties during the time periods that pursuant to law and agreement applies in relation to warranty and liability. The same applies for personal data relating to contact persons for our suppliers and other contacts.

In cases we have obtained consent, we retain personal data for as long as we have consent to do so.

How we work with security

We are continuously taking adequate technical and organisational measures to protect personal data against unauthorised or unlawful processing, disclosure, misuse, destruction or damage. Only authorised personnel have access to identifiable personal data, and they are obliged to maintain confidentiality.

Our security systems are developed with natural persons' integrity as focus and they provide a high level of protection against intrusion, destruction or damage that constitute integrity risks.

Potential personal data incidents shall be reported to our Personal Data Coordinator. Unless it is unlikely that they will result in a risk to the right and freedoms of natural persons, the incident shall be reported to the relevant data protection authority without undue delay and at the latest within 72 hours. We will take all necessary measures in case of an incident.

We have established internal routines in order to safeguard compliance with this policy.

Your rights

You may request correction or deletion of your personal data. You have a right to request a statement of your personal data registered in our systems. If you have complaints on our processing of personal data, you can submit a complaint to a supervisory authority, which in Sweden currently is The Swedish Data Protection Agency (www.datainspektionen.se) and in Finland currently is The Office of the Data Protection Ombudsman (www.tietosuoja.fi).

Entry into force

This policy is decided by CEO and is updated on an as needed bases, at least once a year. Tengbom's Personal Data Coordinator is responsible for the continuous process with updating this policy. The policy and any updates enter into force immediately when decided.

Monitoring

The process with updating this policy is preceded by monitoring and assessment of our processing of personal data. Tengbom's Personal Data Coordinator is responsible for the process pertaining to the updating of this policy in consequence of amendments to legislation or Tengbom's internal processes.

Information responsibility

Every manager at Tengbom is responsible for making this policy known to their co-workers. All employees are responsible for taking part of this policy and any subsequent updates.

Compliance

CEO has the overall responsibility for the compliance with this policy. Each manager is responsible for the monitoring and compliance with this policy.