

Privacy Policy

Background

Your personal integrity is very important to us at Tengbom (Tengbomgruppen AB and its subsidiaries) and we would therefore like to be open and transparent about our use of cookies and how we process your personal data. The point of departure is that all processing of personal data within Tengbom's business is carried out in a way that safeguards the personal integrity of all persons concerned.

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 what is the legal basis for the processing.

Controller

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 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:

A natural or legal persona 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 natural or legal person (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 too 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

Biometric data: Photographs

Confidential data: Date of Birth, social security number, bank and account number

Miscellaneous: Content published by you, i.e. user generated content

Collection of personal data

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

- 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 our clients, suppliers and other interested parties

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

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.

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, we retain personal data in the form of names on 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

As there are always risks involved when personal data is provided, regardless if it is done personally, by telephone, over the internet or in any other way, and no technology is entirely secure with respect to intrusion or manipulation, we have taken technical and organisational information security measures to prevent and limit such risks.

We have taken 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. 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.

If you have complaints on our processing of personal data

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).