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# **Privacy policy**

The Swedish Institute (SI) is a Swedish government agency with the mission to create interest and trust in Sweden abroad. We work towards promoting Sweden, cooperation in the Baltic Sea region and global development.

SI's privacy policy explains how we collect and use your personal data, as well as what rights you have in relation to us and how you can exercise those rights. You can always contact us via si@si.se if you have questions regarding privacy and data protection.

We process personal data to, for example, be able to offer you our services if you wish to take part in them, such as participation in training or events. We may also need to process personal data to provide you with service or provide you with information that you have requested.

SI processes personal data based on predetermined and specific purposes. The legal bases on which SI bases its processing are information in the public interest, legal obligations, agreements and consent. The legal basis for information of public interest is based, for example, on the Ordinance (2015:152) with instructions for the Swedish Institute, the Government Agency Ordinance (2007:515) and appropriation letters. SI may process personal data based on a legitimate interest.

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# What personal data does the Swedish Institute process?

#### In general

The Swedish Institute (SI) processes personal data such as contact details (e.g. name, address, telephone number, e-mail address), information about education, demographic information (age, language, nationality, gender and occupation) and social security number in cases where your identity needs to be confirmed.

#### Pictures and videos

When you participate in our events, programs or courses, photos or videos may be taken that are then publicised and used to market Sweden through various activities. We always inform you when photography takes place and what the images or videos will be used for.

We also take photos and videos for specific purposes such as promotions, for our websites and social media. In cases where we use extras, we always enter into an agreement with them.

#### Payment and credit information

If you have purchased something from SI, we may process information such as payment card details and bank account details to complete and verify purchases.

#### Online Data and Identifiers

We may collect data through cookies and similar technologies through your use of our websites. The data collected relates to your browsing activities and segments, cookie ID, your IP address, mobile device ID, information about your browser, device, and location.

#### Security Data and IT Service Management Data

SI processes data used for our services and premises. This data can include login credentials, passwords, and security logs.

#### Agreement data and transaction data

We process information about your agreements, orders, payment status, invoices and purchases from us. Personal data that occurs in support cases and in contact with us is also processed. It may also occur that SI needs to process certain personal data to be able to administer travel, accommodation and the like.

#### Free-text answers and individually designed assignments

SI processes certain specific personal data linked to individual performances. It can refer to information about what a particular person has done in the past, wants to do or personal motivations for purposes in an application.

#### Comments and chats on social media

On our social media, where we publish videos and pictures, it may be possible for individuals to leave comments or chat with us. We moderate all comment fields and remove those comments that violate our policies and usage rules. The comments are also deleted when we delete posts and publications.

## How and from where does SI collect personal data?

The personal data that SI processes must be adequate, relevant and not too extensive in relation to the purposes for which they are processed. We do not collect personal data for undetermined future needs.

**Through yourself** when you participate in our events, courses, purchase products, visit our website and social media or subscribe to our newsletters.

**Third parties**: other government agencies, universities, schools, public address registers, marketing partners or other data providers may share your personal data with us.

#### Through social media data analysis – "social listening"

Within the framework of SI's work with Sweden image analysis, we collect personal data through tools for analysis of information flows, for example: to find out what is said about Sweden in various social media. The use of the tools primarily aim to produce aggregated analyses of the collected data, and SI will de-identify the collected personal data as soon as possible.

# For what purposes does SI process personal data?

#### Newsletter

We process your contact information to deliver SI newsletters to you in cases where you have given consent.

#### Courses, programmes, events and applications

We collect your consent to process your personal data when you participate in our events or courses.

Within the framework of SI's work and received applications regarding, among other things, scholarships, project support and guest housing in Paris, SI processes personal data in order to be able to carry out programs and activities that individuals and organizations apply for to SI.

#### Marketing and communication about Sweden

SI processes personal data within the framework of its mission to market and communicate about Sweden. Due to SI's assignment to market Sweden, we may also use your personal data to create target group segments for advertising. In these cases, the personal data is always pseudonymised, which means that the data we share with partners can never be directly traced to the individual.

#### Legal obligations

In cases where a law means that SI has a legal obligation to carry out an activity, for example the storage of invoices in accordance with the Accounting Act (1999:1078), your personal data may be processed based on such a legal requirement.

## Who has access to your personal data?

#### Data processors and sub-processors

SI uses certain services provided by suppliers. This means that these providers may have access to your personal data. This applies, for example, to suppliers of IT systems and payment and invoicing partners who then process personal data on behalf of SI. We protect your personal data through data processing agreements and other security measures to ensure that personal data is processed correctly. In some cases, SI's suppliers use sub-processors. In those also cases we ensure that the processing of personal data is performed according to this policy, GDPR and with appropriate security measures.

#### **Partners**

Since SI is tasked with disseminating information about and to market Sweden, we may share personal data with partners, such as universities and government agencies abroad. We always ensure that our partners are suitable based on the requirements of this policy and we pseudonymise the data we share as much as possible.

#### Authorities and disclosure of public documents

In cases where SI is obliged by law to disclose information to authorities, such as the police or courts, your information will be disclosed. Your data may also be disclosed in connection with legal proceedings such as court proceedings or in connection with the disclosure of public documents.

## How long does SI store personal data?

As a starting point, SI preserves public documents in accordance with the archive legislation and disposes of these in accordance with current disposal regulations.

We do not store personal data in a form that enables identification for a longer period than is necessary for the purposes for which the personal data is processed. In some cases, SI may store data for longer, but only after the data has been de-identified, in other words, it is no longer possible to link the data to you. For example, in case we wish to retain certain data in order to be able to carry out in-depth analyses.

To ensure that personal data is not stored longer than necessary, we have deadlines and procedures for deletion of personal data. Your personal data may be stored for a longer period but only for archiving purposes in the public interest, for scientific or historical research purposes, or for statistical purposes.

# How does SI protect personal data?

Our security systems are developed with the individual's privacy in focus. They provide a very high level of protection against intrusion, destruction and other alterations that may pose a risk to your privacy. We protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage, and have implemented appropriate technical and organisational measures to protect personal data for this purpose.

Access to stored personal data is also restricted in the sense that only those who need the data in question to perform a task carried out in the public interest, or to provide information or a service that you have requested, have access to the data. We ensure that access to your personal data is limited through procedures, access control and various technical solutions.

In cases where we use personal data processors, we always have applicable agreements in place and continuously follow up that our data processors process personal data based on this policy and specified security requirements.

### Does SI transfer personal data to countries outside EU/EEA?

Transfer of personal data to a country outside of EU/EE means that personal data is stored or can be accessed by persons residing outside the EU/EEA.

There may be cases where SI transfers personal data to countries outside of EU/EEA. In such cases, we always ensure that the processing to be carried out is carried out in accordance with this policy. It is ensured through contracts, verification of compliance with contracts, as well as appropriate safeguards such as the European Commission's adequacy decision, the EU-US Data Privacy Framework, or standard contractual clauses issued by the European Commission.

We will always inform you before we start any processing with your personal data that may involve a third country transfer.

# Your rights

Here is an overview of the rights that you as a data subject have in relation to SI as a data controller. Please contact us using the contact details provided in this privacy policy if you wish to exercise any of your rights.

Upon contact, we may ask you for information confirming your identity. We do this to ensure that we do not give out information to the wrong person and to protect your privacy.

What we may ask you for depending on your request is:

- a written request
- proof of your identity, may be a personal identity number or other identification
- proof of your address
- ·if possible, information about the units or employees at SI with whom you have been in contact, for what purpose and when the contact was made.

#### Right of access

You have the right to information about the processing that SI does and to request and receive a register extract of your personal data. In the register extract, you will receive information about the categories of personal data that are processed about you, what they are used for, how long they are stored, with whom the personal data has been shared and where the data comes from.

#### Right to request correction of personal data

You can request that information about you must be corrected or updated, if it is inaccurate or if the information needs to be updated.

#### Right to data portability

You have the right to transfer the personal data that you have provided to SI for use elsewhere. The right to data portability can only be asserted if you have provided the data yourself and your personal data is processed on the basis of consent or agreement. If the right to data portability can be applied to your case, you will receive selected personal data in a machine-readable format to be able to attach and send to another party.

#### Right to erasure

As a data subject, you always have the right to request that the personal data concerning you and that is processed by SI shall be deleted. At your request, we will delete the data if the processing for which the data is used is not justified, such as on the basis of a contract or if the processing is a consequence of a legal obligation.

#### Right to withdraw your consent

If you have given your consent for a particular processing, you always have the right to withdraw your consent. In this case, our processing, that is based on your consent, will be terminated immediately. The consent form you have received when we have asked for your consent contains information on how to withdraw said consent. You can also always contact us directly to withdraw your consent. See the contact details in this policy if you wish to do so.

#### Right to object to processing

You have the right to object to the processing of your personal data. We will only continue the processing after such a request if there are compelling legitimate interests to do so.

#### Right to restrict SI's processing of your personal data

In certain circumstances, you have the right to have certain processing restricted. This applies, for example, if you ask us to use your personal data only for certain purposes. In cases where we can restrict our processing, we will mark your data and limit it to the purposes you have requested, provided that this right can be exercised.

The right to restriction also applies in cases where it has been discovered that your personal data with us is incorrect. In this case, you can also ask us to restrict certain processing. Once your data is correct, we may remove the restriction if we have notified you that the processing will be resumed.

# **Managing cookies**

If you wish to manage the cookies that are available on our websites, please use the controls set out in our cookie policy. <u>Our Cookie policy – Svenska institutet (si.se)</u>

#### Contact us

SI is the data controller, which means that we are responsible for how your personal data is processed and that your rights are safeguarded. SI has one data protection officer and one data protection coordinator per business unit.

You can always reach SI's registrar at <u>si@si.se</u>. The same address applies to contact SI's data protection officer.