

30 AUGUST 2018

OUR PRIVACY POLICY



ZITAC CONSULTING AB

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1 PRIVACY POLICY ZITAC CONSULTING AB

1.1 PURPOSE

The purpose of this Policy is to provide information about how Zitac Consulting processes personal data and to explain the rights of data subjects pursuant to the General Data protection Regulation (GDPR).

GDPR defines 'personal data' as any information relating to an identified or identifiable natural person ('data subject'); for example, their name, email address or telephone number.

GDPR defines 'processing' as any operation or set of operations which is performed on personal data or on sets of personal data; for example, collection, processing, storage and erasure.

1.2 CONTROLLER

The controller of personal data is Zitac Consulting AB, company reg. no. 556638-7139, of Gruvgatan 39, 421 30 Västra Frölunda.

2 THE RIGHTS OF THE DATA SUBJECT

GDPR provides data subjects with a number of rights regarding the processing of personal data. Put simply, these rights mean that the data subject is entitled to receive information regarding how and when personal data concerning them is being processed and to have control over their personal data.

- **Right of access:** the data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed. Information regarding the processing of personal data shall be provided by the controller both when the data is collected and upon request from the data subject.
- **Right to rectification:** the data subject has the right to request the rectification of inaccurate personal data concerning them.
- **Right to erasure ('right to be forgotten')**: the data subject has the right to request the erasure of personal data concerning them. The obligation to erase personal data exists if:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - the data subject withdraws consent on which the processing is based;
 - the data subject objects to data processing for direct marketing purposes;
 - the personal data have been unlawfully processed;
 - the personal data must be erased for compliance with a legal obligation;
 - If personal data is erased due to a request from the data subject, the company is also obliged to inform anyone to whom they have disclosed the data of the erasure request.
- **Right to restriction of processing:** under certain circumstances, the data subject shall have the right to request that Zitac Consulting restrict the processing of personal data concerning them. Restriction means that the data shall be labelled so that in future it may only be processed for certain limited purposes.
- **Right to data portability:** the data subject shall have the right to receive the personal data concerning them in a structured, commonly used and machine-readable format. The right to data portability applies to personal data that the data subject has provided to the controller themselves.

3 THE USE OF PERSONAL DATA, LEGAL BASIS FOR PROCESSING AND STORAGE PERIOD

Stated below are the purposes for which we process personal data, the legal basis on which we do so and how long we need to process the data.

3.1 CONTACTS AT EXISTING CUSTOMERS

Purpose In order to meet our undertakings, send out invoices and develop business relationships with existing customers.		
Processing <ul style="list-style-type: none"> • Registering contact details for invoicing purposes. • Communication via telephone and email regarding our contractual undertakings. • Storing and analysing existing customer details. • Conducting quality-assurance surveys. 	Personal data <ul style="list-style-type: none"> • First and surname • Email address • Telephone number • Job title • Correspondence 	Legal basis <ul style="list-style-type: none"> • Fulfil a contractual undertaking: processing is necessary in order for Zitac Consulting to fulfil its contractual undertaking to the customer in accordance with the agreed terms and conditions. • National accounting regulations
Storage period The data will be stored for as long as the business relationship exists and thereafter in accordance with national accounting regulations.		

3.2 CONTACTS AT POTENTIAL CUSTOMERS

Purpose In order to create business relationships with new customers.		
Processing <ul style="list-style-type: none"> • Contact details gathered via customer meetings, network meetings or other meetings. • Registration of contact details in our internal systems for sales purposes. • Communication via telephone and email regarding Zitac Consulting's services. 	Personal data <ul style="list-style-type: none"> • First and surname • Email address • Telephone number • Job title • Correspondence 	Legal basis <ul style="list-style-type: none"> • Legitimate interest: processing is necessary in order for Zitac Consulting to be able to create new business opportunities and relationships.
Storage period The data will be saved until it is no longer required for the abovenamed purposes or in the event that a business relationship between the contact person's company and Zitac Consulting has not been created within 12 months, or until the contact person objects to processing.		

3.3 RECRUITMENT

Purpose

In order to process job applications, whether spontaneous or in response to an announced position.		
Processing <ul style="list-style-type: none"> • Registering and processing applications • Job interviews • Obtaining references • Testing 	Personal data <ul style="list-style-type: none"> • First and surname • Email address • Telephone number • Job title • Correspondence • Information contained in CVs 	Legal basis <ul style="list-style-type: none"> • Legitimate interest: processing is necessary in order to process job applications. Zitac Consulting advises applicants not to submit information concerning, trade union membership, sexual orientation or other details that, pursuant to GDPR, are considered as special categories of personal data.
Storage period Personal data is stored for up to 24 months after the completion of the recruitment process, regardless of whether the application resulted in employment, so that during that period any suspected cases of discrimination can be investigated.		

3.4 CONTACTS AT BUSINESS PARTNERS

Purpose Processing is performed in order to develop the company through business development and sales.		
Processing <ul style="list-style-type: none"> • Registering contacts at business partners in order to conduct joint assignments. • Communication via telephone and email regarding our contractual undertakings. • Agreements with partners. 	Personal data <ul style="list-style-type: none"> • First and surname • Email address • Telephone number • Job title • Correspondence 	Legal basis <ul style="list-style-type: none"> • Fulfil a contractual undertaking: processing is necessary in order for Zitac Consulting to be able to develop the company through business development or sales.
Storage period Personal data is processed from the point at which discussions regarding collaboration commence and stored for three (3) years after the collaborative relationship ceases.		

3.5 TRAINING COURSES, SEMINARS, ETC.

Purpose Processing is performed in order to be able to hold events, seminars and training courses.		
Processing <ul style="list-style-type: none"> • Receive registrations for events, seminars or training courses. • Issue invitations to seminars, events and training courses. 	Personal data <ul style="list-style-type: none"> • First and surname • Email address • Telephone number • Job title • Ant special dietary requirements 	Legal basis <ul style="list-style-type: none"> • Legitimate interest: processing is necessary in order for Zitac Consulting to be able to create new business opportunities and relationships.
Storage period Personal data is stored from the time registration is received until the event in question has been evaluated, after which personal data will be deleted without undue delay.		

4 PROCESSORS

A processor is any natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Zitac Consulting employs the services of processors for:

- financial services, payroll and invoicing;
- sales administration activities; and
- auditing.

Under certain circumstances, Zitac Consulting shares personal data concerning data subjects with its processors, whose processing is always linked to the purposes and legal bases stated in this Privacy Policy.

Zitac Consulting always enters into a written agreement with processors regulating how the personal data we provide them with is to be processed. Under certain circumstances, we may also have a statutory obligation to report personal data to public authorities; for example, if crime is suspected.

5 PROTECTING YOUR PERSONAL DATA AND COMPLAINTS

Zitac Consulting processes personal data in a manner that ensures appropriate data security, including protection from unauthorised or unlawful processing and accidental loss, destruction or damage, by implementing appropriate technical and organisational measures to ensure a level of security appropriate to the risk to privacy and confidentiality. Having analysed the company's limited processing of personal data, Zitac Consulting has decided to implement security solutions that can be considered as industry standard; for example, encryption, updated firewalls, antivirus software, etc.

The Swedish Data Protection Authority is the supervisory authority for issues related to personal data. Naturally, if as the data subject you feel that we are processing personal data concerning you in an unlawful manner, we would ask you to contact us at info@zitac.se; however, you also have the right to complain directly to the Swedish Data Protection Authority.