



The Swedish Club

Privacy Policy

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1 1 PRIVACY POLICY

The Swedish Club, a legal entity incorporated in Sweden with company registration number 557206-526 and address Box 171, 401 22 Göteborg (below referred to as “TSC”), processes personal data in accordance with law, including the General Data Protection Regulation, as a data controller.

The type of personal data that TSC processes

TSC will process the personal data that you provide us with, or we collect about you when you use our services; contact us by phone, e-mail and mail, in person or as a contact person for your organisation TSC will process personal data concerning:

- Members
- Claimants
- Suppliers
- Brokers
- Agents
- Correspondents
- Surveyors
- Experts
- Legal representatives and professional advisors
- Medical providers, rescue services or similar
- Prospective such contacts
- Representatives for such actors
- Individuals who have suffered injuries, sickness or other health issues

1.1 Personal data that you provide us with and which we process

- Your contact details
- Personal data that we need to fulfil our business relationship with you or the organisation that you represent
- Personal data regarding your health that you provide us with in connection with a claim and that we collect about you if you have suffered injuries, sickness or other health issues
- TSC may receive e-mails and other correspondence containing personal data about third parties and therefore process such personal data. If required, TSC will inform you as a third party of the processing separately

1.2 Purposes of processing your personal data

TSC processes personal information to enable TSC to provide insurance, handle claims and services for its members, handle business contacts, promote services, and maintain accounts and records.

1.3 Agreement between the organisation you represent and us

If you represent an organisation with which we have a business relationship, we will process the personal data you provide us with in and for this relationship. The legal basis is a balance of interest (GDPR Article 6.1.f).



TSC has a legitimate interest in processing your personal data to communicate with a representative for its business partner, which overrides your potential interest in protecting your personal privacy. If you do not provide us with your personal data, we cannot have a business relationship with your organisation and fulfil our obligations against your organisation.

1.4 Claims

Suppose you are involved in a claim and have suffered an injury, sickness or other health issues. In that case, we will process personal data, including sensitive data that you or your employer provide us with or that we collect about you.

The legal basis for the processing is consent when you have given consent to your employer that your employer processes such personal data and transfers the data to us (GDPR Article 6.1.a).

The legal basis may also be the protection of your vital interests if you are not physically or legally capable of giving your consent (GDPR Article 6.1.d) or a balance of interest (GDPR Article 6.1.f).

TSC must process your personal data to assist you; this interest overrides your potential interest in protecting your personal privacy. The supplementary legal basis for processing your sensitive data is that the processing is necessary for the establishment, exercise or defence of legal claims (GDPR Article 9.2.f) or for medical diagnosis and the provision of health care or treatment (GDPR Article 9.2.h).

If you are involved in a claim for other reasons, we will process the personal data you provide us with or we collect about you, such as a witness. The legal basis for our processing is a balance of interest. TSC's interest in processing your personal data to handle the claim weighs heavier than your potential interest in not having the data processed.

1.5 Marketing

As representatives of a business contact of TSC, we will regularly provide you with information about our services and other information. We will also provide you with information about our services if you attend our events and subscribe to publications, including The Swedish Club Triton.

TSC will process all of the above-mentioned personal data for marketing by mail, e-mail and SMS. The legal basis for the processing is our agreement with you as an attendant at our events or as a subscriber to our publication (GDPR Article 6.1.b). The legal basis may also be a balance of interests (GDPR Article 6.1.f). Such a legitimate interest, e.g. to market TSC's products and services, exists based on the potential benefits for you as a customer. We respect if you do not want marketing, and you can always inform us about this; see below.

1.6 Communication

When you contact TSC by phone, e-mail and mail, in person or as a contact person for your organisation, TSC will process your personal data for the purposes and on the legal grounds described above.



1.7 Accounts and records

TSC will process information about the services provided by TSC to you for accounting and record purposes. TSC is required by accounting legislation and other applicable law, such as general statutory limitations, to keep records of specific personal data. The legal basis for the processing is that it is a legal obligation.

TSC will process your personal data to the extent required with the above legal/regulatory requirements as a basis.

1.8 Time for processing/storage

Your personal data can be stored in different locations and for different purposes. In light of this, personal data deleted from a system because it is no longer needed may still exist in another system for a different purpose.

Personal data that TSC processes to fulfil TSC's obligations to you or an organisation that you represent or due to a balance of interest will not be stored longer than it is necessary for TSC to fulfil our contract with you or your organisation or for the time during which TSC's interest overrides yours.

TSC will, due to general statutory limitations, personal process data for a maximum of ten and, in some cases, forty years after the occurrence of an event insured against. Sensitive personal data will be stored during your treatment and as long as it is necessary for insurance purposes or to satisfy any legal requirements.

TSC will not store your personal data after you have indicated, expressly or implied, that you are no longer representing an organisation that has a business relationship with TSC (inter alia by stopping attending our events or subscribing to our publication, The Swedish Club Triton). Personal data that TSC process for accounting purposes will, however, according to applicable accounting legislation, be stored for seven years.

1.9 Processing by third parties and transfer of personal data

TSC may need to share the personal data it processes with the following third parties to provide its services:

- Suppliers
- Brokers
- Agents
- Correspondents
- Surveyors
- Experts
- Legal representatives and professional advisor
- Medical providers, rescue services or similar
- Authorities and government bodies

TSC may also disclose your personal data to authorities that require that TSC disclose such personal data.

TSC may store your personal data in Sweden, the EU and EEA, and other countries. Should TSC transfer your data outside of the EU or EEA, TSC will see that contracts are in place to



ensure that such third parties process your personal data per this Integrity Policy and TSC's instructions.

1.10 Your legal rights

You have the right to, free of charge, upon written request, receive information about what personal data we store about you and how that personal data is used and processed. If your personal data is inaccurate or wrong, you have the right to request that we correct or remove the personal data and that we provide you with a copy of the personal data concerning you.

If your request is unfounded or your request is excessive, we have the right to refuse to act on your request or to charge a reasonable fee which covers the administrative costs of the action requested by you. Your request should be sent to gdpr@swedishclub.com.

You may object to your personal data being processed for direct marketing purposes at any time. If you want to avoid using your data for direct marketing, you can notify TSC by sending an e-mail to TSC at gdpr@swedishclub.com. As soon as possible, we will stop processing and delete the personal data. However, we cannot delete the personal data if we need to continue processing it for any other purposes mentioned above.

You may also contact TSC if you would like to change the way TSC processes your personal data. You have the right to file a complaint with the supervisory authority regarding TSC's processing of your personal data or handling of any inquiries related to it. In Sweden, the supervisory authority is Datainspektionen, (www.datainspektionen.se).

TSC may change this privacy policy. Such changes will enter into force by 30 days after TSC has informed you of the revised privacy policy on the website <https://www.swedishclub.com/> by letter or other notification by email or SMS.