

## **The Swedish Club**

### **Privacy Policy**

**May 2018**



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## 1 PRIVACY POLICY

The Swedish Club, a legal entity incorporated in Sweden with company registration number 557206-5265 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 has 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 in order 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, to handle claims and to provide services for its members; to handle its business contacts; to promote its services and to maintain its accounts and records.

### **1.3 Agreement between us and the organisation you represent**

If you represent an organisation that we have a business relationship with, we will process the personal data that 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 for the purpose of communicating 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**

If you are involved in a claim and have suffered an injury, sickness or other health issue, 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 in order to assist you and this interest overrides your potential interest in protecting your personal privacy. The supplementary legal basis for the processing of 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 that you provide us with or we collect about you as for example a witness. The legal basis for our processing is a balance of interest. TSC's interest in processing your personal data in order to handle the claim weighs heavier than your potential interest of not having the data processed.

### **1.5 Marketing**

As representative of a business contact of TSC, we will provide you with information about our services and other information on a regular basis. 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 purposes by mail, e-mail and SMS. The legal basis for the processing is the agreement we have 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 as 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 certain 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 mentioned 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 which has been deleted from a system, because it is no longer needed, may still exist in another system for a different purpose.

Personal data that TSC process in order 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 process personal 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 stopped 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 personal data it processes with the following third parties in order 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, in the EU and EEA as well as in other countries. Should TSC transfer your data outside of the EU or EEA, TSC will see to that contracts are in place to ensure that such third parties process your personal data in accordance with 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 that we store about you and how that personal data is used and processed. In the event 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](mailto:gdpr@swedishclub.com)

You may object to your personal data being processed for direct marketing purposes at any time. If you do not want your data to be used for direct marketing, you can notify TSC by sending an e-mail to TSC at [gdpr@swedishclub.com](mailto:gdpr@swedishclub.com). We will then, as far as possible, stop processing and delete the personal data. However, we cannot delete the personal data if we need to continue processing it for any of the other purposes mentioned above.

You may also contact TSC if you are unhappy with the way TSC is processing 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 inquires related to it. In Sweden, the supervisory authority is Datainspektionen, ([www.datainspektionen.se](http://www.datainspektionen.se)).

TSC may change this privacy policy. Such changes will enter into force no earlier than 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.