

Personal Data Processing - IA users

This document describes how Afa Trygg tjänstepensionsaktiebolag collects and processes your personal data. Different purposes apply depending on the reason of your interaction with us.

1 We protect your personal data

Our objective is to make you feel confident when sharing your personal data with us. We take appropriate technical and organizational measures to protect and to ensure that the processing is performed in compliance with current data protection regulations and with our internal guidelines and procedures.

Afa Trygg tjänstepensionsaktiebolag (company reg. no. 516401–8615) ("**Afa Trygg**", "**we**", "**us**") is the data controller for the processing of personal data and as such, is responsible for ensuring that the data is processed in a lawful and fair manner.

2 What type of personal data do we process and why?

- **IA system access administration**

We process your personal data for the purpose of managing your employer's access to the IA system. More specifically, we process your personal data to:

- handle inquiries,
- communicate login details,
- provide information about the IA system,
- manage contracts and agreements, and
- provide information about system changes.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> • Contact details • Name 	The lawful basis for processing is <i>legitimate interest</i> . The processing is necessary to fulfil our legitimate interest of giving your employer the opportunity to evaluate and provide access to the IA system, as well as to meet other obligations under the terms of the agreement
Retention period: Your personal data is stored during the contractual period.	

- **Support**

We process your personal data for the purpose of providing support. More specifically, we process your personal data to:

- identify and resolve errors, and
- manage access approval to your employer's IA environment.

We also process your personal data for statistical purposes in order to monitor and improve the IA system.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Contact details Name 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest in providing an efficient and effective service.</p> <p>The processing of your personal data for statistical purposes is based on the same lawful basis as the processing for the original purposes for which we collected your personal data.</p>
<p>Retention period: Your personal data is stored for 2 years.</p>	

- E-learning & Webinars**

We process your personal data for the purpose of administration and follow-up of webinars, e-learning and other training initiatives.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Contact details Name 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to administer, execute and follow-up training courses and activities about IA.</p>
<p>Retention period: Your personal data is stored for 2 years.</p>	

- Administration of additional services**

We process your personal data for the purpose of administration of any additional services that your employer orders (e.g. order for the IA app), and to manage access approval to your employer's environment to set up app accounts and seminars.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Contact details Name 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to administer and provide additional IA-services and services according to the agreement with your employer.</p>
<p>Retention period: Your personal data is stored for 2 years. Your personal data may also be stored in compliance with the Swedish Accounting Act where invoicing is required.</p>	

- Improvements and development of the IA system**

We process your personal data for the purpose of improving and developing the IA system. More specifically, we process your personal data to:

- handle suggestions for improvements,
- managing reference groups, and
- managing committees

We also process your personal data for statistical purposes in order to monitor and improve the IA system.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Name Contact details Information about allergies, where this data is provided 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to follow-up on industry experiences, needs and requests with the aim of improving the IA system for the benefit of the user companies and their users.</p> <p>The processing of your personal data for statistical purposes is based on the same lawful basis as processing for the original purposes for which we collected your personal data.</p> <p>We process data about allergies on the lawful basis of your consent.</p>
<p>Retention period: Your personal data is stored for 2 years.</p>	

- Customer surveys**

We process your personal data for the purpose of conducting customer surveys (e.g. questionnaires). More specifically, we process your personal data to:

- Follow-up and improve our communication about IA, and
- Follow-up and improve IA.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Name Contact details 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to follow-up on the user experience of IA in order to improve our service.</p>
<p>Retention period: Your personal data is stored for 3 months.</p>	

- Informing about IA and Afa Insurance**

We process your personal data for the purpose of informing about the IA system and about Afa Insurance. More specifically, we process your personal data to:

- administer, implement and follow-up events and training,
- provide newsletters, and
- inform about IA through different channels.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Name Contact details Photographs, videos and audio recordings, when collected Information about allergies, when collected 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to inform about IA and Afa Insurance.</p> <p>We process data about allergies on the lawful basis of your consent.</p>
<p>Retention period: Your personal data is stored for 2 years.</p>	

- Managing and maintaining relationships**

We also process your personal data for the purpose of maintaining contact with you, e.g. by sending invitations to seminars and events that we believe may be of interest to you and to provide you with relevant information.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Name Contact details 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to maintain our relationship with you as an individual who has shown interest in our services.</p>
<p>Retention period: Your personal data is stored for 2 years.</p>	

- Safeguard our legal interests**

We process your personal data for the purpose of safeguarding our legal interests, e.g. to enable us to deal with any dispute or legal proceedings.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Any data that is collected for other purposes 	<p>The lawful basis for processing is <i>legitimate interest</i>. The processing is necessary to fulfil our legitimate interest to safeguard our legal interests.</p>
<p>Retention period: Your personal data is stored for as long as deemed necessary for the purpose of safeguarding our legal interests.</p>	

- Compliance with legal obligations**

We process your personal data for the purpose of complying with our obligations under applicable laws, e.g. GDPR and the Swedish Accounting Act.

Categories of data	Lawful basis for processing
<ul style="list-style-type: none"> Any data that is collected for other purposes 	The lawful basis for processing is <i>legal obligation</i> .
Retention period: Your personal data is stored for as long as deemed necessary for the purpose of complying with our legal obligations.	

3 From where do we obtain your personal data?

- From yourself**

We collect your personal data when contacting us about the IA system.

- From your employer**

Depending on your role in the IA system, your employer may provide us with data about you.

4 Sharing your personal data

Where necessary, we share your personal data with various recipients. The recipient is responsible for processing your personal data in a lawful and fair manner unless we have specified otherwise.

- Insurance companies within Afa Insurance**

Afa Insurance operates its business as part of one organisation. We therefore share your personal data, where necessary, with the insurance companies within Afa Insurance for the purposes stated in Section 2.

- Service providers**

In order to fulfil the above stated purposes of data processing we may use service providers who process personal data at our request. These service providers are only permitted to process your personal data in accordance with our explicit instructions and are not permitted to use your data for their own purposes.

They also have legal and contractual obligations to take appropriate technical and organisational security measures in order to protect your data.

The category of service providers with whom we may share your personal data is IT service providers.

- **Other recipients**

In certain circumstances, we may also need to share personal data with other recipients for purposes such as compliance with applicable laws and regulations. These could include external advisers and authorities.

Recipients	Purpose	Lawful basis for data transfer
Authorities	We may make necessary information available to authorities where we have a legal obligation to do so.	<i>Legal obligation.</i> The processing is necessary for compliance with - legal obligations.
External advisers	We may make necessary information available to professional advisers, including auditing and accounting firms, law firms and other legal companies where we have a legal obligation to do so, or for the purpose of managing or responding to legal claims.	<i>Legal obligation and legitimate interest.</i> The processing is necessary for compliance with legal obligations, or to fulfil our - legitimate interest in managing and responding to legal claims.
Courts of law, counterparts, etc.	We may disclose data to third parties for the purpose of managing and responding to legal claims.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in managing and responding to legal claims.
Law enforcement authorities, including the police	We may share personal data with law - enforcement authorities, including the police, where we have a legal obligation to do so.	<i>Legal obligation.</i> The processing - is necessary to comply with our legal obligations.
Prospective buyers and sellers	We may share information with prospective buyers and sellers if we sell all or part of our business operations or are involved in a merger.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest in carrying out the sale or merger.

5 Your rights

The General Data Protection Regulation gives you rights in relation to the processing of your personal data. Please visit <https://www.afaforsakring.se/dina-rattigheter> for more information about your rights and how to exercise them.

You have the right to:

- **Request access (data subject access request)**

You have the right to receive confirmation from us that we process your personal data and, in such case, request access to the personal data that we hold about you, known as a data subject access request.

- **Request correction**

You have the right to request correction of any personal data that we hold about you that you consider to be incomplete or inaccurate.

- **Withdraw your consent**

You have the right to withdraw your consent at any time where we are relying on consent to process your personal data. You can withdraw your consent by contacting us via the contact details below.

- **Object to processing of your personal data based on our legitimate interest**

You have the right to object to processing that is based on our legitimate interest for reasons that arise from your specific situation. However, we may continue to process your data, despite your objection to the processing, if we have compelling legitimate basis for the processing which override your interests.

- **Request deletion**

In certain circumstances, you have the right to have your personal data deleted, e.g. if the lawful basis for the processing is consent and you withdraw it. However, the right to deletion does not apply if retention of the data is necessary to comply with a legal obligation.

- **Request restriction**

In certain circumstances, you have the right to request that the processing of your personal data is restricted. However, if you request restriction of the processing of your personal data, we may be unable to fulfil our obligations to you while the restriction is in place.

- **Data portability**

You have the right to receive a copy of your personal data in a structured format (data portability). Unlike the right of access, the right to data portability only applies to data that you have provided to us and where our lawful basis for the processing is, for example, your consent.

- **Right to make a complaint**

You have the right to make a complaint to the supervisory authority about the processing of your personal data.

6 Who should I contact if I have questions?

You are welcome to contact us if you have any questions about the processing of your personal data. You can also contact our data protection officer. Contact details are provided below.

Contact details for AFA Insurance

Postal address: Dataskyddsstöd, Afa Försäkring, SE-106 27 Stockholm, Sweden

Email: personuppgiftshantering@afaforsakring.se

Phone: +46 (0)8-696 49 39

Contact details for the data protection officer

Email: ombudsmannen@afaforsakring.se