


**STRATEGY
PLAN
POLICY
GUIDELINE
PROCEDURE**

PRIVACY POLICY



**Approved by: The Board of Directors
Date: 2018-04-13
Responsible for revision: Legal advisor
Policy to be updated: 2019-02-15
Responsible for follow-up: Executive board
Applicable to: Save the Children Sweden**

SAVE THE CHILDREN SWEDEN'S PRIVACY POLICY – HOW WE PROCESS YOUR PERSONAL DATA

General

Save the Children Sweden is keen that you feel confident in all your dealings with us. We comply with GDPR, the new data protection regulation, which means that we respect your privacy and your right to control your personal data. Our guiding principles are simple. We are transparent about which data we collect and why. We protect your data in the best possible way.

Our privacy policy describes which data we collect, why we collect it, how you can have control over your data and how you can contact us. The policy applies in all contexts: when you visit our website, use any of its services, visit us on social media or get in touch with us in other ways, for example via email or an app. The policy also applies to data we receive via phone or regular post, or data you provide to us in any other way.

Our privacy policy applies whether you are in contact with us as a donor, member, volunteer or someone just interested in our activities. It also applies when you come in contact with us in your professional role or as an employee.

Save the Children Sweden is the data controller in the manner described below, and we are responsible for processing this data in compliance with applicable law.

We are one Save the Children, but there is a division of responsibilities between our National Association and our local associations and districts. This is highly relevant to you as a member or stakeholder.

You can always contact us at Save the Children Sweden at the address on the last page of this policy, regardless of where in the organisation your data is processed.

The personal data we collect

Save the Children Sweden primarily collects personal data directly from you. Examples of personal data we collect include your name and your contact information, such as phone number, email address or physical address. Account number and personal identity number are other examples. Save the Children Sweden may use your personal identity number to update your data from other public registers, such as SPAR (the national register of personal addresses), if it is necessary to maintain good record maintenance (that is, when it is important for identification purposes to ensure that no one else receives your mailings and that we have the correct address). We may also use your mobile phone number to obtain your name or otherwise supplement your data.

Sometimes we obtain your data from other sources, and in such cases we will inform you where we have obtained the data from. We do this during our first contact with you.

Save the Children Sweden will record personal data in connection with these events:

- a) When you register as a member.
- b) When you register as a donor.
- c) When you sign up for or order a service offered through our various channels.
- d) When you fill in your email address or mobile phone number on our website.
- e) When you make a donation using our website, SMS, Swish or any other channel or app.
- f) If you sign up for Save the Children's newsletter.
- g) If you sign a petition or other collection of signatures.
- h) If you contact us via email, phone, our website or social media.
- i) When you visit our website or visit us through any app, provided that you accept our cookies. The information collected there may in some cases be personal data; see more under "About cookies".
- j) When you sign a list of participants for any of our activities.
- k) If we submit a notification of concern when we suspect that a child is being mistreated.
- l) If you are a candidate or elected official in one of our associations or districts.
- m) For employment or internship purposes.

Data collection with your consent

In Save the Children Sweden's care and treatment operations run by the Centre for Support and Treatment, personal data is collected on the basis of consent. Save the Children Sweden complies with the laws and regulations applicable within healthcare services. Consent can also be requested in other cases.

How and why we use the collected information

Save the Children Sweden processes personal data primarily for the purposes listed below, as well as for any additional purposes specified at the time the data are collected.

1) Donor services and member services

- a) To receive and record donations and membership.
- b) To fulfil orders of services via any of Save the Children Sweden's channels.
- c) To enable a high level of service, such as handling your requests, correcting incorrect data or sending information that you have requested, like newsletters.

2) Marketing and communication of information

- a) Information about gift-giving, membership, ordering of services, demonstrated support of our operations, etc. is stored and analysed and is used to provide you with offers (such as different ways to get involved and show your support) as well as general and targeted marketing.
- b) To manage donor profiles and to conduct analyses and market research.
- c) For system administration and to develop statistical data about our users' behaviour and patterns; the data is aggregated and de-personalised so that you as an individual are not identified.
- d) To develop, deliver and improve our products and services, including the different ways and channels you can use to support our work and receive information about what we have achieved. We do this by analysing your behaviour on our website, in our social media and in other channels including apps.
- e) Personal data is also used in analyses for individual segmentation/profiling in order to develop targeted offers and services.
- f) To send you information and promotions via SMS, email, apps, push notifications or other digital communications channels or by regular post or telephone when you have an active relationship with us.
- g) To contact you via SMS, email, app, phone or regular post about other offers, promotions or services that we believe may be of interest to you. Note that you can, at any time, opt out of this marketing.
- h) To provide you with relevant recommendations, offers and custom services based on what others with similar behaviour patterns have shown interest in, what kind of services you have selected, and what you have viewed and shown interest in.
- i) To enhance your user experience of our website, apps, platforms, etc. by customising the content displayed for the device you use and at the same time make it more useful.
- j) To send important messages that communicate changes in our terms and policies.

3) **Administration** – This includes data we need to process so that we can run our business and which are clearly necessary from the perspective of efficiency and/or for technical reasons. This means that we will use your personal data in the following cases.

- a) When you email any of our employees or one of our official addresses, your data is used to maintain contact with you. The same applies when we email you.
- b) When you call any of our employees or our switchboard, your data is used to maintain contact with you.
- c) When you participate in our activities, your data may be used to carry out the activity, for example to place an order or comply with accounting requirements.
- d) If you are in contact with us in your professional role or otherwise become involved in our activities, your data may be present in meeting minutes, memos, as references on invoices or similar.
- e) If we submit a notification of concern when we suspect that a child is being mistreated.
- f) If you are applying for a job with us, we process your data in order to assess whether you are the candidate we want to hire and in order to make contact with you.
- g) When you are hired as an employee, your data will be used for personnel administration, payroll administration and ensuring your physical safety, but also for meeting our own IT and information security requirements.
- h) In our financial management and control, personal data appears on invoices, vouchers, reconciliation documents, and in investigations and other documentation, as well as in communication with the parties concerned.
- i) In our operational control, personal data is present in our internal reporting systems and in reports and presentations.

4) **In our care and treatment operations** – The Centre for Support and Treatment places stricter requirements on processing your personal data due to the nature of the care and treatment. These requirements are in addition to GDPR requirements. If you come in contact with the Centre in a different way, your personal data is processed in accordance with GDPR.

Information we may disclose

We may share information to companies that process data on our behalf so that we can provide you with good service and can develop our business in a cost-effective way that achieves the greatest possible benefits for children. This can involve distribution, analysis, payment services, or organising events and offering other services. When you become a member of Save the Children Sweden, you will be automatically linked to a local association which in turn belongs to a district, and your personal data will be disclosed to both parties. When we process personal data, we always do so with high security and confidentiality.

Save the Children Sweden collaborates only with partners that process personal data within the EU/EEA or with companies that maintain the same level of protection as within the EU/EEA, for example by signing up with the Privacy Shield framework between the EU and the US.

Relationship between the National Association and the local associations and districts

We are one Save the Children, but there is a division of responsibilities between our National Association and our local associations and districts. You can always contact us at Save the Children Sweden at the address on the last page of this policy, regardless of where in the organisation your data is processed. You can also refer directly to the relevant local association or district.

The National Association manages the central member and donor register. Each local association and district has access only to the member register that contains its own members.

The National Association provides all local associations and districts with technical and organisational solutions, such as for email and document management. It also provides policies and procedures relating to their practical application.

Each local association and district is independently responsible, and therefore acts as data controller, for the personal data that is processed in its own association or its own district.

Information is transmitted between the National Association and local associations and districts, and vice versa.

About cookies

When you use our website and apps, data are collected using cookies. However, this is done only after we obtain your approval separately. Information is then stored about your use and the pages you visit. This information can include technical information about your device and internet connection, such as operating system, browser version, IP address, cookies and unique identifier. When you visit our website where our services are provided, different technologies can be used to identify you so that we can learn more about our users. This can be done directly or through the use of a third-party technology. If you do not accept cookies, this may mean that we cannot provide certain services.

Legal basis, storage and erasure of personal data

When you provide personal data to us, you are giving your permission to Save the Children Sweden to record and store information about why you provided it (for example, to become a member or donor, or to order materials) and to process the provided personal data for specified purposes.

There should be a legal basis for all processing. In this respect, we use the following:

- 1) Fulfilment of contract– For example, the actual requirements for becoming a donor or member or for making a purchase.
- 2) Legal obligation – For example, we are required to provide your data to the Swedish Tax Agency or to manage our own accounts.
- 3) Legitimate interest – When it is considered acceptable to use your data in our mission to make the world better for children and when our interests can therefore be considered to outweigh your interests.
- 4) Consent – When you explicitly state that we may process your data and that you understand what that means.
- 5) Performing a task in the public interest – When we submit a notification of concern in accordance with the Social Services Act when we suspect that a child is being mistreated.

This is how our objectives are linked to each legal basis:

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| 1) | Donor and member services | - Fulfilment of contract and legitimate interest |
| 2) | Marketing and communication of information | - Legitimate interest |
| 3) | Administration | - Legitimate interest, legal obligation, fulfilment of contract and consent |
| 4) | Our care operations | - Consent, legal obligation, legitimate interest |
| 5) | Notifications of concern | - Performing a task in the public interest |

If we use legitimate interest as a basis, it will only be for the purposes indicated above. Note that you may, at any time, withdraw your given consent by contacting us. See "How to contact us" below.

Data processing is carried out in accordance with current legislation, and personal data is therefore not retained for the purposes of processing for longer than necessary. We have internal procedures in place to ensure this. Save the Children Sweden will store your personal data for as long as you have a relationship with us, for example if you are a member or donor, and for some time thereafter depending on the purpose. Information that is older than three years will not be used for marketing purposes. This means that the data is erased when it is no longer relevant or necessary for the analysis or direct marketing purposes for which it was collected. Some information may be retained longer if required by other legislation, such as the Swedish Bookkeeping Act. However, when we process personal data we always do so with high security and confidentiality.

Your rights and choices

You have rights regarding your personal data and you can influence which information is stored. Save the Children Sweden will, on its own initiative or at your request, *correct* information that is discovered to be incorrect. You can, at any time, request that your information be deleted or that its use be *limited* by contacting us (see "How to contact us" below). If you believe that your rights are not being respected by us, feel free to contact Save the Children Sweden or the Swedish Data Protection Authority (www.datainspektionen.se).

You can, at any time, opt out of receiving direct marketing communications from us. If you want to avoid direct marketing in a specific channel, click "Unsubscribe" in the email or text message that we send you. If you want to opt out altogether, you are always welcome to contact our customer service for assistance.

You also have the right to object to processing that relies on legitimate interest if you have grounds relating to your specific situation. If we can demonstrate a compelling legitimate reason, however, a new assessment can give us the right to continue to process your data.

You can obtain information about which personal data is recorded by submitting a written or digital request for a register extract from Save the Children Sweden. The information is normally free of charge. It is also possible to get a copy of the data, as long as it does not adversely affect the rights and freedoms of others.

Links to other websites

If our website contains links to third-party websites or material published with third parties, these links are for informational purposes only. Because Save the Children Sweden has no control over the content or materials on these websites, we are not responsible for their content. Save the Children Sweden is not liable for damages or losses that could arise from using these links.

How to contact us

For more information, or if you have questions about personal data management, please feel free to contact our data protection officer:

Rädda Barnen
107 88 Stockholm

Email: dataskyddsansvarig@rb.se
Phone: +46 (0)8-698 90 00

This privacy policy takes effect on 13 April 2018.