

## ALLBRIGHT PRIVACY POLICY

This privacy policy describes how Stiftelsen Allbright, organization number 802426-6457, (“Allbright”, “The Allbright foundation”, “we”) processes personal data according to the EU General Data Protection Regulation (“Data Protection Regulation”).

### PERSONAL DATA CONTROLLER

The Allbright Foundation, with address c/o Michaël Berglund AB, Strandvägen 5B, 114 51 Stockholm, organization number 802426-6457, is responsible for the personal data that Allbright collect. Contact [gdpr@allbright.se](mailto:gdpr@allbright.se) or 073 143 38 51.

If Allbright does not decide on purposes and means but only processes personal data on behalf of others, we are considered a personal data processor.

### WHAT IS PERSONAL DATA?

Personal data is any information that can be directly or indirectly linked to a natural person who is alive. This means that, e.g., the following are personal data: name, address, telephone number, location data, or factors specific to a person's physical, economic, cultural, or social identity. Individual data that do not meet the requirements can constitute personal data together.

### WHAT IS PERSONAL DATA PROCESSING?

To process data can, for i.a., be registration, structuring, processing, and deletion.

Processing of personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership and processing of genetic data, biometric data, data on health, or data on a person's sex life or sexual orientation (so-called special categories of personal data) are generally prohibited. A valid exception to the prohibition is required for such treatment to be permitted. The most common exceptions are that the data subject has given consent or published the data themselves to exercise rights or fulfill obligations within labor law, to establish, assert or defend legal claims or for health and medical purposes.

Processing of social security numbers may only be carried out if it is justified with regard to the purpose of the processing, the importance of secure identification, or any other considerable reason.

### FUNDAMENTAL PRINCIPALS

The basic principles described below must always be observed when processing personal data. Allbright is responsible for and is prepared to demonstrate that the principles are complied with in cases where Allbright is responsible for personal data.

## **LEGALITY, FAIRNESS, TRANSPARENCY**

Personal data must be processed legally, correctly, and transparently in relation to the data subject. This means that each type of treatment must be based on a valid so-called legal basis, such as, for example, fulfillment of a contract, fulfillment of a legal obligation, performance of a task of public interest, legitimate interest, or consent. If no legal basis can be identified that applies to the processing, the processing may not be carried out. The starting point for this principle is clear communication with the data subject, e.g., for which purposes the personal data is processed, what type of processing is carried out, if and how the personal data is shared with others, how long the personal data is stored and how to get in touch with Allbright. Those registered must therefore be given clear and transparent information about the processing of their personal data.

## **PURPOSE LIMITATION**

Personal data may only be collected and processed for specific, explicitly stated, and justified purposes. They may not later be processed in a way incompatible with these purposes.

## **RELEVANT DATA**

Personal data that is processed must be adequate, relevant, and not too extensive in relation to the purposes. Allbright shall ensure that the information collected is truly necessary and does not ask for information just because it might be good to have.

## **CORRECTNESS**

Personal data that is processed must be correct and, if necessary, updated. Allbright will take appropriate steps to ensure that incorrect or incomplete information is corrected, for example, through routines for changing addresses when moving with a compilation of systems and registers where the address is stored.

## **STORAGE LIMITATION**

Personal data may not be stored for longer than is necessary with regard to the purposes of the processing. When the data is no longer needed, it must be thinned, which means it must either be deleted or de-identified.

## **LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

The processing of personal data is only legal if and to the extent that one of the following grounds is applicable.

- The registered person has consented to the personal data being processed for one or more specific purposes. Special requirements must be met for the consent to be valid.
- The processing is necessary to fulfill an agreement to which the data subject is a party or to take measures at the data subject's request before entering into such an agreement.

- The processing is necessary to fulfill a legal obligation incumbent on Allbright. For example, control information submitted to the Swedish Tax Agency.
- The processing is necessary to protect interests of fundamental importance to the data subject or another natural person (e.g., when life is at risk).
- The processing is necessary to perform a task of public interest (e.g., due to the exercise of authority).
- The processing is necessary for purposes relating to the interests of Allbright or third parties, unless the interests or fundamental rights and freedoms of the data subject outweigh and require the protection of personal data (balancing of interests). When balancing interests, there are special requirements for documentation regarding the assessment made.

## WHAT RIGHTS DO YOU HAVE AS A REGISTER?

You have the right to request information from us free of charge about how we process your personal data. At your request or on our own initiative, we will correct or delete personal data about you that are incorrect or misleading or limit the processing of such personal data. You also have the right to request that your personal data is not processed for direct marketing (if this occurs) and to object to other processing of your personal data. You also have the right to receive your personal data in a machine-readable format. Where applicable, you have the right, if technically possible, to transfer the personal data to a third party you designate (so-called data portability).

## YOU CAN ALWAYS WITHDRAW YOUR CONSENT

If the processing would be based on the fact that you gave your consent to the processing, you can withdraw your consent at any time without this affecting the legality of the processing based on the consent before this was withdrawn. Please send your revocation to [gdpr@allbright.se](mailto:gdpr@allbright.se).

## PERSONAL DATA PROCESSING AT ALLBRIGHT

### Advisory and educational department

This personal data is processed by Allbright within the advisory and educational department if it is considered as processing of personal data, and Allbright is considered to be the personal data controller for the processing in question:

Category of personal data	Type of personal data	This is how we collect the data	Purpose	Legal basis	Storage time
Information about the customer's employees	Email, name, workplace, job role	Customer emails Excel file to Allbright	Employee survey	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	Thinned out continuously and deleted no later than 6 months after the assignment has been completed

Analysis of equity	Portraits	Manual coding of images via public websites such as respective management and board websites, and based on the publicly available images, the number of white and non-white men and women is counted solely based on appearance. Allbright does not save any images or other information, and the analysis presented cannot be linked to any individual. It is solely a visual examination based on the personal perception of Allbright's own employees in order to present anonymized data for analytical purposes.	Mapping representation in different industries as well as in leadership positions.	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the data is necessary for the purpose. Thinned continuously.
Contact information	Name, company, role	Via contact over email/phone	Processing and follow-up, prospect register	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the data is necessary for the purpose. Thinned continuously.

**Communications department:**

This personal data is processed by Allbright within the communications department if it is considered as processing of personal data, and Allbright is considered to be the personal data controller for the processing in question:

Category of personal data	Type of personal data	This is how we collect the data	Purpose	Legal basis	Storage time
Photo and video social media	Photos and videos of customers	We photograph and film, both at the customer's location and internally	Marketing of educations/consulting services	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the data is necessary for the purpose. Thinned continuously.
Name management groups/boards	Names of all managers and chairmen of boards in listed companies	Manually via the companies' websites	Mapping gender distribution at senior level	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the data is necessary for the purpose. Thinned continuously.
CEO data	Name, educational background, etc	Via websites, LinkedIn etc	Mapping representation on CEO posts	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the data is necessary for the purpose. Thinned continuously.

Analysis of equity	Portraits	Manuel coding of images via public websites such as respective management and board websites, and based on the publicly available images, the number of white and non-white men and women is counted solely based on appearance. Allbright does not save any images or other information, and the analysis presented cannot be linked to any individual. It is solely a visual examination based on the personal perception of Allbright's own employees in order to present anonymized data for analytical purposes.	Mapping representation in different industries as well as in leadership positions.	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the data is necessary for the purpose. Thinned continuously.
Email addresses of companies/organizations/journalists	Email addresses of companies/organizations/journalists	Via websites, email contact, etc	Contact in connection with report release	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	As long as the contact details are relevant to Allbright. Thinned continuously.
Newsletter	Email addresses	People choose to subscribe to our newsletter via the registration form on our website	Allbright newsletter	Consent	Stored as long as the newsletter format is current

**Administratively internal:**

This personal data is processed by Allbright for job seekers.

Category of personal data	Type of personal data	This is how we collect the data	Purpose	Legal basis	Storage time
Job seeker	Name, address, social security number, e-mail address, telephone number	Directly from jobseekers	In order to handle and administer an application for position at Allbright, we process personal data.	The processing is necessary for purposes relating to the interests of Allbright or third parties and where our interest outweighs the data subject's interest that the data is not processed for the specified purpose.	Saved/archived in accordance with relevant legislation, at least 2 years, and continuously thinned.

**CATEGORIES OF RECIPIENTS**

In cases where Allbright is the personal data controller, we do not release data to third parties who are not suppliers to Allbright and who need the personal data to provide services to Allbright. If personal data is disclosed to such a supplier, Allbright ensures that we have entered into a personal data proxy agreement with such actor. It can refer to IT service providers, newsletters, banks, and the like.

## QUESTIONS ABOUT OR OBJECTIONS TO THE PROCESSING OF PERSONAL DATA

If you are dissatisfied with how we process your personal data, you can contact us (contact details at the beginning of this policy). You also always have the right to submit a complaint to the supervisory authority (Integritetsskyddsmyndigheten, [www.imy.se](http://www.imy.se)).