



# NBV's Privacy Policy

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## **NBV's Privacy Policy**

Below you will find information pertaining to what personal data NBV processes about you as a participant, for what purpose said data is processed, the legal basis for the processing, how long the data is stored and your rights, within the framework of public education activities governed by Regulation (2015: 218) on state grants for public education.

### **Data Controller and Data Protection Officer**

NBV is responsible for the processing of personal data that takes place within the framework of the study association's activities:

NBV, Box 128 25, 112 64 Stockholm

NBV, Data Protection Coordinator, Box 32, 781 21 Borlänge

### **NBV's Partners**

NBV organises all government-sponsored public education activities in NBV and is thus responsible for processing personal data collected in connection with activities conducted with the partner. The same rules apply to activities carried out by NBV alone.

### **How personal data is processed and collected**

NBV collects personal data from the data subject either via pre-registration by means of online forms or telephone or in conjunction with activities. We usually register the name, national identification number, address, email, telephone number and information related to participation in public education activities.



In order for us to keep the personal data in our register up-to-date, we collect regular address updates from address services.

## **Sensitive Personal Data**

We only process sensitive personal data when necessary for the execution of operations and as a prerequisite for state grants. This is pursuant to Regulation (2015: 218) on state grants for public education (1).

*(1) Legal regulation not yet available but proposed to be introduced in Proposition (2017/18:218) Processing of personal data in the field of education. The regulation change is expected in August 2018.*

## **Purpose and legal basis for processing personal data**

Under the provisions of the regulation on state grants for education, it is established in Swedish law that the pursuit of education, education and culture activities by the public and colleges of education and training is a task in public interest. Public education activities covered by the municipal or county council's decisions are also considered as a task in public interest.

## **Managing public education activities**

NBV processes personal data to manage public education activities and to communicate with data subjects. This processing is based on the legal basis of 'task in public interest'. It is necessary for NBV to process participants' personal data to manage activities and communicate with participants. You are not required to provide personal data to us. If you choose not to leave your personal data,



the consequence may be that you cannot participate in public education activities.

### **Meeting regulation requirements and demands from contributors**

NBV processes personal data to meet regulatory requirements as well as the requirements of the Swedish National Educational Council and other contributors to follow up, evaluate and quality-assure NBV's activities, such as participant surveys. This processing is based on the legal basis of 'task in public interest'. Within the framework of this processing, personal data may be combined between two or more of the ten study associations with the purpose of ensuring compliance with the rules and conditions for state grants.

### **Direct Marketing**

NBV processes participants' personal data for marketing purposes relating to student association activities based on the legal basis of balance of interests based on our lawful interest in marketing our services and products.

### **Other activities**

NBV processes personal data in other parts of the activities based on the legal basis of balance of interests in cases where there are lawful interests for the processing.

## Storage of personal data

As a rule, personal data for administration purposes and direct marketing is processed during the year in which a registered person participates in NBV's activities and for up to 24 months thereafter.

However, NBV may save certain personal data longer, based on decisions, requests or guidelines from the Swedish National Education Council, ordinance or authority. For example, there may be requirement from the Swedish National Education Council to follow-up, evaluate and quality-assure NBV's activities for a certain period of time.

NBV is also required to store attendance lists and cultural program reports, which contain personal data for seven years, pursuant to the Accounting Act (1999:1078), when they are verified. NBV erases or anonymises personal data where there is no longer any legal basis for processing.

## Transmission of data to third parties

NBV is required by regulation to provide, upon request, the personal data that the Swedish National Education Council, state authorities or municipalities and county councils consider necessary to carry out their official duties. The transmission is thus supported by the basis of legal obligation.

NBV, in some cases, transmits personal data to subcontractors for marketing information and follow-up purposes. NBV then ensures, through data processing agreements, that personal data is not processed for other purposes.

## Transmission to third countries outside the EU/EEA

NBV does not transmit personal data to countries outside the EU/EEA. NBV has data processing agreements with its service providers that ensure that personal data is not transmitted to third countries.

## The data subject's rights

The data subject is entitled to know if and how the NBV processes his/her personal data and, after written, signed request, obtain a register extract of the personal data that is registered.

The data subject also has the right to request rectification of incorrect or inaccurate data. In some cases, however, a request for erasure cannot be met, e.g., if NBV is required by law or regulation to store the data.

The data subject, under certain conditions, reserves the right to get the personal data relating to him, that has been submitted to the NBV, in a structured, widely used and machine-readable format, as well as the right to transmit it to another data controller (data portability).

The data subject always has the right to refuse that his personal data be used for direct marketing, including profiling, insofar as it is related to such direct marketing. Such a request is sent to:

**NBV**  
**Data Protection Coordinator**  
**Box 32, 781 21 Borlänge.**

The data subject is entitled to lodge a complaint pertaining to NBV's processing of personal data, either directly to NBV or to the Swedish Data Protection Authority.