

Date: 14 May 2018

## **POLICY FOR THE HANDLING OF PERSONAL INFORMATION**

### **Processing of Personal Information**

On this day, 14 May 2018, the following policy has been prepared for Svenska Turistföreningen (802003-5955) and Svenska Turistföreningen STF AB (802003-5955), hereinafter referred to as STF.

The purpose of this policy is to establish how STF handles personal information, the reasons for which we use it, whom may receive it and how a registered party may exercise his rights.

### **What personal information does STF handle?**

We only handle personal information when we have legal grounds. Primarily, we handle personal information in order to fulfil our obligations toward members, guests, franchisees and other stakeholders. Our foundation is that we do not handle more personal information than is necessary for the purpose at hand, and we always strive to use the information that is least sensitive in terms of personal privacy.

What follows are examples of the personal information we handle:

- Name
- Address
- E-mail address
- Telephone number
- Age
- Personal ID no
- Membership number
- Sex
- Title
- User name
- Images
- Debit card numbers, credit card numbers and other bank-related information
- Information that the person registers of his own accord and submits voluntarily

- Content that a person publishes himself, known as user-generated content

### **When does STF handle personal information?**

- Member - STF will handle personal information. Handling can also be done at STF's local departments.
- Guest/customer of STF - information is handled centrally and locally at STF, as well as at the franchisee.
- Franchisee - personal information is handled in order for us to be able to fulfil our contractual obligations.
- STF handles personal information with regard to suppliers and cooperative partners, where appropriate.
- Participants in competitions, surveys, petitions etc.
- Application to electronic newsletters.

Information is gathered, for example, in the following manner:

- Information that the person provides directly
- Information registered upon visits to our home page
- Information we obtain from public registers
- Information we obtain when someone books accommodation/activity at one of our housing facilities
- Information we obtain upon applying to our camps, courses or seminars
- Information we obtain upon applying to newspapers and other dispatches
- Information we obtain when someone answers in contests, questionnaires and investigations
- Information we obtain when someone seeks employment from us
- Information we obtain when someone contacts us in some manner
- Information registered in combination with someone becoming a franchisee

## Legal Basis for Handling

There must be a legal basis for all information handling, and we act pursuant to the following:

1. Fulfilment of contracts - that which, e.g., is actually requirement to become a member or place a booking.
2. Legal obligation - e.g., that we are responsible for submitting information to the Swedish Tax Agency and to manage our bookkeeping.
3. Legitimate interest - when it is considered OK to use a person's information in our efforts to meet Svenska Turistföreningen's objectives and the handling is necessary for the purpose in question.
4. Consent - when a person has expressly stated that we may handle his information and the party has understood what this means.

When we associate legal grounds with the most commonly occurring cases of personal information handling in STF's operation, it resembles the following:

- Membership - our assessment is that this is a matter of fulfilling a contract and of legitimate interest.
- Booking of accommodation, packages and activities - our assessment is that this is a matter of fulfilling a contract and of legitimate interest.
- Signing up for the newsletter - we cite legitimate interest because the handling is necessary for the purpose at hand.
- Competitions and petitions - we obtain the consent of the participants.

## About Cookies

When a person visits our websites and application, information is gathered via e.g., cookies. This is done only after the visitor has indicated that he understand this and has accepted. Then information is saved regarding use and which pages are visited. This may also include technical information, e.g., about what type of device is used and the type of internet connection. Upon visiting our websites where our services are provided, various techniques can be used to recognise visitors in order for us to get to know our users better. This can be done directly or through the use of technology from a third party. If cookies are not accepted, it may result in certain services not being provided.

## Information

STF shall inform registered persons about how the information will be used, what rights the registered party has according to the Data Protection Act and how the

party can exercise these. The registered party shall also be informed about who is responsible for the handling of personal information and how the registered party can contact STF with any questions or if the registered party wants to submit a request or inquiry with regard to personal information and/or rights. The registered party shall also obtain information about how often information can be requested and how corrections can be made.

### **Handling of personal information in a secure manner**

STF continually develops routines and procedures in order for personal information to be processed in a secure manner. The foundation is that only employees and other persons within the organisation that need personal information in order to perform their tasks will have access to the information.

Our security system is developed with privacy in focus and it offers a high degree of protection against unauthorised access, destruction and other changes that can pose a risk to individuals' privacy.

We save information as long as we need it to fulfil our contractual and mandatory obligations.

### **Transfer of personal information?**

Our point of departure is not to divulge personal information to third parties outside of the group unless it is necessary to fulfil our contractual or legal obligations. In those cases, in which we divulge personal information to third parties, we prepare a confidentiality agreement/representation contract, as well as ensure that personal information is handled in a secure manner.

### **The relationship between STF and local departments and franchisees**

We are one STF, but there is a separation between STF central and our local departments and franchisees. A person can always turn to STF central, but he can also contact a local department or franchisee directly.

Svenska Turistföreningen's central office is responsible for the central membership registry, as well as the central booking systems. Each local department has access to the membership system, but only with regard to its own members. The equivalent applies to franchisees and the booking systems.

STF central provides all local department and franchisees with both technical and organisational solutions for e.g., e-mail, document handling, member registration and bookings. Each local department and franchisee is a legal entity of its own, and its therefore the party responsible for personal information regarding the handling of personal information that takes place in its own association or company.

Information is transferred between STF and local departments and vice versa.

## **Responsibility**

STF consists of Svenska Turistföreningen and Svenska Turistföreningen STF AB, both are responsible for personal information, which means that we are responsible for the registered parties rights being safeguarded and for ensuring that personal information is handled in accordance with the applicable law.