

Friends Privacy Policy

Version 1
Solna, May 2018

Friends Privacy Policy

We protect your privacy and want you to be confident that the personal data you provide to us at Friends is in safe hands at all times. Therefore, we have created a privacy policy that documents how we ensure that our processing of your personal data is in compliance with the General Data Protection Regulation (GDPR) and our industry association, the Swedish Fundraising Council (FRII).

Why Friends collects and stores personal data

Friends collects the personal data of its donors in order to communicate with them through various channels easily and to maintain strong and close relationships with each donor in the manner preferred by the donor. Friends also saves application documents and other data provided in direct contact.

Friends communicates with its donors using direct mail by text message, email and mail, depending on what data we have on each donor. We also communicate via our website and social media, such as Facebook and Instagram. Data may also be used for Friends' marketing purposes, its own statistics and for following up and developing its activities.

The situations when Friends processes your personal data include:

- when you make a donation (via website, swish, text message)
- when you start your own fundraiser, add Friends to your will, or donate memorial gifts or gifts of celebration
- when you subscribe to our newsletter
- when Friends engages in targeted marketing activities for analysis or exclusion
- when you make applications and other forms of direct contact
- when you order materials
- when you sign up for an event or seminar
- when you buy products at an event or seminar
- when reports of suspected child abuse or neglect are filed

What right do we have to save your personal data – legal bases

The choice of Friends to save personal data in a list of donors is based on our conviction that this is largely in the interest of each individual donor. Friends' mission is to raise funds for our cause, the prevention of bullying. To do so, the funds we raise should be used as economically as possible.

By providing data to Friends, you consent to Friends collecting and storing data and processing the specified personal data for the specified purposes. The legal basis for processing used by Friends will be performance of a contract, a legal obligation, a legitimate

interest or consent. The consent of the guardian is required for processing of personal data relating to children. The current age limit in Sweden is 16, but a Swedish bill that is currently under referral proposes 13 be the age limit.

Data is processed in accordance with applicable legislation, which means that personal data is not retained for longer than is necessary in relation to the purposes of processing. Friends saves personal data for up to 36 months from the most recent donation in accordance with best practices in the industry and FRIL. This is because donation cycles can be this long. Application documents can be saved for 12 months following completion of the recruitment process. When you order materials, your data is deleted once your order is complete. If you sign up for an event or seminar, Friends saves your personal data only until after the event is over and follow-up processes have been completed, unless you opt in to continue receiving information from Friends.

If our processing of your personal data is based on your consent to processing, you have the right to withdraw your consent. To withdraw your consent, please follow the instructions you received when you gave your consent or contact Friends using the information below.

Who can access the data we have on you?

Friends will not sell the personal data it has collected to third parties or allow them to use it.

The data you provide when making a donation will be matched with other registries (such as SPAR) to update addresses, obtain information about deaths and avoid duplicate entries in our registry.

Friends may also disclose personal data to suppliers that process personal data on behalf of Friends, such as IT suppliers, printers, recruiting firms and other partners. Friends is always responsible for the processing of your data by such partners.

Personal data may also be disclosed if necessary to:

- comply with applicable law, regulations, legal proceedings or requests from executive agencies
- safeguard the legitimate interests of Friends
- discover and prevent security or technical issues and fraud.

Friends always strives to store personal data within the EU/EEA, but personal data may be transferred to and processed in countries outside of the EU/EEA by suppliers and subcontractors, for example, in the case of cloud service usage.

What data on you do we store and how do we collect it?

The personal data below is the information that Friends may collect when you make a donation or come in contact with us in another way. We may also supplement the data we have on you by adding your personal identity number, phone number and postal address, depending on what we have to begin with. Email addresses and bank account information are a type of data provided by you that we cannot purchase.

Friends may also gain access to addresses from suppliers, but the supplier must have specified in its privacy policy that it is permitted to give Friends access to these addresses beforehand.

If you buy a product during an event, your data will be stored and your purchase will be processed as a donation.

We may also purchase addresses for prospecting from established address providers such as SPAR, UC and Bisnode. In this case, we comply with the terms of use governing purchased personal addresses.

- First name and last name
- Postal address
- Personal identity number
- Phone number
- Email address
- Postgiro and bankgiro number
- Account number
- Accounting date and amount of donations
- Most recent donation
- Correspondence notes
- Application documents

Security

Friends has taken the technical security measures required to protect your personal data from unauthorized access, modification and erasure.

Cookies

We use cookies on our website to enable analysis of behavior patterns and improve your user experience.

Links to other websites

Friends' website may contain links to websites owned or operated by a party other than Friends, in which case this privacy policy does not apply.

You have the right to know what we know about you, to rectify any inaccuracies and to erasure

According to the GDPR, you are entitled to a copy of the data Friends has on you free of charge once a year. This request must be in writing, signed by you and sent to us by mail (not email). Friends will get back to you about this within 5–30 working days. Copies of your data that we process will always be sent to your registered address. If data is incorrect, incomplete or irrelevant, you are entitled to request that the data be modified or deleted. You are also entitled to opt out of direct marketing. Contact us at givarservice@friends.se. You can also contact the Swedish Data Protection Authority directly if you have a complaint. <https://www.datainspektionen.se/>

Privacy Policy amendments

In the event of amendments to this Privacy Policy, Friends will publish the modified Privacy Policy at <https://www.friends.se> and <http://www.friendsinternationalcenter.com> including notice of the effective date of the amendments.

If Friends makes any significant amendments to the Privacy Policy, Friends may also choose another method of informing you, such as by email or publishing an announcement at <https://www.friends.se> and <http://www.friendsinternationalcenter.com>.

Controller and data protection officer

Friends is the controller, registration number 802408-7622, Dalvägen 14, 169 56 Solna, Sweden. Contact our data protection officer at: dataskyddsansvarig@friends.se

You are always welcome to contact Friends: Phone: Switchboard (+46) (0)8-545 519 90 (weekdays 8 AM–5 PM, Fridays 8 AM–4 PM), closed for lunch 12 PM–1 PM. Email: givarservice@friends.se