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## PRIVACY POLICY – ID06

ID06 AB (“**ID06**”, “**we**”, “**us**”) is committed to safeguarding your privacy. This Privacy Policy explains how we collect and use your personal data in connection with the ID06 System and how your personal data are used in connection with the services we provide. It also describes your rights in relation to us and how they can be exercised.

The Policy describes how we process your personal data when:

- 1) we receive an order for an ID06 Card or Student ID06 Card for you;
- 2) you are the holder and user of an ID06 Card;
- 3) as a student or teacher you are the holder and user of a Student ID06 Card;
- 4) you use or are affected by ID06 Status Control;
- 5) you register training courses in the ID06 Competence Database;
- 6) you are affected by ID06 Company Report;
- 7) you are affected by ID06 Stamp;
- 8) you are the contact person for a User Company;
- 9) you visit our website;
- 10) you receive our newsletters;
- 11) you receive our updates;
- 12) you otherwise get in touch with us; and
- 13) when we process your data within the scope of administering our business and the ID06 System.

It is important that you read our Privacy Policy. If you have any questions about how your personal data are processed, please contact us via the contact details at the bottom of this Policy.

### Explanation of terms used

This Privacy Policy uses various terms in reference to particular operators and services. To make it easier for you to read the document, some of the terms, as well as some terms used in data protection legislation, are described below:

**ID06 Account** is the personal account in the ID06 System where you can log in to confirm your data for the ID06 Card, activate your ID06 Card, and access the data about you that is stored on the ID06



System. Using your ID06 Account, various authorisations can be assigned that allow other ID06 services to be ordered.

**ID06 Card** is the physical card used in the ID06 System.

**ID06 Company Report** is a service where User Companies who connect to the service are given the opportunity to access financial and other company-related information about other User Companies – or potential partners who can be expected to connect to the ID06 System – they are considering collaborating with.

**ID06 Competence Database** is a register of training certificates and qualifications that has been developed to make workplaces safer and more secure. Individuals have access to their own data and User Companies have access to data about their employees in the ID06 Competence Database.

**ID06 SSO** is a service that enables you to verify identity (through e-ID or username and password (OTP)) and confirm employer relationship when logging in to other services outside the ID06 System.

**ID06 Stamp** is a storage service for electronic personnel registers within the ID06 System.

**ID06 Status Control** is a service for verifying that an individual's ID06 Card is genuine and activated. The app is downloaded to a mobile phone and can be used by User Companies as well as private individuals who need to read your ID06 Card.

**ID06 System** is the authorisation and information system developed to combat undeclared work and other financial crimes and to promote healthy competition in the labour market.

**Personal data** is any information which can be directly or indirectly (i.e. together with other data) linked to you, such as name, image, personal ID number, IP address, address, data concerning entry to and exit from the workplace and completed qualifications.

**Processing** is any operation performed with your personal data, for example collection, recording, organisation, structuring, storage, adaptation, transmission, and erasure.

**Student ID06 Card** is a specific type of ID06 Card issued by elevID06 AB that can be ordered by schools and colleges for teachers and students involved in training as part of a traineeship programme that requires possession of an ID06 Card.

**User Company** is a company, public authority, association or other organisation connected to the ID06 System.

### **What personal data do we process about you and why?**

This Section tells you what personal data we process about you and why. The Section is split into different headings (Sections 1 to 13) based on the various services we offer and the personal data processing we undertake in the capacity of data controller. Please note that you may have multiple roles at the same time, e.g. you could both be the holder of an ID06 Card while also acting as a contact



person for a User Company. If you are unsure which information applies to you, you are welcome to contact us via the contact details at the bottom of this Policy.

## 1. Ordering and issuing ID06 Cards or Student ID06 Cards

### 1.1 Ordering ID06 Cards or Student ID06 Cards

The User Company, i.e. your employer, orders the ID06 Card on your behalf. If you are a teacher or student, your school or college will order your student ID06 Card. How we process your personal data once an order is received is described below.

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Preparing to issue your ID06 Card or Student ID06 Card.	<p>Name, photograph, personal ID number or other identity number and country code, as well as your employer if you are an employee or, if the order concerns a Student ID06 Card, information about your school or college.</p> <p>If applicable, information about A1 certificates or other certificates proving your work and residence permit, as well as your LMA (Asylum seeker) card, are also processed.</p>	<p>The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying the ID06 System in order to increase security and combat undeclared work and criminal activity in the workplace as well as to enable User Companies to fulfil their legal obligations, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.</p> <p>In the balancing of interests, we have also assessed that the User Companies have a legitimate interest in increasing security and combating undeclared work</p>	<p>The data is stored for the time required for us to proceed with the process and issue your ID06 Card. Once we have collected the required data, it is processed in accordance with Section 1.2 below.</p> <p>If a card is not issued, the data is erased.</p>	<p>The companies we work with to supply the ID06 System and store data in the business (IT suppliers) and the public authorities ID06 contacts to verify verifications e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration Agency or other public authorities, and the User Company.</p>



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		and criminal activity in the workplace as well as to comply with their legal obligations, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.		
Enabling the ID06 Card or Student ID06 Card to be connected to your ID06 Account.	Name, photograph, personal ID number or other identity number and country code, as well as your employer if you are an employee or, if the card concerns a Student ID06 Card, information about your school or college.  If applicable, information about A1 certificates or other certificates proving your work and residence permit, as well as your LMA (Asylum seeker) card, are also processed.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying the ID06 System in order to increase security and combat undeclared work and criminal activity in the workplace as well as being able to provide our products and services and connect your ID06 Card to your ID06 Account, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for the time required for us to proceed with the process and connect the ID06 Card to your ID06 Account. When the time comes to implement the connection, your data is processed in accordance with Section 1.3 below.	The companies we work with to supply the ID06 System (IT suppliers).

## 1.2 Issuing ID06 Cards or Student ID06 Cards

When issuing the ID06 Card or Student ID06 Card, we process the following data about you:



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
To verify your identity when issuing the ID06 Card or Student ID06 Card via electronic identification (e-ID) or validation of passport/ID card.	<p>Personal ID number or other identity number.</p> <p>If you lack e-ID, a photograph of your passport, ID card or LMA card is also processed.</p>	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying the ID06 System in order to increase security and combat undeclared work and criminal activity in the workplace as well as being able to verify your identity before issuing the card as part of our work, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for the time required to determine your identity and then erased.	The data is shared with the service you choose to use to confirm your identity.
Issuing your ID06 Card.	<p>We process data provided by the User Company and confirmed by you; name, photograph, personal ID number or other identity number or LMA card, country code and data about which company you are employed by, address details and information about citizenship.</p> <p>Data from validation of passports/IDs for individuals without e-ID; the same data as listed in the points above as well as a photograph of the</p>	The processing is necessary for the performance of the contract we have entered into with you in accordance with Article 6(1)(b) of the GDPR.	<p>Data is stored for the time required for the ID06 Card to be issued.</p> <p>If a card is not issued, the data is erased.</p>	The companies we work with to issue the ID06 Card and supply the ID06 System, including card and IT suppliers, and the public authorities ID06 contacts to verify verifications e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration Agency or other public authorities.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
	<p>passport or ID card including identity number.</p> <p>Where applicable, we also process data that we collect about you from public authorities, for example whether you hold a work or residence permit, A1 certificate or data in foreign worker posting lists.</p>			
Issuing your Student ID06 Card.	Data disclosed by your school or college and confirmed by you; name, photograph, personal ID number, other identity number or LMA card and data about your school or college.	The processing is necessary for the performance of the contract with you in accordance with Article 6(1)(b) of the GDPR.	<p>The data is stored for the time required for your student ID06 Card to be issued.</p> <p>If a card is not issued, the data is erased.</p>	The companies we work with to issue the Student ID06 Card and supply the ID06 System, including card and IT suppliers, and the public authorities ID06 contacts to verify verifications e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration Agency or other public authorities.
Delivering your ID06 Card or Student ID06 Card in accordance with the chosen delivery method.	<p>If the card is to be delivered to your employer or your school or college, we process data about your name as well as data about your employer or your school or college.</p> <p>If the card is to be delivered directly to you, we process information about your name, address and other details that we or one of our suppliers receive in order to be able to deliver your ID06 Card or Student ID06 Card to you.</p>	The processing is necessary for the performance of the contract with you in accordance with Article 6(1)(b) of the GDPR.	The data is stored for the time required to deliver your ID06 Card or Student ID06 Card to you, your employer or your school or college.	The companies we work with to deliver the card. This may, depending on the delivery option chosen, include postal and courier companies, the User Company and manufacturers of ID06 Cards or Student ID06 Cards.



### 1.3 Activating ID06 Cards and ID06 Accounts

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Sending you a link to activate your ID06 Card	Name and e-mail address.	The processing is necessary for the performance of the contract with you in accordance with Article 6(1)(b) of the GDPR.	The data is stored for the time required for us to be able to send you the link to set up and activate your ID06 Account.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers).
Setting up and supplying your ID06 Account	Data required to set up an ID06 Account; e-mail address, phone number, user name and password.	The processing is necessary for the performance of the contract with you in accordance with Article 6(1)(b) of the GDPR.	The data is stored for as long as you have an active ID06 Card or Student ID06 Card and for a period of three (3) years thereafter, or when your ID06 Account has been inactive for one (1) year. Thereafter, we erase or anonymize the data.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers).

## 2. For you as the holder and user of an ID06 Card

### 2.1 Administering and using the ID06 Card

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Storing the information required to supply your ID06 Card.	We process data provided by the User Company and confirmed by you; name, photograph, personal ID number or other identity number or LMA card, country code and data about which company you are employed by, as well as ID06 Card details.	The processing is necessary for the performance of the contract with you in accordance with Article 6(1)(b) of the GDPR.	The data is stored for as long as the Card is valid and for 3 years thereafter.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers) and User Companies.
Enabling your use of the ID06 Card.	Data about whether your ID06 Card is	The processing is necessary for the	The data is stored for as long as you	The companies we work with to supply





	active, blocked or expired.	performance of the contract with you in accordance with Article 6(1)(b) of the GDPR.	have a valid ID06 Card or student ID06 Card and for a period of three (3) years thereafter.	the ID06 System and store data in the business (IT suppliers), User Companies as well as those who use ID06 Status Control (Section 4.2).
To verify that permits and other legal obligations are maintained at the workplace by ensuring, through contacts with public authorities, that, for example, you hold work and residence permits.	Name and personal ID number or other identity number, photograph, address details, information about work and/or residence permit.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying the ID06 System in order to increase security and combat undeclared work and criminal activity in the workplace, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.	The data is stored from the moment we receive an order for an ID06 Card, as well as for as long as you have a valid ID06 Card.	Public authorities

2.2 Provision of ID06 SSO

ID06 provides the ID06 SSO electronic identification service.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Providing the service to enable verification of identity and employer relationship.	Name, e-mail address, personal ID number or other identity number and employer.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying ID06 SSO as a secure login option where verifying identity and employer relationship is required, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for as long as you have a valid ID06 Card and for a period of three (3) years thereafter.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers), as well as those companies who use the service.



Enabling the use of the service.	Electronic identifiers that reveal data about your identity, which service you want to identify to, and when such verification occurs.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in verifying you via ID06 SSO as a secure login option where verifying identity and employer relationship is required, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for the period required to conduct the verification.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers), as well as the company you are verifying yourself to.
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### 3. For students and teachers who hold and use a Student ID06 Card

#### 3.1 Administering and using the Student ID06 Card

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Storing the information required to supply your Student ID06 Card.	We process data provided by the User Company and confirmed by you; name, photograph, personal ID number or other identity number or LMA card, country code and data about which company you are employed by, as well as Student ID06 Card details.	The processing is necessary for the performance of the contract we have entered into with you in accordance with Article 6(1)(b) of the GDPR.	The data is stored for as long as the Card is valid and for 3 years thereafter.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers) and User Companies.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Enabling your use of the Student ID06 Card.	Data about whether your student ID06 Card is active, blocked or expired.	The processing is necessary for the performance of the contract we have entered into with you in accordance with Article 6(1)(b) of the GDPR.	The data is stored for as long as you have a valid ID06 Card or student ID06 Card and for a period of three (3) years thereafter.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers), User Companies as well as those who use ID06 Status Control (Section 4.2).
Verifying that permits and other legal obligations are maintained in the workplace via contacts with public authorities.	Name and personal ID number or other identity number, photograph, address details.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying the ID06 System in order to increase security and combat undeclared work and criminal activity in the workplace, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.	The data is stored from the moment we receive an order for a student ID06 Card, as well as for as long as you have a valid student ID06 Card.	Public authorities

### 3.2 Provision of ID06 SSO

ID06 provides the ID06 SSO electronic identification service.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Providing the service to enable verification of identity and employer relationship (elevID06 AB).	Name, e-mail address, personal ID number or other identity number and employer.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying ID06 SSO as a secure login option where verifying identity and employer relationship is required, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for as long as you have a valid ID06 Card and for a period of three (3) years thereafter.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers), as well as those companies who use the service.

#### 4. For those persons who use or are affected by ID06 Status Control

ID06 Status Control is an app that can be used by both companies and private individuals. The app allows companies or private individuals to verify the validity of your ID06 Card or Student ID06 Card as well as any training you have registered in the ID06 Competence Database. Your card needs to be scanned to verify the data.

When using the ID06 Status Control service, data is obtained from the ID06 System regarding your Card and any training and certificates you have registered in the ID06 Competence Database.

##### 4.1 Using ID06 Status Control

When you download the ID06 Status Control app and a card is verified, we process the following personal data about you.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Enabling your use of ID06 Status Control.	For this purpose, we process data about your mobile device; IP address, language settings, browser settings, time zone, operating system, platform, screen resolution and similar information about your device settings.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in enabling your use of ID06 Status Control in order to satisfy requests for verifications of ID06 Cards for the purpose of increasing security and combating undeclared work and criminal activity in the workplace as well as to enable companies and private individuals to verify ID06 Cards, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.	The data is only stored for the time required to report verified cards back to your mobile device.	Service providers and other companies we work with to supply the ID06 Status Control service, e.g. IT suppliers.

#### 4.2 Verifying your ID06 Card or Student ID06 Card in ID06 Status Control

When personal data is transferred from the ID06 System and the ID06 Competence Database to ID06 Status Control, we process the following personal data about you.

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Enabling and simplifying verifications of ID06 Cards by	Employer, ID06 Card status and information about any	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of	The data is stored as long as it is required to transfer data	The company or natural person who scans your ID06 Card, as well as the service



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
transferring data from the ID06 System to ID06 Status Control.	training and certificates registered in the ID06 Competence Database.	<p>the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying ID06 Status Control in order to satisfy requests for verifications of ID06 Cards for the purpose of increasing security and combating undeclared work and criminal activity in the workplace as well as to enable companies and private individuals to verify ID06 Cards, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.</p> <p>In the balancing of interests, we have also assessed that the recipient has a legitimate interest in verifying ID06 Cards in order to increase security and combat undeclared work and criminal activity in the workplace, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.</p>	to ID06 Status Control.	providers we use to supply ID06 Status Control.

## 5. For those using the ID06 Competence Database

We process the following data about you when you use the ID06 Competence Database:

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
To simplify verifications of	Data about the training/education	The processing is based on your	The data is stored for as long as you	The companies we work with to



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
training certificates and competency, for the overall purpose of increasing security at the workplace.	<p>you have completed, including experience guarantees and validity periods for health certificates (we never process the content of such certificates), your competencies, whether a competency is time-limited, the company that provided the training/education and when it was completed.</p> <p>Data about your logins to the ID06 Competence Database.</p> <p>Data from the National Population Register, which we obtain from the Swedish Tax Agency.</p>	explicit consent (Article 9(2)(a) of the GDPR).	<p>use the ID06 Competence Database service.</p> <p>You always have the right to withdraw your consent. If you withdraw your consent and request that we erase the data registered in the ID06 Competence Database, we will do so. Otherwise, we keep previously registered data, even after you have withdrawn your consent.</p>	supply the ID06 System, for example IT suppliers, User Companies and public authorities (e.g. the Swedish Work Environment Authority and the Swedish Transport Administration).
Preventing misuse of the ID06 System through regular verifications of the training company.	Information about which training courses you have completed and the training company / companies you completed the training with.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in preventing misuse of the ID06 System, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have	Occurs for the entire time that we store the data in our systems in accordance with the above.	The companies we work with to supply the ID06 System, for example IT suppliers, User Companies and public authorities (e.g. the Swedish Work Environment Authority and the Swedish Transport Administration).





<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		your data processed for the purpose.		
Developing statistics about registered training courses/education.	All data in accordance with this Section.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in developing the ID06 System and our services, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	Occurs for the entire time the data is stored in our systems in accordance with the above.	The companies we work with to supply the ID06 System, for example IT suppliers.

## 6. For those using ID06 Company Report

When using the ID06 Company Report service, data relating to the User Companies operating at a particular workplace can be obtained from ID06 Stamp. This is done to simplify the provision and use of ID06 Company Report. The data collected and transferred from ID06 Stamp to ID06 Company Report is not normally personal data, although if such data can be linked to a person the data constitutes personal data, e.g. a sole trader's company registration number (personal ID number).

If data collected for ID06 Company Report can be linked to you, we may process the following categories of personal data about you.

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Setting up and supplying your user account in ID06 Company Report.	User data such as User Company name (for sole traders), company registration number (personal ID number) as well as	The processing is necessary for the performance of the contract we have entered into with you in accordance with	The data is stored for as long as you use the service or appear in a project in ID06 Company Report.	The companies we work with to supply the ID06 System, for example IT suppliers and security firms.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
	workplace identification number.	Article 6(1)(b) of the GDPR.		
To enable and simplify provision of the ID06 Company Report service.	User Company name (for sole traders), company registration number (personal ID number), dates when the User Company was active at the workplace as well as workplace identification number.	<p>The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying the ID06 System in order to increase security and combat undeclared work and criminal activity in the workplace as well as to enable User Companies to fulfil their legal obligations, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.</p> <p>In the balancing of interests, we have also assessed that the User Companies have a legitimate interest in increasing security and combating undeclared work and criminal activity in the workplace as well as to comply with</p>	The data is stored for as long as it is used in ID06 Company Report.	The companies we work with to supply the ID06 System, for example IT suppliers and security firms, User Companies using ID06 Company Report, the person or entity who request reports on which User Companies have been active at workplaces, clients/building contractors or lenders and the public authorities ID06 contacts to verify verifications, e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration Agency or other public authorities.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		their legal obligations, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.		

## 7. For those affected by ID06 Stamp

ID06 Stamp is a storage service for personnel/attendance registers. We process the following categories of personal data about you when you are affected by ID06 Stamp.

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Transferring data stored in ID06 Stamp to ID06 Company Report.	User Company name (for sole traders), company registration number (personal ID number), dates when the User Company was active at the workplace as well as workplace identification number.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in sharing data between various ID06 services, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	Occurs for the entire time we keep the data in our systems, e.g. to fulfil the agreement with you or with the User Company where you are employed.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers), your employer (via ID06 Stamp) and other User Companies involved in the project in question in ID06 Company Report.



## 8. For those persons who are a contact person for a User Company

If you are a board member, CEO or other representative or a designated contact person for a User Company, we may process the following categories of data about you:

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
To provide you with our services and administer the ID06 System.	<p>Data required to connect a company to the ID06 System: name, personal ID number or other identity number, e-mail address, user name, password and the name of the company you represent.</p> <p>Data from validation of passports/IDs for individuals without e-ID; the same data as listed in the points above as well as a photograph of the passport or ID card including identity number.</p> <p>Data required to set up an ID06 Account; e-mail address, phone number, address.</p> <p>Data we collect from public records.</p>	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in administering our customer relationships and thus being able to supply our services within the scope of the ID06 System, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for as long as we have a customer relationship with the User Company and you act as a representative or designated contact person for the User Company.	The companies we work with to supply the ID06 System (e.g. IT suppliers) and the public authorities ID06 contacts to verify verifications (e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration Agency or other public authorities).
To verify the authorised signatories of a User Company.	Data we collect from public records, e.g. the right to sign on behalf of a User Company.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in administering our customer relationships and	The data is stored for as long as we have a customer relationship with the User Company and you act as a representative or designated contact person for the User Company.	The companies we work with to supply the ID06 System (e.g. IT suppliers) and the public authorities ID06 contacts to verify verifications (e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		thus being able to supply our services within the scope of the ID06 System, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.		Agency or other public authorities).
To administer our customer relationships and to contact you as the representative of a User Company.	All data in accordance with this Section.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in administering our customer relationships and thus being able to supply our services within the scope of the ID06 System, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for as long as we have a customer relationship with the User Company and you act as a representative or nominated contact person for the User Company.	The companies we work with to supply the ID06 System (e.g. IT suppliers) and the public authorities ID06 contacts to verify verifications (e.g. the Swedish Work Environment Authority, the Swedish Tax Agency, the Swedish Migration Agency or other public authorities).
Administering invoicing within our business.	Representative and/or contact person at a User Company and the e-mail address for the person in question.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the	Occurs for as long as the company you represent is one of our customers.	The companies we engage to administer our business, e.g. accountancy firms and auditors.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		balancing of interests, we have assessed that we have a legitimate interest in processing your data as the representative and/or nominated contact person for a User Company for the purpose of administering invoicing within our business, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.		
Administering, developing and testing the ID06 System to improve the user friendliness of our user interface and other parts of the ID06 System and to develop new features and services (we anonymize data where possible).	Data required to set up an ID06 Account; e-mail address, phone number, address.  Data about how you use your ID06 Account, for example login times.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in developing the ID06 System and our services, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for as long as we have a customer relationship with the User Company and you act as a representative or designated contact person for the User Company.	The companies we work with to supply the ID06 System, for example IT suppliers.

**9. For visitors to our website**

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Carrying out statistical analysis of our website.	Information about your visit to our website, obtained through cookies. The information includes IP address and how you use our website.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying and maintaining our website through the use of cookies, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	12 months	The companies we work with to supply the ID06 System, for example IT suppliers.
Supplying, maintaining, testing and improving our website.	Information about your visit to our website, obtained through cookies. The information includes IP address and how you use our website.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying and maintaining our website through the use of cookies, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have	3 months	Our external partners, for example IT suppliers.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		your data processed for the purpose.		
Enabling administration, development and testing of our IT systems in order to ensure that the high quality of our platforms is maintained as well as to detect and prevent security breaches (e.g. virus attacks).	Data about how you interact with and use our website as well as IP address.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in supplying and maintaining our website through the use of essential cookies, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	3 months	Our external partners, for example IT suppliers.

## 10. For persons receiving our newsletter

When you activate your ID06 Account, you are given an opportunity to consent to receive direct marketing from us. This marketing takes place in the form of a newsletter. When we send you a newsletter, we process the following categories of data:

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Sending you newsletters.	Data (for example an e-mail address) which we have via your ID06 Account or that you provide in order to either subscribe to a newsletter or obtain other	Your consent in accordance with Article 6(1)(a) of the GDPR. You have the right to withdraw your consent at any time. The easiest way to do this is by clicking on the	The data is stored for as long as we have a valid consent from you.  If you no longer wish to subscribe to a newsletter, you can contact us at	Our external partners, for example IT suppliers.





	information from us.	link in the newsletter.	<a href="mailto:support@id06.se">support@id06.se</a> or click on the link in the newsletter.	
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## 11. For persons receiving our updates

Sometimes we need to contact you, e.g. to inform you of important changes that affect you or your use of our services. The information may concern updates to the ID06 System's agreement, our Privacy Policy or other changes that it is important for you to know, or to provide notification about industry requirements for using ID06 Cards or associated services, e.g. ID06 Competence Database, ID06 Company Report, ID06 Stamp etc. linked to the workplace. When we do this we process the following categories of data about you.

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Sending you updates.	Data (your e-mail address) that we use to inform you of updates to this Privacy Policy, agreement or anything else that is important for you to know.	<p>The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in informing you of important changes in our business that may affect you, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.</p> <p>In some cases, we may be obliged to process your data in order to notify you of something (e.g. when we update this Privacy Policy). In</p>	Data collected for the purpose of sending newsletters is saved for as long as your ID06 Account is active.	Our external partners, for example IT suppliers.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		such cases, we process the data on the basis of a <i>legal obligation</i> . For information on how your rights are affected, please see the “Your Rights” Section of this Policy.		

## 12. For persons who otherwise get in touch with us

When you contact us, for example via customer services, we process the following categories of data about you:

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Handling your case and communicating with you.	Data you provide to us, for example name, e-mail address, address, telephone number and information about your case.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in responding to your inquiry and handling your case, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	The data is stored for as long as your case is open and for a period of two (2) years thereafter.	Our external partners, for example IT suppliers.
Analysing the conversation in order to improve our communications.	Data you give us, for example name, e-mail address, address, telephone number and	The processing is based on a balancing of interests in accordance with	The data is stored for as long as your case is open and for a period of two	Our external partners, for example IT suppliers.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
	information about your case.	Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in improving our communications, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.	(2) years thereafter.	

### 13. To administer our business and the ID06 System

In this Section, we inform you about the personal data processing we do in order to administer our business and the ID06 System.

<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
<p>Helping User Companies detect inaccuracies in registered data in, for example, ID06 Stamp.</p> <p>We do, however, strive to anonymize the data we process whenever possible.</p>	Name, personal ID number or other identity number, photograph, photograph of passport or ID card, registered data in ID06 Stamp and logins and logouts at the workplace.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in helping User Companies detect inaccuracies in the ID06 System, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data	The data is stored for the entire period that we have to keep the data in our systems, e.g. to fulfil the agreement we have entered into with you.	The companies we work with to supply the ID06 System, for example IT suppliers.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		<p>processed for the purpose.</p> <p>In the balancing of interests, we have also assessed that the User Companies have a legitimate interest in receiving information about inaccuracies in registered data in the ID06 System in order to comply with the legal obligations incumbent on the User Companies, that the processing is necessary to achieve the purpose and that our interest overrides your right not to have your data processed for the purpose.</p>		
<p>Preventing misuse of the ID06 System, for example through regularly verifying ID06 Cards that have been issued and verifying your registrations in ID06 Stamp.</p>	<p>Name, personal ID number or other identity number, photograph, photograph of passport or ID card, registered data in ID06 Competence Database and ID06 Stamp as well as logins and logouts at the workplace.</p>	<p>The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in preventing misuse of the ID06 System, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.</p>	<p>Occurs for the entire time we are required to keep the data in our systems, e.g. to fulfil the agreement with you or with your employer.</p>	<p>The companies we work with to supply the ID06 System and store data in the business (IT suppliers). Companies/organisations such as FORA.</p>



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
Pseudonymization of your personal data in order to produce statistics on how our services are used.	Data about your use of ID06 Card or Student ID06 Card, information about your use of our services, information about logins and logouts at your workplace and information about whether your card is active, blocked or expired.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in pseudonymizing your personal data for the purpose of product development. We ensure that the processing this entails is necessary to achieve the purpose, and that our interest overrides your right not to have your data processed for this purpose. By anonymizing data that concerns you, we also ensure that we use personal data as little as possible.	Occurs for the entire time we are required to keep the data in our systems, e.g. to fulfil the agreement with you.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers).
Anonymizing your personal data in order to produce statistics on how our services are used.	Data about your use of ID06 Card or student ID06 Card, information about your use of our services, information about logins and logouts at your workplace and information about whether your card is active, blocked or expired.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in anonymizing your personal data for the purpose of product development. We ensure that the	Occurs for the entire time we are required to keep the data in our systems, e.g. to fulfil the agreement with you.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers).



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		processing this entails is necessary to achieve the purpose, and that our interest overrides your right not to have your data processed for this purpose. By anonymizing data that concerns you, we also ensure that we use personal data as little as possible.		
To develop statistics about connected User Companies and ID06 Cards.	Data about whether your ID06 Card or Student ID06 Card is active or blocked, as well as information about logins and logouts at your workplace  User Company name (for sole traders), company registration number (personal ID number), dates when the User Company was active at the workplace as well as workplace identification number.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in developing the ID06 System and our services, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.	Occurs for the entire time we are required to keep the data in our systems, e.g. for as long as you use the ID06 System.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers).
Administering, developing and testing the ID06 System to improve the user friendliness of our user interface and other parts of the ID06 System and to	Data about how you use your ID06 Account, for example login times.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have	Occurs for the entire time we are required to keep the data in our systems, e.g. for as long as you use the ID06 System.	The companies we work with to supply the ID06 System and store data in the business (IT suppliers).



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
develop new features and services (we anonymize data where possible).		assessed that we have a legitimate interest in developing the ID06 System and our services, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.		
Complying with our legal obligations vis-à-vis, for example, the Accounting Act and tax legislation, as well as to comply with orders and decisions from courts and public authorities.	All data in accordance with this Policy.	The processing is based on the fact that for this purpose we have a legal obligation under Article 6(1)(c) of the GDPR to process the data.	Data for accounting and tax purposes is processed for a period corresponding to the current financial year + 7 years.  The processing related to orders from courts and public authorities takes place for the entire time we have to keep the data in our systems, e.g. so that we can fulfil our agreement with you.	The companies we engage to administer our business, e.g. accountancy and audit firms, as well as the public authorities and courts that order us to submit information.
Establishing, exercising and defending legal claims.	All data in accordance with this Policy.	The processing is based on a balancing of interests in accordance with Article 6(1)(f) of the GDPR. In the balancing of interests, we have assessed that we have a legitimate interest in being able to establish,	Occurs for the entire time we are required to keep the data in our systems, e.g. to fulfil the agreement with you.	The companies we engage to administer and develop our business, e.g. legal representatives, and public authorities.



<i>Purpose</i>	<i>Personal data</i>	<i>Legal basis</i>	<i>Storage period</i>	<i>Recipient</i>
		exercise and defend legal claims, that the processing is necessary to achieve the purpose and that this interest overrides your right not to have your data processed for the purpose.		

### **When and how do we disclose your personal data?**

In addition to the recipients listed in Sections 1 to 13, we may also disclose data to other recipients when required to do so by law or a decision by public authority.

Companies that manage personal data on our behalf must always enter into a data processor agreement with us so that we are able to ensure a high level of protection of your personal data when processed by our partners and suppliers. We only disclose personal data for purposes that are consistent with the purposes for which the data were obtained (e.g. to fulfil our obligations under our agreement with you).

We always strive to only process your personal data within the EU/EEA. We use a data processor for cloud service storage where all personal data is stored on servers within the EU/EEA. The data processor has a parent company in the USA that does not have direct access to the data, nor do we have any reason to believe that it will attempt to access the data. As there is a lack of an adequacy decision for the USA, we have entered into a Data Processor Agreement as well as the standard contractual clauses issued by the European Commission in accordance with Article 46(2) of the GDPR. We have implemented a number of legal, technical and organisational security measures to ensure that your personal data is not transferred to third countries in an identifiable or readable form. In the event this still happens, we will inform you and deal with the incident according to our standard procedures for personal data breaches. For more information about the safeguards we have implemented, please contact us via the contact details available at the bottom of this Policy.

### **How do we protect your personal data?**

Your personal data are collected and processed in a safe and secure manner. We have established and documented technical and organisational procedures and measures to ensure your privacy, as well as the availability and confidentiality of the data, all based on the requirements that follow from applicable data protection legislation.





We always require that parties who use the ID06 System strive to ensure that all data are securely handled and that the privacy of individuals is respected.

## Cookies

When you visit our website, we use cookies. Cookies are small text files that are stored on the visitor's device and which, *inter alia*, enable us to follow what the visitor does on the website and to save personal settings. You will find information about how we process the personal data we collect using cookies in Section 9 of this Privacy Policy. More information about how we place and use cookies can be found in our Cookie Policy: [id06.se/cookie-declaration/](https://id06.se/cookie-declaration/).

## Your rights

The GDPR gives you the right of control over your personal data. This control means that, in addition to the rights we describe below, you have the right to receive information directly from us about how we process data about you. We do this through this Privacy Policy.

Please contact us if you wish to exercise any of your rights. The easiest way to do this is to send an e-mail to [dpo@id06.se](mailto:dpo@id06.se). You can find our other contact details in the following Section.

Right	Description	Possible restrictions
<b>Right to be informed</b>	You have the right to be informed about how we process your personal data. We do this through this Privacy Policy and by answering your questions and concerns.  Further information can be found on the Swedish Authority for Privacy Protection's <a href="#">website</a> .	You always have the right to be informed.
<b>Right to obtain access to your personal data</b>	You have the right to obtain confirmation of and information about how we process your personal data. You also have the right to receive a copy of your personal data. You will receive the information in the form of a register transcript.  Further information can be found on the Swedish Authority for Privacy Protection's <a href="#">website</a> .	You always have the right to request a register transcript.



Right	Description	Possible restrictions
<b>Right to rectification</b>	<p>You have the right to have inaccurate data rectified.</p> <p>Further information can be found on the Swedish Authority for Privacy Protection’s <a href="#">website</a>.</p>	<p>You always have a right to have inaccurate data rectified.</p>
<b>Right to erasure (“right to be forgotten”)</b>	<p>In some cases, you have the right to have your personal data erased. This may, for example, apply to data that it is no longer necessary to process or retain for the purpose for which the data was collected, or data you have withdrawn your consent to be processed.</p> <p>Further information can be found on the Swedish Authority for Privacy Protection’s <a href="#">website</a>.</p>	<p>The right to erasure is not an absolute right. We may deny your right of erasure in cases where we are obliged to process the data by law; or where we need to process the data in order to establish, exercise or defend ourselves against legal claims.</p>
<b>Right to object to our processing of your personal data</b>	<p>In some cases, you have the right to object to our processing of your personal data.</p> <p>You always have the right to object to direct marketing.</p> <p>Further information can be found on the Swedish Authority for Privacy Protection’s <a href="#">website</a>.</p>	<p>The right to object only applies when personal data is processed for the performance of a task carried out in the public interest or in the exercise of official authority or after a balancing of interests.</p>
<b>Right to restriction of processing</b>	<p>In certain specific situations, you have the right to request that the processing of your personal data is restricted. You can request restriction of processing while another request of yours is being investigated, e.g. when you have requested inaccurate data is rectified or have objected to a certain type of</p>	<p>This right only applies in certain specific situations. For more information see the Swedish Authority for Privacy Protection’s <a href="#">website</a>.</p>



Right	Description	Possible restrictions
	<p>processing. There may also be other occasions when you have the right to request restriction of processing.</p> <p>Further information can be found on the Swedish Authority for Privacy Protection's <a href="#">website</a>.</p>	
<b>Right to gain access to and transfer your personal data to another data controller ("right to data portability")</b>	<p>In some cases, you have the right to access your personal data and transfer it to another data controller.</p> <p>Further information can be found on the Swedish Authority for Privacy Protection's <a href="#">website</a>.</p>	<p>This right only applies when the processing is based on consent or a contract. Furthermore, the right to transfer the data to another company only applies when such action is technically feasible.</p>
<b>Right to withdraw your consent</b>	<p>You always have the right to withdraw your consent. The easiest way to do this is by contacting us at <a href="mailto:dpo@id06.se">dpo@id06.se</a>.</p>	<p>You always have the right to withdraw your consent. However, such withdrawal of consent does not affect the legality of the processing that took place before consent was withdrawn.</p>
<b>Right to file a complaint</b>	<p>If you have a complaint about our personal data processing, you can contact the Swedish Authority for Privacy Protection. You can reach the Swedish Authority for Privacy Protection via the following <a href="#">link</a>.</p>	<p>You always have the right to file a complaint with the Swedish Authority for Privacy Protection.</p>

### Contact details

ID06 AB is the data controller for the personal data processing described in this Privacy Policy.

If you would like further information about how we process your personal data, or wish to exercise any of the rights listed above, please contact us at:

ID06 AB

Att.: Data Protection Officer



ID06

Version 3-2023 (released March 2023)

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PO Box 13144

SE-103 03 Stockholm, Sweden

[dpo@id06.se](mailto:dpo@id06.se)

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*This Privacy Policy was last updated on 9 March 2023 and may be subject to change. If we make significant changes to the Policy, we will notify you no later than 30 days before the changes enter into force via e-mail (update), text or through the service, and by publishing a new version on our website.*