



HHGS Privacy Policy

1. Definitions

- 1.1. The Student Union of the School of Business, Economics and Law is further referred to as “HHGS”.
- 1.2. “Personal Data” is any information that is related to or can be used to identify a living person, directly or indirectly. E.g. name, address, phone number, email, social security number or IP address. Photographs and videos through which an individual can be identified are also Personal Data.
- 1.3. The subject of processing, i.e. person whose Personal Data is collected, processed or saved is further referred to as “You”.
- 1.4. The Controller is the natural or legal person who decides for which purposes and how Personal Data will be processed and saved. HHGS is the controller.
- 1.5. The Data Protection Officer, further referred to as the “DPO”, is responsible for meeting requests from individuals or third parties, report incidents and act as a contact person.
- 1.6. “Supervisory Authority” is the Swedish Data Protection Authority.
- 1.7. “The Data Regulation” is the legislation, including the Supervisory Authority’s binding decisions and regulations, that are to be applied to the processing of Personal Data. Also including local adaptations and regulations with regard to the data protection.

2. General information

- 2.1. HHGS will only process Personal Data in accordance with applicable Swedish and European legislation. HHGS strives to protect Your privacy and Your rights in the best possible way. This document describes how HHGS gathers and processes Your Personal Data.

3. What Personal Data is collected?

- 3.1. HHGS will only gather, process and save Personal Data that is necessary, essential and compatible with the purpose of the service-
- 3.2. HHGS might gather the following Personal Data from You:
 - 3.2.1. Name, social security number, address, phone number, email, financial information, username, relevant registration-information, IP-addresses, pictures, information about Your use of HHGS website and digital



platforms, e.g. Ladok, as well as other information that You submit to HHGS.

3.3. When you sign up to any event hosted by HHGS or its sub-organizations, HHGS might gather name, social security number, email and relevant information about Your education, e.g. educational program and semester. Personal Data is also collected for accounting purposes and to enable HHGS to contact You, HHGS official partners or other authorized persons related to the event.

4. Purpose and legal basis for process of Your Personal Data

4.1. HHGS gather, process and save registered Personal Data in order to conduct their business, to offer You various services and to ensure that this is performed in a secure, lawful and correct way.

4.2. With your consent

4.2.1. HHGS will gather, process and save Your Personal Data based on Your consent. This is the case if You want to exercise Your right to use any of the services provided by HHGS, such as Ladok, or participate in organized events hosted by HHGS or any of its sub-organizations.

4.2.2. HHGS might also send out regular newsletters and relevant information about the University and Your studies by email, text and on the website based on Your consent.

4.2.3. HHGS will gather, process and save Your Personal Data to enable continued communication and support.

4.2.4. HHGS might share pictures or videos of You on their social media for marketing purposes, based on Your explicit consent.

4.2.5. Your consent to the processing is only valid for the one or more specific purposes it was given. If necessary, HHGS will request Your consent for further processing.

4.2.6. A valid consent shall be voluntary, specific and unambiguous expression of will. Through which You accept the processing of Your Personal Data in accordance with the given information.

4.3. Based on assessment of legitimate interests

4.3.1. HHGS will process Your Personal Data based on an assessment of legitimate interests. E.g. HHGS might publish pictures from events hosted by HHGS or its sub-organizations on HHGS social media, website or for direct marketing purposes. You are entitled to object against this at any



time by contacting the HHGS and request that pictures of You are either anonymized or erased.

4.3.2. HHGS will process Your Personal Data for direct marketing purposes based on an assessment of legitimate interests. This is the case if You are or have been registered as a member of HHGS or use any of the services provided by HHGS.

4.3.3. Data revealing sensitive information about You, e.g. racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic Data, Data concerning health or Data concerning sex life or sexual orientation will never be processed based on assessment of interests.

4.4. Based on legal contract

4.4.1. HHGS will gather, process and save Your Personal Data based on the agreement of membership when You register as a member of HHGS or any of its sub-organizations.

4.5. To fulfill our legal obligations

4.5.1. HHGS will gather, process and save Your Personal Data to fulfill our legal obligations under national and European law. E.g. Data necessary for accounting purposes of declaration of taxes.

4.5.2. Processing of sensitive Personal Data is necessary for the purposes of carrying out the obligations and exercising specific rights for HHGS or You in the field of employment and social security and social protection law.

4.6. Automated decision making

4.6.1. HHGS might use an automated process for direct marketing permitted by law or by Your consent.

5. Your rights

5.1. You are entitled to request information about what Personal Data HHGS is processing about You, and how, at any time. HHGS will respond to your request as soon as possible and without unnecessary delay.

5.2. You are responsible for the accuracy of any Personal Data that You provide HHGS with. HHGS are not responsible for any errors due to inaccurate Personal Data provided by You. If Your Personal Data is inaccurate or insufficient You should send notice to HHGS as soon as possible. HHGS will change or update Your Personal Data when requested without unnecessary



delay. Your Personal Data needs to be up-to-date at all times in order for HHGS to fulfill its commitment to You and third parties.

- 5.3. You are entitled to request that HHGS correct incorrect, incomplete or misleading Personal Data concerning You at any time.
- 5.4. You are entitled to question the gathering and processing of Your Personal Data when the legal basis for the process is an assessment of legitimate interests.
- 5.5. You are entitled to request that HHGS cease to process your Personal Data and deletes all existing Data concerning You. This right does not apply if there is another legal basis or otherwise a legal obligation for HHGS to continue processing Your Personal Data.
- 5.6. You are entitled to request that the processing of Your Personal Data is restricted. However, this may affect Your future possibility to make use of the services provided by HHGS.
- 5.7. You are entitled to request a copy of all Your Personal Data in a structured, widely used and digital format. By Your request, HHGS will also transfer all Your Personal Data to another Controller or a third party.
- 5.8. You are entitled to withdraw Your prior consent at any time. In case of an withdrawal, HHGS will cease to further gather and process Your Personal Data and previously collected Data will be permanently deleted unless there is another legal basis for continued processing, e.g. to fulfill HHGS legal obligations. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- 5.9. You are entitled to lodge a complaint to the Swedish Data Protection Authority (Datainspektionen) if you consider HHGS to be processing Your Personal Data incorrectly or without legal basis. Such complaint should be made directly to Datainspektionen.

6. Who has access to Personal Data?

- 6.1. HHGS reserves the right to share Your Personal Data with third parties when necessary to fulfill HHGS legal obligations, e.g. towards Supervisory Authority. HHGS may also share Your Personal Data with third parties providing services to the organization, such as IT services. In such cases, HHGS may also share Your Personal Data with a third party outside of the EU/ESS, but only if the country has a documented, adequate level of security level according to the current standards set up by the Commission or with Your



given consent to such treatment. If Your consent is required, You are entitled to relevant information regarding possible risks of the process.

- 6.2. HHGS will notify any third party who has access to Your Personal Data if any changes are necessary or requested to ensure the protection of Your rights under The Regulation and HHGS policy. Notification will be made without unnecessary delay.
- 6.3. HHGS reserves the right to share Your Personal Data with third parties such as; HHGS sub-organizations, HHGS partners and other actors with whom HHGS has legal obligations and the disclosure of certain Personal Data is necessary to fulfill such obligations.
- 6.4. HHGS may share Your Personal Data if it is necessary to comply with applicable national or international legislation, or to comply with HHGS legitimate interests or to detect and prevent unauthorised access or use of Your Personal Data.

7. For how long is Personal Data stored?

- 7.1. HHGS saves Your Personal Data as long as they are necessary for the purpose for which they have been collected and processed, or as long as required by law.
- 7.2. HHGS may save Personal Data longer if it is required by national law or necessary to guard HHGS legitimate legal interests, e.g. if there is an ongoing legal process.
- 7.3. Your Personal Data will be kept in a form which permits identification of You for no longer than is necessary for the purposes for which Your Personal Data are processed. HHGS will examine the continued need for Your Personal Data on a regular basis to ensure that there is still a legitimate legal basis for continued processing. If or when there is no longer a legal basis for processing, all of Your Personal Data will be permanently erased.
- 7.4. Examination and erasing, as stated in 7.3, will occur at least once a year.

8. Security of processing

- 8.1. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms, HHGS will implement appropriate technical and organisational measures to ensure a high level of security, e.g. through firewalls, pseudonymisation and encryption.



8.2. HHGS employes or other persons acting under the authority of HHGS shall have limited access to Personal Data to minimize unauthorized access as well as inappropriate use of your Personal Data.

8.3. The measures are carried out regularly in accordance with HHGS internal routines for processing of Personal Data.

9. Changes to the Privacy Policy

9.1. HHGS reserve the right to change the Policy at any time. If changes are made, You will be notified in advance and given the opportunity to object. If You object HHGS will cease to gather further Personal Data from You.

10. Contact information

Student Union at the School of Business, Economics and Law at Gothenburg University (HHGS);

E-mail: info@hhgs.se

Phone: [+46 \(0\)31 711 13 83](tel:+46317111383)

Address: Vasagatan 1, Box 680, Gothenburg

Data Protection Officer (DPO);

Name: Erik Gustafsson

E-mail: GDPR@hhgs.se

Adress/Office: Vasagatan 1, Box 680, 405 30, Göteborg

Responsibility

The president of the HHGS board is responsible for making sure this policy is updated. If you have any questions about this policy, contact the President of the HHGS board.