

# PRIVACY POLICY

## For you who participate in the project CareConnectWithUkraine

We at Lindholmen Science Park, company organization number 556568-6366 (“**Lindholmen Science Park**”, “**we**”, “**our**” and “**us**”), organize the project *CareConnectWithUkraine* (the “**Project**”) where we e.g. arrange events and match you with job opportunities.

We care about your privacy and want you to feel safe when we process your personal data. With this privacy policy, we want to provide information on our processing of personal data within the Project. Do not hesitate to [contact us](#) with any questions you might have regarding our processing of your personal data.

### In summary: this is how we process your personal data

- We process your personal data to [arrange events and invite you to future events](#)
- We process your personal data in order to [use pictures of you from events for marketing purposes](#)
- We process your personal data to [send relevant marketing to you](#), to [comply with marketing legislation](#),
- We process and analyse your personal data to [inform you about potential job opportunities](#), and
- We process your personal data because of [requirements from SCB and the ESF-Council](#).

### Your rights

In short you have the following rights:

- ✓ [The right to lodge a complaint with a supervisory authority](#),
- ✓ [The right to withdraw your consent](#),
- ✓ [The right to access](#),
- ✓ [The right to object](#),
- ✓ [The right to erasure](#),
- ✓ [The right to rectification](#),
- ✓ [The right to restriction of processing](#), and
- ✓ [The right to data portability](#).

*If you have any questions about your rights, or want to exercise anyone of your rights, you are more than welcome to [contact us](#).*

## Below you find more information about:

By pressing the selected heading, you will be moved to the relevant paragraph.

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## Who is responsible for the processing of your personal data and how to contact?

Lindholmen Science Park AB is in most cases solely responsible for the processing of your personal data as a controller when you share your personal data with us. Should you have any questions regarding our processing of your personal data, or if you wish to exercise any of your rights under data protection legislation, please contact us via any of our contact details stated below.

We need to collect your personal data to comply with requirements from the [Statistics Sweden](#) (Sw: Statistikmyndigheten, "SCB") and the [Swedish European Social Fund Council](#) (Sw: Rådet för Europeiska socialfonden, "ESF"). We also need to share your personal data with SCB. We are the controller for the processing when we collect and share your personal data with SCB. However, SCB is a controller in its own right for the subsequent processing of your personal data. You can read more about this [here](#).

If we collaborate with another company or organisation in connection with an event we and that company or organisation are joint controllers for the processing of your personal data in connection with your participation in the event and have thus entered into an agreement that regulates the joint controllership. We have agreed that Lindholmen Science Park is responsible for handling questions and requests from you as a data subject. If you have questions, or if you wish to make a request, we ask you to contact Lindholmen Science Park, no matter which company the question or request concern. Please see contact information below:

|                              |  |
|------------------------------|--|
| Name:                        | Lindholmen Science Park AB                                       |
| Company organization number: | 556568-6366  |
| Postal address:              | Lindholmospiren 3-5, Box 8077, SE-402 78<br>Gothenburg           |
| E-mail address:              | <a href="mailto:privacy@lindholmen.se">privacy@lindholmen.se</a> |

Telephone number:

+46 (0)70-820 29 69

## Who do we share your personal data with?

We share your personal data with the following suppliers:

- the company or organisation we **collaborate with to arrange an event**,
- the IT-provider we use to **create invites and collect registrations for the event**,
- **SCB**, in accordance with requirements from SCB and ESF that we need to comply with in order to receive financing for our Project,
- the **photographer** that takes your picture will gain access to your personal data and will process your personal data on our behalf and following our instructions as a processor, and
- third parties that process personal data on our behalf, so called processors. These processors are our **IT-suppliers and other suppliers** who will process your personal data on our behalf and following our instructions to ensure good and secure IT operations.

## Transfer of personal data to countries outside the EU/EEA

We do not transfer your personal data outside the EU/EEA.

## Detailed description about how we process your personal data

### Administration of your participation in an event and invitations to future events

We process your personal data in order to administer your registration and participation to an event and to keep track of which companies and competencies that are represented as well as to invite you to future events or educational courses and similar that we believe that you would be interested in. This personal data is collected in connection with you signing up and registering to an event.

| To arrange events and to invite you to future events  |  |  |
|---|--|--|
| What processing we perform  | What personal data we process  | Our lawful basis for the processing  |
| <ul style="list-style-type: none"><li>- Arrange events based on your interests and competences</li><li>- Administer your registration and participation to the event</li><li>- Keep track of which companies and competencies that are represented</li><li>- Invite you to event we believe is in your interest</li></ul> | <ul style="list-style-type: none"><li>- Name and surname</li><li>- Email address</li><li>- Title/professional position</li><li>- Company affiliation</li><li>- Information from your resume and about your competences such as language skills</li><li>- Dietary preferences (allergies)</li></ul> | <p><i>Legitimate interest (article 6.1 f in GDPR)</i></p> <p>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to arrange events that we believe you could be interested in, as well as our legitimate interest to administer your registration and participation to an event for which you have signed up for and to communicate with you in</p> |

|   |   |  |
|---|---|--|
| <p>- Invite you to educational approaches we believe is in your interest</p>  | <p>etc.) you have informed us about</p> | <p>your professional capacity regarding events that we believe is in your interest due to your engagement through a business relation.</p> <p><i>Consent (article 6.1 a in GDPR)</i></p> <p>If we process sensitive personal data, such as information about your allergies, we will obtain your <i>consent</i>.</p> |
| <p><b>Storage period:</b> We will process your personal data until the event is completed. A list of the participants to the event will be stored for a period of one year after the event in order for us to follow up on your participation in the event and invite you to similar events in the future.</p>  |   |  |
| <p><b>Sharing:</b> We will share your personal data with the IT-provider we use to create invites and collect registrations for the event.</p> <p>We will also share your personal data if we collaborate with a company or organization to arrange the event. We and that company or organization will then act as joint controllers for the processing of your personal data.</p> |   |  |

| <p style="text-align: center;"><b>To use pictures for marketing purposes</b></p>  |  |   |
|---|--|---|
| <p><b>What processing we perform</b></p>  | <p><b>What personal data we process</b></p>  | <p><b>Our lawful basis for the processing</b></p>   |
| <ul style="list-style-type: none"> <li>- Take photos of you during an event</li> <li>- Publish your photo on our website and/or on our social media channels to be able to market our events</li> <li>- By participating in an event and not objecting to having your picture taken and for us making use of it for marketing, you agree to our use of your name and picture in marketing in accordance with the Swedish Act on Names and Pictures in Advertising (Sw. Lag (1978:800) om namn och bild i reklam)</li> </ul> | <ul style="list-style-type: none"> <li>- A picture of you</li> <li>- Name</li> </ul> | <p><i>Legitimate interest (article 6.1 f in GDPR)</i></p> <p>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to market the events.</p> <p><i>Consent (article 6.1 a in GDPR)</i></p> <p>If you are clearly depicted in a picture to be used in marketing, the processing will instead be based upon your <i>consent</i> and not legitimate interest as set out above. You have the right to withdraw your consent at any time by contacting us.</p> <p>The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> |
| <p><b>Storage period:</b> If we have published a photograph from the event in which you are depicted on our respective websites, the photograph will stay published until we replace it with another photograph from another event or until you ask us to delete it.</p> <p>Please note that your personal data will only be processed for this purpose after you have been given information about our publication of photos and provided that you have not objected to our processing.</p>                                |  |   |
| <p><b>Sharing:</b> The photographer that takes your picture will gain access to your personal data and will process your personal data on our behalf and following our instructions as a processor.</p>   |  |   |

| To send relevant marketing to you  |   |   |
|--|---|---|
| What processing we perform   | What personal data we process   | Our lawful basis for the processing   |
| <ul style="list-style-type: none"> <li>- If you attend or are registered to one of our events and we believe you are interested in receiving news from us, we will send you relevant marketing. You can <a href="#">object to such marketing</a> at any time by contacting us</li> </ul> | <ul style="list-style-type: none"> <li>- Name</li> <li>- Email address</li> </ul> | <p><i>Legitimate interest (article 6.1 f in GDPR)</i></p> <p>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to send relevant marketing that we believe you are interested in.</p> |
| <p><b>Storage period:</b> We will continue to store and use your personal data for marketing purposes for as long as you interact with us.</p>   |   |   |
| <p><b>Sharing:</b> N/A</p>   |   |   |

| To comply with marketing legislation   |   |  |
|--|---|--|
| What processing we perform   | What personal data we process   | Our lawful basis for the processing  |
| <ul style="list-style-type: none"> <li>- If you have stated that you do not wish to receive marketing from us, we will store such information in an “unsubscribe-list” to make sure we do not send any marketing to you</li> </ul> | <ul style="list-style-type: none"> <li>- Name</li> <li>- Email address</li> </ul> | <p><i>Legal obligation (article 6.1 c in GDPR)</i></p> <p>The processing is necessary to comply with legal obligations which we are subject to, i.e. marketing law, which require us not to send marketing material to individuals who have objected to receiving such marketing.</p> <p>We cannot make sure you will not receive marketing from us without processing your personal data for this purpose and you are therefore required to provide your personal data to us.</p> |
| <p><b>Storage period:</b> You will be listed in our “unsubscribe-list” until further notice.</p>   |   |  |
| <p><b>Sharing:</b> N/A</p>   |   |  |

| To inform you about potential job opportunities   |  |   |
|---|--|---|
| What processing we perform  | What personal data we process  | Our lawful basis for the processing   |
| <ul style="list-style-type: none"> <li>- Individual mapping of your competences in order to provide better matchmaking between you and a potential employer</li> <li>- Based on an analysis of the</li> </ul> | <ul style="list-style-type: none"> <li>- Name</li> <li>- Education</li> <li>- Work experience</li> <li>- Language and language skills</li> </ul> | <p><i>Consent (article 6.1 a in GDPR)</i></p> <p>This function is optional and we will only process your personal data for this purpose if you choose to activate this function and have consented to our personal data processing. We will</p> |

|   |   |  |
|---|---|--|
| <p>individual mapping we will inform you about available job opportunities and potential employers</p> <p><i>The decision about which job opportunities to inform you about will be based on automatic decision-making (so called profiling*)</i></p> | <ul style="list-style-type: none"> <li>- Information about your qualifications such as driving licence</li> </ul> | <p>only process the information you choose to give us.</p> <p>You can withdraw your consent at any time by contacting us.</p> <p>The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> |
| <p><b>Storage period:</b> We will process your personal data for this purpose during August 2022-March 2023.</p>  |   |  |
| <p><b>Sharing:</b> We will share your personal data with Workbuster, the provider of the tool we use to perform the analysis in order to find job opportunities to inform you about.</p>  |   |  |

\* **Profiling:** We use so called profiling to be able to show you relevant job opportunities and potential employers that are relevant to you. We use profiling because without it, you would instead see information which you are probably not as interested in and that might be not be as good match for you. You have the right to object to profiling as described below under the section explaining [your rights](#).

### To be able to arrange the Project under the financing of ESF

The Project is financed by ESF. The financing by ESF comes with some requirements that we need to comply with. One requirement is that we need to report participants of the Project to SCB. For this reason, we need to collect some information about you and your participation in the Project as further set out below.

| What processing we perform   | What personal data we process  | Our lawful basis for the processing  |
|--|--|--|
| <ul style="list-style-type: none"> <li>- Collect your personal data in accordance with the requirements set out by the Swedish European Social Fund Council (Sw. Rådet för Europeiska socialfonden ("ESF")) in order for us to receive financing for the Project and sharing of these personal data with Statistics Sweden (SCB) and ESF.</li> </ul> | <ul style="list-style-type: none"> <li>- Name</li> <li>- Coordination number</li> <li>- Age</li> <li>- Start date for your participation in the Project</li> <li>- Hours per month you have participated in the Project</li> </ul> | <p><i>Legitimate interest (article 6.1 f in GDPR)</i></p> <p>Your personal data will be processed based on our <a href="#">legitimate interest</a> to be able to arrange this Project with the financing by ESF.</p> |
| <p><b>Storage period:</b> We will not store your personal data for this purpose after we have reported it to ESF.</p>  |  |  |
| <p><b>Sharing:</b> We will share statistics to ESF, however this will be on an aggregated level and your personal data will not be identified.</p> <p>We will share your personal data with SCB in accordance with their instructions and requirements from ESF. SCB is the controller for the processing of your personal data.</p>                 |  |  |

## Statistics Sweden processing of your personal data

Please note that Statistics Sweden (SCB) will process your personal data as controller in its own right. Besides the personal data that we share with SCB according to above, SCB will also collect complementary information about you from the Swedish Public Employment Service (Sw: Arbetsförmedlingen) and the Swedish Social Insurance Agency (Sw: Försäkringskassan).

SCB might publish information about the fulfilment of activity and result indicators stated in annex 1 and 2 of the Regulation (EU) 1304/2013. However, it will never be possible to identify individuals in such reports.

SCB will also share statistics of the participation in the Project with ESF. However, the shared information will be on an aggregated level and your personal data will not be identified.

*\*REGULATION (EU) No 1304/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006 (\*Sw: EUROPAPARLAMENTETS OCH RÅDETS FÖRORDNING (EU) nr 1304/2013 av den 17 december 2013 om Europeiska socialfonden och om upphävande av rådets förordning (EG) nr 1081/2006)*

For more information about SCB's processing of your personal data due to your participation in the Project, please see the following link.

## What are your rights when we process your personal data? Detailed description

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

*If you want to know more about your rights or if you want to exercise any of your rights, please [contact us](#) and we will help you.*

### Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

You have the right to lodge a complaint with a supervisory authority. The supervisory authority in Sweden is the [Swedish Authority for Privacy Protection](#) (SW. Integritetsskyddsmyndigheten (IMY)).

*In detail: Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority in the EU/EEA member state of your habitual residence, place of work or place of where the alleged infringement of applicable data protection laws has allegedly occurred.*

*The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.*

### Right to withdraw consent (Article 7.3 GDPR)

You have the right to withdraw your consent at any time by [contacting us](#).

*In detail. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.*

### **Right to access (Article 15 GDPR)**

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. You can make a request by [contacting us](#). If we do process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

*In detail. The information we provide includes the following:*

- *the purposes of the processing,*
- *the categories of personal data concerned,*
- *the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations,*
- *where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,*
- *the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,*
- *the right to lodge a complaint with a supervisory authority,*
- *if the personal data are not collected from you, we provide you with available information about the source of the personal data;*
- *the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and*
- *where your personal data are transferred to a third country or to an international organization, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.*

*For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.*

*Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.*

### **Right to object (Article 21 GDPR)**

You have the right to object to our processing of your personal data at any time.

*In detail: Your right to object applies as follows:*

- *you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 e or 6.1 f GDPR, including profiling based on those provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.*
- *Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.*



- Where you object to processing for direct marketing purposes, you have an unconditional right to have the processing of your personal data for such purposes ceased.
- In the context of the use of information society services, and regardless of Directive 2002/58/EC (ePrivacy Directive, or ePD), you may exercise your right to object by automated means using technical specifications.
- Where personal data are processed for statistical purposes pursuant to Article 89.1, you have the right to object to, on grounds relating to your particular situation, processing of your personal data, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## **Right to erasure (“the right to be forgotten”) (Article 17 GDPR)**

You have the right to ask us to erase your personal data.

*In detail: We have the obligation to erase your personal data without undue delay where one of the following grounds applies:*

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.

*Where we have made the personal data public and are obliged in accordance with the rights stated above to erase the personal data, we shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.*

*We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).*

*Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:*

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law which applies to us or for the performance of a task we carry out in the public interest or in the exercise of official authority;
- for or statistical purposes in accordance with Article 89.1 GDPR, if your right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

## **Right to rectification of processing (Article 16 GDPR)**

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you.

*In detail: Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.*

*We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).*

## **Right to restriction of processing (Article 18 GDPR)**

You have the right to obtain from us restriction of the processing of your personal data.

*In detail: Your right applies if:*

- *the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,*
- *you have objected to processing pursuant to Article 21.1 GDPR pending the verification whether our legitimate grounds override yours,*
- *the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or*
- *you need the personal data for the establishment, exercise or defence of legal claims even though we no longer need the personal data for the purposes of the processing.*

*Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.*

*We will notify each recipient to whom the personal data has been provided to about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to [contact us](#).*

## **Right to data portability (Article 20 GDPR)**

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transferred to another data controller (“data portability”).

*In detail: The right applies if:*

- *the processing is based on the lawful basis consent, and*
- *the processing is carried out by automated means.*

*The exercise of the right to data portability shall be without prejudice to the right to erasure, i.e. Article 17. Your right to data portability shall not apply to processing necessary for the performance of a task we carry out in the public interest or in the exercise of official authority.*

*Your right to data portability shall not adversely affect the rights and freedoms of others.*

## **Balancing of interests assessments when processing personal data based on the legal basis “legitimate interests”**

As we state above, for some purposes, we process your personal data based on our “legitimate interest”. By carrying out a balancing of interests assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs your interests or rights which require the protection of your personal data.

*If you want more information in relation to our balancing of interests assessments, please do not hesitate to contact us. Our contact information can be found at the beginning of this information notice.*