

## flow2thrive Sverige AB Privacy Policy

We protect the privacy of our visitors, partners and customers and strive to maintain a high level of protection of personal privacy. Feel free to take part of this information on an ongoing basis as it may change from time to time.

This policy contains information about how flow2thrive Sverige AB, org. No. 559215-9254 (hereinafter flow2thrive) processes and protects personal information and what we use this information for.

### Why we process personal data

Personal data is registered and processed by flow2thrive mainly for administrative purposes to perform the service requested for which the personal data was supplied.

We must have a valid reason to be able to process your personal data. Unless otherwise stated below, our reason is a legitimate interest, or to perform a contract. Processing may also be required for us to fulfil legal obligations.

flow2thrive's legitimate interest is primarily to fulfil the commitment for which the personal data was provided to us, but also to provide you and your organisation with information (events, insights and news) in areas that we believe are relevant to you in your professional role. When necessary, the legitimate interest may also be to defend a legal claim.

**flow2thrive process personal data with the purpose of e.g.:**

- Managing registration and participation to our events/seminars
- Managing responses in client surveys,
- Delivering projects to our clients,
- Marketing of our products and services,
- Informing about news such as entrepreneurship, business development, regulatory changes, surveys and other changes in the market or within our company,
- Managing job applications or spontaneous applications of interest in employment or internship,
- Managing questions or other requests of contact or information.

### What personal data do we process

**Seminars, events and networks, newsletters and literature etc.**

When you order a publication, register for or participate in a seminar or other event, register for a newsletter etc. you will be asked to provide certain personal data, e.g. name, address, employer or company, title, departmental affiliation, telephone number, e-mail address.

Our seminars, events and meet-ups may include photographing and audio-visual recordings. This may be used to inform about our organisation on our website and social media. If you have any objections to us using an image where you can identify yourself, please contact us in accordance with below.

Your personal data is registered and stored in order to administer, prepare and evaluate meetings and membership in networks, answering inquiries, deliver orders or marketing seminars, events or news by e-mail.

**General enquiries etc.**

When you send us a general inquiry you will be asked to provide certain personal data, such as name, city, company, telephone number or e-mail address. For GDPR related requests you will also be asked to provide information about your relation to Flow2thrive.

The personal data you provide when making an inquiry is registered and stored for the purpose of managing and responding to the inquiry and if necessary to identify you to fulfil the request. The personal data is stored to fulfil legal or contractual obligations such as documentation requirements or defending legal claims.

### **flow2thrive index and flow2thrive Personal Habit Inventory Questionnaire**

Please refer to our separate policy: flow2thrive Sverige AB Privacy Policy\_Surveys.

### **Miscellaneous**

In addition to the above, we will store personal data which you freely have chosen to provide us with, e.g. in e-mail correspondence. Our intention is not to ask for any special categories of personal data ("sensitive data") such as health related information. If you choose to provide us with such information, e.g. when registering for a seminar or in a job application, we have to assume that you want us to process these data in accordance with this policy.

### **Transferring personal data**

Besides what is stated above, personal data may also be transferred to suppliers of IT related services and systems. Recipients may be based inside and outside the EU/EEA. When transferring personal data for processing in a country outside the EU/EEA, which does not certify an adequate level of security, flow2thrive will ensure that the personal data is subject to appropriate safeguards in accordance with applicable data protection legislation.

Personal data may be transferred to insurance companies and legal advisors in connection with legal proceedings if necessary for flow2thrive to exercise its legitimate interests or other recipients if provided by legislation, regulations or governmental decisions.

In addition, personal data will not be transferred unless flow2thrive is obliged or allowed to do so by law or when required for the purpose of carrying out our business (such as outsourcing or other external management).

### **How long is personal data stored**

Flow2thrive takes reasonable measures to store personal data only for as long as is necessary to fulfil the purposes for which it was collected, or for six months if no end date is given.

### **Security measures**

Unfortunately, no data transmission over the Internet or other networks are completely secure, but flow2thrive takes reasonable and appropriate measures to ensure that personal information is processed securely and in accordance with this policy, protected against unauthorised access, alteration and destruction.

flow2thrive implements appropriate technical and organisational measures to ensure the protection of personal data, considering what is deemed appropriate for applicable categories, scope and sensitivity of the personal data. flow2thrive's systems and organisation are managed so that unauthorised persons do not have access to the personal data being processed.

According to legislation and professional obligations, including professional ethics, requirements of organisational security measures also apply, which may include:

- Confidentiality obligations for everyone working for or with flow2thrive, including all information which has been obtained during or in connection with operations with flow2thrive.
- Written data protection agreements with suppliers and consultants.
- Internal routines, training and policies covering careful handling of personal data, as well as data minimisation, purpose limitation, accuracy, storage limitation and incident management.

## Right to request information, information, rectification, limitation or erasure

Unless an exception applies you may request information, rectification, limitation or erasure of your personal data or object to further processing. You are also entitled to submit complaints to the supervisory authority regarding the processing. However, there may be limitations by law, professional regulations and other provisions that restrict these rights.

You are firstly responsible to keep your provided data current and updated. You may send the correct data to us and we will update it as soon as possible. If we otherwise receive information about outdated or inaccurate personal data, we will where its suitable correct, disassemble or remove such personal information.

Personal data will be retained for as long as necessary for the purposes of the processing, or for six months if no end date is provided. Upon request, identifiable personal data will be removed or limited where possible, which means that we will no longer be able to provide you with the service. You are entitled to object to processing of personal data, where the processing is based on flow2thrive's legitimate interest. The opposition must be precise.

You are entitled to receive an extract about your personal data that we process. A request shall be sent to us in writing to our email or postal address, which then requires your name and signature.

## Contact

If you want to request an extract, erasure, restriction, correction or other changes regarding your personal data, please write to us at: flow2thrive Sverige AB, GDPR/Linda Jarnhamn, Nyköpingsvägen 3, 611 76 Nävekvarn, Sweden, or email [linda.jarnhamn@flow2thrive.com](mailto:linda.jarnhamn@flow2thrive.com)