

# Privacy Notice – Futuraskolan

Updated: May 2023

## 1. INTRODUCTION

Futuraskolan AB, with company registration number 556609-5047, (“**Futuraskolan**”, “**we**” or “**us**”) is committed to the protection of your personal data. We take measures to ensure that your personal data is protected when we use your personal data and that the use of your personal data complies with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR).

In this Privacy Notice, we describe how we collect, use and share your personal data, and which rights you have in relation to your personal data.

Personal data means any information that directly or indirectly identifies you, for example your name, contact details, order and payment details, or the IP address that your device uses.

Processing means any action taken (normally electronically) with regard to your personal data, for example collection, structuring, storage and disclosure.

The website means Futuraskolan’s website available on <https://futuraskolan.se>.

## 2. WHO IS COVERED BY THIS PRIVACY NOTICE

This Privacy Notice covers:

- **Children** whose guardians have applied for our pre-schools and children who are attending our pre-schools,
- **Students** whose guardians have applied for our schools and students who are attending our schools,
- **Guardians** having the responsibility for the students and the children who have applied for or who are attending our schools and pre-schools.
- **Job applicants** who have applied for a position or otherwise shown interest in working at Futuraskolan, including **reference persons** to such job applicants,
- **Visitors** of our website and/or digital channels,
- **Individuals who contact us** or otherwise communicate with us, for example via our website or e-mail, and
- **Supplier and partner representatives**, i.e. who are contact persons or otherwise represent suppliers and partners that we work with.

### 3. RESPONSIBILITY FOR THE USE OF YOUR PERSONAL DATA

#### **Futuraskolan acts as a data controller**

Futuraskolan is responsible (data controller) for its own use of your personal data under this Privacy Notice, unless otherwise is stated.

### 4. PERSONAL DATA THAT WE COLLECT

We collect and use different categories of personal data. Which personal data that we actually collect and use depends on our interaction with the individual and his/her role, for example if the use of personal data relates to a guardian, student, child, visitor of our website or a supplier representative.

We collect and use the following categories of personal data:

- **Identity data**, which makes it possible to identify the individual, for example name, user identity, personal identity number and signature.
- **Incident data**, for example information about accidents, injuries and other incidents at our schools and pre-schools.
- **Skills data**, for example information about education, courses, qualifications and grades of students/children of our schools and pre-schools as well as job candidates.
- **Contact data**, which makes it possible to contact the individual, for example postal address, e-mail address and telephone number.
- **Login credentials** of guardians who use our school and pre-school web portals.
- **Health data**, for example information about allergies, food preferences, medical records, disabilities, disorders, injuries or other accidents of students/children attending our schools and pre-schools.
- **Behavioural data** relating to students and children who attend our schools and pre-schools, for example information about behaviour, reprimands by us, violations and incidents.
- **Criminal data** relating to students and children who attend our schools and pre-schools, including information on criminal convictions and offences as well as suspected criminal offences.
- **Attendance and absence data** of students/children attending our schools and pre-schools, for example information on time in school/pre-school, reasons for and period of absence.
- **Organisational information**, which relates to the professional role of our supplier or partner representatives, for example title, position and the company or organisation that the individual works for.
- **Performance and educational data** of students/children attending our schools and pre-schools, for example information on class, group or division to which the student/child belong, goals, performance, fulfilment of goals, grades, evaluations, development, progress and other feedback.

- **Test data** of job applicants, for example results from personality and aptitude tests, including date and type of test.
- **Communication** with us, for example content in email, submitted forms and other responses.
- **Payment data** relating to guardians' payment of pre-school and fritids (after school care) fees, including amount paid, expenses and bank details and where relevant (and on the guardians' initiative) income of guardian's to calculate pre-school and fritids fees.
- **Financial data** of job candidates collected – where deemed necessary and adequate – in connection with background screenings, including information on debts, payment defaults and income details.
- **Technical information** about the device that you use when visiting our website or digital channels and when using these platforms, for example IP address, type of device, version of browser, location data and operating system.
- **User generated information** that is generated based on your activity and use of our and other external websites or digital channels, for example page visits, user preferences, interactions on websites and length of sessions.
- **Demographic data** concerning information on sex, language, civil status, family circumstances, citizenship and age.
- **Photo and video material** which includes photographs and video footages (for example from CCTV cameras which will not record any audio).

## 5. SOURCES FROM WHICH WE COLLECT PERSONAL DATA

The personal data that we collect is collected from:

- **Yourself** when you provide your personal data to us, for example via our website, when you as a guardian register a child or student for one of our schools or preschools, contact or otherwise communicate with us, apply for a position at Futuraskolan, etc.
- **The child/student attending our schools and pre-schools**, for example personal data which is generated indirectly from the child/student during our care and supervision (such as information on behaviour, development and events).
- **The company or organisation** that you as a supplier or partner representative work for,
- **External persons** that provide your personal data to us, for example in connection with communication or an event or similar activity.
- **Companies performing pre-employment assessment tests and screening**, if you as a job applicant have applied for a position at Futuraskolan which involves certain background checks and assessment tests.
- **Recruitment agencies** which we collaborate with in certain recruitment processes.
- **Reference persons** as part of obtaining references from those individuals who you as a job applicant has named as your reference persons.

- **Authorities, including municipalities,** for example information on payments and grades for administration purposes if a student has moved from one school to another.
- **Public sources, for example SPAR,** to ensure that information on guardians, students and children are correct and up to date.

## 6. OUR USE OF PERSONAL DATA

We use the personal data that we collect for various purposes depending on the role of the individual and how he/she has interacted with us. All purposes for our use of personal data stated below may therefore not apply to you or the child or student who are attending our schools and pre-schools.

In summary, we use personal data mainly for the following purposes:

- **Students and children attending our schools and pre-schools:**
  - Receive and manage registrations to start at our schools and pre-schools.
  - Provide and manage the education and schooling, including pre-school education.
  - Ensure student and child health.
- **Guardians:**
  - Receive and manage registrations to start at our schools and pre-schools.
  - Communicate with guardians, including keeping guardians up to date on news, changes and the performance of the students/children.
- **Job applicants:**
  - Evaluate job candidates and manage the recruitment process.
- **Supplier and partner representatives:**
  - Manage the business relationship and communicate with our suppliers and partners.
- **Website visitors:**
  - Manage our website and allow you to browse it and use its features.

To read more about the categories of personal data, purposes and legal bases that we rely on for our use of personal data and for how long personal data is stored in relation to each purpose, please see our [detailed information on our use of personal data](#).

## 7. TRANSFERS OF PERSONAL DATA

### Transfers of personal data to other data controllers

To read more about for which purposes and which categories of personal data we share with recipients and which legal basis we rely on for sharing personal data, please see our [detailed information on our use of personal data](#). The recipient is responsible (controller) for its own collection and use of personal data, unless otherwise is stated.

### Joint controllership with Facebook

To provide you with relevant offers, marketing and communication about us, our businesses and services on our website and on our other digital channels, we share personal data about you (such as IP address, web browser, user behaviour and how you have navigated on our website) with Meta Platforms Ireland Limited (Facebook). Such disclosure is based on your provided consent (Article 6.1 (a) GDPR) when accepting cookies and similar technologies for the same purpose on our website or other digital channels.

When automatically sharing personal data with Facebook by using cookies and similar technology we act, where applicable, as joint controllers for the collection and transfer of your personal data. We and Facebook are, however, sole and separate controllers for the subsequent processing of your personal data.

We have entered into an arrangement with Facebook that describes which role and responsibility that we and Facebook, respectively, have when using your personal data. You have the right to obtain the essence of such arrangement (see reference in below section). Information on Facebook's use of your personal data and how you may exercise your rights towards Facebook can be found in their [Data Policy](#).

We have entered into a [Controller Addendum](#) with Facebook to establish our responsibilities and roles with regard to the use of your personal data for which we and Facebook act as joint controllers.

#### **Transfers of personal data to service providers**

We will transfer personal data to recipients that provide services to us and that need access to personal data to provide such services. These service providers provide *inter alia* IT services (for example business office tools and services relating to IT infrastructure/hosting and support) as well as analytics, performance and communication services. Where the service providers process personal data on our behalf, they act as processors for us, and we are responsible for the processing of the personal data. They must not use the personal data for their own purposes and are contractually and legally obligated to protect it.

#### **Transfers of personal data to third countries outside the EU/EEA**

We use service providers, which also may use sub-contractors, that are established in third countries outside of the EU/EEA and which will have access to the personal data. To ensure an essentially equivalent level of protection for the personal data when transferred (or otherwise made available) to service providers in third countries outside of the EU/EEA which do not provide an adequate level of protection, we use the EU Commission's adopted [standard contractual clauses for international transfers](#) according to decision 2021/914 and implement – in light of the law and practices of the third country – necessary supplementary measures. Supplementary measures include technical, contractual and organisational measures that are necessary to bring the level of protection of the personal data transferred to an essentially equivalent level of protection.

By way of example, personal data of students may, to a limited extent, be transferred to *inter alia* the U.S. and Australia within the scope of our international pedagogical programmes.

For more information on to which third countries personal data is transferred and the safeguards that we have taken to protect personal data, please contact us by emailing [dpo@futuraskolan.se](mailto:dpo@futuraskolan.se).

#### **YOUR RIGHTS**

Individuals have certain rights in relation to your personal data. If you, or the child or student (to whom you are a guardian) wish to exercise these rights, please contact us by e-mailing [dpo@futuraskolan.se](mailto:dpo@futuraskolan.se). We normally respond to requests within one month following the date we received it. However, if the request is complicated or if you have submitted several requests, we may need additional time to handle such requests. We will in such a case notify you and the reasons for the delay. If we cannot, wholly or in part, comply with the request we will notify you and the reasons for this.

When you submit a request to exercise any right under the GDPR, we need to confirm your identity (and potentially the identity of the child or student if you as a guardian wish to exercise the rights of such individual where applicable) to ensure that you are not somebody else than who you claim to be. This to avoid that we for example disclose personal data to an unauthorised person or in error delete personal data. If we do not have sufficient information to confirm the identity, we can request that you provide supplementary information about yourself (and/or the child or student) needed to confirm the identity. We only request such information that is reasonable and necessary. The time to respond to the request starts when we have confirmed the identity.

Below we describe the rights that individuals under this Privacy Notice have in relation to their personal data. For further information on the rights, please see the website of your supervisory authority. In Sweden, the supervisory authority is the [Swedish Authority for Privacy Protection \(IMY\)](#).

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

You have the right to request confirmation from us as to whether we handle your personal data and in such a case receive a copy of your personal data together with additional information on our use of your personal data. Please note that the right to a copy of your personal data may not adversely affect the rights of others.

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

You have the right to request that we rectify or supplement your personal data if you consider that your personal data is incorrect, incomplete, or misleading.

#### **Right to withdraw your consent (Article 7 of the GDPR)**

Where we rely on your consent for the processing of your personal data under this Privacy Notice, you have the right to at any time withdraw such consent. When you have withdrawn your consent, we will not continue to use your personal data based on the consent previously provided.

#### **Right to erasure (Article 17 of the GDPR)**

You have in certain situations the right to request erasure of your personal data (“the right to be forgotten”). Accordingly, the right to erasure is subject to certain conditions. By way of example, the right to erasure applies if we keep your personal data longer than what is needed for the purposes for which it was collected, or if you object to our use of your personal data and we cannot show a compelling reason to further use your personal data notwithstanding your objection.

There are also several exemptions from the right to erasure, including if we are obligated under law to keep your personal data or if the personal data is needed to exercise, manage, and defend legal claims.

### **Right to object to our use of personal data (Article 21 of the GDPR)**

In certain situations, you have the right to object to our use of your personal data. Where we rely on our or another's legitimate interest for the use of your personal data, or where the use of your personal data is necessary for the performance of a task carried out in the public interest, you have the right to object to the use for reasons which relate to your particular situation. You can see below in relation to each purpose for which we collect, use and share your personal data as a result of our or another's legitimate interest or tasks carried out in the public interest. If we cannot show a compelling reason to continue to use your personal data, we will stop using your personal data for the relevant purpose.

You always have an unconditional right to object to our use of your personal data for direct marketing purposes.

### **Right to request restriction of your personal data (Article 18 of the GDPR)**

In certain situations, you have the right to request restriction of your personal data which means that you can, at least for a certain period, stop us from using your personal data. The right to request restriction of your personal data applies if you consider that the personal data about you is incorrect and during the period that we verify this, if the use of your personal data is unlawful and if you wish that we continue to store your personal data instead of deleting the personal data, and if we no longer need your personal data for the purposes for which we collected the personal data, but you need the personal data to manage, defend or exercise legal claims and rights.

You also have the right to request restriction of your personal data if you have objected to our use of your personal data and during the period, we verify whether we have a compelling reason to continue to use your personal data.

If the use of your personal data has been restricted, we are normally only allowed to store your personal data and not use them for any other purpose than to manage, defend or exercise legal claims and rights.

### **Right to copy of certain personal data and transfer of the personal data to an external recipient (data portability) (Article 20 of the GDPR)**

The right to data portability means that you have a right to receive a copy, in a structured commonly used format, of the personal data that you yourself has provided to us. Moreover, where it is technically feasible, you also have the right to request that the copy of your personal data is transferred directly to an external recipient.

The right to data portability under this Privacy Notice only applies, however, to personal data that we handle for the performance of an agreement with you (Article 6.1 (b) of the GDPR) or based on your provided consent (Article 6.1 (a) of the GDPR). We have below in relation to each purpose for which we collect, use and share your personal data outlined which legal bases we rely on for the use of your personal data.

### **Right to lodge a complaint**

You have the right to lodge a complaint with your supervisory authority. In Sweden, the supervisory authority is [IMY](#).

### **Automated individual decision-making**

We do not carry out any automated individual decision-making which have legal effects or similar significant effects on you.

#### **8. UPDATES TO THIS PRIVACY NOTICE**

We regularly update this Privacy Notice. Our use of personal data may change, for example we may collect personal data for new purposes, collect additional categories of personal data or share personal data with other recipients than outlined in this Privacy Notice. If our use of personal data changes, we will update this Privacy Notice to reflect such changes. At the top of this page, you can see when this Privacy Notice was last updated. If we make material changes that are not only editorial to this Privacy Notice, we will notify you of any such changes and what they mean to you in advance.

#### **9. IF YOU HAVE QUESTIONS**

If you have questions about this Privacy Notice, our use of your personal data or if you wish to exercise your rights, please contact us at:

Data controller

**Futuraskolan**

Company reg. No.: 556609-5047

Kontaktuppgifter

Adress: Erik Dahlbergsgatan 58-62

E-post: [dpo@futuraskolan.se](mailto:dpo@futuraskolan.se)

Data Protection Officer: [dpo@futuraskolan.se](mailto:dpo@futuraskolan.se)



# Detailed information regarding the use of personal data

## OUR USE OF PERSONAL DATA

### Students, children and guardians

*Receive and manage applications for our schools and pre-schools*

*Examples of what we do:* We use personal data of our students, children and their guardians to:

- receive and manage applications to start at one of our schools or preschools, which for example includes to administer queues and communicating with the guardian, student or child, and
- make decisions to accept or, where applicable, decline applications.

*Categories of personal data:*

*Students and children*

- Identity data
- Contact data
- Demographic data

*Guardians*

- Identity data
- Contact data
- Demographic data

*Legal basis:*

*Task carried out in the public interest (Article 6.1 (e) of the GDPR).* The use of personal data is necessary to carry out tasks in the public interest, which includes to receive and manage applications for our schools and pre-schools.

*Storage period:* Personal data is stored for this purpose until the application has been accepted or declined.

*Calculate and manage pre-school and fritids (after school care) fees*

*Examples of what we do:* We use personal data of our students, children and their guardians to:

- administer, calculate and issue pre-school and fritids fees (where applicable), for example based on the child's or student's municipality of residency, number of children in the household, income of the household (where relevant) etc., and
- manage payments and, where necessary, be in contact with debt collection companies due to default of payment.

*Categories of personal data:*

*Students and children*

- Identity data
- Demographic data

*Guardians*

- Identity data
- Demographic data
- Payment data

*Legal basis:*

*Task carried out in the public interest (Article 6.1 (e) of the GDPR).* The use of personal data is necessary to carry out tasks in the public interest, which includes to calculate and manage pre-school and fritids fees.

*Performance of contract (Article 6.1 (b) of the GDPR).* If you are a guardian, the use of your personal data is necessary to fulfil the contract with you regarding the pre-school and fritids activities.

- Income details

*Storage period:* Personal data is stored for this purpose until the student/child quits school/pre-school.

## Students and children

*Provide and manage the education and schooling, including pre-school education*

*Examples of what we do:* We use personal data of our students and children to:

- provide education to the students and pre-school related activities to children (where applicable), including for example to set up classes, carry out lessons/activities, carry out trips (necessary for the education), grading students, register attendance and absence, offer workplace trainings and communicate with the students,
- take actions for pedagogic purposes, such as giving feedback on performed tasks and behaviour, assess skills and abilities, conduct surveys and performance reviews as well as offer needed support/education to students and children, and
- take corrective, disciplinary and other measures as necessary under the Swedish School Act (2010:800) to ensure a safe school and pre-school environment.

*Categories of personal data:*

- Identity data
- Contact data
- Attendance and absence data
- Skills data
- Performance and educational data
- Photo and video material
- Demographic data
- Identity and contact data of guardians
- Health data
- Behavioural data
- Criminal data

*Legal basis:*

*Task carried out in the public interest (Article 6.1 (e) of the GDPR).* The use of personal data is necessary to carry out tasks in the public interest, which includes to provide and manage the education and schooling, including pre-school education.

*Legal exemption:*

*Reasons of substantial public interest (Article 9.2 (g) of the GDPR).* The use of health data is necessary for reasons of substantial public interest, which includes to provide and manage the education and schooling, including pre-school education.

Potential criminal data will be used in accordance with Chapter 26a, Paragraph 6 of the Swedish School Act (2010:800).

*Storage period:* Personal data is stored for this purpose until the student/child quits school/pre-school. Moreover, certain documents (such as grades, supporting documents, certain tests and documented disciplinary measures etc.) are retained as long as required under law.

*Manage and provide access to our education web portal*

*Examples of what we do:* We use personal data of our students to:

- set up and manage student login accounts to our education web portal, and
- allow students access to our education web portal as part providing education, including for example to carry out online classes, hand out and obtain assignments, allow students to view their grades, register attendance and absence, etc.

*Categories of personal data:*

- Identity data
- Contact data
- Attendance and absence data
- Skills data
- Performance and educational data
- Photo and video material
- Health data
- Login credentials

*Legal basis:*

*Task carried out in the public interest (Article 6.1 (e) of the GDPR).* The use of personal data is necessary to carry out tasks in the public interest, which includes to provide and manage the education and schooling.

*Legal exemption:*

*Reasons of substantial public interest (Article 9.2 (g) of the GDPR).* The use of health data is necessary for reasons of substantial public interest, which includes to provide and manage the education and schooling.

*Storage period:* Personal data is stored for this purpose until the student/child quits school/pre-school. Moreover, certain documents (such as grades, supporting documents, certain tests etc.) are retained as long as required under law.

*Ensure student and child health*

*Examples of what we do:* We use personal data of our students and children to:

- provide access to pedagogues, school nurses, psychologists, school physicians etc.,
- manage, document and follow up on allergies, special diets, medical needs, accidents, discrimination allegations, abusive treatment, etc.,
- take necessary preventive measures as part of our systematic quality work, to ensure a good school and pre-school environment for the benefit of the students' and children's health, for example by providing learning and development support and health surveys, and
- fulfil other obligations under *inter alia* the Swedish School Act (2010:800), such as ensuring good work/study environment for the students including other safety and health aspects, including follow up on the business.

*Categories of personal data:*

- Identity data
- Contact data
- Attendance and absence data
- Skills data
- Performance and educational data
- Video material
- Demographic data
- Identity and contact data of guardians
- Behavioural data
- Health data

*Legal basis:*

*Task carried out in the public interest (Article 6.1 (e) of the GDPR).* The use of personal data is necessary to carry out tasks in the public interest, which includes to ensure student and child health.

*Legal exemption:*

*Reasons of substantial public interest (Article 9.2 (g) of the GDPR).* The use of health data is necessary for reasons of substantial public interest, which includes to ensure student and child health.

*Storage period:* Personal data is stored for this purpose for a period of two (2) months from the date of the recording, unless a longer period is required to establish, exercise or defend legal claims.

*Take and publish school and pre-school photos*

*Examples of what we do:* We use personal data of our students and children to:

- take and publish school and pre-school photos on for example Futuraskolan's website, social media platforms and in physical form.

Please note that it is voluntary to participate in school photos and we will always ask for the consent of the guardian before taking any photos of students and children.

*Categories of personal data:*

- Identity data
- Audio and video material
- Performance and educational data

*Legal basis:*

*Consent (Article 6.1 (a) of the GDPR).* The use of personal data is only carried out based on the consent of the guardian.

*Storage period:* School catalogues are only available in physical form and stored until further notice. Other photos in digital form used for school work are stored for a maximum period of one (1) year from when the photo was taken. Photos published on our website or other digital channels are stored until further notice, or until the guardian revokes the consent.

*Planning and carrying out activities, including excursions and trips (not required for education)*

*Examples of what we do:* We use personal data of our students and children to:

- offer and carry out non-compulsory school and pre-school trips as well as excursions or similar trips.

*Categories of personal data:*

- Identity data
- Contact data
- Attendance and absence data
- Identity and contact data of guardians
- Health data

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of personal data is necessary to satisfy our legitimate interest in carrying out the relevant excursions, trips and similar activities.

It is our assessment that our legitimate interest outweighs the student's/child's interest of not having his/her personal data processed for this purpose, especially since we otherwise would not be able to carry out non-compulsory activities and since it is voluntary.

*Legal exemption:*

*Explicit consent (Article 9.2 (a) of the GDPR).* Health data (information on food preferences and allergies) will only be used based on the consent of the guardian.

*Storage period:* Personal data is stored for this purpose until the relevant activity has ended.

*Ensure a safe school, pre-school and study environment*

*Examples of what we do:* We use personal data of our students and children to:

- operate CCTV cameras in connection to our schools and pre-schools to prevent crimes and other misconduct,
- ensure network and information security, e.g. by preventing unauthorised access to Futuraskolan's IT systems, and
- conduct compliance monitoring of policies, guidelines and routines.

*We provide clear information on signs where CCTV cameras are operated by us in connection with our facilities.*

**Categories of personal data:**

- Identity data
- Contact data
- User generated information
- Incident data
- Login credentials
- Video materials
- Behavioural data
- Criminal data

**Legal basis:**

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of personal data is necessary to satisfy our legitimate interest in ensuring a safe school, pre-school and study environment.

It is our assessment that our legitimate interest outweighs the student's/child's interest of not having his/her personal data processed for this purpose, especially since the processing is carried out to protect these individuals.

Potential criminal data will be used in accordance with Chapter 26a, Paragraph 6 of the Swedish School Act (2010:800) as well as, where necessary, to establish, exercise and defend legal claims (Paragraph 5.1 of the Swedish Data Protection Ordinance (2018:219)).

**Storage period:** CCTV recordings are stored no longer than 72 hours, unless needed to establish, exercise or defend a legal claim. Personal data in logs are stored for incident handling for a maximum period of six (6) months calculated from the date of the logging event.

## **Guardians**

*Communicate with guardians, including keeping guardians updated on news, changes, student's/child's performance, etc. and for emergency contacts*

**Examples of what we do:** We use personal data of you as a guardian to:

- communicate with you on relevant news, changes and the student's or child's development, performance, education and/or well-being as well due to emergency situations, and
- manage your login account to our school/pre-school portal.

**Categories of personal data:**

- Identity data
- Contact data
- Login credentials

**Legal basis:**

*Task carried out in the public interest (Article 6.1 (e) of the GDPR).* The use of personal data is necessary to carry out tasks in the public interest, which includes communicating with you about the student/child.

**Storage period:** Personal data is stored for this purpose until the student/child quits school/pre-school or earlier if no longer necessary for the purpose. Personal data in communication is stored up to 12 months from the last communication with you.

## **School and pre-school visitors**

*Ensure a safe school, pre-school and study environment*

**Examples of what we do:** We use personal data of you as a visitor of our schools and pre-schools to:

- operate CCTV cameras in connection to our schools and pre-schools to prevent crimes and other misconduct.

*We provide clear information on signs where CCTV cameras are operated by us in connection with our facilities.*

*Categories of personal data:*

- Identity data
- Video materials

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of personal data is necessary to satisfy our legitimate interest in ensuring a safe school, pre-school and study environment.

It is our assessment that our legitimate interest outweighs your interest of not having his/her personal data processed for this purpose, especially since we otherwise would not be able to take these measures to ensure a safe school and pre-school environment.

Potential criminal data will only be used where necessary to establish, exercise and defend legal claims (Paragraph 5.1 of the Swedish Data Protection Ordinance (2018:219)).

*Storage period:* CCTV recordings are stored no longer than 72 hours, unless needed to establish, exercise or defend a legal claim.

## **Representatives of suppliers and partners**

### *Manage the business relationship with suppliers and partners*

*Examples of what we do:* If you are a representative of a supplier or a partner to us, we use your personal data to:

- manage our business relationship with the company or organisation that you work for or represent, for example to register you as a contact person, manage invoices and to communicate with you.

*Categories of personal data:*

- Contact data
- Identity data
- Organisational information
- Communication

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest of managing the business relationship with our suppliers and partners.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to manage the relationship with the company or organisation that you represent.

*Performance of contract (Article 6.1 (b) of the GDPR).* If you are a sole trader, the use of your personal data is necessary to fulfil the contract with you.

*Storage period:* Personal data is stored for this purpose as long as there is an active business relationship with the company or organisation that you work for or represent.

## Website visitors

### *Respond to questions and requests*

*Examples of what we do:* We use your personal data as a website visitor to:

- respond to questions when you contact us, and
- communicate with you and others for the same purpose.

#### *Categories of personal data:*

- Contact data
- Identity data
- Communication

#### *Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest in communicating with you.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since the processing usually takes place on your initiative and to your benefit.

*Storage period:* Personal data is stored for this purpose for a period of 12 months calculated from the date we replied to the questions or requests.

### *Provide you with relevant marketing and tailored content*

*Examples of what we do:* If you visit our website and/or digital channels, we collect your personal data by using cookies and similar technologies to:

- provide with marketing and other tailored content which we believe are of interest to you, for example based on your browsing behaviour and websites visited.

*We will only use your personal data for the above purpose if you have provided us with your consent.*

#### *Categories of personal data:*

- Technical information
- User generated information

#### *Legal basis:*

*Consent (Article 6.1 (a) of the GDPR).* The use of your personal data relies on the consent that you provide by accepting the use of cookies and similar technologies for the same purpose.

*Storage period:* Personal data is stored for this purpose during the period as stated in our cookie policy.

### *Ensure technical functionality and security in our IT systems and services*

*Examples of what we do:* We use your personal data to:

- ensure necessary technical functionality and security of our IT systems and services, for example for spam prevention purposes. For this purpose, we will use cookies and other technologies on our

website and digital channels.

*Categories of personal data:*

Relevant categories of personal data that are stated in relation to the purposes of the use of personal data.

*Legal basis:*

*Consent (Article 6.1 (a) of the GDPR).* The use of your personal data relies on the consent that you provide by accepting the use of cookies and similar technologies for the same purpose.

*Storage period:* Personal data is stored for this purpose during the period as stated in our cookie policy.

## Job candidates

### *Administration of recruitment process*

*Examples of what we do:* If you apply for a job at Futuraskolan we use your personal data to:

- assess the applicant's skills, qualifications and interests against our career opportunities or the job the applicant has applied for,
- take measures to verify that the information provided is true and accurate, for example by means of reference checks, and
- communicate with candidates as part of the recruitment process.

*Categories of personal data:*

- Identity data
- Contact data
- Photo of you
- Performance and educational data
- Demographic data
- Skills data

*Legal basis:*

*Performance of contract (Article 6.1 (b) of the GDPR).* The processing is necessary to take steps at your request prior to entering into a potential employment agreement.

*Legitimate interest (Article 6.1 (f) of the GDPR).* To the extent that you have not requested a specific measure, the processing is necessary in order to satisfy our legitimate interest in managing the recruitment process.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to assess your application.

*Storage period:* Personal data is stored for this purpose during the recruitment process and for a period of 26 months thereafter for the purpose of satisfying our legitimate interest of managing and defending legal claims.

### *Review and assessment of job candidate's personality and abilities*

*Examples of what we do:* If you apply for a job at Futuraskolan we use your personal data to:

- conduct personality and ability tests to assess and evaluate you for applied position.



*Categories of personal data:*

- Identity data
- Contact data
- Test data

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest in carrying out personality and ability tests.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to assess you as a candidate.

*Storage period:* Personal data is stored for this purpose during the recruitment process and for a period of 26 months thereafter for the purpose of satisfying our legitimate interest of managing and defending legal claims.

*Fulfil legal obligations in connection with the recruitment process*

*Examples of what we do:* If you apply for a job at Futuraskolan we use your personal data, where necessary, to:

- carry out work permit checks, including storage of such documentation, and
- conduct background checks for certain employees as required by law.

*Please note that we may ask for a physical copy or your criminal record as part of fulfilling our legal obligations. However, we will never save such a copy digitally and following the check we will return the physical copy to you or safely destroy it.*

*Categories of personal data:*

- Identity data
- Organisational data (including work permit)

*Legal basis:*

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* The use of your personal data is necessary to fulfil our legal obligations.

*Storage period:* Personal data is stored for this purpose during the recruitment process and for a period of 26 months thereafter for the purpose of satisfying our legitimate interest of managing and defending legal claims. Moreover, if your application results in an employment, we will store potential work permits at least 12 months from the end of your employment in accordance with law.

*Record keeping and communication of career opportunities (future recruitment)*

*Examples of what we do:* If you apply for a job at Futuraskolan we use your personal data to:

- keep applicant records for future hiring processes,
- communicate with you and provide information regarding potential career opportunities that suit your profile.

*Please note that we will only store your personal data for future recruitment opportunities if you have approved to this.*

*Categories of personal data:*

*Legal basis:*

- Identity data
- Contact data
- Photo of you
- Performance and educational data
- Demographic data
- Skills data

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest in storing your personal data for future recruitment opportunities.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since you have approved this.

*Storage period:* Personal data is stored for a period of 12 months following the end of the recruitment process for the position that you have applied for and for each period of 12 months thereafter for which you have given your approval to your personal data being stored.

## Reference person

*Verify information and receive input on job candidate from reference person*

*Examples of what we do:* If you have been named a reference person by one of our job applicants, we use your personal data to:

- communicate with you and collect feedback/input on the job candidate.

*Categories of personal data:*

- Identity data
- Contact data
- Performance and educational data

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest in obtaining input for reference persons.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since we otherwise would not be able to fully assess the job applicant in question.

*Storage period:* Personal data is stored for this purpose during the recruitment process and for a period of 26 months thereafter for the purpose of satisfying our legitimate interest of managing and defending legal claims.

## All individuals

*Follow-up and evaluate the business and our activities*

*Examples of what we do:* We use your personal data to:

- follow-up and evaluate the business and our activities, including recruitment processes, for example to compile reports with statistics on an aggregated level (i.e. the information cannot be related to you and therefore does not constitute personal data) to better understand how our business performs,

*Categories of personal data:*

*All personal data necessary for the purpose.*

*Legal basis:*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our

legitimate interest of following-up and evaluating the business and our activities.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose, especially since the reports and statistics will be on an aggregated level (and not include your personal data).

*Storage period:* Personal data is stored for this purpose for a period of 30 months calculated from the date of collection. Statistics and reports on an aggregated level which do not include any personal data are stored until further notice.

### *Fulfil legal obligations*

*Examples of what we do:* We will use, where needed, your personal data to:

- fulfil our legal obligations, for example to fulfil our accounting and data protection obligations.

*Categories of personal data:*

*Legal basis:*

*Relevant categories of personal data that are necessary to fulfil the specific legal obligation.*

*Fulfil legal obligation (Article 6.1 (c) of the GDPR).* The use of your personal data is necessary to fulfil our legal obligations.

*Storage period:* Personal data is stored for such period that is necessary for us to fulfil the specific legal obligation. By way of example, personal data necessary to fulfil book-keeping obligations will be stored for a minimum period of seven (7) years from the end of the relevant calendar year.

### *Establish, exercise and defend legal claims and rights*

*Examples of what we do:* We use, when needed, your personal data to:

- establish, exercise and defend legal claims and rights, for example in connection with a dispute or court proceeding.

*Categories of personal data:*

*Legal basis:*

*Relevant categories of personal data that are necessary to establish, exercise and defend the legal claim or right in the specific case.*

*Legitimate interest (Article 6.1 (f) of the GDPR).* The use of your personal data is necessary to satisfy our legitimate interest of establishing, exercising and defending legal claims and rights.

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose.

*Storage period:* Personal data is stored for this purpose as long as there is an active relationship and for a period of up to ten (10) years thereafter.

### *Manage and protect IT systems and services*

*Examples of what we do:* We use your personal data to:

- ensure necessary technical functionality and security of our IT systems and services, for example in connection with access controls and for security logging, error handling, and backups.

*Categories of personal data:*

*Relevant categories of personal data that are stated in relation to the purposes of the use of personal data.*

*Legal basis:*

*Legitimate interest (Article 6.1 f) of the GDPR). The use of your personal data is necessary to satisfy our legitimate interest of ensuring technical functionality and security of our IT systems and services. It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose.*

*Storage period:* Personal data is stored for the same period as stated in relation to each relevant purpose of the processing.

Personal data in logs is retained in order to satisfy our legitimate interest in troubleshooting and incident management for a period of 13 months from the date and time of the log entry. Personal data in backups are stored for a period of 13 months from the date of the backup.

## WHEN WE SHARE PERSONAL DATA

### Students and children

Purpose:	Recipients:	Categories of personal data:	Legal basis for the transfer:
Fulfil legal obligations as part of conducting our business as a school (for example sharing data with "Skolhälsan")	<ul style="list-style-type: none"> <li>Public authorities</li> <li>Occupational health services</li> </ul>	All personal data necessary to fulfil each legal obligation/request	Task carried out in the public interest (Article 6.1 (e) of the GDPR). The use of personal data is necessary to carry out tasks in the public interest.  Legal exemption:  Reasons of substantial public interest (Article 9.2 (g) of the GDPR). The use of health data is necessary for reasons of substantial public interest, which includes to provide and manage the education and schooling, including pre-school education.
Fulfil legal obligations related to student's change of school, including other statistics and reports	<ul style="list-style-type: none"> <li>Educational institutions</li> <li>Public authorities (for example SCB)</li> </ul>	<ul style="list-style-type: none"> <li>Identity data</li> <li>Contact data</li> <li>Performance and educational data</li> <li>Demographic data</li> </ul>	Task carried out in the public interest (Article 6.1 (e) of the GDPR). The use of personal data is necessary to carry out tasks in the public interest.

### All individuals

Purpose:	Recipients:	Categories of personal data:	Legal basis for the transfer:
Manage sales, investments, re-organisations and restructuring of the business	<ul style="list-style-type: none"> <li>Buyers</li> <li>Potential buyers</li> <li>External advisors</li> <li>Public authorities</li> </ul>	Relevant categories of personal data that are necessary to manage the sale, investment, reorganisation or restructuring of the business.	Legitimate interest (Article 6.1 (f) of the GDPR). The use of your personal data is necessary to satisfy our legitimate interest in managing the sale, investment, reorganisation and restructuring of the business. It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose if the buyer or investor carries out the same or similar type of business.
Fulfil legal obligations	<ul style="list-style-type: none"> <li>Public authorities</li> <li>Law enforcement</li> <li>Trade unions</li> </ul>	Relevant categories of personal data that are necessary to fulfil the specific legal obligation.	Fulfil legal obligation (Article 6.1 (c) of the GDPR). The use of your personal data is necessary to fulfil our legal obligations.

	<ul style="list-style-type: none"> <li>External auditors</li> </ul>		
<i>Manage, defend and exercise legal claims and rights</i>	<ul style="list-style-type: none"> <li>Opposing party</li> <li>External advisors</li> <li>Public authorities</li> <li>Law enforcement</li> <li>Trade unions</li> </ul>	Relevant categories of personal data that are necessary to manage, defend or exercise the legal claim or right in the specific case.	<i>Legitimate interest (Article 6.1 f) of the GDPR).</i> The use of your personal data is necessary to satisfy our legitimate interest of managing, defending and exercising legal claims and rights. It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose.
<i>Respond to legal requests</i>	<ul style="list-style-type: none"> <li>Public authorities</li> <li>Law enforcement</li> </ul>	Relevant categories of personal data that are necessary to respond to the legal request in the specific case.	<i>Legitimate interest (Article 6.1 f) of the GDPR).</i> If there is no explicit legal obligation for us to respond to the legal request, but we consider that we and the public authority have a legitimate interest in responding to the legal request, we rely on this legitimate interest for the use of your personal data for this purpose. This provided that we make the assessment that the legitimate interest in the specific case, considering the circumstances and context of the legal request, outweighs your interest of not having your personal data processed for this purpose.
<i>Provide relevant marketing and communication</i>	<ul style="list-style-type: none"> <li>Third party marketing partners (for example Google)</li> </ul>	<ul style="list-style-type: none"> <li>Technical information</li> <li>User generated information</li> </ul>	<i>Consent (Article 6.1 (a) of the GDPR).</i> The use of your personal data relies on the consent that you provide by accepting the use of cookies and similar technologies for the same purpose.
<i>Manage and protect IT systems and services, for example spam prevention on our website and digital channels</i>	<ul style="list-style-type: none"> <li>Third party cookie providers (for example Google)</li> </ul>	<ul style="list-style-type: none"> <li>Technical information</li> <li>User generated information</li> </ul>	<i>Consent (Article 6.1 (a) of the GDPR).</i> The use of your personal data relies on the consent that you provide by accepting the use of cookies and similar technologies for the same purpose.