

INTEGRITY AND PERSONAL DATA POLICY

Adopted on 08/05/2018

Processing of personal data at Nordic Welfare Centre

Background

Nordic Welfare Centre is a non-profit public institution under the Nordic Council of Ministers. Nordic Welfare Centre is not covered by the Freedom of the Press Act or the Public Access to Information and Secrecy Act. The external personal data we handle is about applications for events, orders and mail-outs of publications, subscriptions and newsletters. Personal data is never given to any third party.

On 25 May 2018, the GDPR (General Data Protection Regulation) comes into force in Sweden, Finland and within the EU. In Sweden, this replaces the Personal Data Act (PuL).

Nordic Welfare Centre has reviewed and systematised its routines for how we work with personal data, in order to ensure we meet the GDPR requirements.

This document, plus appendices, describes Nordic Welfare Centre's data protection policy and how we work with data protection and personal data.

The term personal data means all types of information that can be linked to a living natural person. This can include personal identity number, name, address, photo and in some cases also sound recordings that are stored electronically.

Handling personal data

Nordic Welfare Centre follows GDPR and the associated legislation applicable in Sweden and Finland, for the handling of personal data.

In order for Nordic Welfare Centre to be able to comply with the regulations:

- we do not collect personal data other than what is required for the business and what we are legally permitted to obtain
- we store the necessary external personal data in a communal contact register
- there is a nominated officer for each instance of personal data processing
- we store personal data in a secure way in accordance with the applicable IT policy.

We hold a register of all our personal data processing instances. The register shows who at Nordic Welfare Centre is the register officer, who is the data protection assistant (when personal data processing occurs outside Nordic Welfare Centre), a description of data processing, why we compile and store personal data, time limits for the storage of personal data, deletion routines and what legal basis the personal data processing relies on.

Data protection organisation

The director nominates a data protection representative who works as an internal auditor in respect of processing personal data at Nordic Welfare Centre and who also has contact with the Swedish Data Protection Authority, Datainspektionen.

The director delegates responsibility to a register officer for each personal data processing instance.

The IT officer is responsible for creating an appropriate IT policy for Nordic Welfare Centre that is fit for purpose.

Nordic Welfare Centre has contracts with external data protection assistants who are hired to ensure that they follow the data protection regulations and applicable legislation.

How do we use the collected personal data?

For specific, expressly stated and legitimate purposes. This means that information collected for a specifically reported objective may not be used for an entirely different purpose.

We collect personal data for mail-outs, invitations, staff appointments, salary management, details for the tax authorities and Swedish Social Insurance Agency, staff administration and for news mail-outs to journalists and followers.

Guidelines and routines

How we collect personal data and handle it

We collect our personal data through applications for events or orders for the newsletter and other publications. For the personal data that requires approval, this is given in conjunction with the application/order. Nordic Welfare Centre's register of personal data processing instances states how and on what legal basis the data is collected and how approval is given (where necessary). It also states who is responsible for personal data processing. No-one may collect personal data without the authorisation of that data processing officer.

Storage

Where the collected data is stored will depend on the rules for each register. The same applies to how long the data can be stored. Factors which affect the storage time include laws and regulations, such as the Swedish Annual Accounts Act. Nordic Welfare Centre never stores personal data longer than necessary. The storage time for each personal data processing instance is stated in the register of personal data processing instances. It also shows whether there is automatic deletion of data after a certain time.

The right to be forgotten

Individuals have the right to access their data and have incorrect data deleted. They also have the right to rescind their approval for data collection and, if there is no legal obstacle, to have their data deleted.

Storage and security

All employees follow Nordic Welfare Centre's IT policy (signed at time of employment) and the security measures described therein.

For personal data assistants hired by Nordic Welfare Centre, storage and security is regulated in order to meet GDPR and applicable legislation in their contract.

Related documents:

- Register of personal data processing instances
- Nordic Welfare Centre's IT policy
- Decision on the data protection officer

- Decision on the register officer
- Contract with data protection assistants