

Personal Data Processing Policy

Table of contents

1	Introduction and purpose
2	Application and revision
3	Organization and responsibility
4	Concepts and abbreviations
5	Data treatment

1 INTRODUKTION AND PURPOSE

The purpose of this policy is to ensure that Swedlink Logistics AB handles personal data in accordance with the European Data Protection Regulation (GDPR). The policy covers all treatments where personal data are handled and encompasses both structured and unstructured data.

This policy is based on all our employees.

2 APPLICATION AND REVISION

The CEO is responsible for the processing of personal data following this policy.

The policy shall be determined by the CEO at least once a year and updated as necessary.

The CFO is responsible for keeping in the process of annual update of the policy as a result of new and changed regulations.

This policy applies to the company's customers, contractors, employees including the CEO and board

3 ORGANIZATION AND RESPONSIBILITY

The CEO has overall responsibility for the content of this policy and that it is implemented and enforced by the business. The CEO may delegate responsibility and implementation to the appropriate person at the company. The CEO has delegated implementation of this policy to the CFO.

All employees are responsible for acting in accordance with this policy and what it wants to ensure.

4 CONCEPTS AND ABBREVIATIONS

Begrepp	Betydelse
Personal Data	A personal data is any information that can be directly or indirectly attributed to a physical person who is in life.
Registered	The person to which a personal data refers, that is, the natural person who can be identified directly or indirectly through the personal data in a register.
Personal Data Processing	An action or combination of personal data actions - regardless of whether they are automated or not - such as collection, registration, organization and structuring.

5 PERSONAL DATA PROCESSING

- Each personal data processing should be based on the following principals:
 - According to the law
 - Purpose limitation
 - Minimizing of data
 - Correctness
 - Storage Minimizing
 - Integrity and confidentiality

- For the following treatments, eg email internally or Externally, the following applies in particular: no personal identification numbers or other sensitive personal data may be distributed via email
- Our data treatments are documented on a regular basis in the Treatment Registry
- Monitoring and evaluation of our handling of personal data shall be at least annually
- Any incidents regarding personal data we treat should be reported without delay to the CFO or CEO. Any of these shall report the incident to the Swedish Data Inspection Authority without unnecessary delay and no later than 72 hours, and otherwise take the necessary action as a result of the incident.
- Our requirements for managing personal data according to GDPR should always be ensured in procurement and development of IT solutions and services, and shall be part of the requirements specification