



## PRIVACY POLICY – ID06

### 1. INTRODUCTION

ID06 AB (“**ID06**”) is committed to safeguarding your personal privacy. This privacy policy explains how we collect and use your personal data in connection with the ID06 system. It also describes your rights in relation to us, and how they can be exercised.

The policy applies to individuals who:

- apply for or hold an ID06 card (or a student ID06 card) or have an ID06 account (Section 3.1);
- consent to their data being registered in the ID06 Competence Database (Section **Fel! Hittar inte referenskölla.**);
- are board members, CEOs or other representatives or designated contact persons for a User Company (Section 3.3);
- are affected by ID06 Company Report (Section **Fel! Hittar inte referenskölla.**);
- visit our website (Section 3.5); or
- otherwise come into contact with us, for example via customer services (Section 3.6).

It is important that you read our privacy policy before you use our services. If you have any questions about how your personal data are processed, please contact us via the contact details set out in section 8.

### 2. EXPLANATION OF TERMS

We use various terms in this privacy policy when we refer to particular operators and services. To make it easier for you to understand this policy we describe some of these terms, along with some terms that are used in data protection legislation, here:

**ID06 account** is the personal account in the ID06 system where you can log in to confirm your data for the ID06 card, activate your ID06 card, and access the data about you that is stored in the ID06 system.

**ID06 card** is the physical cards, or their mobile equivalents, used in the ID06 system.

**ID06 Company Report** is a service where User Companies who connect to the service are given the opportunity to access financial and other company-related information about other User Companies – or potential partners who can be expected to connect to the ID06 system – they are considering collaborating with. ID06 Company Report is included in the ID06 system.

**ID06 Competence Database** is a register of training certificates and qualifications that has been developed to make workplaces safer and more secure. Individuals have access to their own data and User Companies have access to data about their employees in the ID06 Competence Database. The ID06 Competence Database is included in the ID06 system.



**ID06 system** is the authorisation and information system developed to combat undeclared work and other financial crime and to promote healthy competition in the labour market.

**My ID06** is a storage service for electronic personnel registers within the ID06 system.

**Personal data** is any information which can be directly or indirectly (i.e. together with other data) linked to you, such as name, image, personal ID number, IP address, data concerning entry to and exit from the work place and completed qualifications.

**Processing** means any operation performed with your personal data, such as collection, registration, organisation, structuring, storage, adaptation, transfer and erasure.

**Student ID06 card** is a specific type of ID06 card issued by elevID06 AB that can be ordered by schools and colleges for higher vocational education with work placement that requires an ID06 card.

**User Company** is a company, government agency, association or other organisation who has joined the ID06 system.

### **3. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU AND WHY?**

This section describes the personal data we process about you, for what purposes and the legal basis for such processing, how long we keep the data and who we share the data with.

Processing of your personal data in connection with various activities is described under separate sub-headings.

#### **3.1 Holders of ID06 cards and ID06 accounts**

##### **3.1.1 General**

We process personal data about individuals who hold ID06 cards in order to deliver and administer the ID06 system. This includes (i) data which your employer or an accredited training company discloses to us, (ii) if you hold a Student ID06 card, data which your school or college discloses to us, (iii) data which you disclose to us yourself, (iv) data which you provide to us yourself, (iii) data generated when you use your ID06 account, and (v) data which we may obtain from partners and public authorities.

Data that is generated when you use your ID06 card are also processed by other participants in the ID06 system, for example User Companies. When such data are processed in the ID06 system, ID06 is the data processor for the User Company. Section 3.1.4 describes how your personal data are processed by the User Company in the ID06 system.

##### **3.1.2 Ordering of an ID06 card**

We collect the following data about you when a User Company orders an ID06 card, or if a school or college orders a student ID06 card, for you:



<i>Categories of personal data</i>	Name, photograph, personal ID number or other identification number, country code and information about your employer or, if the order concerns a student ID06 card, details about your school or college.
<i>Purposes of the processing</i>	<ol style="list-style-type: none"> <li>1. To make preparations for issuing your ID06 card</li> <li>2. To enable connection to your ID06 account</li> </ol>
<i>Legal basis</i>	<ol style="list-style-type: none"> <li>1. Our legitimate interest in delivering the ID06 system in order to increase security and combat undeclared work and criminal activity in the work place and to enable User Companies to meet their legal obligations</li> <li>2. The legitimate interest of User Companies to increase security and combat undeclared work and criminal activity in the work place and meet their legal obligations</li> </ol>
<i>Storage period</i>	Data are stored in order to issue your ID06 card and manage your ID06 account. Data are stored during the period of validity of the ID06 card and for three years thereafter. The data are erased if an ID06 card is not issued.
<i>Data recipients</i>	<ol style="list-style-type: none"> <li>1. The companies we collaborate with to issue ID06 cards and deliver the ID06 system, including card suppliers and IT suppliers</li> <li>2. User Companies</li> </ol>

### 3.1.3 Issuing, registering and administering ID06 cards and ID06 accounts

We process the following data about you when we issue your ID06 card and when you register an ID06 account:

<i>Categories of personal data</i>	<ol style="list-style-type: none"> <li>1. Data provided by the User Company and confirmed by you; name, photograph, personal identification number or other identification number or LMA<sup>1</sup>card, country code and details about your employer</li> <li>2. For student ID06 cards, data disclosed by your school or college and confirmed by you; name, photograph, personal identification number, other identification number or LMA card and details about your school or college</li> <li>3. Data from validation of passports/IDs for individuals without electronic identification; the same data as listed in the points above as well as a photograph of the passport or ID card including identification number</li> <li>4. Data required to set up an ID06 account; e-mail address, phone number, user name and password</li> <li>5. Data about how you use your ID06 account, for example login times</li> <li>6. Data about whether your ID06 card is active or blocked</li> <li>7. Data we may collect about you from public authorities, for example, whether you hold a work or residence permit or data in posting lists (Sw. utstationeringslistor)</li> </ol>
<i>Purposes of the processing</i>	<ol style="list-style-type: none"> <li>1. To validate your identity when issuing the ID06 card via electronic identification or validation of passports/ID cards</li> <li>2. To issue the ID06 card (via the Card Company) and deliver the ID06 account in accordance with our agreement with you</li> </ol>

<sup>1</sup> LMA stands for Swedish Act (1994:137) on the Reception of Asylum Seekers etc.



	<ol style="list-style-type: none"> <li>3. To facilitate your use of the ID06 card and the processing described in Section 3.1.4</li> <li>4. To increase security and combat undeclared work and criminal activity in the workplace</li> <li>5. To check that permits and other legal obligations are maintained at the workplace by ensuring, through contacts with public authorities, that, for example, you hold work and residence permits</li> <li>6. To prevent misuse of the ID06 system, for example through regularly checking issued ID06 cards</li> <li>7. To develop statistics about connected User Companies and ID06 cards</li> <li>8. To administer, develop and test the ID06 system to improve user friendliness in our user interface or other parts of the ID06 system and to develop new functions and services (we anonymise data where possible)</li> </ol>
<i>Legal basis</i>	<ol style="list-style-type: none"> <li>1. Fulfilling our agreement with you (Points 1-3 above)</li> <li>2. Our legitimate interest in delivering the ID06 system in order to increase security and combat undeclared work and criminal activity in the workplace (Points 4-5 above)</li> <li>3. Our legitimate interest in preventing misuse of the ID06 system (Point 6 above)</li> <li>4. Our legitimate interest in developing the ID06 system and our services (points 7-8 above)</li> </ol>
<i>Storage period</i>	The data are stored in the ID06 system for the purposes described in Section 3.1.4 and for three years after expiry of the ID06 card's period of validity. Thereafter, we erase or anonymise the data.
<i>Data recipients</i>	<ol style="list-style-type: none"> <li>1. The companies we collaborate with in order to issue ID06 cards, validate identities and deliver the ID06 system, including card suppliers and IT suppliers</li> <li>2. User Companies</li> </ol>

### 3.1.4 Using your ID06 card

When you use your ID06 card in the workplace, personal data about you are generated and registered.

Some examples of the processing that takes place when you use your ID06 card, and the purposes of that processing, are:

- Registering entrance to and exit from your workplace as well as checking your ID06 card against ID06's black list (*Sw. spärrlista*) in order to:
  - check your identity, your training and your qualifications (information about training and qualifications are connected to the ID06 card as described in Section **Fel! Hittar inte referenskölla.** with regard to the ID06 Competence Database ) and that the ID06 card is valid;
  - maintain an electronic personnel register in accordance with the Swedish Tax Procedure Act (*Sw. skatteförfarandelagen*);
  - enable a secure attendance check and reporting in the event of a workplace accident or similar event; and
  - plan work and increase workplace security.



- Registering purchases of products and services as well as performing checks against ID06's black list (Sw. spärrlista) in order to:
  - check your identity and that the ID06 card is valid; and
  - administer and simplify management of purchases at your workplace.

In the examples above, when you use your ID06 card in the workplace, the User Company that asks you to register your ID06 card is responsible for the processing that takes place. In addition, the User Company for whom you are active in the workplace is the data controller for the data documented about you in an electronic personnel register.

A copy of the electronic personnel register is stored in My ID06 and ID06 processes data in the personnel register on behalf of the User Company in order to make it easier for the User Company to comply with the retention requirements for electronic personnel registers that follow from the Swedish Tax Procedure Regulation (2011:1261). This is carried out by ID06 as the data processor acting in accordance with the User Company's instructions. When personal data in My ID06 are used for other purposes than those that follow from the User Company's instructions, ID06 is the data controller for such processing. You can read more about this and My ID06 in Section 3.1.5.

### 3.1.5 Transferring personal data from My ID06 to ID06 Company Report

When using ID06 Company Report, data relating to the User Companies operating at a particular workplace may be obtained from My ID06. This is done to simplify the provision and use of ID06 Company Report. Data collected and transferred from My ID06 to ID06 Company Report are not normally personal data, although if such data can be linked to a person the data constitute personal data, e.g. a sole trader's company registration number (personal identification number).

If data collected for ID06 Company Report can be linked to you, we may process the following categories of personal data about you:

<i>Categories of personal data</i>	<ol style="list-style-type: none"> <li>1. User Company name (sole trader)</li> <li>2. Company registration number (personal identification number)</li> <li>3. Dates when the User Company worked at the workplace</li> <li>4. Workplace identification number</li> </ol>
<i>Purposes of the processing</i>	To enable and simplify provision of ID06 Company Report.
<i>Legal basis</i>	<ol style="list-style-type: none"> <li>1. Our legitimate interest in delivering the ID06 system in order to increase security and combat undeclared work and criminal activity in the workplace and to enable User Companies to meet their legal obligations</li> <li>2. The legitimate interest of User Companies to increase security and combat undeclared work and criminal activity in the workplace and meet their legal obligations</li> </ol>
<i>Storage period</i>	Data are stored during the time they are used in ID06 Company Report. Thereafter, we erase or anonymise the data.
<i>Data recipients</i>	<ol style="list-style-type: none"> <li>1. The companies we collaborate with in order to deliver the ID06 system, for example IT suppliers</li> <li>2. User Companies using ID06 Company Report</li> </ol>



Section **Fel! Hittar inte referenskölla.** describes how your personal data are processed in ID06 Company Report.

### 3.2 ID06 Competence Database

If you consent to register your training certificates and qualifications in the ID06 Competence Database, we process the following data about you:

<i>Categories of personal data</i>	<ol style="list-style-type: none"> <li>1. Data about training/education that you have completed, including experience guarantees and validity periods for health certificates (we never process the content of such certificates), your qualifications, whether a qualification is time-limited, the company that provided the training/education and when you completed it</li> <li>2. Data about your logging in to the ID06 Competence Database</li> <li>3. Data from the National Population Register, which we collect from the Swedish Tax Agency</li> </ol>
<i>Purposes of the processing</i>	<ol style="list-style-type: none"> <li>1. To simplify checks of training certificates and qualifications, for the overall purpose of increasing security at the workplace. This is achieved, for example, by linking the details about your training/education to the registration of entrance to and exit from your workplace</li> <li>2. To prevent misuse of the ID06 system, through regular checks of the training company</li> <li>3. To develop statistics about registered training/education</li> <li>4. To administer, develop and test the ID06 system to improve user friendliness in our user interface or other parts of the ID06 system and to develop new functions and services (we anonymise data where possible)</li> </ol>
<i>Legal basis</i>	<ol style="list-style-type: none"> <li>1. Consent which we collect separately from you through our website or via the training company (see point 1 above)</li> <li>2. Our legitimate interest in preventing misuse of the ID06 system (point 2 above)</li> <li>3. Our legitimate interest in developing the ID06 system and our services (points 3-4 above)</li> </ol>
<i>Storage period</i>	We store data for as long as we have your consent to do so. If you withdraw your consent and request that we erase the data registered in the ID06 Competence Database, we do so. Otherwise, we keep previously registered data, even after you have withdrawn your consent.
<i>Data recipients</i>	<ol style="list-style-type: none"> <li>1. The companies we collaborate with in order to deliver the ID06 system, for example IT suppliers</li> <li>2. User Companies</li> </ol>

### 3.3 Representatives of User Companies

If you are a board member, CEO or other representative or a designated contact person for a User Company, we may process the following data about you:



<i>Categories of personal data</i>	<ol style="list-style-type: none"> <li>1. Data required to connect a company to the ID06 system: name, e-mail address, user name, password and the name of the company you represent</li> <li>2. Data we collect from public records</li> </ol>
<i>Purposes of the processing</i>	<ol style="list-style-type: none"> <li>1. To deliver and administer the ID06 system</li> <li>2. To check the authorised signatories of a User Company</li> <li>3. To manage our customer relationships and to contact you as a representative of a User Company</li> <li>4. To administer, develop and test the ID06 system to improve user friendliness in our user interface or other parts of the ID06 system and develop new functions and services (we anonymise data where possible)</li> </ol>
<i>Legal basis</i>	<ol style="list-style-type: none"> <li>1. Our legitimate interest to manage our customer relationships and thereby deliver our services within the scope of the ID06 system (points 1-3 above)</li> <li>2. Our legitimate interest of developing the ID06 system and our services (Point 4 above)</li> </ol>
<i>Storage period</i>	As a general rule, we store the data for as long as we have a customer relationship with the User Company.
<i>Data recipients</i>	The companies we collaborate with to deliver the ID06 system, for example IT suppliers.

### 3.4 If you are affected by ID06 Company Report

If you are a sole trader, or if you are a board member, CEO or other representative of a User Company – or a potential partner who can be expected to connect to the ID06 system – your personal data may be processed within the framework of ID06 Company Report. The User Company using the service is the data controller, and ID06 is the data processor and processes data based on the data controller’s instructions.

Examples of processing that takes place within the framework of ID06 Company Report, and the purposes of such processing, are:

- Collecting data from credit reporting agencies licenced under the Swedish Credit Information Act (1973:1173)
  - Evaluating an existing or potential partner

### 3.5 Website

The following personal data about you are processed when you visit our website:

<i>Categories of personal data</i>	<ol style="list-style-type: none"> <li>1. Information about your visits to our website, through so-called cookies (also see Section 6 about cookies)</li> <li>2. Data about how you interact with and use our website</li> <li>3. Data (for example e-mail address) which you provide in order to subscribe to a newsletter or to obtain other information from us</li> </ol>
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<i>Purposes of the processing</i>	<ol style="list-style-type: none"> <li>1. To deliver, maintain, test and improve our website</li> <li>2. To enable administration, development and testing of our IT systems in order to ensure that the high quality of our platforms is maintained as well as to detect and prevent security breaches (for example virus attacks)</li> <li>3. To send you newsletters. If you no longer wish to subscribe to a newsletter, you can contact us at info@id06.se or click on the link in the newsletter</li> </ol>
<i>Legal basis</i>	Our legitimate interest for the purposes described under each respective point above.
<i>Storage period</i>	Data which you give us in order to subscribe to a newsletter is erased when your subscription expires.
<i>Data recipients</i>	Our external partners, for example IT suppliers.

### 3.6 Communication

When you communicate with us in other ways, for example through our customer services, we process the following data about you:

<i>Categories of personal data</i>	Data you provide to us, for example name, e-mail address and information about your matter
<i>Purposes of the processing</i>	<ol style="list-style-type: none"> <li>1. To communicate with you</li> <li>2. To deal with your matter</li> <li>3. To analyse the information in order to improve our communications</li> </ol>
<i>Legal basis</i>	Our legitimate interest in dealing with your matter and improving our communications
<i>Storage period</i>	The data are kept for two years from the date of the communication
<i>Data recipients</i>	Our external partners, for example IT suppliers.

### 3.7 Legal obligation

We also process your personal data when we are obliged to do so by law, e.g. as a result of our accounting obligations. This means that in some cases, we may be required to retain certain data for a longer period than described under “Storage period” above.

## 4. WHEN AND HOW DO WE DISCLOSE YOUR PERSONAL DATA?

In addition to the recipients listed in Section 3, we may also disclose data to other recipients when this is required by law or a decision by a public authority.





Companies that manage personal data on our behalf must always enter into a so-called data processor agreement with us so that we are able to ensure a high level of protection of your personal data when processed by our partners and suppliers. We only disclose personal data for purposes that are consistent with the purposes for which the data were collected (e.g. to fulfil our obligations under our agreement with you).

We do not transfer any personal data to countries outside the EU/EEA.

## 5. HOW DO WE PROTECT YOUR PERSONAL DATA?

Your personal data are collected and processed in a safe and secure manner. We have established and documented technical and organisational procedures and measures to ensure your privacy, as well as the availability and confidentiality of the data, all based on the requirements that follow from applicable data protection legislation.

We always require that parties who use the ID06 system strive to ensure that all data are securely handled and that the individuals' privacy is respected.

## 6. COOKIES

We use so-called cookies when you visit our website. Cookies are small text files that are stored on the visitor's device and which, inter alia, enable us to follow what the visitor does on the website and to save personal settings. You can read more about how we use cookies in our cookie policy: [id06.se/cookies/](https://id06.se/cookies/).

## 7. YOUR RIGHTS

You have certain rights in relation to us. If you wish to take advantage of any of your rights, please contact us via the contact details in the next section.

- *Right of access (register transcript)* – a right to obtain confirmation of and information about the processing of your personal data.
- *Right to rectification* – a right to have erroneous data rectified.
- *Right to erasure* – a right to have data removed. This right is limited to data which, by law, may only be processed with your consent, if you withdraw consent and oppose the processing.
- *Right to object* – a right to object to our processing if it is based on a balancing of interests or direct marketing.
- *Right to restricted processing* – a right to request that personal data processing is restricted, for example, if you oppose the accuracy of the data. ID06's access to the data is restricted while the accuracy of the data is investigated.
- *Right to data portability* – a right to request that personal data are transferred from one data controller to another. This right is restricted to data that you have supplied to us yourself.



If you consider that our processing does not comply with data protection legislation, you are also entitled to lodge a complaint with the Swedish Data Protection Authority (Sw. Datainspektionen) (the competent supervisory authority).

## **8. CONTACT DETAILS FOR THE DATA CONTROLLER**

ID06 AB is the data controller for the personal data processing described in this privacy policy (with the exception of the processing described in Section 3.1.4 and 3.4). If you would like further information about how we process your personal data, or wish to exercise any of the rights listed above, please contact us at:

ID06 AB

For the attention of: Data Protection Officer

PO Box 13144

SE-103 03 Stockholm, Sweden

[support@id06.se](mailto:support@id06.se)

## **9. PRIVACY POLICY UPDATES**

This privacy policy was last updated on 18 April 2019 and may be subject to change. If we make significant changes to the policy, we will notify you by e-mail, text message, through the service or by publishing a new version on our website within 30 days before the changes enter into force.