

# Security policy rev. 0.1

## Table of contents

1	Introduction and objective .....	2
2	Application and revision.....	2
3	Organization and responsibility.....	2
4	Concepts and abbreviations .....	2
5	Personal data processing.....	2
6	When are we processing personal data.....	3
7	What personal data do we process .....	3
8	Why do we process personal data .....	3
9	The legal basis for our treatment of personal data .....	4
10	How long do we save personal data.....	4
11	Who do we share personal data with .....	4
12	How do we protect personal data .....	5
13	The registered persons rights.....	5
14	Modification of security policy.....	6
15	Summary of our personal data processing .....	6
16	Contact information .....	6

## 1 INTRODUCTION AND OBJECTIVE

The purpose of this policy is to ensure that AnVa KSG 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 management team at least once a year and updated if necessary.

The IT manager is responsible for keeping in the process of annual update of the policy as a result of new and changed rules.

This policy applies to company employees and contractors affected by our business.

## 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 IT manager.

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

## 4 CONCEPTS AND ABBREVIATIONS

Concept	Meaning
Personal Data	A personal data is any kind of information that can be directly or indirectly attributed to a physical person who is in life.
Registered	The person to whom 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 performed automated or not - such as collection, registration, organization and structuring.

## 5 PERSONAL DATA PROCESSING

- Each personal data processing should be based on the following principles:
  - Legality
  - Purpose limitation
  - Data minimization

- Correctness
  - Storage Minimizing
  - Relevance
  - Integrity and confidentiality
- Our data processing is documented on a regular basis in the document: GDPR Inventory
  - Any incidents relating to personal data we process should be reported without delay to the CEO with a report of deviation. The CEO / IT Manager shall report the incident to the Data Inspectorate without undue delay and no later than 72 hours, and 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 and possible agreements.

## **6 WHEN ARE WE PROCESSING PERSONAL DATA**

- Employee's personal information is used to manage the job as well as to meet the requirements of authorities and customers.
- When customers and suppliers are to buy our services or at quote requests, we sometimes need to collect and process personal information.  
When we need information that is required for contracts to be concluded and in order to provide our services and offers.

## **7 WHAT PERSONAL DATA DO WE PROCESS**

The personal data for employees, customers and suppliers that AnVa KSG manages includes:

- Name and identification number (social security number, national ID or organization number)
- Address details incl. phone number and e-mail
- Payment terms
- Employee training and previous employment
- Contact information, close relative to employees

## **8 WHY DO WE PROCESS PERSONAL DATA**

AnVa KSG mainly processes personal data in order to:

- Comply with our obligations to you as an employee, customer or supplier.  
Prevent fraud and carry out risk management
- Enable general customer care and customer service, such as answering questions and correcting
- Prevent fraud and carry out risk management
- Follow applicable legislation, such as accounting laws.

## **9 THE LEGAL BASIS FOR OUR TREATMENT OF PERSONAL DATA**

Based on legal grounds (eg labor law, tax laws, insurance laws, collective agreements and data protection regulations.), AnVa KSG processes personal data of employees, customers and suppliers.

In some cases, AnVa KSG may have a legal obligation to process your personal information. This applies, for example, to the processing of personal data we perform in order to meet the requirements of the Accounting Act..

## **10 HOW LONG DO WE SAVE PERSONAL DATA**

Personal data is stored only as long as there is a need for them to fulfill the purposes for which the data was collected. AnVa KSG may save the data for longer if necessary to comply with legal requirements or to guard our legal interests, such as accounting laws or whether a legal process is under way..

## **11 WHO DO WE SHARE PERSONAL DATA WITH**

AnVa KSG may disclose your information to third parties, such as AnVa KSG's parent company and other collaborators.

Personal data may also be provided by AnVa KSG if it is necessary to comply with applicable legal requirements or government requirements to safeguard the legal interests of AnVa KSG or to detect, prevent or pay attention to fraud, technical problems and other security issues.

AnVa KSG may transfer your personal data to non-EU / EEA countries, if any of AnVa KSG's customers, suppliers or partners are located there. If personal data are transferred to any country outside the EU / EEA, AnVa KSG will take steps to ensure that personal data remain protected and also take the necessary steps to legally transfer personal data to non-EU / EEA countries.

AnVa KSG will not disclose personal data to third parties unless we have permission.

## 12 HOW DO WE PROTECT PERSONAL DATA

Employees, customers and suppliers should always be able to feel safe when leaving personal information to AnVa KSG. AnVa KSG has therefore taken the security measures necessary to protect personal data from improper access, change and deletion. For example, all information about employees, customers and suppliers in a password-protected document is saved: GDPR inventory

## 13 THE REGISTERED PERSONS RIGHTS

AnVa KSG is responsible for processing personal data in accordance with applicable legislation.

AnVa KSG, upon request, or on its own initiative, corrects, identifies, deletes or completes information that is found to be incorrect, incomplete or misleading. Den registrerade har rätt att begära:

- a. Access to their personal data. This implies the right to request a registry extract of the processing we conduct regarding personal data. The registered person is also entitled to receive a copy of the personal data being processed. The data subject has the right to obtain information on where the data has been retrieved, the expected period of data to be stored or the criteria used to determine that period. The registrant is furthermore entitled to obtain information about his other rights as set out in this paragraph in the registry extract..
- b. Correction of personal data. We will prompt you to correct incorrect or incomplete information as we deal with you as quickly as possible.
- c. Deletion of personal data. This means that you are entitled to request that your personal data be removed if they are no longer necessary for the purpose for which they were collected. However, there may be legal requirements that will

prevent us from receiving immediately delete your personal data in, for example, accounting and tax legislation. We will then end the processing done for purposes other than complying with the legislation.

You are entitled to object to personal data processing performed on the basis of a balance of interest. If you object to such treatment, we will only continue treatment if there are legitimate reasons for treatment that weigh heavier than your interests.

You are entitled to lodge any complaints regarding the processing of your personal data to the Data Inspectorate.

## **14 MODIFICATION OF SECURITY POLICY**

AnVa KSG is entitled to update its security policy at any time.

## **15 SUMMARY OF OUR PERSONAL DATA PROCESSING**

AnVa KSG has chosen to compile all data in the document: GDPR inventory

## **16 CONTACT INFORMATION**

Please contact us if you have any questions about this security policy, processing your personal information or requesting a registry extract. Our contact information can be found below.

AnVa KSG  
Gunnar W Anderssons Passage 27  
SE-46153 Trollhättan  
Sweden  
tel: +46 520 21 18 20  
ksg@ksgab.se