



SPPs Privacy policy

2021-03-01

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SPPs Privacy policy

Summary information

General

For SPP Pension & Försäkring AB (publ), company registration number 516401-9599 ("SPP"), your privacy is very important and we always strive for a high level of data protection. Our goal is for you to feel safe when we process your personal data. Therefore, in our role as Personal Data Controller, we ensure compliance with applicable law on the protection of your personal data.

Scope

This Privacy Policy applies to SPP's use of personal data for those who use our products and services. It also applies to you who have used or expressed an intention to use our products and services or otherwise be associated with SPP.

Personal data that has been collected and cookies

The information we collect about you is primarily information that you provide yourself in connection with you or your employer entering into an agreement with us, and when you use of our products and services. Examples are information about your identity, contact information, insurance information and information about how you use our products and services. We also collect data from other sources such as employers, occupational pension scheme administrators, intermediaries, public registers and partners.

Furthermore, in order to improve our website, we use cookies. You can read more about cookies on our website.

Use of personal data and sharing

SPP uses your personal data to, in the best way possible, provide you with the products and services we offer. Your personal data is used for the following purposes:

- For drawing up, administering and fulfilling contractual obligations,
- For marketing and sales
- For statistics, analysis and business development
- To ensure the safety of persons on the premises,
- To fulfil SPP's legal obligations,
- To protect SPP's legal interests in the event of a dispute.

We do not use your personal data for any other purposes inconsistent with these and we only save your personal data as long as necessary.

We may share your personal data with other companies within the SPP group, service providers and other companies we cooperate with to provide our products and services. We will not sell your personal data to a third party.

Your rights

You are entitled to information on the personal data about you that we use, along with what we do with such data. You are also entitled to, in certain cases, obtain your personal data, have it corrected or erased, object to certain types of use of your personal data and revoke your consent to its use. If you feel that we have used your personal data in an unauthorised manner, you will also be entitled to file a complaint with the Swedish Authority for Privacy Protection and claim damages. If you would like to learn more about your rights, please read our unabridged Privacy Policy.

Contact information

If you have any questions about this Privacy Policy, our use of your personal data, or if you wish to exercise your rights, please contact us in the following ways:

Personal Data Controller:

SPP Pension & Försäkring AB (publ)
Corporate registration number 516401-8599
Mailing address: SPP, 105 39 Stockholm
Visiting address: Vasagatan 10, Stockholm
Telephone number to our switchboard: + 46 (0)8-451 70 00
Website: www.spp.se

SPP's Data Protection Officer:

Mailing address: SPP, Data Protection Officer, 105 39 Stockholm
Email: dataskyddsbud@spp.se

Privacy Policy, unabridged

General

SPP Pension & Försäkring AB (publ), corporate registration number 516401-9599 ("SPP") respects and safeguards your personal integrity. We want you to feel safe when we process your personal data. Our intention is for this Privacy Policy to demonstrate how we ensure that your personal data is processed in accordance with applicable law.

In order to provide our products and services to you as a user, we must use personal data about you. This Privacy Policy applies to those who use our products and services. It also applies to those who have used or expressed an intention to use our products and services or otherwise be associated with SPP.

Personal data controller and data protection officer

SPP is the Personal Data Controller regarding the use of your personal data and is responsible for ensuring that such use is accordance with applicable law.

SPP's Data Protection Officer (the "Data Protection Officer") is responsible for monitoring that our use of your personal data is in accordance with applicable law. The Data Protection Officer can be contacted by e-mail at: dataskyddsbud@spp.se. You will find all of the contact information for SPP's Data Protection Officer at the end of this privacy policy.

Use of your personal data

SPP uses your personal data to, in the best way possible, provide you with the products and services we offer. We use your personal data for the following purposes:

- For drawing up, administering and fulfilling contractual obligations,
- For marketing and sales,
- For statistics, analysis and business development
- To ensure the safety of persons on the premises,
- To fulfil SPP's legal obligations,
- To protect SPP's legal interests in the event of a dispute.

The table below provides more information on why we use your personal data and which personal data we save in order to achieve those purposes.

Entering into contracts and administering and fulfilling contractual obligations

Purpose	Processing performed	Personal data that we might collect
For entering into contracts and administering and fulfilling contractual obligations	<p>SPP uses your information to provide, manage and personalize our products and services, and to enable you to log in to our web services and provide customer service to you as a user.</p> <p>In connection with providing products and services, along with administration, your information is used for such things as:</p> <ul style="list-style-type: none">• premium calculation and other calculation services• invoicing• determining whether there is a right to compensation• payment of pension and other remuneration• advice <p>Sensitive information about you, such as health details, is processed when the risk assessment requires such and for claims settlement.</p>	<ul style="list-style-type: none">• Identity details such as name, personal identity number and copies of proof-of-identity documents.• Contact information such as address, phone number and email.• Insurance details such as insurance number, insurance type, insurance capital, pension amount, amount paid and beneficiary designation.• Employment details such as employer, job title, employment date and salary.• Demographic details such as age, gender, marital status, address and industry.• Advisory details such as employment, financial information, experience and risk .• Sensitive personal data such as health information.

Legal basis: The processing is necessary for the performance of agreements or to fulfil a legal obligation.

Health information is processed when necessary to consider an application for new insurance or changes, and for claims settlement on the basis of your explicit consent or to determine, enforce or defend legal claims.

Marketing and sales

Purpose	Processing performed	Personal data that we might collect
For entering into contracts For marketing and sales.	SPP uses your personal data within the scope of our marketing activities and market segmentations. By market segmentations we mean categorizing our customer data base as from insurance information and demographical selected criteria with the purpose of <ul style="list-style-type: none"> • Providing you with relevant marketing and information on e.g. our products and services and in connection with advice • Providing you with tips and news 	<ul style="list-style-type: none"> • Identity details such as name, personal identity number and copies of proof-of-identity documents. • Contact information such as address, phone number and email. • Surf habits such as which web pages on our website you have visited and for how long. • Insurance details such as insurance number, insurance type, insurance capital, pension amount, amount paid and beneficiary designation. • Employment details such as employer, job title, employment date and salary. • Activity- and consultation information such as calls to Customer service, calls from adviser, information sent through contact forms, feedback information and meetings. • Demographic details such as age, gender, marital status, address and industry. • Sensitive personal data such as health information.
<p>Legal basis: Weighing of interest. We conclude that the process is necessary to meet our legitimate interest to provide general and segmented marketing to you (for marketing through mail, telephone or social media – and for direct marketing through email, text or MMS messages or other automatic systems if the regulations in the Swedish Marketing Act are met).</p> <p>Consent to direct marketing of third parties´ products and services through email, text or MMS messages or other automatic systems.</p>		

Statistics, analysis and business development

Purposes	Processes performed	Personal data that we might collect
For statistics, analysis and business development.	SPP uses your personal data within the scope of market- and customer analysis, which mainly consists of statistics, data from carried out market segmentations and customer satisfaction evaluations. The analysis results are mainly used as basis for improving, replacing or development of new products, services, processes or work methods with the purpose of <ul style="list-style-type: none"> • Meeting yours and other customer's expectations and requirements. • Making statistical analysis of pricing models • Analyzing feedback in customer satisfaction researches. <p>We may e.g. use personal data to improve our customer service, offer new package solutions, analyze campaigns or adapt our web site according to yours or other customer's requirements. We always strive to anonymize or pseudonymize your personal data to achieve this purpose.</p>	<ul style="list-style-type: none"> • Identity details such as name, personal identity number and copies of proof-of-identity documents. • Contact information such as address, phone number and email. • Surf habits such as which web pages on our website you have visited and for how long. • Insurance details such as insurance number, insurance type, insurance capital, pension amount, amount paid and beneficiary designation. • Employment details such as employer, job title, employment date and salary. • Activity- and consultation information such as calls to Customer service, calls from adviser, information sent through contact forms, feedback information and meetings. • Demographic details such as age, gender, marital status, address and industry. • Sensitive personal data such as health information.
<p>Legal basis: Weighing of interest. We conclude that the process is necessary to meet our legitimate interest to analyze the use of our products and services in order to improve, replace or develop new products, services and offers.</p>		

Ensure the safety of persons on the premises

Purpose	Processing performed	Personal data that we might collect
To ensure the physical safety of persons on the premises.	SPP uses your information to ensure physical safety for you and all other persons on our premises.	<ul style="list-style-type: none"> • Identity details such as name. • Contact details such as telephone number. • Employment details such as employer. • Images such as logging of material from surveillance cameras.
<p>Legal basis: Weighing of interests. We conclude that processing is necessary to satisfy our legitimate interest in being able to control who is in the premises and maintain a reasonable level of safety.</p>		

Fulfil SPP's legal obligations

Purpose	Processing performed	Personal data that we might collect
To fulfil SPP's legal obligations	<p>SPP uses your personal data for information and for reporting to authorities, such as the Swedish Tax Agency, the Social Insurance Agency, supervisory authorities, the Swedish Enforcement Authority and the Swedish Police if doing so is necessary in order to meet our legal obligations. Included in this information is also statistics, follow-up, analysis and troubleshooting.</p> <p>We also use your personal data as necessary to prevent misuse of a product or service or to prevent and investigate criminal offences. Besides fraud, this primarily pertains to money laundering, terrorist financing and international tax reporting.</p>	<ul style="list-style-type: none"> • Identity details such as name, personal identity number and copies of proof-of-identity documents. • Contact information such as address, phone number and email. • Insurance details such as insurance number, insurance type, insurance capital, pension amount, amount paid and beneficiary designation. • Employment details such as employer, job title, employment date and salary. • Demographic details such as age, gender, marital status, address and industry. • Advisory details such as employment, financial information, experience and risk appetite. • Sensitive personal data such as health information.
<p>Legal basis: Legal obligation. We process personal data in order to comply with the obligations we have under law, other regulations and government decisions.</p>		

To protect SPP's legal interests in the event of a dispute

Purpose	Processing performed	Personal data that we might collect
To protect SPP's legal interests in the event of a dispute	In the event of a dispute, SPP processes your information for the purpose of determining, asserting and exercising legal claims, such as dealing with complaints, exercising right of recourse and in connection with a legal process.	<ul style="list-style-type: none"> • Identity details such as name, personal identity number and copies of proof-of-identity documents. • Contact information such as address, phone number and email. • Insurance details such as insurance number, insurance type, insurance capital, pension amount, amount paid and beneficiary designation. • Employment details such as employer, job title, employment date and salary. • Demographic details such as age, gender, marital status, address and industry. • Advisory details such as employment, financial information, experience and risk appetite. • Sensitive personal data such as health information.
<p>Legal basis: Weighing of interests. We conclude that processing is necessary to meet our legitimate interest in determining, asserting and exercising legal claims.</p>		

Sources of your personal data

The personal data that we use comes from a variety of sources. We collect personal data directly from you upon registration, ordering of products and services and also for use of our products and services.

Your employer or Occupational pension scheme administrators (Sw. Valcentral) also provides personal data about you in situations where they perform registration on your behalf. If you enter into an insurance agreement with us through an insurance intermediary, we will retrieve the personal data collected in connection with the brokerage and that we need to process the application for insurance.

In addition to the information you provide directly to us or that we collect from the use of products and services, we also collect personal data about you from public information records and from partners.

In order to provide you with our products and services, it is a requirement that you provide certain personal data. If you do not give us the information we need in order to provide you with our products and services or conduct our business, we cannot enter into an agreement with you or your employer.

Automated decision-making

We do not use automated decision-making if the decision may produce legal effects or significantly affect you in a similar manner.

Where do we process your data?

We will retain your personal data as long as needed for the purposes for which we collected the data under this Privacy Policy. Personal data will be stored during the duration of the contract and thereafter for 11 years. Other retention periods may apply when personal data is stored for purposes other than to fulfil an agreement. In these cases, we only retain the information if it is necessary and it is required for the purpose in question as set out in the respective law or regulation, in order to safeguard our legal interests, legitimate interests or any other important general interests. When we no longer need your information, we delete it from our systems, databases and back-up systems.

Who do we share your personal data with?

SPP shares your personal data with other parties, such as other companies within the SPP group and other companies we cooperate with in order to provide our products and services.

SPP may share your personal data with companies we cooperate with for example:

- Payment solutions (such as banks and other payment service providers).
- Marketing, distribution and archiving (such as printing and distribution, invitations and mailings, social media, media agencies or advertising agencies).
- Delivery of services (such as IT solutions and IT operations, administrative work, communications, information services, security solutions and customer surveys).

In order to deliver our products and services, we may also share your personal information with, for example:

- Insurance intermediaries
- Employers
- Occupational pension scheme administrators
- Other insurance companies (such as reinsurance companies, other insurers and companies providing pooling solutions)
- Auditors

We may also need to disclose information at the request of authorities or other parties on the basis of legal requirements, other statutes and government decisions, and in conjunction with court proceedings or similar.

We also register claims in the joint claims register (GSR) in order to prevent payment of compensation based on incorrect information.

We will not sell your personal data to a third party.

How long do we save your personal data?

In general, SPP processes your personal data within the EU/EEA. With transfers to a country outside the EU/EEA that is unable to ensure an adequate security level for personal data, we use the EU Commission's standard contractual clauses for transfer of personal data to countries outside the EU/EEA. You will find that information here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

Your rights

We are responsible for your rights

SPP is responsible, in its role as Personal Data Controller, for the use of your personal data in accordance with law and allowing you to enforce your rights. You can contact us at any time if you would like to enforce your rights. You will find our contact details at the bottom of this Privacy Policy.

SPP is required to answer your request to exercise your rights within one month of your having contacted us. If your request is complicated or if we have received a large number of requests, we are entitled to extend the time by two months. If we conclude that we cannot meet your request, we are obliged to notify you no later than within one month from the receipt of your request, with an explanation of why we cannot meet your request and inform you that you have the right to file a complaint with the supervisory authority.

All information, communications and all actions we carry out are free-of-charge to you. However, if what you request in respect of your rights is clearly unfounded or unreasonable, we are entitled to charge an administrative fee to provide you with the information or to carry out the requested action, or to refuse to meet your request.

Your right of access, rectification, deletion and limitation

You have the right to request from SPP

- a) Access to your personal data. It means that you are entitled to a transcript detailing our use of your personal data. You are also entitled to, free-of-charge, obtain a copy of the personal data that we use. If you would like additional copies, we are entitled to charge an administration fee. If you make a request electronically, such as via email, we will provide you with the information in a commonly used electronic format.
- b) Rectification of your personal data. We will, at your request or on our own initiative, correct, render anonymous, delete or supplement any information that we discover is inaccurate, incomplete or misleading. You are also entitled to submit further information if anything relevant is missing.
- c) Deletion of your personal data. You have the right to request that we remove your personal data if there is no longer an acceptable reason for us to use it. Deletion can occur if:
 - personal data is no longer needed for the purpose we collected it,
 - we use your personal data on the basis of your consent and you have now revoked that consent,
 - you object to our use of your personal data that has occurred after a weighing of interests and we do not have important interests that outweigh your interests and rights,
 - we have used the personal data in an unlawful manner,
 - we have a legal obligation to delete the personal data, or
 - you are a child and we have collected the personal data in connection with the offer of information society services.

However, there may be requirements in legislation or other compelling reasons for us not deleting your personal data. We will then stop using your personal data for purposes other than complying with the legislation or other compelling reasons.

- d) Limitation of use. This means that we temporarily restrict the use of your data. You have the right to request a restriction when:
 - you believe that your information is incorrect and you have requested rectification in accordance with item 9.2.1 b), while we are investigating the accuracy of the data,
 - the use is illegal and you do not want the data to be deleted,
 - we, in our role as Personal Data Controller, no longer need the personal data for our intended purposes but you need it to be able to establish, enforce or defend a legal claim, or
 - you have objected to use in accordance with item 9.3.1, while waiting an assessment of whether our important interests outweigh yours.

We at SPP will take all reasonable measures possible to notify anyone who has received personal data in accordance with section 7 above if we have corrected, deleted or restricted access to your personal data after you have requested us to do so. Upon your request, we will inform you of those who have received your personal data from us.

Your right to object to use

You have the right to object to such use of your personal data that we engage in on the basis of a weighing of interests or of general interest

(see section 3 above). If you object to such use, we will only continue using your personal data if we have important reasons for doing so that outweigh your interests.

If you do not want SPP to use your personal data for marketing purposes, you are always entitled to object to such use by contacting us. Once we have received your notice of opposition, we will cease using the personal data for those marketing purposes.

Your right to revoke consent

For the uses where we process your personal data based on consent (see section 3 above), you can withdraw your consent at any time by contacting us. You will find our contact details at the bottom of this Privacy Policy. If you revoke your consent, we may not be able to fulfil our agreement with you or your employer.

Your right to data portability

You are entitled to data portability. If our right to process your personal data is based either on your consent or the performance of a contract, you have the right to request that the information relating to you that you have provided to us be transferred to another Personal Data Controller. A prerequisite for portability is that the transfer is technically feasible and can be automated.

Your right to claim damages

You have a right to claim damages if SPP processes your personal data in a manner which breaches the general data protection regulation.

Your right to complain to the supervisory authority

You have the right to make complaints about our use of your personal data to the Swedish Authority for Privacy Protection.

We protect your personal data

You should always feel safe when providing us with your personal data. SPP has therefore taken appropriate security measures to protect your personal data against unlawful or unauthorized access, alteration, loss and destruction.

Cookies

At SPP, we use cookies on our website to improve your experience with us. On our website, we explain more about cookies and how you can delete or clear cookies.

Changes to this privacy policy

SPP may make changes to this Privacy Policy. The latest update is always available on our website, www.spp.se.

Contact information

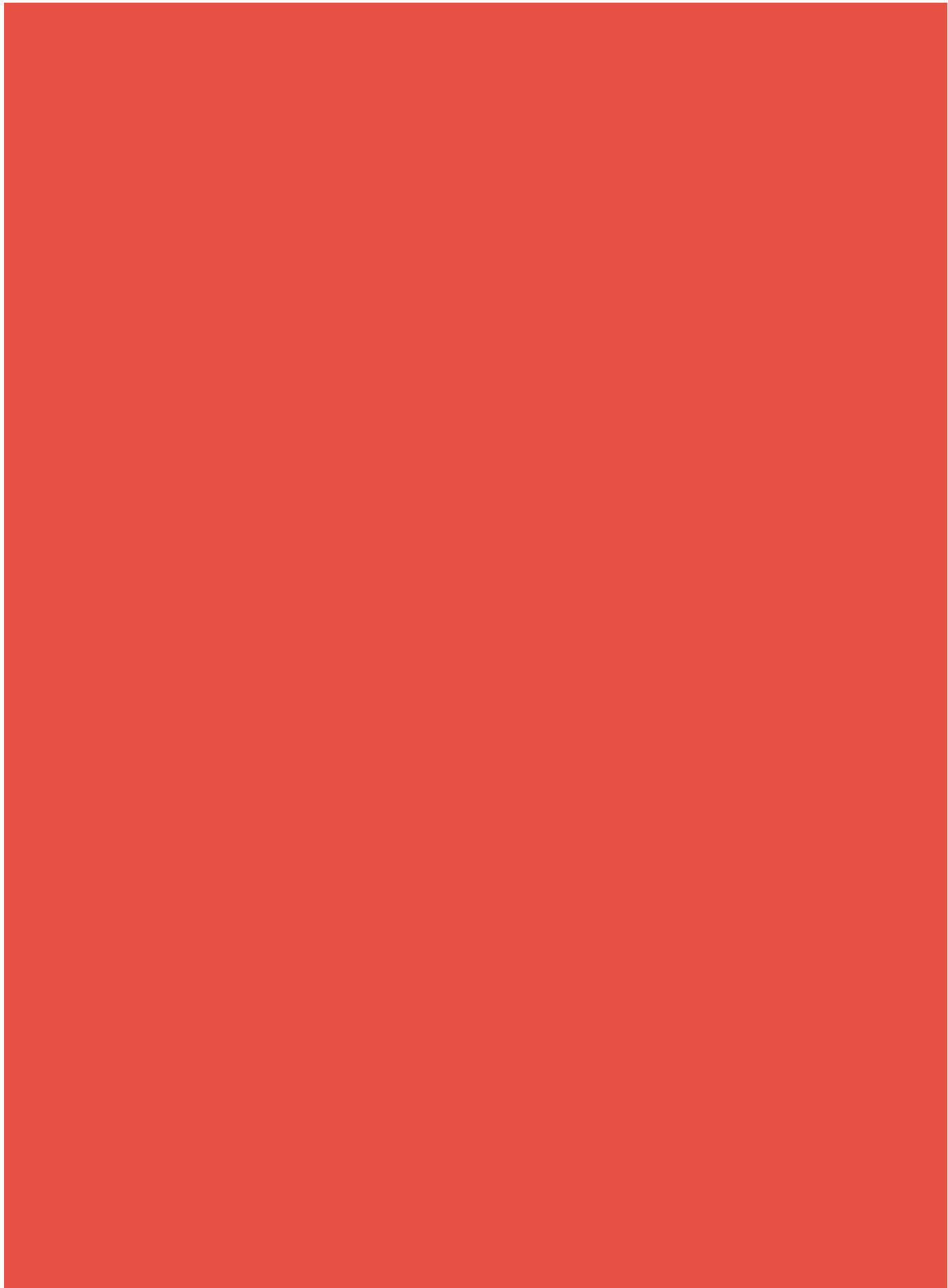
You are welcome to contact us if you have any questions about this Privacy Policy, our use of your personal data, or if you wish to exercise your rights.

Personal Data Controller:

SPP Pension & Försäkring AB (publ)
Corporate registration number 516401-8599
Mailing address: SPP, 105 39 Stockholm
Visiting address: Vasagatan 10, Stockholm
Telephone number to our switchboard: + 46 (0)8-451 70 00
Website: www.spp.se

SPP's Data Protection Officer:

Mailing address: SPP, Data Protection Officer, 105 39 Stockholm
Email: dataskyddsbud@spp.se



For further information go to spp.se or call customer service on +46 771 533 533.

SPP Pension & Försäkring AB (publ). Reg nr 516401-8599. Registered Office Stockholm.
SE-105 39 Stockholm.

