

# Anna-Greta Crafoord's Foundation for rheumatological research

## Privacy Policy

### Background

1. Anna-Greta Crafoord's Foundation for rheumatological research respect your privacy. This Privacy Policy (the "Privacy Policy") describes how we obtain and process your personal data. The Privacy Policy also describes your rights in relation to us and how you can assert these rights.

**All our processing of your personal data is in accordance with our Privacy Policy and current data protection legislation, such as the General Data Protection Regulation (EU) 2016/679 ("GDPR"). We ask you to carefully read this Privacy Policy before you share any personal data with us.**

### 2. Controller

Anna-Greta Crafoord's Foundation for rheumatological research, reg.no 845001-7283, with address Box 137, 221 00 Lund, is the controller for the processing of your personal data as described in this Privacy Policy.

If you have any questions concerning integrity or data protection, please feel free to contact us. The easiest way to do that is to send an e-mail to [info@annagretacrafoord.se](mailto:info@annagretacrafoord.se).

### 3. Who is this Privacy Policy for?

This Privacy Policy addresses how we process personal data regarding

- (a) the applicant for grants from the foundation and contact persons for applicants that are not natural persons as well as other persons connected to such applications,
- (b) the foundation's existing and potential contracting parties, such as suppliers and business partners, as well as contact persons for non-natural contractual parties,
- (c) job applicants,
- (d) visitors to our website,
- (e) subscribers to our marketing information, and
- (f) others who interact with us in any way.

## **4. How do we collect personal data?**

### **4.1 Information from you**

In general, we collect personal data directly or indirectly from you in a variety of ways, both online and offline, such as

- (a) when you or an organisation, for which you are a contact person, apply for grants from the foundation,
- (b) when we otherwise enter into, administer or perform agreements,
- (c) when you apply for a job or otherwise announce your interest in working with us,
- (d) when we meet at meetings, events, seminars, fairs, etc.,
- (e) when you sign up for our newsletter subscription service,
- (f) when you participate and sign up to participate in our events,
- (g) when you interact on our social medias or visit our website,
- (h) when you participate in our surveys,
- (i) when you contact us through our website, by e-mail, letter or phone or face-to-face, or
- (j) when you in any other way interact with us.

### **4.2 Information from other sources**

We may also collect personal data from the following sources:

- (a) applicants for grants from the foundation,
- (b) other persons connected to the party for which you are a contact person;
- (c) from websites owned by the party for which you are a contact person, as well as,
- (d) from your references or from any recruitment consultant or other service provider employed in connection with recruitment.

## **5. What personal data do we process?**

The categories of personal data that we may process about you may be:

- (a) **Identity information**, such as national identification number, date of birth, name, initials,

signature, copy of passport or other identity document, etc.

- (b) **Contact information**, both personal and professional, such as postal address, phone number, mobile phone number, e-mail address, principal, employer, job title, job role, workplace, information about contact person, contact details for the principal or employer etc.
- (c) **Application and project information**, i.e. Information about grants and project matters, such as academic title, university affiliation, occupation, employments and research stays, published scientific publications, degrees, education and other qualifications, projects and budget, participation in additional project application, reference number, managing principal, costs, request for extension of right of disposal (sick leave, parental leave and impediments to recruit), income statement, etc.
- (d) **Images**, that you share with us or that we use with your consent, e.g. of beneficiary.
- (e) **Billing information**, such as billing address, reference person and other billing information, billing history, payment reminders, costs and cost specifications, account information and other payment information, payment history, etc.
- (f) **Qualification and recruitment information**, i.e. information about the applied appointment or appointment of interest, information in any personal letter, CV, resume and submitted credentials and other documents, information provided by references, test values, notes and summaries of interviews and other contacts during the recruitment process, summaries and analyses from any recruitment consultant or other service provider employed in connection with recruitment, certificate of service and testimonials, etc.
- (g) **System and device information**, such as IP address, language settings, browser type, browser settings, time zone, operating system, platform, screen resolution, response time, download error, your geographical location, etc.
- (h) **Traffic and usage information**, such as which links you click and when, the address of the website you arrived from, what marketing information you received and opened, etc.

In addition, we may treat other categories of personal data provided by you or the party for which you are a contact person.

We will only process your national identification number if and to the extent that it is clearly motivated by the purpose of the treatment, the importance of a secure identification or other relevant reason.

## **6. What do we do with your information?**

### **6.1 The purposes of and legal basis for our processing of your personal data**

Below we have compiled our various purposes with our processing of your personal data, the categories of personal data pertaining to the respective process, the legal basis for the processing and how long we store your personal data:

Purpose	Personal data	Legal basis	Storage period
<b>Application and project information</b>			
<b>Manage applications for grants and projects as well as review and make decisions about grants and exercise our rights in connection with decisions about grants.</b>	Identity information	Legitimate interest	During the application process and thereafter as long as there is an accountability regarding approved grants or that the grant procedure otherwise is ongoing.
	Contact information		
	Application and project information		
	Billing information		
	Other categories of data submitted by you or an applicant		Thereafter only necessary information is stored up to ten years from the date of completion of the grant procedure, taking into account regulation concerning statute of limitation or the length of time invoked by the nature of the matter or the possibility of reviewing the procedure in response to a new application from the same applicant or other person concerned.
			In addition, necessary information may be saved for further processing such as for archival purposes of public interest, scientific or historical research or statistical purposes.
<b>Pay approved grants and follow up, check and administer financial reports of approved grants as well as exercise our rights in connection</b>	Identity information	Legitimate interest	During the application process and thereafter as long as there is an accountability regarding
	Contact information		

Purpose	Personal data	Legal basis	Storage period
<b>with paid grants.</b>	Application and project information		approved grants or that the grant procedure otherwise is ongoing.
	Billing information		Thereafter only necessary information is stored up to ten years from the date of completion of the grant procedure, taking into account regulation concerning statute of limitation or the length of time invoked by the nature of the matter or the possibility of reviewing the procedure in response to a new application from the same applicant or other person concerned.
	Other categories of data submitted by you or an applicant		In addition, necessary information may be saved for further processing such as for archival purposes of public interest, scientific or historical research or statistical purposes.
<b>Additional processing for other purposes</b>	The categories of personal data processed for the purposes specified in the <b>Application and project information</b> section may be processed for archival purposes of public interest, scientific or historical research or statistical purposes. The personal data will then be saved until further notice. We then take appropriate safeguards to ensure the registrar's rights and freedoms.		
<b>Job applicants</b>			
<b>Manage the recruitment process</b> E.g. to (i) collect, administer and evaluate your application compared to our requested profile; (ii) assess and evaluate your eligibility for	Identity information	Take steps at the request of you prior to entering into a contract	During the recruitment process.
	Contact information		Thereafter only necessary information is stored up
	Qualification and		

Purpose	Personal data	Legal basis	Storage period
employment with us; (iii) verify your identity and verify your information you provided to us; (iv) communicate with you, etc.	recruitment information  Images		to ten years with respect to the regulation concerning statute of limitation.
<b>Check references and perform background checks and tests.</b> E.g. to contact your submitted references and to confirm your submitted information, supplement the basis for our assessment and evaluate your suitability for employment with us, as well as carry out tests relevant to the requested employment.	Identity information  Contact information  Qualification and recruitment information	Legitimate interest  From time to time we may perform checks and tests as well as request credit information where we will ask for your consent to our processing	<i>If the legal basis is legitimate interest</i> During the recruitment process.  Thereafter only necessary information is stored up to ten years with respect to the regulation concerning statute of limitation.  <i>If the legal basis is your consent</i> During the recruitment process, as long as we have your consent.
<b>Save for future recruitment</b> E.g. in order to contact you and offer employment with us if a need arises.	Identity information  Contact information  Qualification and recruitment information  Images	<i>If we are in a contractual relationship with you</i> Perform our contract with you  <i>Otherwise</i> Legitimate interest	<i>If we are in a contractual relationship with you</i> During our contractual relationship with you and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.  <i>Otherwise</i> Until we have performed necessary actions in response to your correspondence.  Thereafter your correspondence might be stored for additional time, depending on the

Purpose	Personal data	Legal basis	Storage period
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content of the correspondence.

#### Other processes

##### **Interact with you or a party for which you are a contact person**

E.g. to establish, administer, maintain and develop our relationship with you or a party for which you are a contact person, to answer questions or other correspondence from you or take actions in response to your correspondence.

Identity information  
Contact information  
Other categories of personal data provided by you or the party for which you are a contact person

*If we are in a contractual relationship with you*  
Perform our contract with you  
*Otherwise*  
Legitimate interest

*If we are in a contractual relationship with you*  
During our contractual relationship with you and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.

*Otherwise*  
Until we have performed necessary actions in response to your correspondence. Thereafter your correspondence might be stored for additional time, depending on the content of the correspondence.

##### **Manage our contractual relationship and perform our contract**

E.g. to fulfil our obligations and exercise our rights arising from any contract with you or a party for which you are a contact person and to administrate our relationship to you or such party, etc.

Identity information  
Contact information  
Billing information  
Information regarding our contractual relationship  
Other categories of personal data provided by you or the party for which you are a contact person

If we are in a contractual relationship with you:  
Perform our contract with you  
If you are a contact person for someone we are in a contractual relationship with you:  
Legitimate interest

During our contractual relationship with you and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.  
Thereafter only necessary information is stored up to ten years with respect to the regulation concerning statute of limitation.

Purpose	Personal data	Legal basis	Storage period
<p><b>Provide and manage our website</b>  <b>www.annagretacrafoord.se</b>  E.g. to, using cookies, manage our website and your access to it, to optimize your experience of our website and to ensure that content is presented effectively to you.</p>	<p>Contact information</p> <p>System and device information</p> <p>Traffic and usage information</p>	<p>Your consent</p>	<p>For as long as we have your consent. We will refresh your consent as appropriate.</p> <p>Please see the section regarding cookies.</p>
<p><b>Inform about our business and approved grants</b>  E.g. to inform about our business and approved grants on our website, in marketing information and in other contexts, to manage your subscription to our marketing information and invitations to events, to maintain a register of persons who unsubscribed from our marketing information, to send marketing information to you, to follow up sent marketing information through statistical processing, and otherwise communicate relevant information about us, administer events (including arranging relevant food and drink) with you as a participant.</p>	<p>Identity information</p> <p>Contact information</p> <p>Application and project information</p> <p>Images</p> <p>Details of participation in events</p> <p>Details of special food preferences</p> <p>Other categories of data submitted by you or an applicant</p>	<p>Legitimate interest</p>	<p><i>Generally</i></p> <p>Personal data processed for this purpose will be saved as long as it is necessary for the purposes for which the data is processed.</p> <p><i>Information about the register for marketing information</i></p> <p>Necessary information is saved until you have informed us that you no longer want to receive information from us, such as by unsubscribing from our marketing information.</p> <p><i>Information about special food preferences</i></p> <p>Such data will be deleted as soon as the current event has been completed.</p> <p><i>Data in registers of persons who unsubscribed from our marketing information</i></p> <p>Necessary information (name and e-mail address) to maintain such a register is stored without limitation in</p>



Purpose	Personal data	Legal basis	Storage period
			time.
<b>Accounting and book-keeping</b>	<p>Identity information</p> <p>Contact information</p> <p>Application and project information</p> <p>Billing information</p> <p>Information regarding our contractual relationship (if applicable)</p> <p>Other information provided by you or the party for which you are a contact person</p>	Legal obligation	Necessary information is stored for a period of seven years in order to comply with statutory storage time regarding accounting.
<b>Invoicing and debt collection</b>	<p>Identity information</p> <p>Contact information</p> <p>Application and project information</p> <p>Billing information</p>	<p><i>If we are in a contractual relationship with you</i></p> <p>Perform our contract with you</p> <p><i>If you are a contact person for someone we are in a contractual relationship with you</i></p> <p>Legitimate interest</p>	<p>During our contractual relationship with you and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.</p> <p>Thereafter only necessary information is stored up to ten years with respect to the regulation concerning statute of limitation.</p>
<b>Development and analysis of our business</b>	<p>Identity information</p> <p>Contact information</p> <p>Application and project information</p>	Legitimate interest	<p><i>If there is a grant procedure</i></p> <p>During the application process and thereafter as long as there is an accountability regarding approved grants or that</p>

Purpose	Personal data	Legal basis	Storage period
	Billing information		<p>the grant procedure otherwise is ongoing.</p> <p><i>If we are in a contractual relationship with you</i> During our contractual relationship with you and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.</p> <p>Thereafter, the data is stored for a period of up to one year from the date of termination of the grant procedure or termination of the contract.</p>
<p><b>To comply with applicable legislation and other legal obligations</b> E.g. to comply with obligations arising from legal requirements, legal decisions or governmental decisions (such as anti-money laundry laws, accounting laws, tax legislation, etc.)</p>	<p>Identity information</p> <p>Contact information</p> <p>Application and project information</p> <p>Billing information</p> <p>Information regarding our contractual relationship (if applicable)</p> <p>Other information provided by you or the party for which you are a contact person</p>	<p>Legal obligation</p>	<p><i>If we are in a contractual relationship with you</i> During our contractual relationship with you and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.</p> <p><i>Generally</i> During the retention period enacted in each applicable legal obligation.</p> <p>Thereafter only necessary information is stored up to ten years with respect to the regulation concerning statute of limitation.</p>

## **6.2 If you choose not to provide certain personal information to us?**

You are not required to provide personal information to us except when provided by law. But please note, if you choose not to provide us with certain personal data or limit our right to process your personal data, that may result in that we cannot manage or approve your application for grants, process your job application or fail to meet an agreement we have with you.

## **6.3 What are our legitimate interests?**

As you can see in the list above, we may process your personal information because it is necessary for the purposes of our legitimate interests. Our “legitimate interest” corresponds to the purpose for which we perform each processing based on our interest.

When we process your personal information for our legitimate interests, we perform a balancing test where we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate interests, such as business, commercial and employer interests, do not automatically override your interests. We will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We do not consider that our processing disadvantages you in any way. We use your information only in ways you would understand and reasonably expect, and which have a minimal privacy impact, or where there is a compelling justification for the processing.

You have a right to object to processing that is based on our legitimate interests. If you wish to do so, please send an e-mail to [info@annagretacrafoord.se](mailto:info@annagretacrafoord.se).

## **6.4 How to revoke your consent**

A limited part of our processing of your personal data may be based on your consent.

You have a right to revoke your consent to this processing of your personal data at any time. If you would like to make use of this right and revoke your consent, please contact us at [info@annagretacrafoord.se](mailto:info@annagretacrafoord.se).

Please note, if you revoke your consent, it does not affect the legality of the processing we have performed based on your consent before it was revoked.

## **6.5 Cookies**

We may, with your consent, use cookies when you use our website [www.annagretacrafoord.se](http://www.annagretacrafoord.se) in order to optimize your experience. We will inform you about what cookies we use from time to time when we collect your consent on our site.

A cookie is a text-only string of information consisting of letters and numbers sent from our web server and stored on your browser or device.

You can control the use of cookies yourself. Your browser or device allows you to change the settings for the usage and extent of cookies. Go to the settings of your browser or device to learn more about adjusting the settings for cookies. Examples of things you can adjust are blocking all cookies, accepting first-party cookies, or deleting cookies when you close your browser. Keep in mind that some of our services and features on the site may not work if you block or delete cookies. You can read more about cookies on the Post and Telecom Agency website, [www.pts.se](http://www.pts.se).

## **7. Sharing or transferring your information**

We may disclose your personal information to chosen third parties in accordance with the provisions below. In the event of such sharing or transfer we will take every reasonable legal-, technical- and organizational action in order to make sure that your personal data is handled in a safe manner and that the level of security is adequate. Any third party that process your information on our behalf are bound by processor contracts which includes a provision that such third party shall follow our instructions, take the measures that we find necessary, observe confidentiality and respect this Privacy Policy.

### *Advisers, suppliers, subcontractors and other business partners*

We may disclose your personal information to any of our insurers, professional advisers, suppliers, subcontractors, business partners or customers insofar as reasonably necessary for the purposes set out in this policy. Hence, we might share your personal data when a third party provide us with services such as providing, hosting and maintaining IT systems, accounting, technical support, testing, surveys, etc. on our behalf.

### *External reviewers and other foundations*

To the extent necessary for the purposes stated in this Privacy Policy, we may disclose necessary personal information to:

- (a) external auditors who, on behalf of us, examine applications for grants within the Foundation's various areas of inquiry; and
- (b) other foundations we work with.

### *Others*

We may disclose your personal information:

- (a) to the extent that we are required to do so by law or a court order;

- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights;
- (d) for archival purposes of public interest, scientific or historical research or statistical purposes.

## **8. How do we protect your information?**

You should always feel secure when you provide us with your personal data. Therefore, we have taken the suitable legal, technical and organisational precautions to prevent unauthorized access, use, change and deletion of your personal information. We have adopted an IT policy which applies to all our employees that set up the provisions for how we use our information systems. All our processing of your personal data is in accordance with current applicable data protection legislation.

## **9. Where are we processing your information?**

It is our objective to process all your personal data within the EU/EEA. In some situations, however, your personal data may be transferred to and processed by a supplier, a subcontractor or another business partner with registered office in a country outside the EU/EEA.

All such sharing and processing of information will be in accordance with current applicable data protection legislation and we will take all reasonable legal, technical and organisational actions to make sure that your personal data will be processed securely and with an adequate level of protection comparable with, and at the same level as, the protection that is provided within the EU/ EEA.

If you have any questions regarding a transfer, please contact us through the contact details provided in our policy.

## **10. Your rights**

### **10.1 Right of access and to information**

You have the right to obtain a confirmation from us as to whether or not personal data concerning you are being processed by us, and, where that is the case, you have the right to access that personal data.

We will provide a copy of your personal data undergoing processing. For any further copies requested, we may charge a reasonable fee based on administrative costs. If you make the request by electronic means, and unless otherwise requested by you, the information will be provided in a commonly used electronic form.

## **10.2 Right to rectification**

You have the right to obtain from us, the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed.

## **10.3 Right to erasure ("right to be forgotten")**

You have the right to obtain from us, the erasure of personal data concerning you and we have the obligation to erase your personal data in some situations, for example

- (a) if the personal data is no longer necessary in relation to the purposes for which they were collected,
- (b) if the processing is based on your consent and you withdraw that consent (and there is no other legal basis for the treatment),
- (c) if the processing is based on our legitimate interests and you object to the processing and there are no overriding legitimate grounds for the processing,
- (d) if the personal data have been unlawfully processed, or
- (e) if the personal data have to be erased for compliance with a legal obligation, etc.

There might be reasons as to why we cannot immediately erase all your personal data. Our continuous processing of your personal data might for example be necessary in order for us to fulfil a legal obligation that requires processing of your personal data, for example bookkeeping and tax legislation, or to establish, exercise or defend a legal claim. In that case we will block the information that could not be immediately erased from use for any other purposes than the ones that hindered the information from being erased immediately.

## **10.4 Right to restriction of processing**

You have the right, under certain conditions; to obtain from us restriction of processing of your personal data. Restriction of processing means that your stored personal data will be marked with the aim of limiting their processing in the future to certain given purposes.

The right to restriction applies for example when you have contested the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data, and when you have objected to our processing based on our legitimate interests, pending the verification whether our legitimate grounds override yours.

## **10.5 Right to data portability**

You have the right, under certain conditions, to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from us.

When exercising your right to data portability you have the right to have your personal data transmitted directly from us to another controller, where technically feasible.

## **10.6 Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to certain processing of your personal data. The right to object applies when we process your personal data including profiling, to perform an engagement of public interest, as part of the exercise of public authority or after a balance of interest.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to our processing of your personal data for such marketing.

## **10.7 Right to object to automated individual decision-making (including profiling)**

You have the right, with certain exemptions, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

## **10.8 Right to lodge a complaint**

If you consider that our processing of your personal data infringes the GDPR you have the right to lodge a complaint with the *Datainspektionen*, which is the supervisory authority in Sweden.

## **10.9 Exercise your rights**

If you wish to exercise any of your rights you can easily do that by contacting us through email at [info@annagretacrafoord.se](mailto:info@annagretacrafoord.se). In order to protect your integrity and your personal data we might require that you identify yourself when you require our assistance.

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**Our Privacy Policy was updated on October 30, 2018**