

Title: Combient integrity and data governance policy	Date: 2018-05-25
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Information about handling of personal data

Correct handling of personal data is very important for Combient, both to protect personal integrity and to provide good security to the co-operation model that Combient is driving.

This document is a high-level summary to provide an overview of integrity and privacy in Combient.

Responsibility

Combient AB, Sveavägen 17, SE-111 57 Stockholm is responsible for personal data collected and managed under the Combient name by Combient AB in Sweden and Combient Oy in Finland.

Combient has appointed a person as controller of data within Combient.

Personal data

Category	Data	Use	Consent
Employee	Name, personal identity number, postal address, e-mail address & phone number.	Legal and practical requirements for handling employment and communication with employee.	The employee has provided the information and thereby implicit consent.
Consultants	Name, e-mail address & phone number	Used for communication during engagements.	The consultant has provided the information and thereby implicit consent.
Participants from participating companies	Name, e-mail address & phone number	Used for communication (messages & newsletters) and engagements in advisory groups, forums, workshops etc.	The participant or a contact person has provided the information and thereby implicit consent.
Vendors	Name, e-mail address & phone number	Used for communication during engagements. Example: Office cleaner etc. who needs access to the office and needs to be registered in the alarm/security system.	The person in question has provided the information and thereby implicit consent.

Removal or update of personal data

Contact governance@combient.com.



Handling of personal data

Handling of personal data is documented and processes / routines are in place.

All data is provided by implicit consent since it is provided to Combient by the person in question or a specific contact person in the same organisation as the person in question. No data is collected on the Internet.

All data is only related to work (work postal address, work e-mail address and work phone number) and nothing to the private life.

The data is stored as long as Combient has an engagement with the company or individual in question or until the person in question actively asks to be removed.

The data is not shared with other organisations.

Combient is using best possible security to handle the data. This involves two-factor authorisation to accounts, encryption if possible etc. as well as a careful selection of IT products and services.

How does this integrity policy affect the individual?

1.) The right to your personal data

You have the right to know what kind of personal data Combient has about you and how this data is used. As described above it is the name of your employer, personal name, postal address, email address and phone number. Nothing else.

2.) The right to be forgotten

Combient will immediately stop using and / or delete your personal data if you so require. To do so send a request to governance@combient.com.

3.) Data portability

You have the right to move your personal data from Combient to another organization but since this data is so limited it is for most practical purposes not applicable.

4.) Data protection

Combient is practicing "privacy by design" so developing best possible data protection is of utmost importance in all aspects.

5.) Security measures

Combient is using best possible security measures when handling personal data which involves two-factor authorisation, encryption etc. if possible.

6.) Reporting

Combient will report any incidents and breaches to The Swedish Data Protection Authority (DPA) within specified time limits.