

# Wingårdhs Privacy Policy

Wingårdh Architects processes personal information for business purposes and in accordance with applicable legislation. This privacy policy describes how Wingårdh Arkitektkontor AB ("Wingårdh"), organization number 556339-7503, processes personal information. Wingårdh will in every case ensure that personal information is processed legally and correctly. What follows is a description of how we process your personal information.

## 1. Who is responsible for your personal information?

Wingårdh is the data controller responsible for ensuring that your personal information is processed in accordance with applicable data protection legislation

## 2. Whose personal information do we process?

We process personal information about the following categories of people:

- **Visitors**, i.e. private individuals who visit our website.
- **Newsletter recipients**, i.e. private individuals who, after visiting our website, apply to receive our newsletter.
- **Clients and collaborative partners**, i.e. private individuals who represent our current or future clients or collaborative partners who purchase or pose questions about Wingårdh Architects' products and services.
- **Suppliers**, i.e. private individuals who represent our suppliers.

## 3. What personal information about you do we process?

### • 3.1 For visitors to our website

We may process the following personal information about you as a visitor to our website:

- Your IP address and information about your usage of the Wingårdh website.

### • 3.2 For newsletter recipients

We may process the following personal information about you as a recipient of our newsletter:

- Email address and IP address and information about your usage of the Wingårdh website.

### • 3.3 For clients, collaborative partners, or suppliers

We may process the following personal information about you as a client or supplier:

- Name, personal identity number, copy of your identity card or driver's license, and contact information, including street address, email address, telephone number, and links to your profiles on social media platforms.

#### **4. Why do we process your personal information, and on what legal grounds do we do so?**

- **4.1** In order to enter into and manage agreements with you as a customer, collaborative partner, or supplier, Wingårdh processes personal information belonging to you. The legal grounds for our processing of your personal information is that it is necessary for us to execute our agreement with you or for us to take actions that are necessary in order to enter into such an agreement. If you do not provide the personal information listed above, it is not possible for us to provide our services or otherwise satisfy our commitments to you. In the event you are a representative or contact person for an organization that is a client, collaborative partner, or supplier to Wingårdh, the legal ground for our processing of your personal information is a weighing of interests, i.e. the processing is necessary for a purpose relating to our legally entitled interest in maintaining and executing our responsibilities under contractual relationships. If you do not provide your personal information, we may not be able to execute our responsibilities to your organization.
- **4.2** Wingårdh also collects and processes personal information belonging to you as a visitor to our website, recipient of our newsletter, client, collaborative partner, or supplier in order to ensure the quality of our work or to contact you to offer or market our services to you. We may also send relevant marketing offers to you in the form of, for example, newsletters or special offers through social media and email. The legal ground for this is that such information processing is necessary for our legally entitled interest in developing our business, responding to your needs, and marketing products and services we think you might be interested in. Our interest in processing your personal information for this purpose supersedes the interest you have in protecting your personal privacy in light of the potential advantages this marketing confers on you. However, you have the right to object at any time to our processing of your personal information for direct marketing purposes.
- **4.3** Some personal information may also be processed because Wingårdh has a legal obligation, for example, to provide personal information to be in compliance with accounting requirements or other obligations required of us by law.
- **4.4** After Wingårdh enters into a contractual agreement with a client, the two sides may need to agree on further processing of personal information for a particular project, such as work with websites, social media, etc. Separate information regarding the privacy policy for a particular project will be developed and provided for each project individually.

## **5. How long do we save your personal information?**

- **5.1** Wingårdh never saves personal information longer than necessary to process the information for the intended purpose. To that end we regularly erase personal information from our records in order to remove information that is no longer necessary.
- **5.2** Wingårdh saves information about you as a client, collaborative partner, or supplier for the duration of an active contract. When our contractual relationship has come to an end, Wingårdh saves personal information as long as we have or can make a legal claim that is validated by the contract. However, Wingårdh may need to save your personal information even after the conclusion of this time period in order, for example, to administer warranties, to respond to complaints or claims, to satisfy legal obligations, to respond to other legal demands that may be directed at Wingårdh but do not stem from any contract, or to market services and make offers that Wingårdh determines may be of interest to you.
- **5.3** Wingårdh saves information about you as a visitor to our website or recipient of our newsletter until you object to our processing of your personal information. If you object to such processing, Wingårdh will erase your personal information as soon as possible.

## **6. Who has access to your personal information?**

- **6.1** Your personal information may be shared with and processed by a third party, such as an affiliated company, service provider, legal counsel, accountant, management consultant, authority, etc. Examples of situations in which your personal information may be transferred to a third party include when doing so is necessary because of a law, a dispute, or a governmental inquiry or decision, when requested by you, or when necessary to satisfy an interest to which Wingårdh is legally entitled. Wingårdh remains responsible as data controller for any personal information transferred to a third party, while, depending on the circumstances, the third party either becomes independently responsible, jointly responsible together with Wingårdh, or responsible as Wingårdh's representative for your personal information.

## **7. Where do we save your personal information?**

- Wingårdh will only process your personal information within the EU.

## **8. Cookies**

- **8.1** When you visit our website, we do not use cookies because we have no need to know which pages you visit. Cookies are small text files that are saved in your device when you visit a website in order to collect data and track, for example, the number of visitors, which links visitors click on, and visitor demographics and interests.

## 9 Profiling

- **9.1** Wingårdh's website does not process your personal information through profiling except for the sole purpose of presenting you with appropriate projects and areas of expertise.

## 10. What rights do registered users have?

- **10.1 Right to access**

You have the right to turn to Wingårdh as data controller to request access to the personal information we hold about you, and to request information about, for example, the purposes for our processing of your information and with whom it has been shared.

As data controller, Wingårdh will provide you with a copy of the personal information we hold about you at no cost to you.

- **10.2 Right to correction and limitation**

You have the right to have your personal information corrected or, under certain conditions, limited without unnecessary delay. If you believe that Wingårdh is processing personal information about you that is incorrect or incomplete, you may demand to have it corrected or completed.

- **10.3 Right to erasure**

You also have the right to have your information erased if, for example, it is no longer necessary for the agreed purpose or if our processing of it is contingent upon consent that you have revoked. However, there may be legal requirements or contractual obligations that prevent us from erasing your personal information.

- **10.4 Right to object**

As a registered user of the website you have the right to object at any time to our processing of your personal information if the legal ground for that processing is the weighing of interests. As a registered user you also have the right to object at any time to our processing of your personal information if it is being used for direct marketing.

- **10.5 Right to data portability**

As a registered user of the website you have the right to data portability, i.e. to obtain the personal information you have provided to Wingårdh as data controller and to transfer that information to a different data controller. However, this is only true if it is technically feasible and if our processing of your information was necessary for the execution of a contractual agreement.

- **10.6 Right to submit a complaint**

If you are dissatisfied with how we have processed your personal information, we request that you contact us at the contact information given in Section 12 below. You also have the right to submit a complaint about our processing of personal information to the Swedish Data Protection Authority, or Datainspektionen (the agency is changing its name to Integritetsskyddsmyndigheten during 2018) at

Datainspektionen  
Box 8114  
104 20 Stockholm  
datainspektionen@datainspektionen.se

## **11. Changes to this policy**

Wingårdh retains the right to change and update this policy. In the event of substantive changes to the policy or if existing information is to be processed in a way that differs from what is indicated in the policy, Wingårdh will provide notification in an appropriate way.

## **12. Contact Wingårdhs**

- **12.1** If you have questions or requests related to our processing of personal information, please contact Wingårdh's privacy policy ombudsman:

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Wingårdh Architects  
Kungsgatan 10a  
411 22 Göteborg  
tel +46 10 788 1066  
personuppgiftsombud@wingardhs.se