

## INFORMATION ON THE PROCESSING OF YOUR PERSONAL DATA

Digital registration for activity at Stockholms City Mission's Social Centers

#### Introduction

This document aims to provide you with information about how Stockholm City Mission processes your personal data when you digitally register for an activity at Stockholm City Mission's Social Centers via the web-based tool EsMaker.

Stockholm City Mission is a non-profit organization working for a more humane society for all by providing social care, employment integration, and education. Stockholm City Mission is an ideologically driven, independent actor operating separately from the state, municipality, and church.

Stockholm City Mission operates four different "Social Centers": "Social Center City", "Social Center Vårberg", "Social Center Hässelby", "Social Center Mariatorget". The social centers provide activities in which you, as a participant, are offered the opportunity to receive basic needs support (primarily meal serving), participate in various group activities, and receive individual support.

Stockholm City Mission (org. no. 802003-1954), with address Box 35, 131 06 Nacka, email address gdpr@stadsmissionen.se and phone number 08-684 230 00, is the data controller for the data you give us according to the EU's General Data Protection Regulation (GDPR).

Stockholm City Mission respects your privacy and protects your personal data. All processing of personal data is in accordance with applicable law.

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## 1 Processing of personal data

## 1.1 Which personal data are processed?

Stockholm City Mission only processes personal data that you as a participant provide to us. It is always voluntary to provide data and you can also use a fictitious name if you do not want to disclose your real name. The personal data that Stockholm City Mission processes when registering for activities are:

- a) first name
- b) surname
- c) phone number
- d) email address
- e) type of activity
- f) time(s) for the activity
- g) time of registration

If you want to exercise any of your rights described in <u>section 2</u>, Stockholm City Mission, if possible, will address your request directly without processing any additional personal data. If Stockholm City Mission is unable to fulfill your request directly, Stockholm City Mission will process your first name, last name, and your contact details (phone number and email address) in order to get back to you when an action has been taken. These personal data (first name, last name, and contact details) are stored in an Excel file that is stored in our records system, Carebuilder, from the time your request is received until an action has been taken. Please read more about your rights in <u>section 2</u>.

## 1.2 For what purposes are the personal data processed?

In digital registration lists, your first name, last name, and contact details, the activity you intend to participate in, and the time(s) of the activity are processed. The time of your registration is also recorded. Some activities occur on repeated occasions. The purpose of the registration lists is to inform you if the activity is cancelled or changed, to plan and safely carry out the activity, and to ensure that only those who have registered are participating in the activity. The timing is recorded to ensure that registration has occurred within the registration period.



## 1.3 What are the legal bases for the processing of your personal data?

#### **Legitimate Interest**

The processing is based on Stockholm City Mission's legitimate interest according to Article 6.1 f) of the GDPR. Stockholm City Mission has an interest in being able to plan and safely carry out activities based on the number of attendees. Also, it is important to be able to contact you if necessary, for instance if the activity should be cancelled or moved. Lastly, to ensure that only those who have registered are participating in the activity.

## **Legal Obligation**

The personal data processing that may occur if you want to exercise any of your rights as per section 2. is based on the legal basis of legal obligation (Article 6.1c GDPR).

#### 1.4 How long is the personal data stored?

Personal data documented in a digital registration list is deleted as soon as possible after the activity is carried out, but no later than a week. For activities that occur on repeated occasions, the registration list is deleted as soon as possible after all instances of the activity are completed, but no later than one week after the last activity.

If you request that Stockholm City Mission takes an action on the basis of your rights as per section 2, your personal data is only stored if Stockholm City Mission cannot handle your request immediately. Data that is saved is deleted when you have received feedback on your request. This normally happens within a month. In complex cases where your request is extensive, your personal data can be stored for up to three months.

#### 1.5 Who has access to your personal data?

Stockholm City Mission has taken appropriate technical and organizational security measures to protect your personal data against loss and unauthorized access.

Digital registration lists are managed via the web-based tool EsMaker. Users of EsMaker have a personal account that is password protected. Only the user who has created the registration form has access to your personal data. Your personal data may also be shared with staff members working within Stockholm City Mission's social centers if they plan or arrange the activity you are to participate in. In such cases, the participant list may also be stored in our record system Carebuilder.

Both EsMaker and Carebuilder are GDPR-secure systems that have servers in Sweden. The risk of intrusion is assessed as low.

Personal data stored in an Excel file due to you wanting to exercise your rights under <u>section 2</u> are available to staff at meeting places, as well as IT administrators and product owners of Carebuilder.



## 2 What are your rights?

#### 2.1 General

Stockholm City Mission is the data controller for the processing of your personal data. This means that Stockholm City Mission is responsible for your personal data being processed correctly and in accordance with applicable legislation. You exercise your rights by contacting the organization via the contact details below and submitting a request free of charge. There are no specific form requirements for how a request should look, and you can do it both orally and in writing, but Stockholm City Mission may need to verify your identity. If you want to submit a request or ask how Stockholm City Mission processes your personal data, see contact details below:

Stockholm City Mission (org. No 802003-1954), address Box 35, 131 06 Nacka, email address gdpr@stadsmissionen.se and phone number 08-684 230 00

Stockholm City Mission is obliged to handle a request in accordance with your rights without delay, and no later than within one month. If the case is complex, Stockholm City Mission has the right to extend the deadline to a maximum of three months in total. If you have objections or complaints regarding Stockholms City Mission's processing of personal data, you can contact the Swedish Data Protection Authority (imy@imy.se). Read more about your rights below.

#### 2.2 The right of access (Article 15)

You have the right to know if Stockholms City Mission is processing your personal data. If Stockholm City Mission is processing your personal data, you have the right to receive a copy of the personal data and the following information:

- a) The purpose of the processing.
- b) What information Stockholm City Mission is processing.
- c) What recipients or categories of recipients your personal data has been or will be disclosed to.
- d) How long Stockholm City Mission keeps your personal data.
- e) Your right to request correction or deletion or restriction of Stockholm City Mission's processing of your personal data or to object to the processing.
- f) Your right to lodge a complaint with a supervisory authority.

#### 2.3 The right to rectification (Article 16)

You have the right to have incorrect or incomplete personal data about you corrected, updated, or supplemented.

## 2.4 The right to erasure (Article 17)

You have the right to have your personal data deleted in the following cases:

- a) The data is no longer necessary for the purpose for which they were collected or otherwise processed.
- b) The processing of personal data is done for direct marketing, for example, our newsletter, and you want it to stop.
- c) You have objected to the processing of your personal data based on a legitimate interest (according to Article 21) and there are no legitimate reasons that outweigh your interest in having the data deleted.
- d) If your personal data is processed illegally, for example, because there is no basis in the GDPR for the processing of personal data.
- e) If the deletion of your personal data is required to fulfill a legal obligation.



Stockholm City Mission may deny your request to delete your personal data if the Stockholm City Mission must retain the data to fulfill a legal obligation or to establish, assert, or defend legal claims. Please note that deleting your personal data may impair the Stockholm City Mission's ability to provide support to you.

#### 2.5 Right to restriction (Article 18)

You have the right to have the processing of your personal data restricted in the following cases:

- a) You have disputed the accuracy of your personal data, however, only during the time the Stockholm City Mission needs to verify the accuracy of the personal data.
- b) The processing of your personal data is illegal, but you oppose deletion and instead wish for a limitation on our use of your personal data.
- c) The Stockholm City Mission no longer needs your personal data, but you need them to establish, assert, or defend legal claims.
- d) You have objected to the processing of your personal data, however, only during the time the Stockholm City Mission needs to investigate whether the organization's interest in processing your personal data outweighs your interest in them not being processed.

During the time a restriction of personal data processing applies, the restricted personal data may only be used beyond storage to protect another person's rights or to assert or defend legal claims. Please note that a restriction on your personal data may impair our ability to provide support to you.

### 2.6 Right to object (Article 21)

You have the right to object at any time to the Stockholm City Mission's processing of your personal data. If you object to the processing and the Stockholm City Mission cannot demonstrate compelling legitimate reasons for the processing that outweigh your interests, the Stockholm City Mission may not continue to process your personal data. This means that your personal data will be deleted. You always have the right to object to the processing of your personal data for direct marketing. You have the right to request that your personal data be restricted while the Stockholm City Mission processes your objection.

## 3 Changes

If the Stockholm City Mission makes any changes regarding the processing of your personal data, the Stockholm City Mission will inform you of this by providing an updated version of this document in the Stockholm City Mission's premises and on the Stockholm City Mission's website. If you have provided your contact details for the purpose of receiving newsletters and information about the activities of the organization, the Stockholm City Mission will also email you if the Stockholm City Mission makes changes regarding the processing of personal data.



# 4 Table of our processing of your personal data

No.	Which personal data is processed?	For what purpose is the personal data processed?	What is the legal basis for the processing of personal data?	How long is the personal data saved?
1	First name Surname	If you want to participate in an activity, you can write these personal details on a sign-up	Legitimate interest	The registration list is deleted after the activity has been carried out, at the
	Surname	list. Stockholm City Mission		latest after one week. If the
	Phone	needs your contact information		activity occurs on repeated
	number	to be able to contact you if the		occasions, the list is culled
	Activity type	activity is cancelled, for example. Stockholm City		after all activity occasions have been completed, at
		Mission also collects this		the latest after one week.
	Time of	information so they can plan		
	activity	and safely conduct the activity and ensure that only people		
	Time for	who have signed up for the		
	notification	activity participate.		
2	First name	If you, as a participant, request	Legal	Deleted immediately after
		to have your rights as a	obligation	you have received
	Surname	registered individual fulfilled,		feedback. In simpler cases,
	Dhara	Stockholm City Mission may		feedback should be given
	Phone number	need to process your contact		within at most one month
	number	information in order to provide you with the information you		after the request has been received. In complex cases,
	Email	wish to receive, as well as to get		feedback should be given
	address	back to you once action has		within at most three
		been taken.		months after the request has been submitted.