

## Our Privacy Policy - the short Version

- Bahnhof handles customer data according to the General Data Protection Regulation, also called GDPR.
- Bahnhof does not request more information than necessary for our customers to enter an agreement with us.
- Bahnhof does not request more information than necessary to deliver the service that our customers have ordered.
- Bahnhof only transfers customer information to subcontractors that are approved by us, and only for the purpose of being able to deliver a service and for billing.
- Bahnhof only keeps necessary information about customers as long as they are our customers. Billing and certain financial data are securely stored with us for a longer period when it is governed by the Accounting Act.
- Bahnhof deletes IP-address logs within 24 hours.
- Processing is necessary for the performance of a contract in which the data subject is party or to take action at the request of the data subject prior to the conclusion of such an agreement.
- Processing is necessary for the performance of a legal obligation which is the responsibility of the Controller.
- Processing is necessary to protect interests that are of fundamental importance to the data subject or to another person.
- Processing is necessary for the performance of a task carried out in the public interest or as part of the exercise of the Controller authority.
- Processing is necessary for purposes relating to the legitimate interests of the Controller or of a third party, unless the interests or fundamental rights and freedoms of the data subject are heavier and require the protection of Personal data, in particular where the data subject is a child.

## Our Privacy Policy - the long version

### Bahnhof handles the following data

**Customer:** Information that is associated with our customers contract and their service with us such as name, address, e-mail address, telephone number, social security number, IP-address the order was made from.

**Traffic data:** Information necessary for the transmission of data in an electronic communication network.

Pleasde note! Traffic data is not content, but data describing the transfer such as IP logs, email logs and call history if you have telephony with us.

### Customer data is gathered from

- Any information customers provide when they order a service, or when they submit a fault report, or if they want to receive offers from us.
- When you visit our website, as well as when you call, text message or send us an e-mail.
- Publicly available personal data registers such as SPAR, credit assessment as UC and
- Call history - if you have telephony with us.

### What is customer data needed for?

GDPR's rules for lawful handling of personal data are as follows:

- The data subject has given his/her consent to the processing of his/her personal data for one or more specific purpose/s.

### Delivery of service

We need our customers personal information in order to deliver the service that they have ordered from us, or to complete our agreement regarding the delivery of services and products and to ensure the operation and support of our services. We also need customers information for billing services, credit information purposes, to report complaints and to help with questions about their service with our customer service.

Without access to customers personal information in this regard, we may not provide our services to them.

### How long do we keep customer data

We will save our customers data as long as they are customers, and we will send it to our authorized subcontractors to deliver service as well as for debugging. Some data is kept longer depending on what the data needs to be used for and our obligations under the law.

Once a customer has annulled their customer relationship with us, their information will remain with us for 1 year. In order for the information to be as secure as possible during this time, we will "lock" the customer profile and limit access to it after 6 months, and after another 6 months, we will delete all information we have about the customer.

### Customer data with our partners

#### Subcontractors

In order to deliver our services, we use subcontractors in some cases. This means that they also need some of the information that a customer have provided to us.

Our subcontractors may not use the information about our customers for any other purpose than to provide the service or under the terms we specify.

Examples of our subcontractors include: City networks, Eniro/Find, 21 grams (to create your bill), SNPAC and various installation companies.

Non-EU countries

If we need to use subcontractors that have parts of their business outside Sweden or outside the EU/EEA, we will take appropriate precautions and ensure that the transmitted data is handled in a safe manner and in accordance with applicable law.

## Authorities

We are obliged to disclose data to authorities such as the police and SOS Alarm, at the request of law and government decisions.

## How we protect customer data

We handle our customer data with extreme care. ALL interaction between us and our subcontractors that contains data is encrypted or made through portals secured with SSL.

APIs to other systems only send minimal information. Instead of personal data we use customer numbers, and service IDs instead of names or social security numbers, etc. with all subcontractors.

## Customers rights

**Right of access:** Customers have the right to know what personal information we have about them and how we handle it, and they may access it free of charge. The data subject makes a request for information in electronic format, and the information shall be provided in an electronic format which is generally known, if the data subject does not request otherwise.

**Right to rectification:** We are responsible to ensure that the personal information we handle about a customer is accurate and up-to-date. If a customer notices an error, they have the right to request rectification of this information.

**Right to erasure:** Under certain circumstances a customer has the right to have his/her personal data deleted. This is applied in the following situations:

- If the personal data is no longer needed for the purpose/purposes for which they have been collected.
- If the data has been collected solely on the basis of consent from a customer and they wish to revoke that consent.
- If a customer disagrees with the handling of data for direct marketing purposes.
- If a customer believes that the personal data, after a balance of interests, does not meet legitimate reasons that outweigh the interest or fundamental rights and freedoms.

**Right of objection:** Right to object the processing of personal data provided by Bahnhof on the basis of a balancing of interests. We need to receive the treatment a customer is opposed to. Then we will only continue to deal with the data if there are compelling legitimate reasons for the personal data to be processed and if these outweigh the customers interests. For marketing purposes, a customer is always entitled to oppose the processing of personal data.

**Right of limitation:** Our customers may limit our processing of their personal data if they dispute the accuracy of the data, if the processing is illegal or if the data is not required for the purpose of the processing.

## Data to develop services

In order to improve and develop our products, services and networks, customers traffic data may be needed for statistics and/or analysis. The data used for these purposes will be anonymized.

## News and Offers

If a customer wants to receive news and offers from us, they must give their consent before we may contact the customer for that purpose. When a customer has given their consent, we may contact them by post, SMS, phone, email, My Pages at bahnhof.se or any other way they have accepted.

## Security of information and to prevent abuse of services

We process data in order to ensure the security of our services and communication networks, to detect or prevent any kind of illegal use or use that otherwise violates the terms of the service.

We also process this data to prevent misuse of networks and services and to detect and prevent fraud, virus attacks, and other potential threats.

## Law and dispute

Agreements and disputes must be interpreted and applied in accordance with Swedish law.

In the event of a dispute between Bahnhof and the customer, the Parties shall seek to agree first. Disputes arising from interpretation and application shall ultimately be settled in the ordinary courts.

## Contact us to exercise your rights

Contact us at [gdpr@bahnhof.net](mailto:gdpr@bahnhof.net) if you would like to request extracts of your personal data, if you would like to correct or delete your personal data or if you would like to revoke submitted consents.