

# Look Closer's Privacy Notice

## General

Look Closer AB ("Look Closer", "we", "us") is committed to protecting the privacy, integrity, and security of your personal data. This Privacy Notice sets out the types of personal data we collect, how we collect and process that information, who we may share it with in relation to the services we provide, and certain rights and options that you have in this respect.

## Who is responsible for our processing your personal data?

Look Closer is the data controller and therefore responsible for the lawful processing of the personal data we collect. Look Closer owns and operates the web site [www.lookcloser.se](http://www.lookcloser.se).

## Personal data we collect

Look Closer will collect personal data when we are asked to do so by our clients in order to conduct an in-depth background check on a person, if you are a client or service provider of ours, or when you apply for a position with us. The personal data that we collect includes name, address, and phone number. When we conduct background checks we will also collect data concerning prior employment, your family situation, and similar information.

We may collect and process the following personal data from you:

- **Identity and contact information**, including your name, e-mail address, address, telephone number;
- **Business related information**, including information provided in the course of the contractual or client relationship between you or your organisation and Look Closer, or otherwise voluntarily provided by you or your organisation, and other personal data concerning your preferences relevant to the service(s) for which you hired us;
- **Employment related information**, such as employment history, educational or professional background, job title and function, and other personal data concerning your preferences relevant for a recruitment process or an in-depth background check; and
- **Background information**, such as educational or professional background, family situation, address history, and other personal data relevant for a recruitment process or an in-depth background check.

## How we use the data that has been collected

We may collect your personal data under the following circumstances:

- When an organisation asks us to do an in-depth background check or to provide a similar service;
- When you or your organisation provides, or offer to provide, services to us;
- When you correspond with us by e-mail or other electronic or physical means, or when you correspond directly with us, including in conversations with our consultants or other staff, by phone or directly face-to-face;

- When you or your organisation make a request or otherwise interact with our web page; and
- When making requests from your organisation or other organisations with whom you have or had contacts with such as former employers and educational institutions, or from third party sources such as from publicly available records.

How will we use your personal data?

We may use your personal data (only) for the following purposes:

- To maintain adequate records of you;
- To administer and manage communication with you;
- To administer and manage a background check we may do on you; and
- To provide you with information and offers related to our services.

The above-mentioned purposes will be processed on one or more of the following legal grounds:

- Because it is necessary for us to do so to perform in accordance with a contract between you and us;
- Because it is necessary based on our legitimate interests;
- Because it is necessary to comply with our legal obligations such as to keep records of our accounting or for taxation purposes; and
- Because you have given us your consent to process your data.

### **Disclosure and international transfer of your personal data**

We may disclose or transfer information to parties which process personal data on our behalf in order for us to perform our services, e.g. to providers of IT-services or to parties that assist us in our background checks. High levels of security and confidentiality is always considered when transferring your personal data.

We only collaborate with parties that process personal data within the EU/EEA. To the extent that your personal data will be transferred to a country outside the EU/EEA, not recognized by GDPR as providing an adequate level of protection for personal data, such transfer will be covered by a framework recognized by GDPR and relevant authorities to ensure it provides an adequate level of protection (such as the EU Commission's standard contractual clauses).

### **Retention periods**

We will not keep your personal data longer than what is necessary with regards to the respective purposes of the processing. We will store your personal data for as long as you are a client, are involved in a recruitment process, are the subject of a background check, or for as long as it is necessary in order to determine whether a business relationship is established or not. Practically, this means that personal data will be deleted when it is no longer up-to-date or necessary with regards to the purposes for which they were collected unless we have a legal obligation to keep the data.

## Your rights

- **Access:** You have the right to request a copy of the personal data that we process that relates to you. However, there are exceptions to this right, so that access may be denied if, for example, making the information available to you would adversely affect the rights and freedoms of another person, or if we are legally prevented from disclosing such information. If you want a copy of the data related to you that we process, please contact us.
- **Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to let us know by contacting us if any of your personal data is not accurate or has changed since you provided us with it.
- **Objecting:** In certain circumstances, you have the right to object to processing of your personal data and to ask us to block, erase and/or restrict the processing of your personal data. If you would like us to stop using your personal data, please contact us.
- **Porting:** In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.
- **Erasure:** You have the right to erase your personal data when the personal data is no longer necessary for the purposes for which it was collected, or when, among other things, your personal data have been unlawfully processed.
- **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts.

You may, at any time, exercise any of the above rights, by contacting us using the contact information provided in this Privacy Notice. We may require that you provide an appropriate proof of your identity, e.g. a copy of your ID card, or passport, or any other valid identifying document or service.

## How to contact us

For more information about our Privacy Notice or if you have any questions, please contact us at: [info@lookcloser.se](mailto:info@lookcloser.se).

This Privacy Notice is applicable from 25 May 2018.