

# Privacy policy

*Version: 2020*

This privacy policy declares how Haldor AB, with org. Number: 559023-7516, handles personal information.

We also want to clarify the responsibilities we are obliged to in order to protect your rights and privacy by explaining how we use the personal information you share with us and why they are needed in order for us to provide you with the best possible service experience.

## Parties and responsibilities for the processing of your personal data

Haldor AB, Org. Number: 559023-7516, Storgatan 25, 852 30 Sundsvall, Sweden, is a system supplier of Haldors educational tools referred to hereafter as the "Service". Haldor AB is a personal data processor for your personal data in the service and has the responsibility for organizational and technical security measures. These are further described in detail in our general 'Terms and Conditions'. The data controller for the processing of your information in the service is the "Customer" who is the registered organization at Haldor AB, which are either private or public schools. If you are a user and have your own login information/credentials for the services, you are referred to as a "User". The services include a role defined as "system administrator", which is the representative(s) of the customer regarding the services that is responsible for creating users and other system administrators, assigning rights and giving instructions to Haldor AB regarding the processing of data, incl. personal data in the service.

Haldor AB is the data controller for the processing of personal information that you share with us when:

- you order the service
- you have a question and/or contact us by phone, email or chat
- you subscribe to our newsletter
- you sign up for a online demo, a webinar or a another event
- you visit our website and accept cookies

## What personal information do we process about you?

When you order the service, we collect your contact information and company information. All users have registered contact information, login information and "online identifications" with us in order to be able to use the service. The images, files and documents you choose to upload to the system will be stored by us. When registering for a digital demo of the services, we need your contact information and company information.

If you have a question or if you contact us about any other matter, the amount of personal data, and what type of data it is, will vary depending on the communication channel used. Categories of personal data are usually contact information, “online identifications”, company information and the case itself which is unstructured information, which contains the personal information you have chosen to share with us. Information about what cookies are and how we handle cookies is described on our [Cookie Policy](#)-page.

## **Why do we process your personal information?**

Haldor AB collects personal information about you as a user and customer in order to provide the services, fulfill commitments to you under contract, and provide you with the best possible experience of both the services and our website. We also process your personal information in order to deliver newsletters and offers as well as carry out events such as webinars and exhibits. This is necessary for us to be able to identify you and administer your account – for statistical purposes and for communication. The personal information collected when ordering is required to handle the order, invoice and send you login information.

All users’ personal information is required in order to provide you with access to the services, to enable you to use the services, to create a treatment history for you as a customer, to identify you and to know which users and customers use the services.

We also process the data to send evaluations and follow-up forms that you agree to. When you contact us via any of the communication channels to Haldor AB, the information about you is used to handle the matter, to contact you and to improve our services by saving the matter on recurring questions. If you visit the website <https://www.haldor.se>, you consent to cookies for the processing of your information.

## **Who do we share personal information with?**

In the use of certain features of the services, we may share personal information with subcontractors of Haldor AB within the EU/EEA. The service runs in Microsoft’s Azure Cloud Service. The suppliers have corresponding obligations regarding the processing of personal data that you, as a customer, have agreed to with us and are shown in the processor agreement. Your information as a customer may be merged with a third-party registry to collect more information about you as a customer. We may need to share personal information with other companies within the corporate group in order to provide the services and fulfill our obligations towards you. We share personal information about users and customers between the companies within the corporate group when you have a user case to our services – if the information is needed to help you. If you choose to enable an integration to the services, we will share the personal information that the integration requires, to be able to comply to your request(s).

## How long do we save your personal data?

Haldor AB saves personal information about you as a customer as long as there is a customer relationship or if it is necessary to achieve the purposes described in this policy. Upon termination of the agreement, Haldor AB will delete or anonymize your information within one year of termination, unless another Swedish or European law, court or authority says otherwise. Your data can be saved based on a balance of interests if there are security or economic reasons. The duration of your personal data stored by us as users will vary depending on the purpose of their collection. Personal data processed for billing will be retained as long as it is required as a basis for accounting. Information collected when you contact us is stored as long as you are a customer with us to fulfill our commitment. Upon termination of the customer relationship, we may store the data based on the balance of interests as evidence in case of problems. The storage is carried out with managed access control.

## What rights do you have?

As a registered customer at Haldor AB you have several rights that you should know about. You have the right to (free of charge once a year, provided you have justified reasons) request a registry statement of what information is registered about you. In some cases, you also have the right to data portability of the personal information. You have the right to have your personal data/information corrected if it is inaccurate, incomplete or misleading and the right to restrict the processing of personal data/information until it is changed. You have the right to be forgotten, but deletion of personal data cannot be carried out if it is necessary for the performance of the contract or if another Swedish or European law, court or Government decision says otherwise, and if it is based on the balance of interests. Should you think that there are no legitimate reasons or that the balance of interests is incorrect, you have the right to object to the processing. You also have the right to withdraw consent, complain about processing to the Data Inspection Board (Datainspektionen), oppose to automatic decision-making, profiling and direct marketing.

## Our bot

Our Haldor Education bot is enabled by Microsoft Bot Framework. The Microsoft Bot Framework is a set of web-services that enable intelligent services and connections using conversation channels you authorize. As a service provider, Microsoft will transmit content you provide to our bot/service in order to enable the service. For more information about Microsoft privacy policies please see their privacy statement here: <http://go.microsoft.com/fwlink/?LinkId=521839>. In addition, your interactions with this bot/service are also subject to the conversational channel's applicable terms of use, privacy and data collection policies. To report abuse when using a bot that uses the Microsoft Bot Framework to Microsoft, please visit the Microsoft Bot Framework website at <https://www.botframework.com> and use the "Report Abuse" link in the menu to contact Microsoft.

## **For more information**

If you have any questions about our Privacy Policy and the processing of your personal data or if you wish to delete or change wrongful information, you can contact us through the contact details found on the website [www.haldor.se](http://www.haldor.se).