

Information on processing of personal data in filing systems for acceptance and handling of clients and engagements

Background

When personal data is processed, the controller has a duty to supply certain information to the data subjects. As a consequence of the engagement, personal data will be processed by Revisorerna Syd and by its network firms, if any. For this reason, the following information is provided.

Revisorerna Syds processing of personal data

Revisorerna Syd will process personal data in accordance with applicable law. The personal data that will be processed is obtained from the client, its group companies (if applicable) or other entity, for example the Swedish Tax Agency, the Swedish Companies Registration Office or publicly available sources and relates to authorised representatives and other persons whose personal data is needed to deal with the client relationship and beneficial owner. The personal data is processed prior to the acceptance of clients and/or engagements and as a consequence of the performance of the engagement in order to undertake [checks of independence,], quality checks, checking of conflicts of interest, measures under the Act (2017:630) on Measures Against Money Laundering and Terrorist Financing (“the Anti-Money Laundering Act”) and in order to document measures taken. Such processing is necessary in order to fulfil the legal obligations of Revisorerna Syd, or a statutory auditor within the Revisorerna Syd who has undertaken to perform the engagement and is necessary for the Contractor’s legitimate interest in fulfilling professional duties. Revisorerna Syd may also process personal data for other risk management measures (such as insurance matters) and in order to carry out internal financial reporting. This processing is necessary for Revisorerna Syds legitimate interest in managing risks and any claims.

The categories of personal data that may be processed for the above-mentioned purposes include contact details such as name, address, personal identity number/coordination number, telephone number, e-mail address and details of departmental affiliation and position. In connection with registration of the client Revisorerna Syd may also process copies of identity documents for those persons who represent the client within the framework of the customer due diligence measures taken under the Anti-Money Laundering Act.

Revisorerna Syd may also process personal data such as name, departmental affiliation, position and e-mail addresses in order to provide information on seminars and other events that Revisorerna Syd arranges and in order to send newsletters and other marketing material. Processing for such purposes is necessary for Revisorerna Syds legitimate interest in being able to reach out to employees at clients who may be interested in events, marketing and news in areas that are relevant to the positions of these persons.

Transfer to third countries

Personal data may be processed by Revisorerna Syds network firms and other entities engaged by Revisorerna Syd for the purpose of carrying out the measures referred to above on behalf of

Revisorerna Syd ; they may be based either in or outside the EU/EEA. In the transfer of personal data for processing in a country outside the EU/EEA that does not guarantee an adequate level of protection, Revisorerna Syd is responsible for personal data being covered by appropriate safeguards for example through standard data protection clauses adopted by the European Commission under Article 46 of the General Data Protection Regulation¹, and on condition that enforceable data subject rights and effective legal remedies for data subjects are available.

Recipients of the information

Revisorerna Syd is obliged to ensure that the information processed as a consequence of the engagement does not become available to unauthorised persons, which means that personal data will be processed confidentially.

Revisorerna Syd may disclose personal data to network firms or another entity engaged by Revisorerna Syd for the purpose of checking and maintaining the impartiality and independence of Revisorerna Syd, carrying out quality checks and taking other risk management measures, as well as sending invitations to events and other marketing material. Revisorerna Syd may also disclose personal data to insurance companies or legal advisers in connection with a judicial procedure to the extent required to enable Revisorerna Syd to look after its legal interests or to another recipient if such an obligation exists under applicable laws and regulations, professional obligation or decision of an authority.

Security in processing of personal data

Revisorerna Syd is responsible under applicable law for the personal data that is processed being protected by necessary technical and organisational security measures, having regard to what is appropriate in relation to the nature and sensitivity of the personal data Revisorerna Syds system and organisation are arranged so that unauthorised persons do not have access to the personal data processed as a consequence of the engagement.

Storage of personal data

The personal data will not be processed for a longer time than is necessary for the purposes for which the personal data is processed.

Rights of the data subject

Data subjects have the right in certain cases to request receipt of information concerning whether personal data relating to the data subject is processed, and if so to obtain access to the personal data in the form of what is known as an extract from a filing system. Data subjects furthermore often have the right to obtain the rectification of inaccurate personal data concerning them. Furthermore, data subjects may have the right to erasure of their personal data and the right to request restriction of the processing of personal data concerning the data subject or to object to such processing. Data subjects also have the right to lodge a complaint with a supervisory authority concerning the processing.

With regard to personal data processed in connection with the acceptance of clients and engagements and as a consequence of the engagement, Revisorerna Syd is obliged to retain documentation in this

¹ Comment: These are available at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

respect for at least ten years. This means that it is not permitted to erase personal data included in such documentation beforehand, and sometimes neither is it permitted to rectify the data. For the reasons mentioned, it is not possible for Revisorerna Syd in such cases on request from a data subject to restrict or limit the processing of personal data. With regard to Revisorerna Syds processing of personal data for marketing purposes, however, data subjects have the right to request erasure, rectification and restriction and to object to the processing of their personal data for such purposes.

Contact person for questions:

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