



KUNGL. HOVSTATERNA

The Royal Court of Sweden – General Data Protection Act policy

Please note that this is a translation of the Swedish text. If the information in English differs from the Swedish version of this page, the Swedish version applies.

How do we gather personal data?

We gather and process personal data that you give us when, for example, you buy tickets for the royal palaces, you send a question or greeting to the Royal Family or we receive a gift from you.

We do not actively gather personal data about you from other sources.

Where is personal data stored?

We store our data mainly on servers located in Sweden, but where this is not possible the servers are located in the EU.

The exception is the data that comes from our online visitor statistics. This data is handled by a company in the USA and is therefore stored on servers in that country. Please see our cookie policy for more information. The cookie policy may be found at www.kungahuset.se/english

Why do we process your personal data?

Below is an account of why we process your personal data, how long it is stored in our systems and the legal basis on which we base our processing.

What rights do you have as a registered person?

Right to an extract of the registered information: You have the right to know what information we have registered about you and to receive an extract detailing it. You also have the right to know how we as an organisation use your personal data. You have the right to receive information about:

- Whether or not we have registered any personal data about you
- What sort of personal data we have registered
- What the personal data is used for
- How long the personal data will be stored
- Who we have shared the personal data with
- Where the information comes from



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Please note that your right to an extract of the registered information is not the same as getting a copy of the entire document. We can therefore deny you access to the document in its entirety, but will notify you of the personal information contained in the document.

Right to amendment: The information we record about you must be accurate and current. If you notice that we hold incorrect information about you, you have the right to have the incorrect information corrected.

Right to deletion: You have the right to request that your personal data is deleted from our systems. The right to deletion applies in the following cases:

- If the information is no longer needed for its original purpose.
- If processing your data is based on your consent, and you decide to withdraw your consent.
- If data is processed for direct marketing purposes and you object to the data being processed.
- If you have objected to your data being processed on the basis of the Royal Court's legitimate interest and there is no legitimate interest that outweighs your interest.
- If the Royal Court is performing a task of public interest and there is no legitimate interest that outweighs your interest.
- If the personal data has been processed unlawfully.
- If deletion is required to fulfil a legal obligation.

Please note that the right to deletion only applies to digital data and not to data on paper or other media.

How can you exercise your rights?

If you want to exercise your rights and would like to know whether we have registered any personal data about you, please contact us at dataskydd@kungahuset.se.

If you would like to read more about the General Data Protection Regulation, our responsibilities and your rights, please see the Swedish Authority for Privacy Protection's website: www.imy.se.

You can also contact the Swedish Authority for Privacy Protection if you feel that we have failed to fulfil our obligations to you. More information about this can be found at www.imy.se.



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Processing personal data within the Royal Court of Sweden

Managing invitations for events

If you are invited to a dinner with the Royal family or to an event under the auspices of the Royal Court, your personal data will be processed. The purpose of the registration is to know who has been invited to the event, who has accepted the invitation, and whether there are allergies or dietary preferences to take into account when planning a possible menu and so on.

| Type of personal data | Lawful grounds |
|--|---|
| <ul style="list-style-type: none">• Name• Contact details• Allergies or other special needs | Legitimate interest: Being able to contact you before an event and to be able to offer meals that are suitable for everyone. |
| Conditions for storing personal data: Your personal data will be found in our register from the moment the invitation to the event is sent out. The register will be stored in the archive for the future to document the history of the Swedish monarchy | |

Documenting the Swedish monarchy

If you attend an event where a member of the Royal Family is participating, there is a high probability that there will be photographers and journalists on site. This means that you may be photographed or filmed and thereby appear on, for example, the Royal Court's accounts on social media or at The Royal Court website www.kungahuset.se.

Please note that pictures and films often are taken by photographers who are not employed by the Royal Court. This means that you may need to contact a third party if you want to know more about a photograph or film in which you appear.

| Type of personal data | Lawful grounds |
|--|--|
| <ul style="list-style-type: none">• Photograph• Sound• Age and place of residence. May be relevant if the photograph or film was taken in connection with, for example, an award ceremony, a conversation with someone from the Royal Family or the like | Legitimate interest: Our duty to document the Swedish monarchy. |
| Conditions for storing personal data: Photographs and films will be stored in the archives as we document the history of the Swedish monarchy. Posts on social media are stored on the respective platform as long as the platform and/or account exists. | |



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Responding to questions and greetings

The Royal Court of Sweden processes your personal data in order to answer your questions and greetings to the Royal Family and/or the Royal Court.

| Type of personal data | Lawful grounds |
|--|---|
| <ul style="list-style-type: none">• Name• Contact details• Your correspondence | Legitimate interest: Our interest in receiving and responding to your questions and greetings. |
| Conditions for storing personal data: Your personal data will be stored from the time it reaches us until we have responded to your question or greeting. In some cases, we may store your question up to five years for quality purposes. If your child sends us a question or a greeting, the personal data is stored until we have responded to the question or greeting. Our response and the child's first name are then stored for quality purposes. If the question is of particular interest for the future, it will be stored in the archive together with our response to document the history of the Swedish monarchy. | |

Evaluating and following up on the use of digital platforms

When you visit our digital platforms, the Royal Court of Sweden collects personal data. We use this data to evaluate and follow up on the use of our digital platforms, for example by using site statistics and collecting your comments and opinions through our digital channels.

| Type of personal data | Lawful grounds |
|---|---|
| <ul style="list-style-type: none">• Name• Contact details• Your correspondence• Your interaction with our digital channels and platforms, for example which sites you visit and where you click | Legitimate interest: Our interest in evaluating and following up on the use of our digital channels and platforms. |
| Conditions for storing personal data: Your personal data is stored for as long as you use our digital channels. Please see our cookie policy for more information. If you send us your opinion, it is stored from the time we received it and until we have given you our response. If your opinion is of particular interest to us, your personal data may be stored for quality purposes until we have dealt with the matter, but for no longer than 12 months. | |

Managing requests – for example booking guided tours

The Royal Court of Sweden processes your personal data when you send us a request, for instance a request to book a guided tour at one of the royal palaces or to access images in our photo archive.



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| Type of personal data | Lawful grounds |
|---|---|
| <ul style="list-style-type: none">• Name• Contact details• Your correspondence• Photographic material | Legitimate interest: Our interest in receiving, handling and responding to your request. |
| Conditions for storing personal data: Your personal data is stored from the time we receive your request until we have given you our response. If the request is of particular interest for the future, it will be stored in the archive together with our response to document the history of the Swedish monarchy. | |

Managing job applications and recruitment

The Royal Court of Sweden processes your personal data when you apply for a position with us.

| Type of personal data | Lawful grounds |
|--|--|
| <ul style="list-style-type: none">• Name• Contact details• Your correspondence• Photographic material• Other information provided in the application | <u>Recruitment</u> Consent: When you apply, we ask for your consent to store and process all the data that you provide as part of the recruitment process. Legal obligation: According to Swedish discrimination legislation, personal data is always stored for two years after recruitment to protect your ability to make a legal claim in the event of discrimination. <u>Employment</u> Legal obligation: If you are employed by us, we will store your personal data in order to fulfil our legal obligations to you, for example paying your salary and ensuring that you receive the correct number of days of annual leave. Contract: Our mutual interest in your employment contract being fulfilled correctly. |
| Conditions for storing personal data (recruitment): Your personal data is stored, together with the rest of the information you provide, for up to two years. This is in line with other legal obligations within the field of recruitment. | |
| Conditions for storing personal data (employment): If you are employed by us, your personal data will be stored for as long as you are employed by the organisation and | |



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for as long as we have legal obligations to you. These legal obligations may involve matters such as pension payments, and can last for many years after you have left your employment.

Managing gifts

The Royal Court of Sweden processes your personal data when you send a gift to the Royal Family, in order to register the gift and to send you a thank you note.

| Type of personal data | Lawful grounds |
|---|--|
| <ul style="list-style-type: none">• Name• Contact details• Details of the gift• Date of the gift | Legitimate interest: Our interest in receiving, registering and responding to gifts sent to the Royal Family. |
| Conditions for storing personal data: Your personal data is stored from the time we receive your gift and until we have sent you a thank you note. If the gift is of particular interest for the future, it will be stored in the archive together with our response to document the history of the Swedish monarchy. If your child sends a gift to the Royal Family, the same conditions for storing personal data apply as above. | |

Managing purchases of goods and services from us

The Royal Court of Sweden processes your personal data in order to manage your purchases, for example processing payment for items purchased from the Royal Gift Shop, or administering ticket purchases or purchases of photographs. Personal data is also used for quality assurance of our goods and services.

| Type of personal data | Lawful grounds |
|--|---|
| <ul style="list-style-type: none">• Name• Contact details• Customer number• Information about the purchase• Your correspondence/communication | Contract: To fulfil our agreement with you when purchasing a product or service from us. |
| Conditions for storing personal data: Your personal data is stored until the purchase is complete, and thereafter for the time required to fulfil legal obligations (for example accounting). | |

Recording telephone calls

If you call the Royal Court of Sweden's switchboard, we will record your telephone call for security purposes.

| Type of personal data | Lawful grounds |
|--|---|
| <ul style="list-style-type: none">• Audio material | Legitimate interest: Our interest in being |



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| | |
|---|---|
| <ul style="list-style-type: none">• Your communication• Name• Contact information | able to document calls for possible subsequent investigation in the event of threats or other security-related incidents. |
| Conditions for storing personal data: Your personal data will be stored for this purpose for three (3) weeks from the time of recording, or for as long as necessary thereafter for the investigation of threats or other incidents. | |

Camera surveillance to prevent, detect and investigate crimes

When you visit us, there will be camera surveillance for security purposes, for our safety and yours. The locations where camera surveillance takes place are clearly signposted.

| Type of personal data | Lawful grounds |
|--|---|
| <ul style="list-style-type: none">• Filmed material | Legitimate interest: Our interest in preventing, detecting and investigating crimes and incidents. |
| Conditions for storing personal data: Your personal data is stored for this purpose for one (1) month from the time of recording in order to prevent, detect or investigate crimes and incidents, or for as long as necessary thereafter for the detection and investigation of crimes, threats or other incidents. | |

Managing and complying with legal requirements

The Royal Court of Sweden may process your personal data in order to establish, assert and defend legal claims in the unlikely event that a dispute should arise, or if we need to deal with and respond to legal claims in some other way.

| Type of personal data | Lawful grounds |
|--|---|
| Information necessary for the matter in question. For example: <ul style="list-style-type: none">• Name• Contact details• Your communication• Photographic and/or audio material• Information about your actions | Legitimate interest: Processing is necessary to satisfy our legitimate interest in establishing, asserting and defending legal claims. Data on criminal offences is only processed if necessary for legal claims to be established, asserted or defended in an individual case. |
| Conditions for storing personal data: Your personal data is stored for as long as necessary, e.g. until a dispute is finally settled. | |

Fulfilling legal obligations

The Royal Court of Sweden processes your personal data in order to fulfil our legal obligations, for example regarding accounting when you buy a product or service from us.

| Type of personal data | Lawful grounds |
|-----------------------|----------------|
|-----------------------|----------------|



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| | |
|--|---|
| Information necessary for fulfilling our legal obligations | Legal obligation: To fulfil our legal obligations, for example regarding accounting. |
| Conditions for storing personal data: Your personal data is stored for the time necessary to fulfil our legal obligations, e.g. seven years for accounting materials. | |



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Recipients with whom we share information

In some cases, we need to share your personal data with other parties, such as debt collection companies to collect unpaid invoices, selected researchers for historical research purposes or service providers who process personal data on our behalf.

You have always the right to know who we share your personal data with. Please contact dataskydd@royalcourt.se for more information.

With whom do we share information?

Other personal data controllers

If we share your personal information, the recipient is responsible for processing the information securely and correctly.

Debt collection companies

If an invoice is not paid on time, we may share your personal information with debt collection companies to collect payment, e.g. when hiring a chapel.

Sharing personal data – Managing and complying with legal requirements

| Type of personal data | Lawful grounds for sharing personal data |
|--|---|
| <ul style="list-style-type: none">• Name• Contact details• Social security number• Information about your purchase• Other information necessary for managing the claim | Legitimate interest: To satisfy our interest in being able to establish, assert and defend legal claims. |

Historical research purposes

We may process some of the information we have collected about you to conduct surveys or to produce statistics for historical research purposes in areas that affect our business. We only disclose personal data to selected researchers.

Sharing personal data for historical research purposes

| Type of personal data | Lawful grounds for sharing personal data |
|--|--|
| <ul style="list-style-type: none">• Categories of personal data relevant to the research project | The same lawful grounds as for the original processing |



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The National Archives of Sweden

We may share some of your personal information for archival purposes of general interest with the National Archives of Sweden, of which the Palace Archives are a part.

| Type of personal data | Lawful grounds for sharing personal data |
|--|---|
| <ul style="list-style-type: none">• Photographic and/or audio material• Name• Other categories of personal data that are relevant to the National Archives of Sweden | Legitimate interest: Our interest in being able to document the history of the Swedish monarchy and making it available to the general public. |

Personal data controller

We sometimes share personal data with our service suppliers. These companies may only process personal data in accordance with the instructions issued by us, the personal data controller. They may not use your personal data for their own purposes.

We make sure that the companies we share your data with sign an agreement that states the following:

- That both parties comply with the GDPR legislation.
- That both parties are aware of the commitments and obligations to each other and the registered person.
- That both parties will protect customers, employees and other registered individuals' personal data.
- That both parties will document more clearly and can thus more easily show that they follow the rules (liability).

Online ticket service

When buying tickets online, for example for a guided tour at one of the Royal Palaces, we use an online ticket service.

IT services and accounting

We hire companies that help us with storage, service and support, as well as with accounting services.



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Other recipients

In some cases, the Royal Court of Sweden may share your personal data with other recipients if the situation so demands (e.g. to fulfil legal obligations or to handle and respond to legal requirements). Examples of such recipients include external advisors, authorities, courts and the police.

| Recipient | Purpose | Lawful ground for sharing personal data |
|---|--|--|
| Authorities | We can share necessary information with authorities if we are obliged by law to do so. | <i>Legal obligation</i> Sharing the information is necessary in order to fulfil our legal obligations. |
| External advisors | We can share information with external advisors, e.g. accounting firms or law firms, if we are obliged by law to do so or to deal with and/or respond to legal requirements. | <i>Legal obligation and legitimate interest</i> Sharing the information is necessary to fulfil legal obligations or to satisfy our interest to deal with and/or respond to legal requirements. |
| Courts, counterparties, etc. | In order to deal with and respond to legal requirements, we may share information with other parties | <i>Legitimate interest</i> Sharing the information is necessary to satisfy our interest to deal with and respond to legal requirements. |
| Law enforcement agencies, e.g. the police | We may share personal data with Swedish law enforcement agencies, e.g. the police, if we: <ul style="list-style-type: none">- are obliged by law to do so, or- to contribute to an ongoing criminal investigation, or- to contribute to the work of the Security Service in the event of a suspected threat | <i>Legal obligation and legitimate interest</i> Sharing the information is necessary to fulfil legal obligations or to satisfy our interest in order, on request, to contribute to an ongoing criminal investigation |



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Dealing with whistleblowing

When we receive reports in accordance with the Act (2021:890) on special protection against reprisals for workers who report irregularities (the 'Whistleblowing Act'), we process personal data about those who submit a whistleblowing report (if they have not chosen to remain anonymous) and about those who appear in the report. We do this to receive the report and to contact the person who submitted the report, to follow up on what has been reported, to provide feedback to the reporter, to assess the accuracy of the statements made in the report, and to provide information on the investigated allegations for further action.

| Type of personal data | Lawful grounds |
|---|--|
| <ul style="list-style-type: none">• Information about the specific action• Contact details• Communication report• Photographic and/or audio material if that is handed in with the report. | Legal obligation: Processing your personal data is necessary for us to fulfil our legal obligations in accordance with the 'Whistleblowing Act' |
| Conditions for storing personal data: Personal data in a follow-up case in accordance with the Whistleblowing Act is stored for a maximum of two years after the case is closed. | |

Please note that, in accordance with the Whistleblowing Act, the individual who deals with a follow-up case may not disclose information that could reveal the identity of the reporter or of any other individual who appears in the case without authorisation. Chapter 5, Section 1 of the Data Protection Act states that Article 15 of the Data Protection Regulation on the right of access to personal data does not apply to such data that the data controller may not disclose to the data subject in accordance with law or other statutes, or in accordance with decisions issued pursuant to statutes. When the party responsible for personal data is not an authority, the exemption also applies to information that would have been classified by an authority in accordance with the Public Access to Information and Secrecy Act.