

PRIVACY STATEMENT Differ GROUP

Introduction

Differ Sverige Holding AB, registration number 559146 - 5934 is a consultancy firm that supports companies on their journey of sustainable growth. We're a powerhouse for mindful change within customer insight, strategy, brand development, design, communication and business transformation

Within the framework of our operations, Differ Sverige Holding AB and its subsidiaries in the Differ group process personal data. This is done mainly within client (existing and potential) relationships, in the recruitment processes (candidates, potential candidates and reference persons), and in connection with various events, courses and seminars (clients, prospects) arranged by Differ.

We care about your privacy and take matters relating to data protection very seriously. In this Privacy policy, we describe the processing of personal data that is performed within the framework of our operations, the purpose of such processing, the legal basis for the processing, who we may share your personal data with, and your rights in relation to your personal data. For you to understand how your personal data is processed, we recommend that you read our Privacy policy. If you have any questions relating to our Privacy policy, or wish to enforce the rights you have in relation to your personal data, you are always welcome to contact us at info@different.se.

Data controller

The party ultimately responsible for processing personal data is either a subsidiary in the group or Differ Sverige Holding AB. If you know which Differ company is the data controller, you can always contact this company directly, and you can always contact us at info@different.se.

Differ Holding AB, company reg. no. 559146-5934 i, with the address Regeringsgatan 67, 111 56 Stockholm

Purpose and legal basis for processing of your personal data and storage period

We process personal data to perform to develop and retain our business and the services we provide to the market and to plan and perform events, seminars and courses and in recruitment process. Below we have specified the purpose of the activities, what we do and what categories of personal data we use, the legal basis for the processing and the storage period.

Purpose and legal basis for processing of your personal data and storage period

DEVELOP AND RETAIN OUR BUSINESS

Contact people at existing customers		
Purpose	What we do	Categories of personal data
To be able to retain and develop business relationships with our existing clients	Communication via telephone or e-mail regarding our contractual commitments Marketing messages	First and last name E-mail address Phone number Job title Correspondence between you and Differ Assignment history Information, if you do not wish to receive marketing messages
Legal basis for processing: Legitimate interest as the processing is necessary to fulfill Differ's need to be able to retain and develop our business relationships with clients		
Storage period: For as long as the business relationship lasts, personal data that is no longer correct will be erased as soon as possible when the controller receives information about this		

Contact people at potential customers		
Purpose	What we do	Categories of personal data
To be able to build business relationships with new clients	Communication via telephone or e-mail regarding our contractual commitments Marketing messages	First and last name E-mail address Phone number Job title Correspondence between you and Differ Information if a client does not wish to be contacted by Differ (opt out) Technical information on how you have interacted with us
Legal basis for processing: Legitimate interest as the processing is necessary to fulfill Differ's need to be able to create new business relationships		
Storage period: Until the data is no longer needed to fulfill the purposes listed in this Privacy statement		

Direct marketing using purchased business contact details		
Purpose	What we do	Categories of personal data
To identify and contact prospective business customers, to assess	Collect business contact information from providers such as Apollo.io and other	Name Job title Employer or company affiliation

whether our products, services, events or offers may be relevant to the recipient's professional role and establish and develop business relationships through relevant and targeted B2B marketing	similar sources to identify relevant contacts, share business-related information, and follow up on interest.	Business email address Telephone number Company name LinkedIn Country/Region/City of employment The processing does not include special categories of personal data
Legal basis for processing: The legal basis is our legitimate interests under Article 6(1)(f) of the GDPR in marketing and developing our business and establishing business relationships. We have concluded that processing is necessary for these purposes and that, in view of its professional context, limited scope and the safeguards applied, our interests are not overridden by the data subject's interests, rights and freedoms.		
Storage period: Personal data is retained for 12 months from the date of collection or the most recent relevant contact. We then review whether the data is still needed and delete or update it as appropriate. If you object to direct marketing, limited information may be retained on a suppression list for as long as necessary to ensure that you are not contacted again for such purposes.		

EVENT, SEMINARS AND COURSES

Participants		
Purpose	What we do	Categories of personal data
To be able to plan and perform events, seminars and courses	Receiving registrations to an event, seminar or course Planning and performing an event, seminar or course	First and last name E-mail address Phone number Job title Invoicing information, where applicable Information about food preferences Technical information on how you interacted with us
Legal basis for processing: Consent in connection with registration. The processing is necessary to be able to plan and perform events, seminars and courses.		
Storage period: Your personal data will be retained from the time of registration until 12 months after the event, seminar, or course has taken place. If no further interaction occurs during this period, your contact information will be deleted. If you interact with us during the 12-month period, we will retain your personal data for a further 12 months from the date of the most recent interaction. If you object to direct marketing, limited information may be retained on a suppression list for as long as necessary to ensure that you are not contacted again for such purposes.		

Prospects		
Purpose	What we do	Categories of personal data
To be able to market future events, seminars and courses.	Information/marketing of a future event, seminar or course	First and last name E-mail address Phone number Job title Information on if you do not want to be contacted by Differ for marketing purposes Technical information about how you have interacted with us
Legal basis for processing: Separate consent in connection with communication regarding an event, seminar or course which you have registered for and/or participated in. The processing serves to market and inform on future events, seminars and courses.		
Storage period: If you are not a client of Differ, your personal data will be stored for up to 12 months for marketing purposes. You can at any time contact Differ and request not to be contacted for marketing purposes. This information will also be stored for 12 months.		

RECRUITMENT

Job applicants		
Purpose	What we do	Categories of personal data
To enable handling of a job application, whether it is regard to a specific position or is a general application	Registration and handling of application Testing (where applicable) Job interviews Taking references Communicating outcomes	First and last name E-mail address Phone number Address Job title Gender Date of birth Image Cover letter Resume Grades (when applicable) References given

		Links to social media, such as LinkedIn correspondence Any results of tests performed as part of the recruitment process Interview notes• Technical information on how you have interacted with us
Legal basis for processing: Legitimate interest in selecting applications based on competence and other requirements. At the end of the recruitment process and provided you have consent, your information will be kept in our recruitment database We have no interest in gaining knowledge about sensitive personal data not relevant for the recruitment. It is therefore important that you do not provide such special categories of personal data in connection with your application. We also ask you not to send your personal identification number in your application.		
Storage period: The information is stored for up to 24 months from the date of registration, regardless of the application leads to employment or not, to allow investigation of discrimination during that period.		

Potential job candidates		
Purpose	What we do	Categories of personal data
To be able to contact you regarding relevant career opportunities if you are a potential candidate	Collection of potential candidates through internal networks and/or social media	First and last name E-mail address Phone number Address Job title Gender Date of birth Image Cover letter Resume Grades (when applicable) References given

		Links to social media, such as LinkedIn correspondence Any results of tests performed as part of the recruitment process Interview notes• Technical information on how you have interacted with us
Legal basis for processing: Legitimate interest and consent to be able to contact potential candidates for employment, we collect personal data through internal and external networks and search in social media, such as LinkedIn. This collection is usually in the potential candidate's interest, as it can lead to new career opportunities.		
Storage period: The information is stored to be able to contact you regarding relevant career opportunities for up to one month. If this does not lead to you being involved in the recruitment process for a specific job, the information will be kept for up to 24 months.		

Personal reference		
Purpose	What we do	Categories of personal data
To be able to contact personal references and perform thorough and well-founded recruitment	Contact reference people by phone and e-mail	First and last name E-mail address Phone number Job title Employer
Legal basis for processing: Legitimate interest as the processing is necessary to fulfill Differ's need to be able to perform thorough and successful recruitment.		
Storage period: The information is stored for up to 24 months after the end of a recruitment process, regardless of if the application leads to employment or not, to be able to investigate any accusations of discrimination during that period.		

Data processors

A data processor is an enterprise that processes personal data on behalf of Differ and in accordance with our instructions. We have data processors that assist us with, for instance:

- Support with tools for recruitment (Team tailor)
- Support with tools for evaluation and testing of candidates (Alva Lab)
- Support for sending and administering invitations to seminars, events and courses (Confetti, Mailchimp, Simplify, Wix)

When your personal data is shared with our data processors, this is done only for purposes in line with the purposes for which we collect the information (e.g., to fulfill our commitments in accordance with contracts concluded, or to handle candidates in a recruitment process).

We have written contracts with all data processors, through which they guarantee security for the data processed and commit to observing our security requirements and delimitations and requirements regarding international transfer of personal data.

We may also be obliged to share your personal data with authorities with the role of independent data controllers. If an authority is an independent data controller, this means that Differ cannot govern how the information provided to the authority is processed.

When your personal data are shared with an authority which is an independent data controller, the privacy policy and data processing of this authority will apply.

Your rights

Right of access (so-called register extract): We are always open and transparent regarding how we process personal data and if you want greater insight into which personal data we process, you can request access to this data. To ensure efficient handling of your request and that the information is being provided to the right person, we may need to request further information about you.

Right of rectification: You can request rectification of your personal data if the data are inaccurate. Within the context of the purpose stated, you also have the right to provide additional information if your personal data is incomplete.

Right of erasure: You can request an erasure of personal data that relates to you if the personal data no longer is needed for the purpose for which they were collected or processed or you object to the balancing of interests that we have performed based on a legitimate interest and your reasons for objection outweigh our legitimate interest. Although we may have the right to reject your request if there are legal obligations preventing us from immediately erasing certain personal data. These obligations may come from legislation on discrimination or bookkeeping. It may also be the case that the processing is necessary for our establishment, exercise or defense of legal claims. If we are prevented from acting on a request for an erasure, we will instead block the personal data from use for other purposes than the purpose that prevents the requested erasure.

Data portability: In cases where our processing of personal data is based on your consent or the fulfillment of a contract, you have the right to request that the information that concerns you and that you have provided us with is transferred to another data controller. However, this is provided that the transfer is technically possible and that it can be performed in an automated manner.

Complaints

The Swedish Authority for Privacy Protection (IMY) is the authority responsible for monitoring the application of the legislation. If you believe that Differ is processing your personal data in an incorrect manner you can contact us at info@differ.se before presenting a complaint to IMY.

Use of cookies

Differ uses cookies to analyze traffic on our website. The information is also shared with third parties, so that we can offer you tailored contents. If you do not want this, you can choose to

check “Decline all”. By clicking on “Accept all” you are consenting to all purposes. You can at any time revoke your consent by clicking on the widget to re-open the cookie banner advanced settings.

Updates of the Privacy Policy

We may come to make changes to our Privacy policy. The latest version of the Privacy policy in English is always available at www.differ.se.