

Sverige Bygger's policy concerning data management, integrity, and cookies

Your integrity and the right to have control over your personal data is important to Sverige Bygger AB, (henceforth Sverige Bygger). We are transparent about which information we collect and why we collect it, and we will protect it in the securest manner possible.

Sverige Bygger's policy states what data we collect, the purpose for collecting the data, how you can manage your personal data, and how you can contact us. This Personal Data Policy applies when you use web pages, applications, and services that are part of an app or a website managed by Sverige Bygger. Sverige Bygger is the controller of personal data in accordance with these terms and is responsible for ensuring that the data management is in accordance with current legislation.

To be clear and to make understanding easier, we have divided the policy into two parts, based on who you are in relation to us and which of our target groups you belong to:

You may read a short summary under each section before reading the part/parts of the policy that applies to you more in-depth.

1. Below is a summary of the data we have collected under the moniker "Byggsverige".

What personal data we collect in our continuous market research of construction projects and the project market, as well as **how** and **why** we collect the data.

Short summary

- ✓ **We process personal data based on what is most beneficial for the industry and we view this as justified on grounds of legitimate interest**
- ✓ **However, we do not collect sensitive personal data.** We only collect personal data that is in some form relevant to people's function/profession at enterprises involved in construction projects.
- ✓ **Among other things, we collect personal data to enable quality assurance of project information, marketing and spreading of information about construction projects, e.g plans, tenders and procurements of projects, to enable construction statistics, exchange of experience and reference projects, to enable buyer-seller relationships, and to enable market communications,**

marketing, product information, industry news, offers, recruitment, polls, surveys or research within b2b. Finally, the third party (our customer or partner) may be a Government agency, and in those cases the personal data is collected for the purpose of assisting agencies in their exercise of public authority.

- ✓ We store some personal data in Scandinavia's largest database for construction projects, related enterprises, and decision-makers.
- ✓ We also store some personal data in CRM systems on decision-makers at enterprises who we deem to be relevant actors and beneficial to the industry.
- ✓ We process specified personal data by sending it into integrated systems and services where we, our customers, and industry professionals, who either are in or are connected to the construction industry, can use them for the purposes stated in our policy and in our agreements with them
- ✓ Our customers are themselves controllers of personal data when it comes to the processing of the personal data that they may supply in or via our services, but they shall process the personal data in accordance with the purposes stated in our policy
- ✓ Some profiling may also be carried out within the framework of the same purposes stated in the policy

About our continuous market research of the construction project market

Under the moniker "Byggsverige", we perform continuous market research where we gather information on who is currently building or who is planning to build what, where, when and how on the construction project market. In short, the data is centred on construction projects either at the planning stage or carried out at present.

Processing of personal data in connection with our continuous market research of the project market is based on the following:

1. Legitimate interest, weighing of interests

The basis of our information management is about various construction projects on the market and the enterprises (in some cases also co-operative housing associations or agricultural operations) involved in the projects.

Thus, we contribute to a more efficient, more transparent, and more open project market which facilitates buyer-seller relationships (purchasers and tenderers) and contacts between

actors with construction projects at the planning stage, who wish to exchange experience or references with actors who have built or plan to build similar projects.

The construction industry has a number of well-known industry problems (heavy expenses, low efficiency rate, unreported employment, problems of the working environment, corruption etc.) The industry faces challenges when it comes to the need and want to streamline, digitalize and make the construction industry more open and transparent. By being open and transparent about the enterprises and persons involved in various projects, everyone jointly contributes to greater transparency which in turn may counteract industry problems, increase efficiency, reduce costs, and facilitate business with new actors within Europe.

In order to gather the right information about the right construction project, the right enterprise and at the right time, we and the construction industry have a need to speak to the right people, and to have personal data concerning the right people, to be able to contact them. We do not collect sensitive personal data. We only collect personal data that is in some form relevant to people's functions/profession at enterprises involved in construction projects. *Examples of such personal data include the individual's name, position at the enterprise or role in the construction project, email address, and phone number (read more about which personal data we collect [here](#)).*

We and our lawyers are of the opinion that the interest and benefit for the persons concerned, as well as for the construction industry as a whole, outweighs the integrity of these professionals. In accordance with recital 47 of the General Data Protection Regulation, the processing of personal data for direct marketing purposes may, for instance, be justified on grounds of legitimate interest. Therefore we believe that we are justified on grounds of legitimate interest, when we collect the limited and non-sensitive personal data that we process. [Read more about the purposes and the benefits here.](#)

2. **Necessity to fulfil** (often agreed upon) **quality assurance**, such as weighing of interests

To fulfil what we agree upon with the persons we speak to regarding construction projects, we need to collect certain personal data. For example, to carry out quality assurance and information checks by email and handle user logins for the persons involved in the projects. We often agree to contact individuals by phone later on to keep information about the projects up-to-date.

This is not a formal contract, but an agreement and a weighing of interests. We are of the opinion that the processing of this non-sensitive personal data, in accordance with this policy, including the benefit for the person, the person's enterprise and the industry, outweighs the registered individual's interest in protection against intrusion of privacy.

The personal data we collect, and how and when we collect it

Sverige Bygger gathers information directly from persons, who in their function/profession at an enterprise are involved in a current or planned construction project. *Alternatively, the information is gathered from another person whom is involved in the same project and in those instances you will be contacted via email when we have checked the information, or you will be contacted by phone after we have received the information from the other person. We will attempt to contact you a certain number of times, although we cannot make a disproportionate effort because we view the beneficial aspect as a weighing of interests, and the personal data that we process is non-sensitive and only relates to the person's profession.*

Examples of personal data include your name, your function/profession within the project (the enterprise), and your contact information such as your mobile phone number, direct number, and email address.

Sverige Bygger may update your personal data with information from other public filing systems if necessary, in order to uphold sound file maintenance.

Sverige Bygger registers, or may register, your personal data when:

1. You speak to us directly (or by email), or when we collect your information from another person involved in the same project.
2. You apply to a service offered via one of the different platforms managed by Sverige Bygger, e.g your login account at Byggsverige.se where information on projects as well as personal data can be updated.
3. When you register your name, email address or mobile phone number at the website.
4. If you contact us by email, by phone, via our websites or via social media.
5. If you subscribe to our newsletter, or a similar service.
6. When you visit any of our websites or when you use our apps, including, but not limited to, location data, web log data and other types of communications data, as well as your IP address, device, operating system, and web browser.

The personal data we collect when you contact us the first time

When you submit an interest form on our website (e.g when you submit and market a project via the form at Byggsverige.se, or login into your account at Byggsverige.se), you are given the option to read our policy and confirm that you have understood its contents. In these cases, we refer also to the weighing of interests, provided that the beneficial aspect outweighs the registered individual's interest in protection against intrusion of privacy. Therefore, we do not adhere to the term consent. However, we value transparency and therefore highlight our policy when you fill out these forms.

When you visit our website, you are also informed about the use of cookies, both so called first-party and third-party cookies, on your computer. These cookies keep track of your

browsing patterns for the purpose of offering you information, marketing or free services based on your pattern. Read more about the use of cookies [here](#).

How we use collected information – purposes and benefits

Sverige Bygger mainly processes personal data for the purposes stated below, *as well as for additional purposes stated at the time of collection*:

A) Purposes and benefits for ensuring the correct information about the correct construction project, in regards to the information gathered for “Byggsverige”

1. To fulfil (often agreed upon) quality assurance, proof checking of project information, and login information to services via one of the platforms offered by Sverige Bygger;
2. To contact you again by phone or email (as agreed upon) and to update information about construction projects;
3. To provide good service, such as manage your requests, correct erroneous information or send information that you have requested, e.g proof checking, suggestions for reference projects, suggestions for actors who have been involved in similar projects, and so on.
4. To analyse your behaviour on our website and in our app in order to develop, deliver, and improve upon our products and services.
5. Personal data is also used for analysis purposes, in order to carry out segmentation/profiling, to develop personalised offers and services, and to carry out surveys;
6. To send you information and marketing offers by text message, email, app notifications, push notifications and other digital contact channels such as social media as part of your active relationship with us.
7. To contact you by phone, text message, email, app notifications or regular mail about other offers, campaigns or services we think you might be interested in as part of your role in a certain construction project. Please note that you are free to unsubscribe to these types of marketing offers at any time;
8. To be able to give relevant recommendations, references, offers and personalised services based on your construction project, what other users with similar projects or patterns of behaviour have shown interest in, as well as what services you have chosen, watched or shown interest in;
9. To help us develop a more usable website and app, and to improve the user experience of Sverige Bygger’s platforms by customising the services based on which type of device they are used on;
10. To send important messages about changes to our terms and polices;
11. In some cases, when consent is given, your personal data is stored to avoid your information being shown again on new projects. A prerequisite for us to keep track of whether or not you, e.g want to receive emails, direct marketing offers and so on, is to store some personal data to be able to fulfil your request and agreement with us.

B) Purposes that are beneficial for the industry

1. To enable **greater transparency, openness, and efficiency** on the construction project market
2. As a consequence of the above, to also **increase the exchange of information and experience, reduce constructions costs** (through more and better tenders, offers, estimates, and solutions), reduce corruption, unreported employment, and problems of the working environment.
3. To enable contact between buyers, decision-makers, project managers, specifiers, and various influencers, or between those who sell goods and services (purchasers, consultants, and tenderers etc.) on the construction project market, and to facilitate business between enterprises who are in some form connected to the construction industry.
4. To enable **relevant, directed market communications, marketing, product information, industry news, and offers** within the b2b project market, which in itself may contribute to greater competence, insights into new solutions, inspiration, and more sustainable and efficient construction projects.
5. To enable **unique construction statistics** used by the industry for several years; this is valuable and well-established statistics concerning the historical development of the project market. *The personal data collected is not used directly in the statistics, but the personal data is a prerequisite* for collecting and updating information about the projects so that the statistics are available and can be kept up-to-date. *Industry professionals and trade associations use the statistics for several different purposes, such as planning, organising, and budgeting.*
6. It is also used to be able to ask questions and to carry out **surveys for business development purposes**, which helps us and the industry to streamline the contact between buyers and sellers (decision-makers and influencers) of services and goods, but also to streamline the industry and the project market as a whole. For example, to contribute to more sustainable construction projects and to facilitate the development of new services, products, and solutions for the industry, as well as for its actors, developers, consultants, contractors, retailers, subcontractors, suppliers, wholesalers, estate agents, lessors, agencies, etc.
7. To carry out polls and surveys for research and inquiry purposes. We have, among other things, carried out a number of collaborative efforts with universities and trade associations for various purposes, e.g to develop documentation for decision making within the construction industry and to streamline the project market. The personal data is not used directly in the research or in the surveys, but the use of personal data is absolutely necessary for us to ask the right questions and to receive the right answers from the right people in the right enterprises concerning the right projects. Research projects and inquiries/surveys can be carried out both by email and by phone. Examples of research and investigations/surveys have e.g, concerned productivity, sustainable construction, regulatory levels, awareness and views on issues regarding industry professionals, brands, solutions, material, as well as goods and services on the project market.

8. Another purpose may sometimes be **the journalistic purpose**, in order to facilitate which enterprises and persons shall be interviewed in the media industry, concerning different projects and industry issues.
9. Other purposes for the use of personal data, may also be in situations when teachers and students at universities would like to get in contact with decision-makers working on certain projects, or within certain enterprises, e.g their degree projects or for finding trainee jobs.
10. When the personal data we collect is shared with customers, partners or other industry professionals, they are themselves controllers of personal data, when in regards to the processing of the personal data that they provide via our services. As per agreement, they may only use the personal data within the framework for the purposes stated in our policy, unless they already have ongoing business relationships with (customers, suppliers, partners), or have received other consents of their own from, the same persons referred to in our personal data.

2. For new and former customers and for those who have been, or should be interested in our information and services.

Here is a summary of what personal data we collect, as well as how and why we collect the data. We also explain what happens on the website when you visit, or when you contact us through other channels:

- ✓ **We process personal data to fulfil orders for services and based on what is beneficial to you and the construction industry, on grounds of legitimate interest.**
- ✓ **However, we do not collect sensitive personal data.** We only collect personal data relevant to people's function/profession, e.g in their capacity as managing director, owner or any other senior position, as well as other positions involved in sales, marketing, product development, decision support, analysis, human resources etc. to enterprises who either are or should be interested in the construction project market, and/or professionals within that market.
- ✓ **We keep track of your web activity and may use it for marketing purposes**

- ✓ **We sometimes collect personal data for the purposes of market communications, product information, and customer communications**
- ✓ **We process personal data by sending it to integrated systems, e.g CRM systems**
- ✓ **We store personal data in our system for the purpose of market research**
- ✓ **We carry out automated profiling based on web activity, your profile may also be used for marketing purposes**

Personal Data we collect

Sverige Bygger collects data directly from you as a customer. Examples of personal data we collect are your name, your title (if any), and contact information such as your mobile phone number and email address. Sverige Bygger may update your personal data with information from other public filing systems if necessary, in order to uphold sound file maintenance.

Sverige Bygger registers, or may register, your personal data when:

1. You subscribe to a service offered via Sverige Bygger's different platforms.
2. When you register your name, email address, or mobile number on the website.
3. If you contact us by email, by phone, via our websites or via social media.
4. If you subscribe to our newsletter, or a similar service.
5. When you visit any of our websites or when you use our apps, including, but not limited to, location data, web log data and other types of communications data, as well as your IP address, device, operating system, and web browser.

Collection with consent

By filling out a consent form on our website (e.g when you fill out an interest form, subscribe to our newsletter or take part in any offers), you give us your consent to use your personal data (e.g your name, phone number and email address) for sale or marketing purposes for the services being offered at the point when you give your information to us.

We also collect your IP address, location data, and interests, to be able to better adapt our marketing offers for you.

When you visit our website, you also consent to the placement of cookies on your computer, both so called first-party and third-party cookies. These cookies keep track of your browsing behaviour, for the purpose of providing marketing offers to you, based on your behaviour.

How we use the information that is collected

Sverige Bygger mainly processes personal data for the purposes stated below, as well as for additional purposes stated at the time of collection:

1. To fulfil orders for services offered via one of Sverige Bygger's platforms;
2. To provide good customer service, such as manage your requests, correct erroneous information or send information you have requested, e.g our newsletter;
3. The information collected when subscribing to a service is stored and analysed as well as forming the basis of offers and discounts, as well as general and direct marketing;
4. To manage customer profiles, as well as carry out analysis and market research;
5. For the purposes of system administration, and to provide statistical data concerning user behaviour and user patterns. However, we do not identify individuals and the data is only used on an aggregated level;
6. To analyse your behaviour on our website and in our app in order to develop, deliver, and improve upon our products and services.
7. Personal data is also used for analysis purposes to carry out segmentation/profiling to develop personalised offers and services
8. To send you information and marketing offers by text message, email, app notifications, push notifications, and other digital contact channels such as social media, as part of your active relationship with us.
9. To contact you by app notifications, phone, text message, email or regular mail, concerning other offers, campaigns or services we think you might be interested in. Please note that you are free to unsubscribe to these types of marketing offers at any time;
10. To be able to give relevant recommendations, offers, and personalised services based on what other users with similar patterns of behaviour have shown interest in, as well as what services you have chosen, watched or shown interest in;
11. To help us develop a more usable website and app, and to improve the user experience of Sverige Bygger's platforms by customising the services based on which type of device they are used on;
12. To block your personal data, e.g to block your email address for marketing purposes, if you have declined to marketing offers;
13. To send important messages about changes to our terms and polices;

How we disclose your information

In addition to us disclosing your information to third parties, such as corporate clients and business partners for the purposes stated above, we may also pass on your information to other enterprises who manage data on our behalf, so that we may provide services such as analysis, distribution or other services aimed at maintaining and adapting our terms of service and terms of delivery. Although, all management of personal data is always subject to a high level of security and secrecy.

Sverige Bygger only works with partners who manage personal data within the EU/EES or any enterprise who maintains the same level of security as within the EU/EES, e.g, by adhering to the EU-US Privacy Shield decision.

About cookies

When you visit our websites or when you use our apps, personal data may be collected by e.g cookies. This is however, always achieved through a separate consent. If your web browser, (or similar equipment used for accessing a website) is set to allow cookies when you visit our website, you have thereby given your consent to the collection of such data. Data on your activities and which pages you visit are then stored. Such data may include information about your device and internet connection, e.g your operating system, web browser version, IP address, cookies, and unique identifiers. When you visit any of our websites where our services are offered, various technologies may be used to identify you, for the purpose of us learning more about our users. This information may be collected directly or by the use of technology from a third party.

Legal ground, storing, and selection of personal data

By sharing your information with Sverige Bygger, you are giving your consent to Sverige Bygger registering and storing data on which service that you have bought, and processing the given personal data for the purposes specified. As legal ground for the processing of data, Sverige Bygger refers to the fulfilment of agreement, legitimate interest or consent. If Sverige Bygger refers to grounds of legitimate interest for processing of data, it shall only be done so for the purposes stated in our policy.

Please note that you may withdraw your consent (if you have given it), at any time by contacting us. You can find our contact details under the heading *Contact us*.

The processing is carried out under current legislation, which means that personal data is not stored for longer than necessary in accordance with the purposes stated for data processing. Sverige Bygger will store your personal data for as long as you are customer with us or if you have any other relation to us in accordance with the purposes stated in our policy.

In accordance with the General Data Protection Regulation, we shall state for how long the personal data will be stored or, if that is not possible, state the criteria we use for establishing how long the data will be stored. In our business activities it is not possible to specify exactly how long the personal data will be stored. Instead, we state the criteria of our activities in order to be as transparent and explicit as possible.

When it comes to information on decision-makers involved in construction projects, which in accordance with our policy is processed on grounds of legitimate interest, the data is stored for as long as the persons are involved in a construction project. In many cases, construction projects may consist of various phases that take place over many years, from idea, planning, projecting, procurement, construction period, renovation etc. to the completed project. It is not uncommon for an individual project to last anywhere from a few years to many years. These persons are frequently featured in many projects at once and then later go on to work on new projects, and for as long as they are relevant for our activities, their personal data are stored in accordance with the purposes stated in our policy.

Personal data related to customers, former customers and prospects, and potential customers are managed similarly as stated above. That is, for as long as they are working and hold a leading position or any position in sales, market, analysis etc., within an enterprise, and if we consider them to be relevant in accordance with the purposes stated in our policy, their personal data will be stored.

The decision-makers whose personal data we process, can at any time decide that we may not use their information for marketing purposes, and so therefore we offer a number of customised limitations for use. In our continuous market research of the project market and our processing of those actors we deem to be interested in the information we collect about the project market, we constantly update our filing system with information, and we are automatically notified if a person terminates their employment, proceeds to new employment or passes away. Keeping our personal data up-to-date is a natural part of our work because we are regularly in contact with the enterprises and the decision-makers who are planning construction projects, as well as with those who we deem to be interested in these projects.

The decision-makers often become part of new construction projects over time, and to help those who do not wish to receive direct marketing offers, we recommend that we store their personal data to keep track of their preferences, in regards to direct marketing in one form or the other. If we were to delete them, it is likely that they would be added to our filing system as soon as they are related to a new construction project. We would then use it again in accordance with our policy, based on weighing of interests, yet without knowing whether or not they wish to take part in direct marketing offers. We manage current, former, and potential customers in the same manner.

For those who would like to have their data deleted, we shall delete it if there are no legitimate reasons for processing, which outweigh the registered users' interest in privacy. If the personal data is no longer necessary for the purposes of collecting it in the first place, it will obviously be deleted. Persons who contact us for the purpose of having their data deleted, instead often choose to restrict the processing of their personal data.

For research and inquiry purposes, the names of decision-makers who have terminated their employment at enterprises which have been involved in construction projects, may be stored with the information of their recent termination added. Their contact information is deleted, but their names may still be stored if it is considered to be of interest to the industry and for the purposes stated in our policy, e.g knowing which decision-makers have been involved in which projects.

As for legal requirements, for example in accordance with the Swedish Bookkeeping Act, personal data may need to be stored under current legislation.

All management of personal data is always subject to a high level of security and secrecy.

Your rights and choices

You have rights when it comes to your personal data, and you have the possibility of controlling your information and what is stored. Sverige Bygger will either on our own, or by the customer's initiative, correct data that is found to be erroneous. You are entitled to have your data deleted or its use limited, by contacting us at any time (contact details can be found under the heading *Contact us*). If you believe that we have not respected your rights, please contact Sverige Bygger, or the Swedish Data Protection Authority (datainspektionen@datainspektionen.se).

You are free at any time to cancel (fully or in part) services containing marketing communications from us, either by contacting us directly, or by unsubscribing via email or text message. Please contact our customer service if you would like change your contact preferences or if you would like us to not contact you at all.

**We offer customised limitations based on your terms and wishes. We are also more than happy to inform you of the benefits and effects that your choices entail.*

Once a year you may request a statement from Sverige Bygger concerning what personal data is registered, by submitting a written request to us. Your written request must be sent to the postal address below and must be signed by you personally.

GDPR in short

The General Data Protection Regulation is sometimes called GDPR for short. The regulation comes into force on 25 May 2018 and replaces the Swedish Personal Data Act (PUL).

There are many reasons for why GDPR is introduced, although two of the main reasons are:

- ✓ To give private individuals control over how their personal data is used

- ✓ The EU wants to make it easier for enterprises to conduct business within Europe

Sverige Bygger views this as something very positive, that is in line with the objectives of our own activities, that is, to make it easier for enterprises and persons to conduct business (and to exchange experience etc.) with each other in a simpler and more efficient manner. Persons who work for enterprises within the construction industry, shall also be able to use the personal data that we store more effectively as well as gain more control over it.

Moreover, the Swedish Government Official Reports (SoU) is of the opinion that the purpose of GDPR, is to not affect marketing that currently takes place. It is true that the contact information of decision-makers (b2b) is personal data, but industries such as our own have a greater interest in fulfilling what is beneficial for the industry, rather than protecting harmless personal information. However, company registers (b2b) naturally require a high level of security, regularity, and transparency in regards to the processing of personal data, as well as clarity concerning purposes and rights.

Linked websites

If our website contains links to third party websites, web pages or any other material published by a third party, then links are made available for information purposes only. Because Sverige Bygger neither manages the content of these websites nor the material on them. We shall not be held responsible for the content on these sites. Thus, Sverige Bygger cannot be held responsible for the damages or losses that may arise from following these links.

How to contact us

For further information on the processing of personal data or if you have any questions, please feel free to contact us:

Sverige Bygger AB

Box 1200, Sjötullsgatan 10, 824 15 Hudiksvall, organisation number 556264-9607.

Phone 0650-40 28 00, email gdpr@sverigebygger.se

This policy will come into force on {{PUBLISH_DATE}}