2018-05-25

TRIOPLAST

Privacy policy

This policy has been adopted by Trioplast Industrier AB, hereinafter referred to as the "Company" on 25 May 2018. The policy applies to all fully-owned subsidiaries in the Trioplast Group.

Introduction

Trioplast maintains structured work procedures for processing personal information in a correct and legal manner. This policy describes our overall routines for managing personal information.

Roles and responsibilities

The top management of the company has overall responsibility for addressing and monitoring the issues covered by this policy. All managers are responsible for the compliance of their own organizations.

Principles for our processing of personal information

We must act responsibly when processing personal information, no matter whether this concerns employees, customers, suppliers or other partners. Issues that in various ways relate to the processing of personal information can be found in all aspects of our operations, and as a result we encourage continuous reconciliation of the processing of personal information.

All the information of the registered subjects must be processed in a legal, correct and open manner. We must act transparently about what information we process, and we must ensure that the persons who are registered in our systems will be able to safeguard their rights in an efficient manner.

Collection of personal information should only take place for specific, expressly stated and legitimate purposes, and we should only collect information that is specifically needed for this purpose. We are actively working to limit the storage by sorting out relevant information by applying sorting routines and where appropriate by automatic sorting tasks. By applying reasonable measures, we must make sure the information is correct.

Procurement of IT services

When procuring IT services, such as software or operation and support, we should first conduct a risk and vulnerability analysis and after this choose a solution or supplier based on the outcome.

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When employing assistants for processing of personal information, we shall only retain those who can provide sufficient guarantees on the implementation of appropriate technical and organizational measures in such a manner that the processing will comply with the legal requirements and ensure that the rights of the registered subjects are protected. All considerations made, including documentation of security levels, etc., must be documented. Furthermore, agreements must be signed with all assistants managing personal information.

As much as possible, we must avoid the transfer of personal information to third countries, however, when this is considered appropriate or necessary, this may only take place after all adequate security measures have been implemented and documented.

Risk assessment of IT security

We must continuously conduct risk assessment of the processing of personal information that we conduct. We must implement technical and organizational measures to achieve a security level that is appropriate in relation to the risk. This risk analysis and the decisions on implemented measures must be documented.

Authorities

Written instructions of authority must be prepared for all IT systems in which personal information is stored. The basic principle should be that authority permissions should be assigned so that only the persons with a need to access the personal information will be able to access this. Depending on the sensitivity of the information, the scope of authority may differ.

Incident management

All security incidents must be documented in an incident management log, including information about the circumstances of the personal information incident, its effects and the corrective actions taken. "Security Incident" here refers to an incident that results in accidental or illegal destruction, loss or change or to unauthorized disclosure of or unauthorized access to the personal information that was transferred, stored or otherwise processed.

When legally required, incidents must also be reported to the Swedish Data Protection Authority and the affected registered person.

Processing log

We must maintain a log of processed personal information. Each system owner shall be responsible for keeping this log list up-to-date in case of changes.

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Impact assessment

If the processing of personal information, in particular by applying new technology and taking into account its nature, scope, context and purpose, is likely to lead to a high risk for the rights and freedoms of natural persons, according to the Swedish Data Protection Authority we are required to conduct an impact assessment prior to processing the information.

Even when unsuccessful in complying with the Impact Assessment requirement, when appropriate we must implement a simplified risk analysis. This analysis should constitute the basis for selection of technical and organizational security measures.

Integrated data protection and standard data protection

We must proactively evaluate the possibilities of implementing technical measures, such as pseudonymization and minimization of information, to effectively live up to the GDPR requirements and protect the rights of those registered.

We must also implement appropriate technical and organizational measures to ensure, in the standard case, that only personal information that is necessary for each specific purpose of processing the information will be used.

Training

Our employees must receive relevant information and training regarding the processing of personal information in accordance with the separate annual training plan. If necessary, in-depth or targeted training should be provided to those who manage sensitive information.

Participation in such training courses must be documented.

Follow-up

Compliance with this policy must be verified by spot checks. We must continuously evaluate whether our data protection work complies with the legal requirements, and we must implement changes when this is required.

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