

SUMMARY

We at STS care about data protection and your privacy. In this privacy policy, we want to inform you about how we as a sending organisation process your personal data when you, as a participant or as a legal guardian on behalf of the participant, applies to and participates in a high school experience.

[During the application](#), we process your personal data to:

- handle the application; and
- make a preliminary assessment of your application.

[During the high school experience](#), we process your personal data to:

- fulfil our obligations according to our agreement;
- make sure you have a pleasant experience;
- share pictures from your experience on social media for marketing purposes (if you consent); and
- comply with applicable accounting legislation.

[Both during the application and the high school experience](#), we process your personal data to:

- send relevant information and surveys;
- send newsletters and marketing to you;
- improve and develop our e-mails and marketing; and
- (if you have objected to receiving marketing from us) process your personal data to comply with marketing legislation to make sure that we do not send marketing to you.

In short you have the following rights:

- | | |
|---|--|
| ✓ The right to lodge a complaint with a supervisory authority , | ✓ The right to erasure , |
| ✓ The right to withdraw your consent , | ✓ The right to rectification , |
| ✓ The right to access , | ✓ The right to restriction of processing , and |
| ✓ The right to object , | ✓ The right to data portability . |

In the below text, you find a detailed description about how we process your personal data for each purpose. For example, information about how we [process your personal data outside of the EU/EEA](#). If you have any questions about your rights, or want to exercise any of your rights, you are more than welcome to [contact us](#).

PRIVACY POLICY FOR HIGH SCHOOL (SENDING ORGANISATION)

Click to read more about:

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When you are going on a high school experience with STS, we are acting as a *sending organisation*. It means that, when you apply for a high school experience, we collect and process your personal data in order to make a preliminary assessment of your application and to organise your high school experience if you become a participant. After STS has made a preliminary assessment, a *receiving organisation* will collect and process your personal data to make a final assessment and to administer your participation in the country you are travelling to. Also, the high school you will attend is also processing your personal data in relation to the high school experience. Both the receiving organisation and the high school are responsible for their own processing of your personal data. In those situations, they give you information about their processing of personal data separately. The processing by the high school and the receiving organisation are not part of this privacy policy.

Sometimes we at STS act as a receiving organisation. You can read more about how we process your personal data in when we are acting as a receiving organisation [in our separate privacy policy](#).

STS's responsibility and contact details

STS Education Group AB, Swedish company registration number 559251-3112, ("**STS**", "**we**", "**our**"), is responsible, in the capacity of controller, for the processing of your personal data when we process your data for our own purposes, as described in this privacy policy.

If you have any questions regarding our processing of your personal data – or if you want to exercise any of [your rights](#), please contact us. STS has the following contact information:
Address: Norra Hamngatan 36, 411 06 Gothenburg, Sweden, telephone number: +46 771-20 20 40 and e-mail address: dataprotection@sts.se.

From where we collect your personal data

Applicant/participant

We collect your personal data from:

- You,
- Your legal guardian,

- Your teacher (if you provide their recommendation during the application),
- Your host family,
- The receiving organization,
- The high school you visit, and
- Us (when we take pictures of you or similar measures).

Legal guardian

All personal data that we process about you is provided to us by you yourself, provided by the applicant/participant or collected from the receiving organisation.

Do you have to provide your personal data? What happens if you don't?

When applying for a high school experience with STS you decide which information you provide to STS. However, some information is necessary for the applicant/participant and the legal guardian to provide to STS for us to make a preliminary assessment and to enter into an agreement with STS.

If we do not receive and process the information that is necessary for the performance of the contract as described in the tables below or if you do not consent to the processing of special categories of personal data in the cases where such processing is necessary for STS to determine your suitability and to make a preliminary assessment, STS will not be able to handle your application. Providing us with your personal data is therefore necessary to enter into a contract with STS and you are therefore obliged to provide the personal data when applying for a high school experience. If you provide us with any special categories of personal data, such as information about your health, you must give STS your explicit consent to the processing.

Recipients of your personal data

We will share your information with our selected internal and external IT suppliers and any other suppliers, but only to the extent necessary to fulfil their obligations in relation to STS. For example, the system we use to handle your application will process information in your application. All IT suppliers will process personal data on our behalf and on our instructions (as processors).

When you are going on a high school experience as a participant with STS, we will also share your personal data in the following way:

During your application

- After we have made a preliminary assessment and decided that you are suitable for a high school experience, the receiving organisation will collect and process personal data from you (in capacity of a controller). When the receiving organisation starts to collect personal data from you, they are responsible for providing information about how they process your personal data.
- We share information from your application with the high school since it is necessary in order for the intended school to review your application.

During your travel

- We will share your information with a booking agency and the airlines and other carriers to book your trip and high school experience. Please note that such booking agencies and airlines or other carriers are responsible for the processing of your personal data when processing it for its own purposes and give you separate information about the processing of personal data;
- To the extent necessary we are sharing information about you with our partners in the country that the high school experience is in, e.g. partner offices, hotels, host families, local representatives and local guides in order to book your trip and to handle your stay during the high school experience;
- To offer an insurance we share personal data with an insurance provider;
- We share your e-mail address with Verified, if you are from a Nordic country, which is processing your personal data on our behalf as a processor so that you can sign agreements digitally;
- To handle the payment, your payment information will be processed by the payment provider, Fortnox, which is processing your personal data on our behalf as a processor, to send the invoice to you;
- We share the personal data from our e-mail communication in Outlook with Microsoft, which is processing your personal data on our behalf as a processor;
- We share your contact information, information about the high school experience, birth date and information about how you open our newsletters and what you click on with Mailchimp and Microsoft, which is processing your personal data on our behalf as a processor;
- To handle your application, we share personal data in the application with Zapp which provides the system which handles your application. Zapp is processing your personal data on our behalf as a processor. We need to use Zapp since it is the only available IT-system specifically made for high school experiences;
- We share all your personal data stated in the tables below with the supplier of our CRM system, Zoho, which is processing your personal data on our behalf as a processor; and
- If you are a participant, we will share information about you and your experience with your legal guardian during your stay.

Depending on which country you are travelling to, the companies and organisations that gain access to your personal data may vary. For detailed information about which companies and organisations that will gain access to your personal data, please read more [\[here\]](#).

Transfer of your personal data outside of EU/EEA

We avoid sharing your personal data outside the EU/EEA as far as possible. When transferring your personal data outside the EU/EEA we make sure such transfer only takes place in accordance with applicable data protection legislation.

During your travel

- If you are travelling to a high school experience outside the EU/EEA we need to share your personal data with any airline and other carriers you will use, with the receiving organisation, with our partner office, any hotel you stay at, with your host family, with travel agencies and when necessary, to local guides, local representatives and our other partners based in the country you will visit. This means that we need to share your personal data to the country you will visit. In this case the transfer is necessary for the performance of the contract between us (GDPR art. 49.1.b).

During your application, travel and if you are a legal guardian

- We transfer your personal data outside of EU/EEA to our IT suppliers Zapp, Zoho, Microsoft and Mailchimp that are processing the personal data on behalf of us as processors. Such IT-systems are hosted outside of the EU/EEA. Depending on which country the application or travel concern, the suppliers that gain access to your personal data may vary. You find information about which personal data that is transferred in which situation in [the tables below](#).

We will transfer your personal data to the IT-suppliers Zapp, Zoho, Microsoft and Mailchimp outside the EU/EEA when we can ensure an appropriate level of protection of your personal data. This means that we use standard contractual clauses, (GDPR article 46.1.c and module 2 of the standard contractual clauses) GDPR, together with supplementary measures. You can find the standard contractual clauses [here](#).

If you have any questions regarding our transfer of your personal data, which companies that will gain access to your personal data or if you want to obtain a copy of the appropriate or suitable safeguards, please [contact us](#).

How do we process your personal data – in detail

All processing of your personal data, both as an applicant/participant or as a legal guardian, is carried out for the main purpose of handling the application to the high school experience.

In this description you can read in detail about:

- why we process your personal data;
- the categories of personal data that we process;
- the legal basis for the process of your personal data; and
- for how long we process your personal data.

During the application

If you/your legal guardian apply to a high school experience, we process the following of your personal data.

TO HANDLE THE APPLICATION

APPLICANT/LEGAL GUARDIAN

The purpose for our processing	What personal data we process	Our lawful basis for the processing
To handle the application and gather all information required by the high school which you apply to.	<ul style="list-style-type: none"> • Name. • Date of birth. • Home address. • Contact information, i.e. phone number and e-mail address. • Information that the high school you apply for require as part of the application process, e.g. gender and citizenship. • Latest School record transcript about the applicant. 	<p>Performance of contract (GDPR art. 6.1.b)</p> <p><i>The processing is necessary for us to take steps at the request of you prior to entering into a contract.</i></p>
To make a preliminary assessment of your suitability for a high school experience from a health perspective.	<ul style="list-style-type: none"> • Information about allergies, illnesses, medication, and other information that may affect your ability to travel. 	<p>Consent (GDPR art. 6.1.a)</p> <p><i>The personal data about your allergies, illnesses, medication and other information that may affect your ability to travel will be processed based on your consent. You can withdraw such consent at any time.</i></p>
<p>Storage period: We will process your personal data until our handling of your application is done and you get a preliminary assessment of your application. If you/your child travel with us, we will continue to store your personal data as we describe in the tables below.</p>		

TO MAKE A PRELIMINARY ASSESSMENT OF YOUR SUITABILITY

APPLICANT

The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>To make a preliminary assessment of your suitability for a high school experience from a general perspective.</p> <p>We share information about you (not sensitive information) that your host family needs in order to get to know you better before you stay with them, for example information in your photo album.</p>	<ul style="list-style-type: none"> • Information relevant to make a preliminary assessment of your suitability for a high school experience, such as: • Personal information from your interview with STS, such as expectations, family life, problem solving and other information that your legal guardian provided to STS during the interview. • Information you, your parents or your teachers provided during the application process, i.e. your grades, information in your school record transcript, information in the interview report form, 	<p>Performance of contract (GDPR art. 6.1.b)</p> <p><i>The processing is necessary for us in order to take steps to entering into a contract.</i></p> <p>Consent (GDPR art. 6.1.a)</p> <p><i>The sensitive personal data will be processed based on your and your legal guardian's explicit consent. You can withdraw such consent at any time.</i></p>

	<p>information in the student letter and in the parent letter, information in your photo album and information in your teacher recommendation.</p> <ul style="list-style-type: none"> • Gender. 	
<p>To make a preliminary assessment of your suitability for a high school experience from a health perspective.</p>	<ul style="list-style-type: none"> • Information about allergies, illnesses, medication, and other information that may affect your ability to travel. 	
<p>Storage period: We will process your personal data until the term of the high school experience is finished and until we can determine that there are no remaining questions between us. However, if you do not move forward with the application, STS will delete the information as soon as you no longer are an applicant. Although, we keep your name, e-mail address and birth date for two years to send relevant marketing and newsletters to you as we describe in the tables below here. If you/your child travel with us, we will continue to store your personal data as we describe in the tables below here.</p>		

During the high school experience

If we enter into an agreement and you participate in a high school experience, we process the following personal data about you as a participant and you as a legal guardian.

TO FULFILL OUR OBLIGATIONS ACCORDING TO OUR AGREEMENT		
PARTICIPANT/LEGAL GUARDIAN		
The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>To handle the customer relationship and store information we need to fulfil our obligations according to our agreement and to handle the end of your high school experience, for example:</p> <ul style="list-style-type: none"> • handle payment, • store information about the insurance you have chosen during the high school experience, • store the information we need to enable you to go on the high school experience, • share necessary information with your legal guardians, and 	<ul style="list-style-type: none"> • Name. • Contact information, i.e. phone number and e-mail address. • Password. • Payment information. • Signature. • Information in our agreement and your consent to processing of your personal data. <p>PARTICIPANT:</p> <ul style="list-style-type: none"> • Date of birth. • Address. • Nationality. • Participant number (PID). 	<p>Performance of contract (GDPR art. 6.1.b)</p> <p><i>The processing is necessary for the performance of the contract.</i></p> <p>Consent (GDPR art. 6.1.a)</p> <p><i>The sensitive personal data will be processed based on your and your legal guardian's explicit consent. You can withdraw such consent at any time.</i></p>

<ul style="list-style-type: none"> • store emergency contact details. 	<ul style="list-style-type: none"> • Insurance information. • Information about who your parents and emergency contacts are. • Information you, your parents or your teachers provided during the application process as stated above here. • Information about your home country, travel destination and the period of validity of the insurance. • Gender. <p>Information about your high school experience, e.g. your placement.</p> <p>LEGAL GUARDIAN:</p> <ul style="list-style-type: none"> • Relationship to the participant, that you are a legal guardian to the participant and that you are an emergency contact. 	
<p>PARTICIPANT:</p> <p>Share necessary information with the airlines and other carriers, with the receiving organisation as well as our partners in the country you are travelling to, e.g. travel guides and hotels.</p>	<ul style="list-style-type: none"> • Information necessary to book your flight, e.g. a copy of your passport and visa. 	<p>Performance of contract (GDPR art. 6.1.b)</p> <p><i>The processing is necessary for the performance of the contract.</i></p>
<p>Storage period: We will process your personal data for as long as it is necessary for us to fulfil our agreement, i.e. until the term of the high school experience is finished and until we can determine that there are no remaining questions between us.</p> <p>Payment information will be processed until payment is made. Your payment information will be stored for a longer period to comply with bookkeeping legislation.</p>		
<p>In addition to the above, your personal data will also be processed by our payment suppliers to manage your payment. Our payment suppliers are controllers of such processing of your personal data and will give you separate information regarding their use of personal data.</p>		

<p style="text-align: center;">TO GIVE YOU A PLEASANT EXPERIENCE</p> <p style="text-align: center;">PARTICIPANT</p>		
<p>The purpose for our processing</p>	<p>What personal data we process</p>	<p>Our lawful basis for the processing</p>
<p>To make sure you have a pleasant experience. For example,</p>	<ul style="list-style-type: none"> • Information that we received from you, your legal guardian, 	<p>Performance of contract (GDPR art. 6.1.b)</p>

<p>processing to ensure that information you or/and your legal guardian have given us about special requirements or circumstances are taken into account.</p>	<p>accommodation and local representatives before and during the high school experience.</p> <ul style="list-style-type: none"> • Non-sensitive information, for example information about how you are doing in school, in activities and in the accommodation. • Sensitive information, for example information about illnesses or accidents that occur during the experience. 	<p><i>The processing is necessary for the performance of the contract.</i></p> <p>Consent (GDPR art. 6.1.a)</p> <p><i>The sensitive personal data will be processed based on your explicit consent. You can withdraw such consent at any time.</i></p>
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Storage period: We will process your personal data for as long as it is necessary for us to fulfil our agreement, i.e. until you get home from the high school experience.

If your explicit consent is the legal ground for the processing, STS will be processing the information until you get home from the high school experience.

If your explicit consent is not the legal ground for the processing, we will process the information as long as it is necessary to protect vital interests of you or another natural person or as long as it is necessary to establish, exercise or defend legal claims. The processing length depends on the reason we do not process your information on consent.

SHARING PICTURES FROM YOUR EXPERIENCE ON SOCIAL MEDIA FOR MARKETING PURPOSES

PARTICIPANT

The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>Sharing pictures from your experience on social media for marketing purposes.</p>	<ul style="list-style-type: none"> • Pictures that we have received from you or that we have taken ourselves. 	<p>Consent (GDPR art. 6.1.a)</p> <p><i>The personal data will be processed based on your and your legal guardian's explicit consent. You can withdraw such consent at any time.</i></p>

Storage period: We will process your personal data until you withdraw your consent or ask us to delete the picture.

TO COMPLY WITH APPLICABLE ACCOUNTING LEGISLATION

PARTICIPANT/LEGAL GUARDIAN

The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>To comply with applicable accounting legislation.</p>	<ul style="list-style-type: none"> • Information in the invoice, i.e. your name. • Information about the transaction, which may be linked to you. 	<p>Legal obligation (GDPR art. 6.1.c)</p> <p><i>Processing is necessary for STS's compliance with its legal obligation under the applicable accounting legislation.</i></p>

		<i>We cannot comply with law without processing your personal data for this purpose and you are therefore required to provide your personal data to us.</i>
<p>Storage period: We will process your personal data for [seven to eight years] to comply with applicable accounting legislation (the end of the seventh fiscal year).</p>		

Both during the application and the high school experience

Both if you/your legal guardian apply to a high school experience and if we enter into an agreement and you participate in a high school experience, we process the following personal data about you.

SEND RELEVANT INFORMATION AND SURVEYS		
PARTICIPANT/LEGAL GUARDIAN		
The purpose for our processing	What personal data we process	Our lawful basis for the processing
Send information relevant for the application, trip or similar trips.	<ul style="list-style-type: none"> • Your contact information, such as your name, e-mail address and postal address. • Information about your high school experience. 	Performance of contract (GDPR art. 6.1.b) <i>The processing is necessary for the performance of the contract we have with you.</i>
Send surveys to your e-mail address. We improve and develop our e-mails by analysing them, see more information about this here below . Since you do not provide your name or contact information in any answers to surveys, we are in practice not able to identify if you have answered the survey or what answers you have given.	<ul style="list-style-type: none"> • E-mail address. • Information that you provide in the survey. • IP-address. 	Performance of contract (GDPR art. 6.1.b) <i>The processing is necessary for the performance of the contract we have with you.</i>
<p>Storage period: We will send information during the trip and thereafter for two years.</p> <p>We will continue to store your IP-address and any answers to our surveys for two years after you answered our surveys.</p> <p>You can choose to unsubscribe or object to receiving our invitations at any time. If you object to receiving marketing from us, we keep track of this in our "unsubscribe-list" to avoid sending you any further marketing material.</p>		

SEND NEWSLETTERS AND MARKETING TO YOU

PARTICIPANT/LEGAL GUARDIAN

The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>To send newsletters and marketing to you, for example in order to be able to give you discount as a returning participant/customer.</p> <p>We improve and develop our e-mails by analysing them, see more information about this here below.</p>	<ul style="list-style-type: none"> Your contact information, such as your name, e-mail address and postal address. Information about previous trips. 	<p>Legitimate interest (GDPR art. 6.1.f)</p> <p><i>The personal data will be processed based on our legitimate interest to send marketing to you as a customer.</i></p>

Storage period: We will send marketing to you during the application process and as long as you/your child participate in the high school experience. We as well send marketing to you for two years after the high school experience ended or for two years after your application process ended (if you/your child did not proceed to travel with us). After this period, we ask whether you wish to continue receiving marketing from us and only send such marketing if you consent to us doing so.

You can choose to unsubscribe or object to receiving our invitations at any time. If you object to receiving marketing from us, we keep track of this in our "[unsubscribe-list](#)" to avoid sending you any further marketing material.

IMPROVE AND DEVELOP OUR E-MAILS AND MARKETING

PARTICIPANT/LEGAL GUARDIAN

The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>Improve and develop our e-mails and marketing by analysing how you open them and what you click on.</p>	<ul style="list-style-type: none"> Information about how you open our newsletters and what you click on. Based on such information our newsletter tool Mailchimp rate your interest in receiving our newsletters. E-mail address. IP-address. Birth date, so we can adapt the marketing depending on if you are a participant or a legal guardian. 	<p>Legitimate interest (GDPR art. 6.1.f)</p> <p><i>The personal data will be processed based on our legitimate interest to improve and develop our e-mails, when you have been given an opportunity to reject such analysis.</i></p>

Storage period: We continue to analyse the e-mails we send to you for as long as you continue to receive them.

TO COMPLY WITH MARKETING LEGISLATION

PARTICIPANT/LEGAL GUARDIAN

The purpose for our processing	What personal data we process	Our lawful basis for the processing
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<p>If you have stated that you do not wish to receive marketing from us, we will store such information in an “unsubscribe-list” to make sure we do not send any marketing to you.</p>	<ul style="list-style-type: none"> • Name. • E-mail address. • Phone number. 	<p>Legal obligation (GDPR art. 6.1.c)</p> <p><i>The processing is necessary to comply with legal obligations to which we are subject, i.e. marketing law which requires us to not send marketing material to individuals who have objected to receiving such marketing.</i></p> <p><i>We cannot make sure you will not receive marketing from us without processing your personal data for this purpose and you are therefore required to provide your personal data to us.</i></p>
<p>Storage period: You will be listed in our “unsubscribe-list” until further notice.</p>		

If we have any discussions or if you have a claim or complaint

We do everything we can to please our customers and as a result rarely receive complaints, but if you would like to make a claim or complaint, or if we have any discussions, we will process your personal data as described below. We will collect your personal data from you or provide the information ourselves.

Note that the ongoing claim or right may mean that we cannot delete all your personal data after your request.

TO HANDLE A QUESTION OR AN ACTUAL OR A POSSIBLE COMPLAINT OR LEGAL CLAIM PARTICIPANT/LEGAL GUARDIAN		
The purpose for our processing	What personal data we process	Our lawful basis for the processing
<p>To handle questions or a possible or actual complaint or legal claim.</p>	<ul style="list-style-type: none"> • Name. • Contact information. • The information that the question, complaint or claim concerns. It can be e.g. information in your application or information about your experience 	<p>Performance of contract (GDPR art. 6.1.b)</p> <p><i>The processing is necessary for STS’s performance of the contract we have with you to answer your questions and for the defence of legal claims.</i></p> <p>Legal obligation (GDPR art. 6.1.c)</p> <p><i>The processing is necessary for STS’s compliance of its contractual and legal obligations to handle complaints in accordance with consumer protection law and for the defence of legal claims.</i></p> <p>Legitimate interest (GDPR art. 6.1.f)</p> <p><i>The personal data will be processed based on our legitimate interest to defend ourselves against a possible complaint or claim.</i></p>

		<p>Processing of sensitive personal data (GDPR art. 9.2.f)</p> <p><i>Any sensitive personal data is processed when necessary for the establishment, exercise or defence of legal claims.</i></p>
<p>Storage period: We will process your personal data until we have answered the question or for as long as the complaint or legal claim is ongoing to handle an actual complaint or legal claim.</p> <p>We will process your personal data during a period of three years after you get home from the high school experience to handle possible complaints or legal claims.</p>		

STS's legitimate interests

STS will process some of your personal data on the legal ground that it is necessary for the purposes of the legitimate interests pursued by us. When STS relies upon the legal ground that processing of personal data is necessary for STS's legitimate interests, STS has carried out *a balancing test* to determine if STS's legitimate interests outweigh the general privacy rights that you have as an individual. STS's legitimate interests are stated in the tables above. If you want more information about the balancing test, please [contact us](#).

Your rights – detailed description

You have certain rights that you can exercise to affect how we process your personal data. You can read a more detailed description about what those rights are below.

If you want to know more about your rights or if you want to exercise any of your rights, please [contact us](#) and we will help you.

Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

You have the right to lodge a complaint with a supervisory authority.

The supervisory authority in Sweden is the [Swedish Authority for Privacy Protection](#) (Integritetsskyddsmyndigheten, the IMY).

***In detail:** Your right to complain exists without prejudice to any other administrative or judicial remedy. You have the right to lodge a complaint with a supervisory authority in the EU/EEA member state of your habitual residence, place of work or place of where the alleged infringement of applicable data protection laws has allegedly occurred.*

The supervisory authority has an obligation of informing you on the progress and the outcome of the complaint, including the possibility of a judicial remedy.

Right to withdraw consent (Article 7.3 GDPR)

You have the right to withdraw your consent at any time by [contacting us](#).

***In detail:** The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.*

Right to access (Article 15 GDPR)

You have the right to obtain confirmation as to whether we are processing personal data concerning you or not. You can make a request by [contacting us](#). If we do process your personal data, you also have a right to obtain a copy of the personal data processed by us as well as information about our processing of your personal data.

***In detail:** The information we provide includes the following:*

- *the purposes of the processing,*
- *the categories of personal data concerned,*
- *the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations,*
- *where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,*
- *the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing,*
- *the right to lodge a complaint with a supervisory authority,*
- *if the personal data are not collected from you, we provide you with available information about the source of the personal data;*
- *the existence of automated decision-making, including profiling, referred to in Articles 22.1 and 22.4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the predicted consequences of such processing; and*
- *where your personal data are transferred to a third country or to an international organisation, you have the right to information regarding the appropriate safeguards, pursuant to Article 46 GDPR, put in place for the transfer.*

For any further copies of the personal data undergoing processing requested by you, we may charge a reasonable fee based on administrative costs. If you have made the request by electronic means the information will be provided to you in a commonly used electronic form, unless otherwise requested by you.

Your right to obtain a copy referred to above shall not adversely affect the rights and freedoms of others.

Right to object (Article 21 GDPR)

You have the right to object to our processing of your personal data at any time.

***In detail:** Your right to object applies as follows:*

- *you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6.1 e or 6.1 f GDPR, including profiling based on those provisions. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.*
- *Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.*
- *Where you object to processing for direct marketing purposes, you have an unconditional right to have the processing of your personal data for such purposes ceased.*

- *In the context of the use of information society services, and regardless of Directive 2002/58/EC (ePrivacy Directive, or ePD), you may exercise your right to object by automated means using technical specifications.*

Right to erasure (“the right to be forgotten”) (Article 17 GDPR)

You have the right to ask us to erase your personal data.

***In detail:** We have the obligation to erase your personal data without undue delay where one of the following grounds applies:*

- *the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;*
- *you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;*
- *you object to the processing pursuant to Article 21.1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21.2 GDPR;*
- *the personal data have been collected in relation to the offer of information society services referred to in Article 8.1 GDPR;*
- *the personal data have been unlawfully processed; or*
- *the personal data have to be erased for compliance with a legal obligation in Union or Member State law that applies to us.*

Where we have made the personal data public and are obliged in accordance with the rights stated above to erase the personal data, we shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

We will notify any erasure of personal data carried out in accordance with your rights stated above to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

Please note that our obligation to erase and inform according to above shall not apply to the extent processing is necessary according to the following reasons:

- *for exercising the right of freedom of expression and information;*
- *for compliance with a legal obligation which requires processing by Union or Member State law which applies to us; or*
- *for the establishment, exercise or defence of legal claims.*

Your right to data portability shall not adversely affect the rights and freedoms of others.

Right to rectification of processing (Article 16 GDPR)

You have the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you.

***In detail:** Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.*

We will communicate any rectification of personal data to each recipient to whom the personal data have been provided to, unless this proves impossible or involves disproportionate effort. If you want information about those recipients, you are more than welcome to [contact us](#).

Right to restriction of processing (Article 18 GDPR)

You have the right to obtain from us restriction of the processing of your personal data.

***In detail:** Your right applies if:*

- *the accuracy of the personal data is contested by you, during a period enabling us to verify the accuracy of the personal data,*
- *you have objected to processing pursuant to Article 21.1 GDPR pending the verification whether our legitimate grounds override yours,*
- *the processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of their use, or*
- *you need the personal data for the establishment, exercise or defence of legal claims even though we no longer need the personal data for the purposes of the processing.*

Where the processing has been restricted according to above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

We will notify each recipient to whom the personal data has been provided to about any restriction of processing according to above, if this do not occur to be impossible or entails a disproportionate effort. If you want more information about these recipients, you are welcome to [contact us](#).

Right to data portability (Article 20 GDPR)

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and, where technically feasible, have your personal data transferred to another data controller (“data portability”).

***In detail:** The right applies if:*

- *the processing is based on the lawful basis consent or on a contract, and*
- *the processing is carried out by automated means.*

The exercise of the right to data portability shall be without prejudice to the right to erasure, i.e. Article 17.

This policy was adopted by STS on [date]