

STS PRIVACY POLICY

A policy to protect your privacy – Introduction & Summary

At STS, we care about protecting your data and your privacy. In this privacy policy, we want to inform you about how we process your personal data and about your rights while using our website. Personal data refers to all information that can be connected to you, such as your name and email address.

We mainly process your personal data to:

- [provide a well-functioning website. If you consent, we will also process your personal data to analyze how our website is used and to market our products to you on other pages](#)
- [send you information and marketing about our services](#)
- [answer your questions](#)
- [enable you to register and participate in a meeting with us](#)
- [process your notification of interest in High School](#)
- [process your notification of interest in being a host family or ambassador](#)
- [conduct a preliminary assessment of your application for one of our services](#)

Your rights

In summary, you have the following rights:

- ✓ [Right to lodge a complaint with the Swedish Authority for Privacy Protection](#)
- ✓ [Right to withdraw your consent](#)
- ✓ [Right of access](#)
- ✓ [Right to object](#)
- ✓ [Right to erasure](#)
- ✓ [Right to rectification](#)
- ✓ [Right to restriction of processing of personal data](#)
- ✓ [Right to data portability](#)

If you have any questions about your rights or if you would like to exercise one of your rights, you are welcome to [contact us](#).

Would you like more information? Please read our detailed explanation below, in which you can learn about [how, why and for how long we store your personal data](#).

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Who is responsible for processing your personal data?

STS Education Group AB, with Swedish corporate identity number 559251-3112 (“STS”), is responsible, as data controller, for the processing of your personal data when STS processes your personal data for STS’ own purposes, in accordance with the description below.

In this Policy, we want to inform you about how we process your personal data when you use our website. If you continue your application by traveling with us or if you become one of our host families or ambassadors after using our website, we will provide you with additional information in a separate policy about how we further process your personal data. If you would like more information about this now, please contact us.

If you have any questions about our processing of your personal data or if you would like to exercise one of your rights in accordance with the description in the section of this policy called [What are your rights when we process your personal data?](#) – please contact us.

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Address: Norra Hamngatan 36, 411 06 Gothenburg

Telephone number: +46 771-20 20 40

Email address: dataprotection@sts.se

From whom do we collect personal data about you?

You or your parent/guardian have provided personal data that we process about you when you use our website.

You, as a parent/guardian, submitted the personal data that we process about you.

If you visit our website, we also process personal data that we have collected from your device (such as a mobile phone, computer or tablet) when you visit our website. Some of our suppliers also use information they already have to conduct analyses and to show you

interesting offers from us. All relevant suppliers are listed in our consent service, which you can always find by clicking the icon at the bottom left-hand corner of the website.

Do you have to provide us with personal data? What happens if you do not?

In general, it is always up to you to decide which personal data you share with us. However, there is still some personal data that we must process in order to fulfill our contract and obligations to you. This is the case when we act on a request from you, for example when we send you a brochure that you ordered. If you do not provide us with the necessary information, we will not be able to fulfill our obligations to you as per your request, i.e. our contract.

Who has access to your personal data?

Your personal data are processed mainly by STS. However, your personal data are shared with external parties when necessary to deliver brochures or newsletters that you have requested or to fulfill our contract.

Here are the details of how we share your personal data:

- We share your personal data with our IT suppliers (external and internal), as well as other suppliers. Your personal data are only shared to the extent necessary for the suppliers to be able to fulfill their contractual obligations to STS, such as carrying out IT support, and
- If you order brochures from us, we share your personal data with companies that print and deliver the brochure on our behalf.
- [If you use our website](#), your personal data are processed through the services used on the website, such as [Cloudflare](#), [Consentmanager](#), [Google Maps](#) and [Microsoft](#). However, this personal data processing is very limited and these suppliers cannot, in principle, identify you. If you have consented, analysis services are also used, such as [Google Analytics](#) and marketing services such as [Google](#), [Meta](#), [LinkedIn](#) and [TikTok](#). These recipients process personal data on our behalf as our data processors, but also process your personal data independently as data controllers. These suppliers will notify you separately about the personal data processing for which they are responsible. All relevant recipients are listed in our consent service, which you can always find by clicking the icon at the bottom left-hand corner of the website.

Do we transfer your personal data outside of the EU or EEA?

STS will transfer your personal data outside of the EU/EEA.

- We will share your personal data with other parties to the extent necessary in order to administer our communication with you and process your application.
- We will also transfer your personal data outside of the EU/EEA to our IT suppliers that process personal data on our behalf as data controller. The purpose of this transfer is for us to obtain help from the IT supplier that provides our cloud services and carries out our IT support and maintenance.

- [If you use our website](#), your personal data are at risk of being transferred outside of the EU/EEA, for example to [Google](#) and [Meta](#), which process your personal data through the analysis and marketing services that we use. These services are located in the US, but ensure the minimization of the information they receive and have taken several measures to reduce the risk of your personal data being transferred outside the EU/EEA – all to make it as difficult as possible for anyone outside of the EU/EEA to understand who the personal data pertains to.

When we transfer your personal data to IT suppliers, this transfer is based either on the Commission’s decision on an adequate level of protection as per Article 45 of the GDPR, or on appropriate safeguards.

Transfer of personal data to the US is carried out based on a so-called adequacy decision from the European Commission as per Article 45 of the GDPR. The adequacy decision entails that the EU has determined that a given country has adequate protection for your personal data. For transfer to the US, the EU and US have an agreement called the [EU-US Data Privacy Framework](#). We rely on this, for example when using the services Google and Meta, which are certified according to the EU-US Data Privacy Framework.

If you have any questions regarding how we share your personal data or if you would like a copy of the applicable protective measures we have taken, you are welcome to contact STS. You can find our contact information [above](#).

What are your rights when we process your personal data?

In accordance with data protection legislation, you have certain rights that you may use to influence how we process your personal data. Read more below.

If you have any questions about your rights, or if you want use one of your rights, you are welcome to contact us using the contact information [above](#). The [Swedish Authority for Privacy Protection](#) has more detailed information about when your rights are applicable and any exceptions.

Right to lodge a complaint – Article 77 of GDPR

You have the right to *lodge a complaint* with a competent supervisory authority if you consider the processing of your personal data to be in breach of the GDPR. The competent supervisory authority in Sweden is the [Swedish Authority for Privacy Protection](#).

- The competent supervisory authority in Norway is the [Norwegian Data Protection Authority](#).
- The competent supervisory authority in Finland is the [Office of the Data Protection Ombudsman](#).
- The competent supervisory authority in Denmark is the [Danish Data Protection Agency](#).

Right to withdraw consent – [Article 7.3 of GDPR](#)

You have the right to *withdraw your consent* at any time by [contacting us](#). You may always withdraw consent given on the website directly on the website.

Right of access (“right to register extract”) – [Article 15 of GDPR](#)

You have the right to *obtain confirmation* of whether or not we are processing your personal data. You may submit a request by [contacting us](#). If we are processing your personal data, you also have the right to *a copy of the personal data* we are processing *as well as information about the processing*, for example the purposes of the processing and for how long the data will be saved.

Right to object – [Article 21 of GDPR](#)

You have the right at any time to *object* to the processing of your personal data for the purposes of direct marketing (including any profiling) and to object to the processing of your personal data based on a weighing of interests (including any profiling).

Right to rectification – [Article 16 of GDPR](#)

You have the right to *have incorrect personal data pertaining to you corrected* without undue delay. You also have the right to *complete incomplete personal data*.

Right to erasure (“right to be forgotten”) – [Article 17 of GDPR](#)

Under certain circumstances, you have the right to *have us erase your personal data* without undue delay. For example, if you [withdraw your consent](#) and there is no other legal basis for processing the personal data or if the personal data are no longer necessary for the purposes for which they were collected or processed.

Right to restriction of processing – [Article 18 of GDPR](#)

In certain circumstances, you have the right to request that we *restrict our processing* of your personal data. For example, if you contest the accuracy of the data, or if the processing is unlawful and you oppose erasure of the personal data, but instead request a restriction of their use.

Right to data portability – [Article 20 of GDPR](#)

If we process your personal data with the support of your consent, or in order to fulfill a contract, you *have the right to obtain the personal data* concerning you. This right applies to the information that you have submitted to us in a structured, commonly used and machine-readable format. You also have the right to *transfer this personal data* to another data controller when technically possible.

Information about the personal data we process, the purpose of our processing, the legal basis for processing and how long we process the data

All processing of your personal data is conducted for the purposes of sending newsletters and brochures that you have ordered from us, responding to your questions and registering you for meetings with us. Our purpose is also to process your notifications of interest in becoming a host family or ambassador, to process applications to our trips, and to market our services to you after we have had contact. If you consent, we also use your personal data to improve our website and to market our services by showing offers and new services that we believe are relevant to you on other websites.

You may read the details of how we process your personal data in the tables below.

Our processing when you use our website

Below, you will find information about how we process your personal data when you visit our website. We also use cookies on our website in order to optimize your experience with us. Find more information about how we use cookies here.

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
<p>Analyze how you use our website in order to improve it. To do this, we share your personal data with analysis tools such as Google Analytics.</p> <p>This works by assigning you, as an entity, a unique ID in order to distinguish between visitors and to see patterns in website use. However, we cannot see who you are.</p>	<p>The encrypted IP address that STS cannot specifically link to you, your geographic location, other information about how you use the website, for example what you click on, device information, how many times you have visited the website and information that Google already has about you, for example from what website you navigated to us.</p>	<p>Your consent, which you give through the cookie service on the website.</p> <p>You can avoid Google Analytics by downloading and installing this browser program.</p> <p>You may withdraw your consent at any time. Withdrawal takes effect moving forward (not on the lawfulness of processing prior to withdrawal of consent).</p>	<p>Your personal data will be stored during your visit to the website and anonymized as soon as possible thereafter.</p> <p>Google will continue to process your personal data as an independent data controller even after we no longer store it. How long Google stores your personal data can be read in their privacy policy.</p>

<p>Market our services by showing you offers that we think are relevant for you. We show you marketing on, for example, Google, LinkedIn and Instagram.</p> <p>We do so through so-called profiling, which means that automated decision-making is used to show you offers that we think will best suit you. Without profiling, instead you would see offers that are not always suitable for you. You may object to profiling at any time.</p>	<p>Encrypted IP address that we cannot link to you specifically, your email address and geographic location.</p> <p>You will subsequently see search results and ad banners based on the analysis of how you use our website and information that the marketing services already had about you, for example from what website you navigated to us.</p>	<p>Your consent, which you give through the cookie service on the website.</p> <p>You can make choices about the marketing you see from Google here. You can find more information about your choices on Instagram here.</p> <p>You may withdraw your consent at any time. Withdrawal takes effect moving forward (not on the lawfulness of processing prior to withdrawal of consent).</p>	<p>Your personal data will be stored during your visit to the website and anonymized as soon as possible thereafter.</p> <p>The marketing services we use will continue to process your personal data as independent data controllers. How long Google, LinkedIn and Meta store your personal data can be read in their respective privacy policies.</p>
<p>To provide necessary functionality. This includes ensuring the website functions as smoothly as possible and remembering whether you have provided consent and other choices you make.</p>	<p>Information about your device, such as IP address and what kind of device you are using (mobile phone, computer or tablet)</p> <p>Any information you enter into the chat.</p> <p>Any information about your choices on the website, such as your choices regarding consent as well as information about when you responded to our consent.</p>	<p>Legitimate interest. We want to be able to provide a well-functioning website (a so-called weighing of interests). Weighing of interests means that we have made an assessment that our legitimate interest in processing outweighs your interest and your fundamental right not to have your personal data processed.</p>	<p>The personal data used for website functionality are no longer used when you close your browser. However, information about the choices you make on the website will continue to be saved for six (6) months at most after your choice, after which we will ask again.</p>

Our processing when we send information and marketing about our services to you

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
To send newsletters to which you have chosen to subscribe.	Your email address. To determine what marketing is relevant to you, we process information that you have shared with us or that we collect from you when you use our website.	Your consent.	Until you withdraw your consent or unsubscribe from our newsletter and marketing.
To send the brochure you have ordered.	Your name, telephone number and email address. If you want us to mail the brochure to your home address, we also process your mailing address.	This processing is necessary in order to fulfill the contract, i.e. to send the brochure that you have ordered.	Until you have received the brochure.
To market our services to you after we have had contact, for example after you have filled in one of our forms (see above and below).	Your name, contact information and other information you shared with us when filling in one of our forms.	Your consent.	Until you withdraw your consent or unsubscribe from our marketing.

Our processing when we answer your questions

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
To answer the questions you have asked us via email, chat, telephone or when you fill in one of	Information that you provide to us when you ask questions, for	This processing is necessary in order to fulfill the contract, i.e. to be able to answer	For three (3) months after we have responded to your questions, so that you

our forms (see below). Especially when you fill in the form “have us call you”.	example your name and your question. If you ask us to call you, we process your name and telephone number. If you email us your questions, we will process your email address.	your questions as requested.	can return to us with further questions or if you want to continue with an application.
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Our processing when you register for a meeting with us

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
For you to be able to register and participate in an information meeting, open house, online meeting, or in-person meeting with us.	Your name, telephone number and email address.	This processing is necessary in order to fulfill the contract, i.e. so that you can participate in a meeting.	Until the meeting has ended.
To provide information that you need before the meeting.	Your name, telephone number, email address and other information that you have shared with us.	This processing is necessary in order to fulfill the contract, i.e. to ensure that you have the relevant information when you participate in one of our meetings.	Until the meeting has ended.

Our processing when you submit a notification of interest in High School

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
To process your notification of interest in	Your name, nationality, telephone number, email address, mailing	This processing is necessary in order to take action on your	Until we have processed your

the following program: High School.	<p>address and date of birth.</p> <p>If you register for High School, we also process information about who your parent/guardian is, what your relationship is, as well as your parent/guardian's telephone number and email address.</p> <p>We also process information about you that you share with us, such as when and where you want to travel as well as what program you are interested in.</p>	request before entering a contract, i.e. to contact you for a consultation free of charge.	notification of interest.
In order to continue your application process, i.e. to contact you about your application.	Your name and contact information.	This processing is necessary in order to take action on your request before entering a contract.	Until you have decided not to go further with your application or until you have taken the next step in your application process.

Our processing when you submit a notification of interest in being a host family or ambassador

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
To process your notification of interest in being one of our host families.	<p>Your name, telephone number and email address.</p> <p>We also process information about you that you share with us</p>	This processing is necessary in order to take action on your request before entering a contract.	Until we have processed your application.

	when you fill in the form.		
To process your notification of interest in becoming an ambassador.	Your name, telephone number, email address, nationality, birth year and information about previous trips you have taken with us. We also process information about you that you share with us when you explain why you want to be an ambassador.	This processing is necessary in order to take action on your request before entering a contract.	Until we have processed your notification of interest.
In order to continue the application process, i.e. to contact you about your application.	Your name and contact information.	This processing is necessary in order to take action on your request before entering a contract.	Until you have decided not to go further with your application or until you have taken the next step in your application process.

Our processing when you send us an application for one of our services

For what purposes do we process your personal data?	What personal data do we process?	What is the legal basis for processing?	For how long do we process your personal data for this purpose?
To conduct a preliminary assessment of your application to the following programs: High School or Language Trips. This includes processing information about your gender in order to place you in suitable housing when you continue with your application.	Your name, nationality, telephone number, email address, mailing address and date of birth. If another participant has asked to stay with you, we will also process your name for this purpose. If you register for High School or Language Trips, we also process	This processing is necessary in order to take action on your request before entering a contract, i.e. to process your application and determine whether you may travel with us.	Until we have processed your application.

	information about who your parent/guardian is, what your relationship is, as well as your parent/guardian's telephone number and email address.		
In order to continue your application process, i.e. to contact you about your application.	Your name and contact information.	This processing is necessary in order to take action on your request before entering a contract.	Until you have decided not to go further with your application or until you have taken the next step in your application process.

This policy was adopted by STS on 20240705