Privacy Policy – GRUTS WORK

Your privacy is important to us. We process your personal data with care and only collect the information that is necessary. Whether you are a member or interested in becoming one, you should feel confident when providing your personal information to us.

This policy explains how we process your personal data, why we do so, and what rights you have.

Data controller

Gruts Work, Company Registration Number 559172-1815, is the data controller responsible for the processing of personal data described in this policy.

You can contact us at:

Email: cecilia@grutswork.se
Postal Address: Västra Rådhusgatan 5B, 903 26 Umeå, Sweden

Detailed Information About the Processing of Your Personal Data

Purpose	Categories of Personal Data	Legal Basis	Retention Period
Communication with you via email, telephone, or social media	Name, email address, telephone number, social media username, and any other information you choose to provide.	Article 6(1)(f) GDPR – Legitimate interest in communicating with you, for example to respond to inquiries and manage your case.	For as long as we have active correspondence or your matter is being handled. Comments and communications on social media remain until you choose to delete them. Content deemed inappropriate or offensive may be removed on an ongoing basis.
Sending newsletters or invitations to events	Name, email address, company (if applicable), and job title.	Article 6(1)(a) GDPR – Consent of the data subject.	For as long as consent remains valid. Data is deleted when you unsubscribe from the newsletter.
Analyzing how our website is used	IP address, device information, browser information, pages visited, click and	Article 6(1)(a) GDPR – Consent via the cookie banner for analytical cookies.	In accordance with the retention period specified in our Cookie Policy.

	behavioral data collected through cookies.		
Organizing and conducting events	Name, company, job title, email address, telephone number, and any dietary preferences or allergies you choose to provide.	Article 6(1)(f) GDPR – Legitimate interest in organizing and managing events. Allergy information constitutes health data. Such data is only processed with your explicit consent pursuant to Article 9(2)(a) GDPR and solely to accommodate dietary requirements at the event.	During the planning and execution of the event and for a reasonable follow-up period thereafter. The data is then deleted.
Photos and videos	Photographic and video material in which individuals can be identified, name, and job title (if applicable).	Article 6(1)(a) GDPR – Consent, where you are clearly identifiable. Article 6(1)(b) GDPR – Contract, where a model or participation agreement has been entered into. Article 6(1)(f) GDPR – Legitimate interest in marketing and documenting our activities for overview and environmental images where individuals are not the primary focus.	As long as the material remains relevant for marketing or documentation purposes, or until consent is withdrawn.
Entering into a membership agreement with Gruts Work	Name, personal identity number or company registration number, address, email address, telephone number, billing information, and contact person details (for companies).	Article 6(1)(b) GDPR – Processing is necessary for entering into and fulfilling the membership agreement.	During the term of the agreement and for a reasonable period thereafter to manage matters relating to the contractual relationship.
Invoicing and accounting	Name, personal identity number or company registration number, address,	Article 6(1)(c) GDPR – Processing is necessary to comply with a legal obligation	Seven (7) years following the end of the calendar year in which the financial

	billing information, payment information, invoice number, and contract or membership reference.	under accounting legislation.	year was closed, in accordance with applicable accounting legislation.

Are You Required to Provide Personal Data?

Where processing is necessary to enter into or perform a contract with you, certain information is required. If you do not provide this information, we may be unable to enter into the agreement or fulfill our obligations under it. Where processing is based on a legal obligation, you are required by law to provide the relevant information.

Who May Receive Your Information?

We only share personal data when necessary for the purposes described above and never to a greater extent than required. Recipients may include:

- Providers of our IT systems and digital services.
- Social media platforms when you communicate with us through those channels.
- The Swedish Tax Agency and other public authorities where disclosure is required by law.
- Legal representatives, counterparties, and courts where necessary to establish, exercise, or defend legal claims.

Social Media

When you interact with us through our social media pages, your personal data is also processed by the platform provider. The platform may profile you based on your activity, which is outside our control.

Our social media accounts are public. Comments, reactions, and shares may be visible to others. Please do not share sensitive information on our social media pages. If you wish to contact us directly, please do so via email or telephone.

We and the platform provider may act as joint controllers under Article 26 GDPR regarding visitor statistics generated by the platform.

Processing Outside the EU/EEA

We strive to process personal data within the EU/EEA. However, certain IT services may involve transfers to countries outside the EU/EEA.

Such transfers only occur where appropriate safeguards are in place, including:

- Adequacy Decisions issued by the European Commission.
- Standard Contractual Clauses (SCCs) approved by the European Commission.
- Binding Corporate Rules (BCRs) approved by a supervisory authority.

If you would like more information about a specific transfer or a copy of the safeguards used, please contact us.

Automated Decision-Making and Profiling

We do not use automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you. If this changes, we will provide specific information regarding the logic involved and the expected consequences.

Your Rights

You have several rights regarding our processing of your personal data:

- Right of Access – Obtain confirmation of whether we process your personal data and receive a copy of it.
- Right to Rectification – Request correction of inaccurate or incomplete information.
- Right to Erasure – Request deletion of your personal data in certain circumstances.
- Right to Restriction of Processing – Request that processing be restricted in specific situations.
- Right to Data Portability – Receive your personal data in a machine-readable format and transfer it to another controller where applicable.
- Right to Object – Object to processing based on legitimate interests.
- Right to Withdraw Consent – Withdraw consent at any time where processing is based on consent.
- Rights Related to Automated Decision-Making – Not be subject to decisions based solely on automated processing that significantly affect you.

Complaints

If you believe that we process your personal data in violation of applicable data protection legislation, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection (IMY).

Website: www.imy.se
Email: imy@imy.se
Telephone: +46 8 657 61 00

We would, however, appreciate the opportunity to address your concerns first.

Changes to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website. If significant changes are made, we will inform you appropriately.This policy is effective as of October 5, 2026.