

# Introduction

This privacy notice applies within the Bonnier News business area, hereinafter referred to as "Bonnier News", "we", "us", etc. The privacy notice applies to such personal data as we compile via our digital platforms when you register for a subscription (physical or digital) or for a user account, apply to participate at any of our events and conferences, purchase a product online, participate in any of our competitions, or when you contact our customer service (the "Services"). We care about your privacy and it is important that you read the information on how we process your personal data. Contact details to us and our data protection officer are available under "CONTACT US".

This privacy notice comprises the companies listed below. Unless otherwise stated, the company within Bonnier News whose Service you use is the controller with respect to the use of personal data which is compiled via the Services it provides.

- AB Dagens Nyheter (reg no: 556246-8172) ("DN")
- Dagens Industri Aktiebolag (reg no: 556221-8494) ("Di")
- AB Kvällstidningen Expressen (reg no: 556025-4525) ("Expressen")
- Sydsvenska Dagbladets Aktiebolag (reg no: 556002-7608). Sydsvenska Dagbladets Aktiebolag also includes the brands Sydsvenskan, Helsingborgs Dagblad and Tidningen Hallå, jointly referred to as "HD-Sydsvenskan"
- Bonnier Business Media Sweden AB (reg no: 556468-8892) ("BBM"). BBM includes a number of the brands' websites, including resume.se, dagensmedia.se and vainsights.se; a complete list is available at <https://bbm.bonnier.se/kontakt/>.
- Bonnier Magazines & Brands AB (reg. no. 556012-7713) ("BMB"). BMB includes a number of brands, including Amelia, Allt om mat, Mama and Teknikens Värld; a complete list is available at <https://bonniermag.se/varumarken/>.
- MittMedia AB (reg. no. 556004-1815) ("MittMedia"). MittMedia includes a number of brands, including Sundsvalls Tidning, Nerikes Allehanda and Gefle Dagblad; a complete list is available at <https://www.mittmedia.se/vara-varumarken/>.

We use information that we compile about our customers and users for five main reasons:

- to carry out our business operations and provide the Services (including improvements and adaptations), i.e. to ensure that users and customers have access to, and are able to use, the Services;
- to provide our users and customers with personally tailored Services;
- to verify that the Services are used in accordance with applicable regulations and conditions, satisfy statutory requirements and security requirements;
- to communicate with our users and customers in respect of the user/customer relationship, including both administrative communication such as feedback in a customer service matter and marketing communication focused directly to you, if permitted by law; and
- to market services and certain advertising, in our own services and websites which are financed through advertising revenue.

For the above purposes, we combine information which we compile in order to provide you with a smoother, more consistent and personally tailored experience. The advertisements that you see on our websites may be chosen based on information about you which we combine and process in order that you see advertisements that we believe may be relevant to you. We combine information about, for example, your location, your age group or content in which you have shown interest, and our current user or customer relationship (depending, for example, on whether you are currently a subscriber or use a free account). In order to better protect your privacy, we have built in technical and organisational safeguards to prevent certain combinations of data, including so called pseudonymisation. For example, this means that the information that we use to display

ads is separated from data that may be related to a specific individual (such as name and contact details).

Bonnier News is part of the Bonnier company group. Some of the companies within the Bonnier company group shares certain administrative systems and operates customer support and quality-assured data analysis. For these reasons we share certain data with each other within the scope of a company group co-operation. Bonnier News AB manages the joint database, and is a joint controller for the data processing together with the Bonnier company where you are a customer or which Services you are using. The joint data processing is described in the joint privacy notice which you can find at [gdpr.bonniernews.se/kdb](https://gdpr.bonniernews.se/kdb).

Supplemental terms and privacy notices may apply with respect to some of the Services that we offer. Kindly read them when you sign a subscription with us, book an event, choose to participate in competitions, download an app, buy a product or service, or register a user account.

Read more about how we use personal data and how we protect your rights by clicking on the links to the various sections below.

## The personal data we compile

We compile personal data in order that our Services will function efficiently and provide you with the best possible experience. Some of the data is provided by you directly, for example when you complete a form when ordering a subscription or when you register for and create an account in an app or on our websites, when you administer your user account in respect of a Service, apply to attend an event, register for a newsletter, buy a product from an online store or contact us for support. We obtain some of the data by registering how you interact with our Services and products, for example through use of technology such as cookies on our websites and through information to which we obtain access via the unit (such as mobile telephone, computer or tablet) you use when you obtain our Services, such as IP address, language settings and push settings.

We can also obtain data from external companies or authorities, referred to as third-party sources. Such third-party sources may vary over time but have previously included:

- Data brokers, such as Bisnode, from whom we purchase demographic data in order to supplement information we have compiled;
- In conjunction with the use of a Service which requires payment, we compile the name, personal ID number, address details and means of payment from payment service providers such as Klarna in order to confirm your identity and address details;
- Social networks where you afford a Service access to your data in one or more networks, for example if you have chosen to identify yourself via Facebook or LinkedIn we compile data from your public Facebook or LinkedIn profile. We also compile information from social media about our visitors in order to display relevant advertisements on, for example, Facebook.
- Partners with whom we collaborate in order to offer Services or to participate in joint marketing activities; we can, for example, obtain data from sponsors with whom we collaborate at any of our events;
- Publicly available sources, for example open public authority databases or other data sources which is available to the general public, such as SPAR (The State's Personal Address Register).

If you do not provide data which is necessary to gain access to the Services or a particular function, there is a risk that you will be unable to use the specific Service or function.

The data we compile depends on the context for your interactions with us, your choices, including your computer or mobile phone privacy settings and the functions you use in the Services. The data we compile may include the following:

- **Name and contact details.** We compile your first name and surname, email address, postal address, telephone number, delivery address and other similar contact details.
- **Authentication details.** We compile encrypted versions of passwords, password hints, personal ID numbers and other similar security information used for authentication and account access.
- **Demographic data.** We compile information about you, for example age and gender.
- **Information to carry out transactions.** We compile information which is necessary to process your payment in conjunction with any purchase, which may include means of payment number (for example, credit card number) and associated security code or bank account number.
- **Purchase history.** We compile information about your purchases, subscriptions, amounts, time of purchase and offers which you take up.
- **Unit and use data.** We compile data about your unit and how you and your unit interact with Bonnier News and our Services. For example, we compile information on how our Services are used, i.e. we compile data about the functions you use, products you purchase and the websites you visit. This also includes the settings you make and the software configurations you use most. We also compile information about the unit, the connection and configuration, i.e. data about the unit and the network you use to connect to our Services. This may include information about IP addresses and language settings.
- **Interests and favourites.** We compile data about your interests and favourites, for example which shares you monitor through a financial app, and your favourites among the news articles you store on your profile on your user account. In addition to the information which you expressly provide, your interests and favourites can also be derived or linked from other information which we compile, for example based on purchase and reader history.
- **Miscellaneous.** We also compile information which you provide to us and the content of messages which you send to us, such as feedback and reviews you write, or questions and information you submit in customer service matters. When you contact us, e.g. for customer support by telephone or chat sessions with our representatives, the conversations will be monitored and recorded for our mutual security and to continuously evaluate our customer service encounter.

Note that if you request that we do not contact you by email, we will retain a copy of your email address in our distribution blocked list to ensure that you do not receive undesired mailouts in the future.

In the product-specific sections below, "Specifically about some of our Services", we describe in greater detail how we compile and process personal data with respect to several specific Services.

## How we use personal data

We use personal data to provide the Services and customer support, to develop and improve the function of the Services and to market our Services and display relevant ads. In this chapter we have summarized our primary areas of use. In connection to each of the purposes stated below we have also provided information on which legal basis we use. We primarily process your personal data on the legal basis that our processing is necessary for the performance of a contract to which you are a party (Performance of a Contract), or that the processing is necessary for the purposes of the legitimate interests pursued by us or a third party ("Legitimate Interest").

We have made the assessment that we have a Legitimate Interest to process personal data in those cases where the processing is necessary to meet our users' and customers' wishes and requests, to evaluate, develop and improve our content and the Services and to carry our business operations in an efficient and appropriate manner.

- **Providing products and Services.** We use information in order to carry out your purchases from us and to provide you with our Services such as subscriptions, private advertisements, premiers, events and courses, including providing contact in conjunction with events and courses, and to display personalised content and provide customer support. We may verify your age, payment details and/or your account when registering as a subscriber or user of our applications via the email you stated when registering. Legal basis: Performance of Contract or Legitimate Interest. Processing which is necessary for us to fulfil our contractual obligations to you is for example collection and storing of your address in order for us to be able to distribute a newspaper that you subscribe to. Processing that is based on our Legitimate Interest is for example that we process your contact details in connection to your participation in a competition or voting. We also process your personal data to be able to accommodate your interest to receive customer support.
- **Product improvement.** We use data to improve our existing Services, among other things by updating functions and obtaining an increased understanding as to how we can improve your user experience. For example, we use error reports in order to improve security functions, user behaviour, search questions and clicks on our websites to improve the relevance of search results, to determine which new functions should be prioritised, the content on websites and placement of relevant content for you on our websites. Legal basis: Legitimate Interest.
- **Business Intelligence.** We process personal data in order, through our joint group analysis function which is managed by Bonnier News AB, to develop aggregated analyses and Business Intelligence which enables us to operate and protect our business and to take well-founded decisions. The fact that we possess a joint and quality-assured analysis capability ensures correct and safe processing of our customers' personal data for permitted purposes, as described in greater detail in this policy, and in our joint personal data privacy notice for analyses, which you can read on [gdpr.bonniernews.se/kdb](https://gdpr.bonniernews.se/kdb). Legal basis: Legitimate Interest.
- **Personalised services.** Several of our Services entail that you obtain access to a more personalised experience which is based on what we know about you and about your activities, interests and favourites, as well as your location. The information is analysed and grouped by the relevant Service provider and based on our joint group analysis function which is managed by Bonnier News AB pending selection, prioritisation and planning of contacts with the customer/the user so that you receive personalised services and offers which may be of interest to you. One or more markers about the type of adaptation of web services and market communication focused on the user are linked to the information; this is referred to as personalisation. Legal basis: Performance of Contract (if personalised content is part of the Service) or Legitimate Interest.
- **Security and regulatory compliance.** We use information in order to protect our products, services and customers' security by discovering and preventing fraud, for example double take up of offers, to resolve disputes and perform our agreements. We use information in order to comply with applicable legislation such as the Swedish Accounting Act (Sw: bokföringslagen). Note that we may delete content which you have published via, for example, a comment function, if it violates our user terms for a specific Service.

Legal basis: Legitimate Interest or, where applicable, that the processing is necessary for compliance with a legal obligation.

- **Communication.** We process personal data in order to communicate with you. For example, we may contact you by email, telephone, push-function or otherwise to inform you when a subscription is about to expire; to notify you when security updates are available; to remind you that you still have products in your shopping cart; to get back to you in a customer service matter; to inform you that you need to take a measure to keep your account active; to deliver a newsletter which is included in your subscription or in which you have expressed interest; or to inform you of offers which may be of interest to you. Read more about how you manage your contact details, email subscriptions and campaign messages under the heading "HOW TO ACCESS AND CHECK YOUR PERSONAL DATA". You are always entitled to object to direct marketing; read more under the section "YOUR INDIVIDUAL RIGHTS".

Legal basis: Performance of Contract (if the processing is necessary to carry out our contractual obligations to you) or Legitimate Interest.

- **User accounts.** When you create a personal user account upon registration or by making a purchase from us, we ask for certain personal data. We will allocate you a unique customer ID for identifying your account and associated information. Your login information can, in certain cases, be used to log into user accounts provided by other companies within Bonnier News. The company which provides the Service is responsible for the use of your personal data. If you have already provided your information for a user account with one Bonnier News company, you do not need to personally create a new account; instead, we will obtain relevant account details from our joint customer register. When you log into your user account, we create a registration of the login, including date and time, information about the product you logged into, IP address and any error messages.

Legal basis: Legitimate Interest.

- **Marketing and personalised advertising.** We use personal data which you provide to us when you register a user account, carry out a purchase and use our Services and websites to provide you with relevant marketing and certain advertising which you may be interested in when you visit our websites and subscribe to our newsletters. We use different channels for marketing and advertising, e.g. postal, telephone, email, SMS and our websites and other digital channels. The marketing and advertisements may, depending on channel, include our own products as well as other Bonnier group companies, our partners and other companies.

We analyse and group data with the support of our joint group analysis function which is managed by Bonnier News AB. This allows us to direct interest-based advertising to our users who visit our websites. When you visit our websites, some of the cookies we place on your computer will be advertising cookies, which are specifically intended to remember how you navigate on the Internet and which websites you visit; this is in order to make the advertising more relevant and effective. This is used to enable us to understand the types of sites you are interested in. We can thereafter display recommendations about products and services or advertisements based on your perceived interests. For example, if you have shown particular interest in travel, you may see travel advertisements and/or advertisements for products/services associated with travel.

It is important to remember that none of the technicians we use with respect to interest-based advertising on our websites compile information about your name, address, email or telephone number.

The advertisements you see on our websites may be based on data about you which we process, for example your interests and favourites, your location (if you have consented to our using such data), your purchases, how you use our products and Services, search

questions or content shown to you. The advertisements may also be based on other information which we learn about you through the use of demographic data, use data from our Services and websites and from the websites and apps of our advertisers and partners.

A certain kind of interest-based advertising is called "retargeting". This form of advertisement allows us to display ads for our products and services on websites which is not controlled by Bonnier News. The advertisement is based on your reader and click patterns on our websites. For example, this allows us to direct advertising to you if you leave our website without making a purchase.

We share anonymous behaviour data about our users with our advertisers and other companies with whom we collaborate with respect to advertising, including companies which sponsor content which is marked by "Sponsored by", "Paid content/Paid by" or "Content from advertisers/From our advertisers". Anonymous data comprises information which cannot be connected to an individual since references and links to users have been removed. This means that when you visit other websites, the website may display advertising based on your behaviour on our websites. We can also display advertisements on our websites which are based on your behaviour on other websites. Advertising on mobile units may require compilation and sharing of unit information, such as the type of unit you possess, with companies that purchase advertising space on our mobile applications.

Legal basis for marketing and personalised advertising: Legitimate Interest.

- **Behaviour-based retargeting of our advertisers' products and services.** This is another form of interest-based advertising which allows us and several of our advertisers to display advertising for our advertisers' products and services. The advertisement is based on your reader and click patterns on a website which is not controlled by Bonnier News. For example, if you visit an online clothing store, you may see advertisements for the clothing store's products on our websites. This allows companies to direct advertising to you if you leave their website without making a purchase. You can thereby be reminded, for example through an advertisement on DN.se, about the product or service you chose not to buy.

Legal basis: It is the responsibility of the advertiser to ensure that it has a legal basis to process your data for retargeting ads on our websites. We do not process your data, we only provide advertisement space on our website.

**Other purposes.** If we plan to use personal data for a new purpose, other than as described in this policy, you will be informed of such use before, or in connection with, compilation of the personal data and we will request your permission or, where required, your consent. Alternatively, we will request your permission and/or consent after such compilation has taken place but before we use your personal data for a new purpose.

## Reasons why we share your personal data

It may sometimes be necessary for us to share your personal data with other companies in our group or with companies who perform services on our behalf, to enable us to deliver the Services you have requested.

We also share personal data with Bonnier News AB in order to facilitate your contact with the correct customer support, personalised Services, interest-based advertising and to improve our Services, as described in greater detail under the section "HOW WE USE PERSONAL DATA".

In those cases where we share information about you with our providers and partners, we require such companies to comply with our terms for personal data processing. Providers and partners are not entitled to use personal data they receive for any purpose other than as described in this privacy notice.

The payment information which you provide to carry out a purchase is shared by us with banks and other institutions that process payment transactions or deliver other financial services, and to prevent fraud and reduce credit card risks. Examples of such providers include Klarna and Dibs. Such payment service providers are controllers for the processing of personal data in relation to the payment transaction.

We may also share information with companies that we retain to provide customer service support, marketing and traffic measurement and for assistance in protecting and securing our systems and services, where they require access to personal data in order to provide such assistance. We will disclose personal data as part of a joint transaction, for example a merger or sale of assets. When participating in an event, your personal data may be shared with sponsors who have sponsored the event or the conference.

When you use our Services you can choose to share articles via social media via a social plug-in (for example, a share button). When you share information via a social plug-in, your browser will transfer unit data to the social medium, such as date and time of the sharing, the type of unit you use, your operating system and IP address, URL for the visit, as well as information regarding the article you share. For more information about how relevant social media process the information you provide via social plug-ins, we encourage you to read the respective social medium's terms and personal data policies.

Some of the companies within Bonnier News share data with Facebook (through a tool called the Facebook pixel). You can find more information under the section "SPECIFICALLY REGARDING SOME OF OUR SERVICES" below.

Finally, we may need to disclose or store your data when we believe that doing so is necessary to:

1. comply with laws or legal processes and to disclose information to the police and other competent authorities;
2. protect our customers, for example to prevent junk mail or attempted fraud;
3. manage and maintain the security of our products, including preventing or stopping an attack on our systems or networks;
4. protect rights or property belonging to Bonnier, including performance of the terms which determine your use of the Services. When necessary, we refer the matter to the police for further action.

Note that some of our websites contain links to external companies, for example to offers regarding products and services, whose personal data policies differ from Bonnier's. If you provide personal data in any of these products, your personal data is processed in accordance with their respective personal data policy; we recommend that you read such policy before disclosing data to an external company. We are not responsible for the use of your personal data by such external companies.

## How to access and check your personal data

The way in which you access or check your personal data depends on which Services you use. Through your browser settings or push settings on your telephone, you can monitor for example cookie history and location information. In certain cases you can independently edit information which you have provided via your user account, such as your email address.

You are always welcome to contact us via our customer service with any questions concerning the processing of your personal data. Read more about how to proceed under "YOUR INDIVIDUAL RIGHTS" and "CONTACT US".

**Your communication settings.** If you receive advertising messages from us by email or text message and wish to unsubscribe from them, you can do so by following the instructions in the message. Note that such subscription cancellation does not apply to other communication which is required to enable us to provide the Services, such as communication regarding changes or updates to user terms.

**Your advertising settings.** Please note that even if you choose not to receive personalised/interest-based ads, you will still see advertisements on our websites, however the advertisement displayed will not be adapted to you and may therefore be perceived as less relevant. To the extent the data used for personalised/interest-based ads is also used for other legitimate purposes (such as for providing our Services, analyses and fraud detection) such use will not cease because you choose not to receive personalised/interest ads. If you wish to receive more information about interest-based marketing and how you can decline to receive it, kindly visit [youronlinechoices.com](http://youronlinechoices.com) or [networkadvertising.org](http://networkadvertising.org) (if you visit our US websites).

Browser-based controls

- **Cookie controls.** Relevant browser-based cookie controls are described in our Cookie policy.
- **Tracking protection.** Certain browsers have a function called Tracking Protection which blocks content from third parties, including cookies, from all websites which you place in the tracking protection list. By limiting calls to these websites, the browser limits the information which such third-party sites can compile about you

**User account.** You can make certain settings via your user account.

## Your individual rights

It is important that you understand your rights regarding the processing of your personal data, as stated below. Contact information about whom to contact to protect any of your rights is available under "CONTACT US".

You have the following rights:

- If processing of personal data is based on your consent, you are entitled at any time whatsoever to withdraw your consent to future processing of your personal data .
- You are entitled, free of charge, to request access to a copy of your personal data (referred to as a register extract), request rectification of incorrect information and, under certain circumstances, request that your personal data be deleted.
- You are entitled to demand that we limit the processing of your personal data during the period we are required to investigate any objections from you or if we lack any legal ground to continue processing but you do not wish the information to be deleted, or if we no longer need the information but you require it in order to assert your rights.
- In certain cases you are entitled to data portability, i.e. to receive personal data which has been provided through you, in a structured, generally usable and mechanically readable format and to be able to transfer such to another controller of personal data in those cases where our entitlement to process your personal data is based either on your consent or on performance of an agreement with you.
- You are entitled, in certain cases, to object to the use of your personal data with the consequence that we must possibly cease the processing unless we can show



compelling justifiable reasons which outweigh the interest in not processing the personal data.

- You are entitled, at any time whatsoever, to object to direct marketing (including profiling for direct marketing purposes), with the consequence that we may no longer continue to use the data for this purpose.
- You are entitled to complain to a data protection authority. The Swedish Data Protection Authority (Sw: Datainspektionen) is the authority in Sweden which exercises supervision over the manner in which we, as a company, comply with legislation.

When we process your personal data, we do so on a needs basis in order to provide the Services you use, to conduct our business, to perform our contractual and statutory obligations, to protect our systems and customers or to satisfy other legitimate interests as described in the sections above entitled "HOW WE USE YOUR PERSONAL DATA" and "REASONS WHY WE SHARE YOUR PERSONAL DATA", or, when so required, with your consent.

It costs nothing to exercise your rights. We answer requests about your rights and enquiries about access to or deletion of your personal data within, as a starting point, 30 days. The measures are taken within a reasonable time which, depending on the circumstances, may be up to 3 months. We reserve the right to charge a reasonable fee or decline to take any measure in the event of an unreasonable or manifestly unfounded objection or request.

**Information regarding editorial content.** Editorial content such as our articles, pictures and TV programs are not subject to the provisions of the GDPR. This means that you cannot request removal of an article based on the provisions of the GDPR. If you discover any errors in published material please contact editor-in-chief.

## Security for your personal data

We employ a number of security technicians and security methods to protect your personal data from unwanted access, use and disclosure. For example, personal data which you state on a computer system to which there is restricted access is stored in protected premises. In conjunction with the transfer of extremely sensitive data (for example, credit card numbers and passwords) via the Internet, we provide protection of such data through encryption. In those cases where our providers use subcontractors, we conduct regular audits of such subcontractors to ensure that processing takes place in accordance with this policy and our security routines. We store the information we compile when a user is not logged in (authenticated) separately from customer-specific account information which identifies you, such as your name, email address or telephone number. When analysing customer views, product development, personalisation, trends, statistics and for similar purposes, we primarily use anonymous data which does not consist of personal data; alternatively, we use pseudonymised data which cannot be linked to a specific individual without supplementary information being used.

## Where we store and process personal data

The processing of personal data primarily takes place within the EU/EEA, including compilation, storage, destruction, etc. In certain cases we use providers who are established outside the EU/EEA, such as for distributing newsletters and for development and maintenance of our systems, which allows the provider access to personal data. In those cases where processing of personal data takes place outside the EU/EEA, there is a statutory basis therefor by means of the EU Commission having established in a decision that the country ensures an adequate level of protection for the processing of personal data or that other applicable security measures are in place. We primarily use standardised model clauses that are approved by the EU Commission and are accessible on the Swedish Data Protection Authority's website.

# How long we store your personal data

We store personal data for the time necessary for the reasons for which they are used, e.g. for such time as required to enable us to provide the Services; to maintain and improve the performance of existing Services; to distribute necessary communication and market communication; to engage in development of our Services; and to perform our statutory obligations. Since needs can vary as regards different types of data and with respect to different types of Services, products and contexts, the period in which we store the information may vary.

The criteria that determine how long personal data will be stored are:

- the reason we use the data, i.e. if we use the data to meet statutory requirements, it is stored for a longer time than, for example, contact information for direct marketing;
- the type of data involved, i.e. sensitive data such as a food allergy is stored for a shorter period of time than, for example, contact information;
- the way in which the data is stored, i.e. data which is not pseudonymised is stored for a shorter period of time than information which is pseudonymised;
- our relationship with you, i.e. whether you are an existing, former or potential user/customer or whether you are visiting us without being logged in.

We are entitled to use your contact details for direct marketing during such time as we have a user or customer relationship and for a certain period of time after our user or customer relationship has ended, provided you have not objected thereto; read more under "YOUR INDIVIDUAL RIGHTS". We store your details for up to 2 years following conclusion of the Service. If your contact details are connected to a company that you represent, for example in conjunction with an event, your contact details may be stored to direct marketing to you for up to 36 months after the concluded event. We may contact potential customers by telephone in order to market our Services and products. If you choose not to enter into a customer relationship with us, we store the contact details for up to 3 months from the date of contact.

If you have registered a user account, we use your data regarding, for example, interests and favourites, reader and purchase history, until such time as you close your account and for up to 2 years thereafter, if you do not request that we delete certain data. We store data in order to process complaints and to analyse user and customer behaviour with the aim of improving our Services and for interest-based marketing. Data which is stored for analysis and is used for interest-based marketing is kept separate from information which shows the person to which the information relates.

Your personal data is deleted or anonymized when it is no longer relevant for the purposes for which it has been compiled. In conjunction with analyses of customer views, trends, etc. we use anonymous data which does not comprise personal data, alternatively pseudonymised data which cannot be attributed to a particular individual without additional data which requires specific measures.

Your personal data is stored for longer than stated above in those cases where we are obliged to do so pursuant to any law, ordinance or public authority decision or to retain data which must be retained in order to resolve a dispute or if you have consented thereto. We use your data for marketing only if permitted by law and you have not objected thereto.

## Changes to this privacy notice

We will update our personal data policy as needed to reflect customer feedback and changes to our Services. When a policy is updated, the date of the latest update is changed at the top of the

policy and the changes are described at the bottom of the page under "CHANGE HISTORY", whereupon the changes enter into force.

In the event of major changes to the policy or in the way we use your personal data, where so required by law you will be notified via an announcement on the website or by email before the changes enter into force. Please read this personal data policy from time to time to stay updated as to how we at Bonnier News protect your personal data and your privacy.

## Contact us

If you have questions about the status of your personal data, a complaint or a question to our data protection representative, you can contact us by using the contact information listed below.

Data Protection Officer DN, Di, Expressen, HD-Sydsvenskan:  
**[dataskyddsbud@bonniernews.se](mailto:dataskyddsbud@bonniernews.se)**.

Data Protection Officer BMB: [dataskyddsbud@mag.bonnier.se](mailto:dataskyddsbud@mag.bonnier.se)

Data Protection Officer MittMedia: [dataskyddsbud@mittmedia.se](mailto:dataskyddsbud@mittmedia.se)

### **Personal data controller DN**

Dagens Nyheter AB (reg no: 556246-8172)  
105 15 Stockholm  
Website: **<https://kund.dn.se/kontakta-oss/>**  
Email: **[kundservice@dn.se](mailto:kundservice@dn.se)**  
Telephone: 08-738 26 00

### **Personal data controller Di**

Dagens Industri AB (reg no: 556221-8494)  
105 15 Stockholm  
Website: **<https://pren.di.se/pren/min-sida/>**  
Email: **[kundservice@di.se](mailto:kundservice@di.se)**  
Telephone: 08-573 651 00

### **Personal data controller Expressen**

AB Kvällstidningen Expressen (reg no: 556025-4525)  
105 16 Stockholm  
Email (not magazine subscribers): **[kundservice@expressen.se](mailto:kundservice@expressen.se)**  
Customer service contact for our magazine subscribers:  
**<https://expressenmagasin.prenservice.se/Kundtjanst>**  
Telephone: 0770-457 195

### **Personal data controller HD-Sydsvenskan**

Sydsvenska Dagbladets AB (reg no: 556002-7608 )  
205 05 Malmö or Helsingborgs Dagblad 251 83 Helsingborg  
Website: **<https://www.sydsvenskan.se/kundservice/#!/kontakt/>**  
or **<https://www.hd.se/kundservice/#!/kontakt>**  
Email: **[kundservice@sydsvenskan.se](mailto:kundservice@sydsvenskan.se)** or **[kundservice@hd.se](mailto:kundservice@hd.se)**  
Telephone: 040-93 41 00 eller 042-489 90 89

Sydsvenska Dagbladets AB is the controller for Sydsvenskan's, Helsingborgs Dagblad's and Tidningen Hallå's customer data.

**Personal data controller BBM**

Bonnier Business Media Sweden AB (reg no: 556468-8892)

Torsgatan 21, 113 21 Stockholm

Website: <http://bbm.bonnier.se/kontakt/>

Email: [kundservice@bbm.bonnier.se](mailto:kundservice@bbm.bonnier.se)

**Personal data controller BMB**

Bonnier Magazines & Brands AB (reg no: 556012-7713)

105 44 Stockholm, Telephone 08 736 53 00

<https://bonniermag.se>

**Personal data controller MittMedia**

MittMedia AB (reg no: 556004-1815)

Telephone: 010-7097900. Website: <https://kundservice.mittmedia.se>

If you want to exercise your rights via your user account we need to verify your identity. Please visit Mitt Konto, Kontoinställningar and choose Min Information. If you do not have an account with MittMedia please send a letter with your request and a copy of your ID card to the following address: MittMedia AB, Kundcenter, 701 92 Örebro.

## Specifically regarding some of our Services

Presented below is specific information about some of our services to which we would particularly like to draw your attention. To find out in greater detail which personal data we compile, why and the way in which we use the data, reference is made to the information in the sections above.

**Conferences and events**

We arrange conferences and events with the aim of creating a meeting place for, among other things, networking within the business community.

If you apply to attend a conference or an event which we arrange together with one or more of our partners/sponsors, there may be specific terms and privacy notices for the processing of your personal data applicable to participation. Note that when applying for a conference or an event you may be required to provide us or our cooperation partners with particularly sensitive information, such as information about special food or allergies, for booking and provision of the event. We will process such data pursuant to the consent you provide when booking participation in the event. Note that your contact details may also be shared with sponsors who participate in the event.

**Specifically regarding offers and benefits**

We provide offers and benefits for users and customers on specific platforms, such as [upptack.dn.se](http://upptack.dn.se), [stjarnklubb.sydsvenskan.se](http://stjarnklubb.sydsvenskan.se), [hdpasset.hd.se](http://hdpasset.hd.se) and [lasarshoppen.se](http://lasarshoppen.se). Through newsletters, we may invite you to take advantage of the offers and benefits on the website. In order to take advantage of the offers, you are linked to external websites belonging to the companies who provide the offers. Note that we are not responsible for such companies' use of your personal data, and you should always read their personal data policies and terms.

**Specifically regarding forums and health apps**

**Mitt Kök.** Mitt Kök is a recipe platform provided by Expressen. If you choose to create a user account on Mitt Kök, you are afforded the opportunity to upload a profile picture, describe yourself and provide information on how other users can contact you via your social media such as

Twitter, Facebook and Instagram. Mitt Kök uses data to provide recipe platforms and to communicate with you via newsletters. You close your account by contacting us ( [mittkok@expressen.se](mailto:mittkok@expressen.se)) or personally inactivating your account; read more about how to store your data under the section "How we store your data".

### **Specifically regarding work-related Services**

In respect of our Services focused on individuals in their professional life, we compile data about titles and any specialisation, workplace and job sector. We use this information in order to adapt relevant offers to you in your professional life and to be able to deliver products to your workplace. The data may be collected from official sources, e.g. websites and social media such as LinkedIn.

### **Specifically regarding on some of Bonnier Magazines & Brand's services**

**Bonshop.se.** Bonshop.se provides subscribers with a wide range of advantageous offerings relating to popular lifestyle brands and courses developed specifically to meet our subscribers' interests. If you sign up for a course that we arrange together with one of our partners your personal data may be processed by our partner in accordance with their specific terms.

**Bontravel.** Bontravel provides BMB subscribers with a wide range of experience offerings, exclusively developed for this group. We co-operate with experts and experienced partners within different areas also outside the Bonnier group, that offers travels, courses and events such as fitness trips, writing courses, fashion trips, trend nights and ski weekends. If you sign up for an experience that BMB arranges together with one of our partners your personal data may be processed by our partner in accordance with their specific terms.

Please note that when you book an experience you may have to provide certain sensitive information such as allergies and special food requests for flights/hotels to us and our partners. We will process such data based on consent that we collect separately when you book your trip.

### **Specifically regarding Expressen and Bonnier Magazines & Brands (BMB) use of the Facebook Pixel**

Expressen's and BMB's websites use a tool called the Facebook pixel which is provided by Facebook. This tool makes it possible for us (Expressen and BMB) to display better ads for you on Facebook based on your behaviour on our websites. This will only happen if you are a Facebook user and if you have given your permission to Facebook to show better ads for you. You can withdraw your permission by visiting Facebook and go to Settings on your account. Please see below how to do it. The Facebook pixel shares data regarding your behaviour on Expressen's and BMB's websites (which url's that you visit) and is stored by Facebook. We as advertisers on Facebook, and other advertisers on Facebook, may build customer target groups for our respective ads which is partly based on pixel data. In addition to pixel data other Facebook behavioural data will be used. Please read Facebook's data policy for users here: <https://www.facebook.com/about/privacy/update>

Expressen and BMB uses the Facebook pixel to be able to display better ads for you on Facebook, e.g. ads for our brands. If you want to decline ads based on your behaviour on Facebook, other websites and the Facebook pixel, please do the following: Go to Settings on your Facebook account. Click on Ads in the menu, thereafter Ad Settings. Change the setting from "Allow" to "Not allow" for "Ads based on data from partners" and "Ads based on your activity on Facebook Company Products that you see elsewhere". Direct link to your account settings:

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)

# Change history

Maj 2018: Clarification as a consequence of the new General Data Protection Regulation ("GDPR") entering into force on 25 May 2018. The updated Personal Data Policy will enter into force automatically in respect of all existing customers and visitors on 25 May 2018. Your continued use of our Services from that date will be governed by the new Personal Data Policy. The policy has also been revised to be concise, clear and comprehensible, as well as simpler to read and understand.

June 2019: Adjustment of the privacy notice due to the fact that Bonnier News AB has taken over management of the Bonnier group joint customer database. The database was previously managed by Bonnier AB. For data processing within the scope of the joint database, Bonnier News AB is a joint data controller together with the Bonnier company where you are a customer or which Services you are using.

August 2019: Adjustment of the privacy notice due to the integration of MittMedia AB (MittMedia) and Bonnier Magazines & Brands AB (BMB) into the Bonnier News group. MittMedia's and BMB's former privacy notices have been replaced by the joint privacy notice which is also used by other Bonnier News companies. This way we hope that it will be easier for our customers that subscribes or uses the services of different companies within the Bonnier News group to be informed about their rights and how we use personal data. In this version we have also made some clarifications on how we process personal data.