

# BeChange - Privacy Policy (GDPR)

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## Scope

This policy applies to the website [www.bechange.se](http://www.bechange.se) and BeChange app [app.bechange.se](http://app.bechange.se).

The privacy policy explains how we use any personal information we collect about you when you use this website and our wider services.

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## Glossary of Terms

### What is personal data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information i.e. emails and telephone numbers
- E-mail addresses
- Employment history
- Employee numbers

### What is sensitive personal data?

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions

### What is a Data Controller?

For general data protection regulation purposes, the “data controller” means the person or organization who decides the purposes for which and the way in which any personal data is processed.

The data controller is BeChange AB.

### What is a Data Processor?

A “data processor” is a person or organisation which processes personal data for the controller.

### What is Data Processing?

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

## What information do we collect about you and how?

### App.bechange.se

BeChange are supporting behavioural change with the mission to support individuals to achieve a more sustainable and climate-friendly lifestyle. Part of the service include quizzes that measure current carbon footprint as well as quizzes on feelings and attitude around climate, environment and behaviour.

When you participate in our course, or have registered as a user to one of our quizzes, we collect personal data which includes name, email address and the information which you are providing as part of the service(s) you are accessing. This includes information about your habits and attitude towards behavioral change and global environmental sustainability challenges. If you as a user have access to our messaging services, this data is also saved in order to be accessed in the chat function for the specific course which you are registered to. Google analytics is used to track your interaction with the service.

### Newsletter:

When signing up to our newsletter, we collect personal data which includes name, email address. For our newsletter we use Mailgun which is an external provider allowing us to send out emails.

### Website visitor:

When you visit our website, we collect personal data which includes cookies, i.e., information about your visit to the website. We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

We use Facebook, Instagram and LinkedIn to track the visits to the website and to be able to provide internet-based advertising. You will decide which cookies to allow via the cookie banner on the website.

# How will we use the information about you and why?

In our app, we collect behavioral data from you to draw insights on your change journey in BeChange to give you better coaching and to measure the effect of the method. Data will also be used for statistical purposes.

As a registered user, or someone who has actively signed-up to our newsletter, we will share updates with you via e-mail related to our services or information which we believe may be of interest to you.

As a website visitor, we collect information on our website to process your enquiry, deal with your event registration, give advice based on survey data and improve our services.

We will not share your information for marketing purposes with other companies so that they may offer you their products and services. We may however share suggestions with climate-friendly offerings directly to you.

## Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you give to us may be transferred to countries outside the European Union ("EU"). For example, some of our members may be located outside of the EU. Where this is the case, we will take steps to make sure the right security measures are taken so that your privacy rights continue to be protected as outlined in this policy. By submitting your personal data, you're agreeing to this transfer, storing or processing.

We use a postgresSQL database via Heroku, based within Europe. If you use our services while you are outside the EU, your information may be transferred outside the EU to give you those services.

## Security precautions in place about data collected

When you give us personal information, we take steps to make sure that it is treated securely.

Personal data are sent over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

# Profiling

As stated earlier when you participate in BeChange courses, we do collect your personal data to analyze your change journey. In order to do so we are required to create a profile of your lifestyle and preferences.

# Marketing

We would like to send you information about our services which may be of interest to you. As a recipient to our newsletter, you may opt out at any point as set out below.

You have a right at any time to stop us from contacting you. To opt out please click the link to unregister as provided in the newsletter.

# How long will we hold your data for?

- Course and newsletter: We will hold your data until you ask for it to be deleted.
- We will hold your data for a period of 10 years. We store your data for 10 years for statistical purpose and to be able to track carbon emission reduction over time.
- You will have the opportunity to opt out or update or delete data at any point should you need to do so. Details are set out in this policy as to how to do that.

# Access to your information, correction, portability and deletion

## What is a Subject Access Request?

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email: [privacy@bechange.se](mailto:privacy@bechange.se)  
We will respond to your request within one month of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing please email: [privacy@bechange.se](mailto:privacy@bechange.se)

## Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” apply.

## Data Portability

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

### Your Right to be Forgotten

Should you wish for us to completely delete all information that we hold about you please email: [privacy@bechange.se](mailto:privacy@bechange.se)

### Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in Swedish is Datainspektionen.

## Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on May 6 2021 and the Version number is 0.2 in line with the new GDPR guidelines.

## How to contact us

Please contact us if you have any questions about our privacy policy or the information, we hold about you:

By email: [privacy@bechange.se](mailto:privacy@bechange.se)