



# e-Verification I Sverige (e-VIS) Privacy Policy

## What is the purpose of e-VIS's processing of personal data?

e-VIS processes personal information necessary for communicating within the scope of administrating agreements with companies and other organisations as well as to reach out and for example send information and summoning to meetings to those individuals who are a part of e-VIS's different networks, such as the reference group and other working groups. Furthermore, e-VIS processes personal data that is necessary in order to fulfil its legal obligations, for example to administer and follow up on matters concerning e-verification and the Swedish system for e-verification, deactivation of products (SMVS) and also to comply with our obligations according to the Swedish Book Keeping Act.

We only collect data required for these purposes and delete the data once they are no longer needed. e-VIS does not process any sensitive personal data.

## Legal basis for the purposes of the processing

In order for e-VIS to process your personal data there must be support for this in the general data protection regulation (GDPR). Such support is called a legal basis. For the processing of your personal data we have the following legal basis for our processing:

### *Legal obligation*

Certain processing of personal data is necessary in order for e-VIS to comply with a legal obligation.

Processing of personal data which is performed on this legal basis primarily concerns information connected to manufacturers, holders of marketing authorisations or its representatives, wholesalers and individuals that have permits or are authorised to distribute medicinal products to the public, as well as other relevant parties in order to fulfil the obligation that e-VIS has according to the Commission Delegated Regulation (EU) 2016/161 of 2 October 2015 supplementing Directive 2001/83/EC of the European Parliament and of the Council by laying down detailed rules for the safety features appearing on the packaging of medicinal products for human use (or other national legislation in Sweden).

Processing can also concern our obligations according to the Swedish Book Keeping Act. For example, personal data is found on invoices and other accounting information in the form of named contact persons.

### *Legitimate interest*

Certain processing of your personal data is necessary for purposes that concern e-VIS's legitimate interest.

Processing related to this legal basis is processing which takes place if you participate in e-VIS's network or working groups where we require certain data such as name, phone number and e-mail address in order for us to communicate with you, for example by sending you summoning to meetings. In this case we have a legitimate interest in processing your personal data because we cannot communicate with you unless we process your personal data.

Furthermore, we process your personal data on the basis of a legitimate interest in order to fulfil our obligation in accordance with the agreement with your organisation, including administering the user account for SMVS for your organisation. We also process your personal data in order for us to handle the application to onboard SMVS that you have sent us on behalf of the organisation you represent. In these cases we have a legitimate interest of processing your personal data because we must be able to communicate with our contact at the organisation with which we have an agreement as well as to enter into agreements with such organisations wishing to onboard.

The same applies if you subscribe, or will subscribe, to potential newsletters which e-VIS distributes. In that case, e-VIS has a legitimate interest of processing your personal data in order to distribute our newsletter because the processing is required to be able to distribute the newsletter or to otherwise communicate with you.

Further information on the different legal basis can be found on the Swedish Authority for Privacy Protection's (IMY) website: <https://www.imy.se/other-lang/in-english/the-general-data-protection-regulation-gdpr//>

## **How do we collect the data?**

The data which we process is data provided to e-VIS by you via e-mail, via the website form or by oral communication.

## **Which data do we process?**

The personal data we process are contact details and includes the following:

- First and last name
- Role/title
- Phone number
- E-mail address
- Address

## **How long do we retain the data?**

We retain your personal data only for the time which is required considering the legal basis above. For example we retain your personal data within the scope of your role as a contact person during the time we have an active agreement with the organisation you represent. Furthermore, we process your personal data to manage your SMVS user account as long as you have an active user account with e-VIS. In relation to the processing necessary to comply with



legal obligations we retain your personal data as long as is necessary in order to comply with the legal obligation in question, for example seven years for book keeping purposes. When your personal data is no longer necessary for the purposes for which they were collected your personal data is permanently deleted.

## **To whom can the personal data be disclosed?**

You should be aware that e-VIS in certain situations may need to transfer or disclose your personal data to a third party, including suppliers which provide administrative, technical or other services to e-VIS. Such transfer or disclosure is always made in accordance with the legal basis described above.

e-VIS may preferentially need to transfer or disclose your personal data to manufacturers, holders of marketing authorisations or its representatives, wholesalers and individuals authorised to distribute medicinal products to the public as well as other relevant parties in order to fulfil the obligation that e-VIS has according to the Commission Delegated Regulation (EU) 2016/161 of 2 October 2015 supplementing Directive 2001/83/EC of the European Parliament and of the Council by laying down detailed rules for the safety features appearing on the packaging of medicinal products for human use (or other national legislation in Sweden).

Personal data may also be disclosed according to the below.

### **Courts**

During a legal dispute the data which we deem relevant for the legal proceedings will be disclosed to the court.

### **Supervisory authorities and other authorities**

e-VIS's activities fall under both the Swedish Financial Supervisory Authority and the Swedish Authority for Privacy Protection's supervision (because we process personal data). Upon the request of these authorities we may disclose the data which they request.

The Swedish Medical Products Agency is the supervisory authority for the Commission Delegated Regulation (EU) 2016/161 in Sweden and may request information from e-VIS. Upon such request e-VIS may disclose information including such personal data listed under "Which data do we process?" above.

### **External auditors**

External auditors continuously audit e-VIS's operations. At the time of such external audit, upon the request of the auditors, certain information is disclosed which may contain personal data (for example invoices).

### **Transfer of personal data to a third country**

e-VIS never transfers personal data to a third country (a country outside the EU/EEA).



## How we protect your personal data

e-VIS protects your personal data in multiple ways. The employees of e-VIS are working under professional secrecy and in order to access your personal data authorisation is required. We protect your personal data both by technical and administrative means. Security solutions such as strong authentication at login is an example on such a technical mean. Your personal data is also protected through administrative means for example by strict rules on granted authorisation.

## Your rights

### Right of access

You have the right to, free of charge, access your personal data which we process. A so-called extract from the register will be sent to you.

A request for an extract from the register can be sent as an e-mail to [info@e-VIS.se](mailto:info@e-VIS.se) or by writing to:

e-VIS  
c/o LIF Service AB  
Box 17608  
SE-118 92 Stockholm  
Sweden  
Phone: +46 8 462 37 00  
[info@e-vis.se](mailto:info@e-vis.se)

Please mark the envelope with "Extract from personal data register", or if you send via e-mail use this as the subject of the e-mail.

The extract is sent by registered letter to your publicly registered address.

### Right to rectification

We are responsible to make sure that the data we process is correct. Should you notice that data on you which we process is inaccurate you have the right to have these rectified. If you deem that certain data is missing you also have a right to provide supplementary data.

When we rectify data upon your request we also notify the persons or entities which we have disclosed the data to, subject to such notice being possible and not unreasonably laborious. You also have the right to request information on whom we have disclosed your personal data to.

### Right to erasure / right to be forgotten

You can contact us and ask for your personal data to be erased. Such request should be sent to us by e-mail or letter. Erasure must then take place under certain circumstances, such as if the data is no longer necessary for the purposes which it was collected.

Obligations according to the agreements we have with your organisation, and where your personal data is processed as a contact person, can only be fulfilled if we have an ability to process such personal data. Therefore, we cannot erase such personal data as long as we have



an ongoing agreement. Other reasons, such as a legal obligation (see above), may make it necessary to retain a limited amount of personal data.

#### **Right to object**

You have the right to object to processing of your personal data which is done on the basis of a legitimate interest or processing for the purpose of direct marketing. If you object to processing of your personal data e-VIS must show an overriding legitimate interest to keep processing the personal data.

#### **Right to data portability**

Under certain circumstances you may have a right to data portability which means that you have the right to access your personal data on a commonly used and machine-readable format as well as the right to share this data with other parties.

#### **Right to restrictions on processing**

Under certain conditions you have the right to request a restriction on processing your personal data. If you for example deem that the data on you is inaccurate and has requested a rectification, the processing of your data during the time we investigate the accuracy can be restricted.

#### **Right to file complaints**

To file complaints or to notify us of your opinion on our processing of your personal data you can turn to us via phone, e-mail or letter per the below.

You also have the right to file a complaint with the Swedish Authority for Privacy Protection which is the supervisory authority for data privacy related questions.

#### **Automated individual decision-making or profiling**

e-VIS does not use automated individual decision-making or profiling with personal data as the basis.

#### **Contact details to the personal data processor**

e-Verification in Sweden (Sw. *e-Verifikation i Sverige*) is the personal data processor and is responsible for the personal data which we collect.

e-VIS  
c/o LIF Service AB  
Box 17608  
SE-118 92 Stockholm  
Sweden  
Phone: +46 8 462 37 00  
[info@e-vis.se](mailto:info@e-vis.se)