

# Privacy Policy

**Effective Date:** 1. Jan 2020

**Last Updated:** 10. Mar 2025

## 1. Introduction

Scandinavian Trust AB, Scandinavian Trust & Accounting AS, Scandinavian Trust CMS Oy and Scandinavian Trust ApS (“Scandinavian Trust”, “we”, “us”, or “our”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect personal data in accordance with **EU General Data Protection Regulation (GDPR), national data protection laws in Sweden, Denmark, Norway, and Finland,** and best practices from global industry leaders.

By using our services, website, or interacting with us, you agree to this Privacy Policy.

---

## 2. Data Controller & Contact Information

Scandinavian Trust AB

Birger Jarlsgatan 12

114 34 Stockholm

Sweden

SE Reg no: 556991-3089

Scandinavian Trust & Accounting AS

Klingenberggata 7A

0161 Oslo

Norway

NO Reg no: 933 213 773

Scandinavian Trust CMS Oy

Vilhonkatu 4c

00100 Helsinki

Finland

Scandinavian Trust ApS

Hammerensgade 1, 2

1267 København

Denmark

Data Protection Officer Contact:

Email:

Phone:

Lars-Andreas Nilsen

andreas@scandinaviantrust.no

+46 705 333944

If you have any questions regarding this Privacy Policy or your personal data, please contact our **Data Protection Officer (DPO)**.

---

## 3. What Personal Data We Collect

We collect personal data that is necessary for providing our services. This may include:

- **Identification Data:** Name, date of birth, nationality, national ID/passport number, company directorship details.
- **Contact Data:** Email, phone number, address.
- **Employment & Financial Data:** Salary, tax details, pension contributions, accounting records.
- **Compliance & Regulatory Data:** KYC (Know Your Customer) and AML (Anti-Money Laundering) documentation, due diligence checks.
- **Technical Data:** IP address, cookies, usage analytics when you visit our website.

We collect data directly from individuals, corporate clients, partners, and third-party sources such as **regulatory authorities, financial institutions, and compliance databases.**

---

#### 4. Purpose & Legal Basis for Processing

We process personal data based on the following legal grounds under **Article 6(1) GDPR:**

Purpose	Legal Basis
Providing <b>Corporate Administrative &amp; Directorship Services</b>	Contractual Obligation (Art. 6(1)(b))
Compliance with <b>AML/KYC Regulations</b>	Legal Obligation (Art. 6(1)(c))
Processing <b>Financial Transactions &amp; Payroll</b>	Legal Obligation (Art. 6(1)(c))
Responding to inquiries, managing accounts	Legitimate Interest (Art. 6(1)(f))
Marketing communications (only with consent)	Consent (Art. 6(1)(a))

We **do not** process sensitive personal data unless required by law.

---

#### 5. How We Use Personal Data

We use personal data for the following purposes:

1. **Client Services:** Providing corporate governance, financial services, and process agent services.
2. **Regulatory Compliance:** Ensuring adherence to Nordic regulations and EU directives (e.g., AML, tax laws).

3. **Security & Fraud Prevention:** Protecting against identity theft, cyber threats, and unauthorized access.
4. **Marketing & Business Development:** With explicit **opt-in consent**, we may send newsletters, industry updates, or event invitations.

We will not use personal data for purposes incompatible with the original intent.

---

## 6. How We Share Your Data

We do **not** sell or trade personal data. However, we may share information with:

- **Regulatory Authorities:** If legally required (e.g., tax authorities, financial regulators).
- **Third-Party Service Providers:** IT, cloud storage (OneDrive, NetDocuments), auditors, payment processors.
- **Affiliated Entities & Business Partners:** If necessary to provide contracted services.
- **Legal & Compliance Professionals:** External legal advisors, as needed.

All third-party processors are bound by strict **Data Processing Agreements (DPA)**.

---

## 7. International Data Transfers

We process personal data within the **EU/EEA**. If transfers occur outside the EU, we ensure compliance with **GDPR Chapter V**, using:

- **Standard Contractual Clauses (SCCs)**
- **Adequacy decisions by the EU Commission**
- **Binding Corporate Rules (BCRs)** if applicable

A list of third-country transfers can be provided upon request.

---

## 8. Data Security & Retention

### Security Measures

We implement strict security controls including:

- **Encryption** of data at rest and in transit
- **Multi-factor authentication (MFA)** for system access

- **Role-based access control (RBAC)** for employees
- **Regular security audits & penetration testing**
- **Incident response procedures** for data breaches

### Retention Periods

We retain personal data **only as long as necessary** for its intended purpose:

<b>Data Type</b>	<b>Retention Period</b>
Client records (contractual)	10 years (AML laws)
Payroll & accounting data	7 years (tax compliance)
Marketing data (with consent)	Until withdrawn
Website logs & analytics	12 months

After the retention period, data is securely **erased or anonymized**.

## 9. Your Rights Under GDPR

Individuals have the following rights:

1. **Right to Access** – Request a copy of personal data.
2. **Right to Rectification** – Correct inaccurate or incomplete data.
3. **Right to Erasure (“Right to be Forgotten”)** – Request deletion of personal data under certain conditions.
4. **Right to Restriction of Processing** – Limit how data is used.
5. **Right to Data Portability** – Receive data in a structured, machine-readable format.
6. **Right to Object** – Opt out of certain processing, including marketing.
7. **Right to Lodge a Complaint** – File a complaint with **[Local Data Protection Authority]** if concerns are unresolved.

To exercise your rights, contact us at **[Insert Email]**.

## 10. Cookies & Tracking Technologies

We use **cookies and analytics tools** (Google Analytics, Matomo) to enhance website functionality. Users can manage cookie preferences through browser settings.

---

## **11. Updates to This Policy**

We may update this Privacy Policy to reflect legal or operational changes. Significant updates will be communicated via **email or our website**.

**Last Revised:** 10.Mar 2025

---

## **12. Contact Information**

For privacy-related inquiries:

**Data Protection Officer**

Email: [andreas@scandinaviantrust.no](mailto:andreas@scandinaviantrust.no)

Phone: +46 705 333944