

## How MTM processes your personal data

### Introduction

This is the central privacy policy for MTM and the services we provide through this and other websites, services and applications (our “Services”) by the Swedish Agency for Accessible Media, organisation number 202100-3591, including our brands and products such as Legimus, the publishing firm LL and the newspaper “8 sidor”.

We use the information we collect about our customers and users for four primary purposes:

- conducting our business activities, comply with legal obligations and providing (as well as improving and adapting) the services and products we offer.
- providing personalised services, uniquely adapted to the individual user,
- communicating with our users, including campaigns, and
- marketing services and displaying advertisements in our own services and websites which are supported by advertising.

For these reasons, we combine the data we collect to provide a personalised user experience. To better protect your privacy, we have implemented a number of technical and organisational security measures.

MTM conducts its activities on behalf of the Ministry of Culture and the Ministry of Education and Research. Our purpose is to serve as a national centre of knowledge and to strive towards giving everyone access to literature and societal information based on the conditions of each individual, regardless of reading skills or disability. When you use MTM’s products and services, or come into contact with us in any capacity, you may provide us with personal data. This policy explains which personal data we collect, why, how we use it and for how long we store it. The policy also describes your rights.

It is important that you read through our policy and feel comfortable with how we process your personal data. Do you have any questions regarding how we process your personal data? You can find our contact information on page 12.

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## **1 What is personal data and what does processing of personal data mean?**

Personal data is any piece of information that refers to an identified or identifiable person who is currently alive. Processed images and audio recordings can for example be considered personal data even if no names are mentioned. Encrypted data and various forms of electronic identities (e.g. IP numbers) are considered personal data if they can be linked to a natural person.

Processing of personal data is anything done to the personal data. Every action taken that involves personal data is considered processing. The processing is subject to applicable privacy legislation (primarily the General Data Protection Regulation) whether the processing is automated or manual, and if the data in question is or will be included in a registry. Examples of common forms of processing are collection, registration, organisation, structuring, storage, adaptation, transfer and erasure.

### **1.1 Who is responsible for the personal data collected?**

The controller is the Swedish Agency for Accessible Media, MTM, organisation number 202100–3591. Contact information is available in Section 6 on page 12 below.

### **1.2 Legal ground**

In order to be allowed to process personal data, we must have legal grounds for said processing. The legal grounds are the following.

- 1) Consent
- 2) Agreement
- 3) Legal obligation
- 4) Protect the interests of fundamental importance to you or another natural person
- 5) Exercise of public authority/Task in the public interest
- 6) Balancing of interests

## 2 Which of your personal data do we collect and for what purpose?

### 2.1 Data regarding individuals who borrow books through Legimus

#### Purposes

- 1) We process your data in order to manage your Legimus account, your loans through Legimus services and your customer service cases.
- 2) Name, birth information (personal identity number/co-ordination number/LMA number), email address and username are used to create a Legimus account, to enable us to send login information to you and for you to be able to access and use the service.
- 3) Data regarding the bookmarks and lists you have created to enable you to navigate using them.
- 4) Data regarding how much of the book you have read so that you do not have to start from the beginning every time you open the book in the app or web player.
- 5) Data regarding which books you have borrowed to prevent abuse. MTM protects its talking books using a digital watermark to make them traceable. When a talking book is unlawfully distributed, it is possible to trace who has borrowed and distributed the talking book.
- 6) Analysis of the data we have collected for the stated purpose. We conduct analyses on an aggregated level using anonymisation or pseudonymisation of the data without any links to you as an individual based on the data we collect (technical data regarding which units you have used, how often you use our services, what and for how long various services have been visited). The data is used to assess, develop and improve our services, products and systems.

#### Personal data being processed

Name, personal identity number/co-ordination number/LMA number\*, email address and the most recent account activity. For minors, the guardian's name and personal identity number/date of birth is also stored. In addition to personal data, information about which books you have borrowed (through watermarking), your created bookmarks and lists, and how much of the book you have read is also stored.

\* LMA refers to the Reception of Asylum Seekers and Others Act (1994:137). The LMA card is a plastic card with your picture on it to indicate that you are an asylum seeker. The number on the LMA card is your LMA number

#### Legal ground

Public interest/Exercise of public authority. Personal identity numbers are processed as to determine the identity of the data subject.

#### Storage period

We will store your data for as long as you are a registered Legimus user. Your data will be erased following three years of inactivity. Data for users who have never logged in to their account will be erased 12 months after the account was created.

The deletion times have been established based on limitation periods and copyright offences.

## 2.2 Data regarding individuals who borrow books written in Braille and tactile materials

### Purposes

We process your personal data in order to:

- 1) administer your loans and send you your borrowed material digitally or via mail
- 2) manage your customer service cases
- 3) assess, develop and improve our services, products and systems

### Personal data being processed

Name, personal identity number, phone number and email address.

### Legal ground

Public interest/Exercise of public authority. Personal identity numbers are processed as to determine the identity of the data subject.

### Storage period

Inactive data is erased annually.

## 2.3 Data regarding individuals who subscribe to talking newspapers or county and municipal magazines, or who uses the service "Talboken kommer" for talking newspaper/magazine readers

### Purposes

We process your personal data in order to:

- 1) administer your subscription to talking newspapers/magazines, your borrowed talking books and your borrowed player. Personal data regarding your immediate family is processed in special cases where necessary to administer the subscription.
- 2) manage your customer service cases
- 3) troubleshoot any issues
- 4) assess, develop and improve our services, products and systems

### Personal data being processed

- Name
- Personal identity number,
- Address information via SPAR
- Phone number and email address
- Data regarding subscriptions,
- Talking book loan history (optional),

- Data of how you read your newspapers/magazines (through the app, email or player)
- Data regarding the latest use of the service
- And the name and phone number of the subscriber's immediate family in cases where this is necessary

#### **Legal ground**

Public interest/Exercise of public authority. Personal identity numbers are processed as to determine the identity of the data subject.

#### **Storage period**

Inactive data is erased annually.

### **2.4 Data regarding individuals who subscribe to MTM's newsletters and newspapers/magazines, purchase or order material from us**

#### **Purposes**

We process your personal data in order to:

- 1) send the newsletters and newspapers/magazines you subscribe to, in order to
- 2) manage orders, purchases and invoices
- 3) manage customer service cases

#### **Personal data being processed**

Name, address, email address. If you read newspapers/magazines in Braille, we will also store information of how you read your newspapers/magazines.

#### **Legal ground**

Public interest/Exercise of public authority, legal obligation (for invoice data)

#### **Storage period**

We will store the data until you cancel your subscription or your order has been delivered. We save invoice data in accordance with current accounting regulations.

### **2.5 Data regarding individuals who partake in assistant reader activities**

#### **Purposes**

We process personal data to be able to send out information material, invitations to educational and in-service training programmes, and subscriptions to the magazines *Läsombudet*, *Läsliv* and newsletter about reading as a part of providing care. Information about data processing for subscriptions can be found in Section 2.4 *Data about users who subscribe to MTM's newsletters and newspapers/magazines, purchase or order material from us* on page 7

#### **Personal data being processed**

Name, phone number and email address.

#### **Legal ground**

Public interest/Exercise of public authority

#### **Storage period**

We store the data for as long as you are active. Inactive data is erased annually.

## 2.6 Data regarding individuals participating in our courses, conferences and webinars

<b>Purposes</b>
We process your personal data to be able to administer your participation in courses, conferences and webinars.
<b>Personal data being processed</b>
Name, phone number, email
<b>Legal ground</b>
Public interest/Exercise of public authority
<b>Storage period</b>
We only store the data for as long as it is necessary to administer your participation in courses. This includes registration, the mailing of course material and evaluation questionnaires. For courses and conferences where a fee is attached, we will store invoice data in accordance with current according regulations.

## 2.7 Data regarding individuals who contacts MTM's answering service or MTM's registrar function

<b>Purposes</b>
We process your personal data to manage and record your case.
<b>Personal data being processed</b>
Personal data attached to the case, such as email, name and personal identity number.
<b>Legal ground</b>
Public interest/Exercise of public authority, legal obligation (with regards to archiving etc.). Personal identity numbers are processed as to determine the identity of the data subject.
<b>Storage period</b>
We store your data in accordance with current archiving regulations.

## 2.8 Data regarding individuals in photos in MTM's image bank

<b>Purposes</b>
We process your personal data as a part of MTM's communication and graphic profile.
<b>Personal data being processed</b>
Picture, name.
<b>Legal ground</b>
Public interest/Exercise of public authority
<b>Storage period</b>
Inactive data is erased annually.



## 2.9 Data regarding individuals who have applied for a position at MTM

### Purposes

We process your personal data in order to manage your job application. Your application will be processed through a candidate profile which collects the information you provided as part of your application.

### Personal data being processed

Name, personal identity number, email address, phone number, address and any personal data provided in your answers to sampling questions, in your attached CV or cover letter.

### Legal ground

Public interest/Exercise of public authority. Personal identity numbers are processed as to determine the identity of the data subject.

### Storage period

We will store your data for two years from your latest application, after which we will erase the data.

## 3 How is your data collected?

In addition to the data you provide yourself or collected through your use of our services, we may also collect data from someone else (a so-called third party). The data we collect through third parties are the following:

- Address information from the Swedish Tax Agency regarding your address as it appears in the national register to ensure that the data we have access to is correct, as well to enable us to send you register excerpts should you request them.
- Details regarding name, contact information and subscription data for daily newspapers to enable us to handle customer service cases for new talking newspaper subscribers.
- Details regarding name and contact information for new assistant readers who participate in courses through adult educational associations, to ensure that our information about you is correct if you are a part of the assistant reader activities.

### 3.1 Who might we share your personal data with?

In cases where it is necessary for us to do so in order to offer our services, we will be sharing your personal data with suppliers who are called processors, as well as other government agencies or partners. When your personal data is shared with a processor, government agency or partner, this is only for purposes compatible with the purposes for which we have collected the information. We will also provide the processor with relevant processing instructions for any parts where we are the controller.

### 3.1.1 Processors

A processor is an organisation that processes the information on our behalf and according to our instructions. We perform checks for all processors to ensure that they can provide sufficient guarantees regarding the safety and privacy of the personal data. We have written agreements with all processors through which the guarantee security for the personal data being processed and commit to adhere to our security requirements, as well as the restrictions and requirements regarding the international transfer of personal data.

We have processors who provide assistance with:

- 1) Lending and our media distribution (print, distribution, user management)
- 2) Customer service
- 3) Invoicing and payment solutions
- 4) Marketing and user survey (print and distribution, survey companies)
- 5) IT services (companies who manage the necessary operations, technical support and maintenance of our IT solutions).

#### 3.1.1.1 Libraries

Through a processing agreement with MTM, libraries can give users access to available media through the digital library Legimus and the service “Talboken kommer”. The libraries only have access to personal data from people who frequent their library. For individuals who partake in the assistant reader activities, details regarding name, address and email address may be shared with local and regional libraries to administer invitations to educational and in-service training programmes.

### 3.1.2 Partners

#### 3.1.2.1 Adult educational associations

Adult educational associations collaborate with MTM to arrange events such as training programmes as part of the assistant reader activities. MTM does in certain cases share personal data for people who partake in the assistant reader activities with the adult educational associations, but only to allow them to administer invitations to educational and in-service training programmes. The adult educational associations' processing of personal data is conducted in accordance with MTM's written instructions.

#### 3.1.2.2 Papers and magazines

MTM collaborates with daily newspapers and county and municipal magazines to distribute the paper's talking products to their subscribers. MTM and the magazine/paper process the subscription data for each publication in order to provide the subscriber with access to their talking magazine/paper. The newspaper's/magazine's processing of personal data is conducted in accordance with MTM's written instructions.

## **4 How are your personal data protected?**

We have organisational and technical security measures in place to protect your personal data from unlawful and unauthorised processing. We use IT systems to protect the confidentiality and privacy of, and access to, the personal data. Only individuals who actually need to process your personal data in order for us to fulfil our stated purposes will have access to them.

### **4.1 Where is your personal data being processed?**

Your personal data is processed in the EU/EEA and all our internal IT systems are located within the EU/EEA. In cases where we hire processors who process the personal data outside the EU/EEA, this processing will only take place in countries found by the European Commission to have a sufficient level of protection, or after we and/or the processor have taken the necessary safety precautions.

## **5 Your rights as a data subject?**

You have the right to know which personal data we are processing regarding you or a minor in your custody (hereafter “child”) and for what purpose. You also have the right to receive information about the personal data we are processing regarding you or your child through a register excerpt. You can read more about your rights below. If you have any questions regarding the processing of your personal data or if you believe that these are inaccurate, would like to have them rectified, erased, restricted, made portable or object to them being processed, please contact MTM. You can find our contact information in Section 6, page 12.

### **5.1 Right to access**

You have the right to know which of your own or your child’s personal data we are processing and for what purpose. You have the right to request a register excerpt from us. We can only provide you with personal data we know with certainty belongs to you and which are not confidential. In order to request a register excerpt, please contact MTM. You can find our contact information below. Register excerpts are normally sent to your registered address. If you request that the register excerpt be sent electronically, you have the right to receive it in a digital format. This presupposes that we can do this without injuriously affecting the rights and freedoms of you or others (according to article 8(1) of the Charter of Fundamental Rights of the European Union).

### **5.2 Right to rectification**

We are responsible for ensuring that the personal data we are processing regarding you or your child is correct and up to date. You have the right to request to have your own or your child’s personal data rectified if this data is inaccurate. You also have the right to have this data supplemented if you believe that there are elements missing.

### 5.3 Right to erasure

You have the right to request that your own or your child's personal data be erased in the following cases:

- If the personal data is no longer required for the purposes for which we have collected and processed them.
- If you withdraw the consent upon which the processing is based and there is no other lawful basis for the processing
- If the processing is part of direct marketing activities and you object to the processing of personal data.
- If the personal data must be erased in order for us to comply with our legal obligations.

Please be aware that we may deny your request if there are legal obligations in place preventing us from immediately erasing certain personal data.

### 5.4 Right to restrict processing

If you dispute that the personal data we are processing are correct, you have the right to request that the processing of such data be restricted during the time it takes us to determine whether the personal data is correct. Restriction means that the personal data may only be processed for certain, restricted purposes.

## 6 Contact information

Controller: The Swedish Agency for Accessible Media, MTM

Visiting address: Hans Michelsensgatan 2, level 7 and 8, 211 20 Malmö

Postal address: Box 51, 201 20 Malmö

Phone number: +46 (0)40-653 27 00 (switchboard)

Phone number, MTM answering service: +46 (0)40-653 27 10

Website: [www.mtm.se/english/contact-mtm](http://www.mtm.se/english/contact-mtm)

E-mail address, MTM customer service: [info@mtm.se](mailto:info@mtm.se)

E-mail to Data Protection Officer: [dataskyddsbud@mtm.se](mailto:dataskyddsbud@mtm.se)

## 7 Complaints to supervisory authority

You can file a complaint with a supervisory authority (such as the Swedish Authority for Privacy Protection) if it concerns personal data processing as such. Contact information for the Swedish Authority for Privacy Protection can be found on [www.imy.se](http://www.imy.se).

### **7.1 Updating this privacy policy**

We may change the policy, its appendices and relevant guidelines from time to time. Should any fundamental changes be made, we will inform all registered users of our services. Other changes, including changes which do not concern non-users, will be communicated on our website without notice. Please note that if you are a data subject, you should check which version of the policy and the attached documents is the most recent.

*Updated on 27/04/2021.*