

# Privacy Policy

GlobalConnect

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GlobalConnect (“we”, “our”, “us”) respects your privacy. We therefore want to inform you as to how we process the personal data you provide to us, as well as regarding which rights you have.

This privacy policy applies if you contact us as regards our marketing to you, visit our websites, are our customer, represent one of our customers, potential customers, suppliers or partners, or participate in a recruitment process with us.

Below you will find additional information as to how and why we process your personal data. We also describe your rights, e.g. that you have the right to file a complaint with a competent supervisory authority and that you may object to marketing and profiling at any time. You may also withdraw your consent at any time.

Additionally, we describe our legal basis for processing your personal data and how long we store your personal data.

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## Who is responsible for the processing of your personal data?

GlobalConnect AB, company registration number 556597-6122, is responsible for the processing of your personal data (personal data controller) when we process your personal data for our own purposes.

If you have any questions regarding our processing of your personal data or if you want to exercise any of your rights, please contact us at +46 (0)200 43 00 00 (customer service) or via our contact form: <https://globalconnect.se/kontaktformular/>. Our postal address is GlobalConnect AB, 753 81 Uppsala. GlobalConnect has a data protection officer who monitors and ensures that the business complies with applicable data processing legislation. You can contact the data protection officer at [privacy@globalconnect.se](mailto:privacy@globalconnect.se). Please also visit [www.globalconnect.se](http://www.globalconnect.se) for more information about GlobalConnect.

## Where do we get your personal data?

The categories of personal data we collect about you depend upon whether or not we have a contractual relationship with you. We only collect the personal data which is necessary for each instance of processing.

- Prior to marketing and sales of our products and/or services, we have collected your personal data from an external register (such as the Swedish Mapping, Cadastral and Land Registration Authority register, Metria, Bisnode, hittabrf.se, and others), via a notice of interest directly from you or via the property owner or the board of your tenant-owner association.
- In connection with you or your principal entering into an agreement with us, we collect your personal data directly from you or your principal. The data is required to enable us to contact you for the purpose of providing information and delivering the product and/or service ordered by you or your principal, or to enable us to receive a product and/or service we have ordered from you.
- In connection with you seeking employment with us and providing us with personal data.
- In connection with you applying for installment payments, a credit check is carried out and we then receive information about you from credit agencies.

## Must you provide us with your personal data?

We must process certain personal data in order to be able to execute the agreements we have entered into with regards to delivery of our services and to enable us to comply with laws and other provisions. You must therefore provide us with this personal data.

You will not be able to become our customer if you do not provide such personal data. In the tables below, you can read about which personal data which you must provide where the legal bases are “performance of agreements” or “legal obligation”.

## Who has access to your personal data and why?

Your personal data is processed primarily by us at GlobalConnect. We never sell your personal data to third parties. We will share your personal data as set forth below. In those cases where other parties process personal data on our behalf (known as personal data processors or personal data sub-processors), we have always entered into an agreement which regulates how the personal data may be processed. In the agreement, we have also ascertained both the technical and organisational security levels for processing of the data.

### Subcontractors

When you order a fiber connection, you enter into an agreement with GlobalConnect, which acts as the data controller for the processing of your personal data in connection with the order and contract management. In order to fulfil the agreement and carry out the installation, GlobalConnect transfers the necessary personal data to IP-Only Produktion AB, company registration number 556717-9444 (“IPP”), which is our subsidiary and acts as a data processor. IPP adheres to the same privacy policy and ensures that your data is processed securely in accordance with applicable legislation.

Where applicable, IPP may engage subcontractors (sub-processors) to perform the installation. Such processing is always carried out in accordance with data processing agreements and sub-processing agreements, ensuring that personal data is handled correctly, securely, and solely for the purposes necessary to install the fibre connection.

### Public authorities

Upon request made in accordance with law or public authority decision, we are obliged to provide the data at issue in respect of such decision (e.g., decision of the Swedish Police). The public authority then becomes independent personal data controller. We also provide data to public authorities taking our customers’ interests into consideration, for example applications to the Swedish Tax Agency for deductions for ROT/RUT.

### Cooperation partners

We may also share your data with our cooperation partners, e.g. if you have a fibre connection installed, we provide your data (name and contact information) to service providers that deliver services in our communication network so that they can contact you and offer their broadband services to you. Our cooperation partner then becomes independent personal data controller.

### IT providers

In order to conduct our business in an effective manner in relation to you, your personal data may also be processed in our IT systems, which means that we may share your personal data with our IT providers.

### Providers of financial services

We might provide your personal data to banks and other financial parties and cooperation partners in order to process, store, or manage payments and/or other financial information. The purpose is to be able to conduct our business and perform our commitments to you.

If you would like to have more information regarding how we share your personal data, you are welcome to contact us as described above.

## Do we share your personal data outside of the EU/EEA?

We try to always process your personal data within the EU/EEA. However, in certain situations, the data may be transferred to, and processed by, a third party in a country outside of the EU/EEA. In those cases where personal data is processed outside of the EU/EEA, there exists either a decision from the Commission that the third country in question ensures an adequate level of protection or appropriate safeguards, in the form of standard contractual clauses, binding corporate rules, and supplementary measures (where applicable), which ensures that your rights are protected. If you would like a copy of the safeguards we have taken or information regarding where they are available, you may contact us as described above.

## What are your rights?

You have certain rights regarding how we deal with your personal data. You can read about these rights below.

### Right to withdraw consent, if any

You have the right to withdraw all or part of any consent to processing of your personal data.

### Right to object to processing

You have a right to object to processing of personal data which is based on a balancing of interests.

Even if you make such an objection, we may nevertheless process your data where there exist compelling legitimate grounds which override your interests, rights, and freedoms, or where the processing is carried out for the establishment, exercise, or defense of legal claims.

However, you always have a right to object to the processing of your personal data for marketing purposes or profiling, such as in connection with direct marketing.

### Right to information

You have a right to a written confirmation as to whether and how we process your personal data.

### Right to rectification

You have a right to rectification of any inaccurate personal data concerning you, as well as the right to request that we complete incomplete personal data.

### Right to erasure (right to be forgotten) and restriction of processing

Under certain conditions you have a right to request erasure of your personal data. Such conditions arise where, for example, the personal data is no longer necessary for the purposes for which it has been collected or processed, or you revoke your consent on which the processing is based and there is no other legal basis for the processing.

You also have a right to request that we restrict our processing of your personal data. Such conditions arise where, for example, you contest the accuracy of the data or the processing is illegal and you oppose the erasure of the personal data and, instead, request a restriction on the use of the data.

### Right to complain to a competent supervisory authority

You always have a right to file a complaint with a competent supervisory authority.

It is better to file such a complaint in the Member State within the EU/EEA where you usually reside, where you work, or where an infringement of applicable laws and rules regarding protection of personal data is alleged to have been committed. In Sweden, the competent supervisory authority is the Swedish Data Protection Authority. This right does not have any impact on any other administrative procedure or judicial remedy.

### Right to data portability

You have a right to receive your personal data from us in a structured, commonly used, and machine-readable format. You also have a right to have your personal data transmitted to another company where this is technically possible (“data portability”).

The right to data portability applies to personal data which you have provided to us in a structured, commonly used, and machine-readable format where the processing is based on your consent or on an agreement and the processing is carried out by automated means.

## Detailed description regarding how we process and store your personal data

Here you can read, in more detail, about why we process your personal data, which categories of personal data we process, legal basis (e.g. balancing of interests), and information regarding how long we store your personal data.

Balancing of interests means that we assess whether we have a legitimate interest in carrying out the processing which overrides your individual interest in us not processing your personal data.

In our cookie policy you can also read about how we use cookies. You will find our cookie policy at [www.globalconnect.se](http://www.globalconnect.se).

### For you contact our customer service by phone

Purpose: To ensure the quality of our customer service, to train and coach our employees, and where necessary to be able to review what has been said during a telephone call.		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Recording incoming and outgoing telephone calls via customer service</li> <li>Follow-up and review of information provided or requested during telephone calls</li> <li>Training and coaching of customer service employees through sampling and review of their own calls</li> </ul>	<ul style="list-style-type: none"> <li>Voice</li> <li>Information disclosed during the call, such as name, contact details, customer or contract information</li> </ul>	<p><b>Legitimate interest</b> <i>The processing is justified by our legitimate interest in ensuring and improving the quality of our customer service, in training and coaching our employees, and in being able to verify what information has been provided during a telephone call in the event of questions or disputes.</i></p>

**Retention period:** Recorded telephone calls are stored for a maximum of 91 days from the time of the call and are then automatically deleted, unless they need to be retained for a longer period due to an ongoing case or a legal obligation.

If you receive marketing from us

Purposes: In order to direct marketing to you		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Directing marketing with offers and information.</li> <li>Target marketing through segmentation on the basis of age</li> <li>Preparing an accurate unsubscribe list, in the event you have unsubscribed from our marketing</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> </ul>	<p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to send relevant marketing to you who are, or represents, a potential customer or our customer. You have a right to object to marketing when the personal data is collected as well as in conjunction with every mailout.</i></p> <p><b>Consent</b> <i>If you have consented to receiving marketing from us, we send marketing on the basis of your consent. You may withdraw your consent at any time.</i></p> <p><i>Personal identity numbers are processed for secure identification.</i></p>
<p><b>Retention period:</b> The personal data is stored for two years after termination of the contractual relationship, on the basis of a balancing of interests. Where there is no contractual relationship, the data is stored not longer than six months. If you have given your consent, we will send marketing to you until you unsubscribe from our mailouts. We always stop sending marketing if you unsubscribe from our mailouts or in any other way object to marketing.</p> <p>If you unsubscribe we will retain your personal data in our “unsubscribe list” until further notice in accordance with marketing legislation in order to avoid sending marketing to you again.</p>		

If you visit our websites

Purposes: In order to analyse your use of our websites and improve our websites		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Assessing and analysing how our websites are used in order to carry out improvement activities through analysis tools and cookies</li> </ul>	<ul style="list-style-type: none"> <li>Language</li> <li>Country and locality</li> <li>Information from the device you are using to visit our websites, such as IP address, browser, operating system, internet service provider, and screen resolution</li> </ul>	<p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to develop and improve our websites in order to be able to give you and other users a better user experience.</i></p>
<p><b>Retention period:</b> Personal data is collected through our placing cookies in your computer and the duration of the processing of the personal data varies, depending on the type of cookie. Some cookies are erased immediately after your visit to our websites while some cookies are stored for a longer period. For more information, please see our cookie policy at <a href="http://www.globalconnect.se">www.globalconnect.se</a>.</p>		

Purposes: Information security		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Monitoring of network use in order to detect suspicious activity which may threaten the security of the communication network</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Online identifiers, such as IP address</li> </ul>	<p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in ensuring that our communication network has satisfactory security and that we can offer a well-functioning service.</i></p>

<ul style="list-style-type: none"> <li>Monitoring of our websites and our IT systems to protect against attack, breaches, and fraud</li> </ul>		
<p><b>Retention period:</b> We store your personal data for 18 months after the monitoring measure in question.</p>		

If you are, or represent, a potential customer or our customers

<b>Purposes: In order to administer the contractual relationship</b>		
<b>Processing carried out</b>	<b>Personal data processed</b>	<b>Legal basis</b>
<ul style="list-style-type: none"> <li>In order to negotiate, enter into, administrate and manage agreements with you or the organisation you represent, including cancellation and termination</li> <li>Carrying out payment</li> <li>Sending order confirmation and delivery confirmation</li> <li>Entering into and administering other agreements in connection with fibre rollout, for example land use agreements with property owners</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Housing information and property information</li> <li>Order information</li> <li>Payment information</li> <li>Information from our communication with you</li> </ul>	<p><u><i>If you are a private individual or sole trader:</i></u></p> <p><b>Performance of agreements</b> <i>The processing is necessary in order to enable us to perform our agreement with you. If the personal data is not provided, you will not be able to complete a purchase with us.</i></p> <p><i>For secure identification, it is important that personal identity numbers are processed.</i></p> <p><u><i>If you are a representative:</i></u></p> <p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to enter into and perform agreements with the organisation you represent.</i></p>

<ul style="list-style-type: none"> <li>• Application to the Swedish Tax Agency for deductions for ROT/RUT</li> <li>• Retrieving credit reports in connection with an application to for installment payments</li> </ul>		
<p><b>Retention period:</b> We store your personal information for three years after the termination of the contractual relationship.</p>		

Purposes: In order to manage claims		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>• Handle claims, if any, relating to, for example, purchase, complaint matters, warranty claims, and to initiate a possible claim</li> </ul>	<ul style="list-style-type: none"> <li>• Identification data and contact data</li> <li>• Information from our communication with you in connection with your claim</li> <li>• Relevant information about you relating to the claim such as, where applicable, order information, payment information, housing information and property information</li> </ul>	<p><b>Performance of agreements</b> <i>The processing is necessary in order to enable our exercise our rights and perform our obligations arising from our agreement with you or the organisation you represent.</i></p> <p><b>Legal obligation</b> <i>The processing is necessary in order to comply with consumer legislation or sale of goods legislation.</i></p> <p><b>Balancing of interests</b> <i>We also have a legitimate interest in being able to initiate and defend against any legal claim.</i></p>

**Retention period:** The personal data is stored as from when we become aware of the claim and is processed for the duration of the litigation regarding the claim. Where necessary, data may be processed for as long as is required in accordance with applicable statutes of limitation.

**Purposes: Cooperation with service providers and cooperation partners**

Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>• Transferring data to cooperation partners so that they can offer their products and services to our customers, for example service providers that provide services over our communication network</li> <li>• Transfer data to contractors for calls to tender based on homeowners who have accepted or declined fibre rollout in a specific neighbourhood, as well as comparable data in connection with construction processes</li> </ul>	<ul style="list-style-type: none"> <li>• Identification data and contact data</li> <li>• Housing information and property information</li> </ul>	<p><b>Balancing of interests</b> <i>We have a legitimate interest in disclosing customer information to certain cooperation partners whom we deem are useful to our customers and to improve our offering.</i></p> <p><i>For secure identification, it is important that personal identity numbers are processed (only applicable to private individuals and sole traders).</i></p>

**Retention period:** We will store your data until it is transferred to our service providers and/or cooperation partners. The data may be stored for a longer period for other purposes which follow from this policy.

Purposes: Complying with statutory requirements		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Complying with statutory requirements, such as accounting legislation and other laws and provisions, including public authority requirements in connection with fibre rollout</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Housing information and property information</li> <li>Order information</li> <li>Payment information</li> </ul>	<p><b>Legal obligation</b> <i>The processing is necessary in order to comply with rules such as the Swedish Accounting Act</i></p>
<p><b>Retention period:</b> Data which is processed for accounting purposes is stored for up to eight years in accordance with the Swedish Accounting Act. Data which is processed in order to comply with other statutory requirements is stored as long as is required according to applicable law or provisions.</p>		

If you are, or represent, a current or potential cooperation partner

Purposes: In order to administer the contractual relationship		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>In order to negotiate, enter into, administer and manage agreements with you or the organisation you represent</li> <li>Carrying out payment</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Payment information (if you are a private individual or sole trader)</li> <li>Information from our communication with you</li> </ul>	<p><u><i>If you are a private individual or sole trader:</i></u></p> <p><b>Performance of agreements</b> <i>The processing is necessary in order to enable us to perform our agreement with you. If the personal data is not provided, you will not be able to complete a purchase with us.</i></p> <p><i>For secure identification, it is important that personal identity numbers are processed.</i></p>

		<p><u><i>If you are a representative:</i></u></p> <p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to enter into and perform agreements with the organisation you represent.</i></p>
<p><b>Retention period:</b> We store your personal data for the term of the agreement and for one year thereafter. However, if you are a representative, we stop storing your personal data when we learn that you no longer represent the organisation.</p>		

Purposes: In order to manage claims		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>• Manage and initiate claims, if any, such as revocation of purchase, complaint matters, and warranty claims</li> </ul>	<ul style="list-style-type: none"> <li>• Identification data and contact data</li> <li>• Information from our communication with you</li> <li>• Relevant information about you relating to the claim</li> </ul>	<p><b>Performance of agreements</b> <i>The processing is necessary in order to enable our exercise our rights and perform our obligations arising from our agreement with you or the organisation you represent.</i></p> <p><b>Legal obligation</b> <i>The processing is necessary in order to comply with sale of goods legislation.</i></p> <p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to communicate with you or the organisation you represent and resolve, as best as possible, a situation that arises and, where absolutely necessary, to act in any dispute with the organisation you represent, including to be able to initiate and defend ourselves against a legal claim, if any.</i></p>
<p><b>Retention period:</b> The personal data is stored as from when we become aware of the claim and is processed for the duration of the litigation regarding the claim. Where necessary, data may be processed for as long as is required in accordance with applicable statutes of limitation.</p>		

Purposes: Complying with statutory requirements		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Complying with statutory requirements such as the Swedish Accounting Act</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Payment information (if you are a private individual or sole trader)</li> </ul>	<p><b>Legal obligation</b> <i>The processing is necessary in order to comply with rules such as the Swedish Accounting Act</i></p>
<p><b>Retention period:</b> Data which is processed for accounting purposes is stored for up to eight years in accordance with the Swedish Accounting Act.</p>		

If you are participating in a recruitment process with us

Purposes: Recruitment		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Administering, organising and concluding a recruitment process, among other things reviewing qualifications, conducting interviews and tests</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Test results</li> <li>Information provided to us by you or your reference, such as in your CV and personal letter</li> </ul>	<p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to carry out recruitment processes in order to secure needs for expertise.</i></p> <p><b>Consent</b> <i>Data provided in connection with the recruitment process may be processed for up to two years after the conclusion of the recruitment process where the processing is based on your consent. You may withdraw your consent at any time.</i></p>

<ul style="list-style-type: none"> <li>• Storing and processing data about you and your skills in our recruitment database</li> <li>• Information sharing with recruitment consultants, if any, who assist us with the recruitment</li> <li>• Informing and maintaining the contact for possible positions in the future</li> </ul>		
<p><b>Retention period:</b> Your personal data which is processed based on a balancing of interests ceases to be stored after the conclusion of a recruitment process in which you have participated. If you have provided your consent, we process your personal data for up to two years after you have given your consent, provided you do not withdraw it.</p>		

Purposes: In order to manage claims		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>• Manage claims, if any, such as, objection to recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• Identification data and contact data</li> <li>• Information from our communication with you in connection with the claim</li> </ul>	<p><b>Performance of agreements</b> <i>The processing is necessary in order to enable us to exercise our rights and perform our obligations arising from our agreement with you.</i></p> <p><b>Legal obligation</b> <i>The processing is necessary in order to comply with statutory requirements such as the Swedish Anti-Discrimination Act.</i></p>

	<ul style="list-style-type: none"> <li>• Relevant information about you relating to the claim such as, where applicable, information regarding your qualifications</li> </ul>	<p><b>Balancing of interests</b> <i>The processing is justified by our legitimate interest in being able to communicate with your organisation and resolve, as best as possible, a situation that arises and, where absolutely necessary, to act in a possible dispute with the organisation you represent, including being able to initiate and defend against a legal claim, if any.</i></p>
<p><b>Retention period:</b> The data is stored as from when the claim is initiated and for the duration of the litigation regarding the claim.</p>		

Purposes: Complying with statutory requirements		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>• Compliance with statutory requirements in discrimination legislation</li> </ul>	<ul style="list-style-type: none"> <li>• Identification data and contact data</li> <li>• Information regarding your qualifications</li> </ul>	<p><b>Legal obligation</b> <i>The processing is necessary in order to comply with legal requirements, i.e. the Swedish Anti-Discrimination Act.</i></p>
<p><b>Retention period:</b> In order to comply with the requirements of the Swedish Anti-Discrimination Act, we retain your data regarding your qualifications for up to two years after a concluded recruitment process if you have been offered a position or moved on to the interview phase.</p>		

### General processing independent of our relation to you

Purposes: In order to communicate with you		
Processing carried out	Personal data processed	Legal basis
<ul style="list-style-type: none"> <li>Responding to and managing your communication, for example questions you ask us regarding our products and/or services or in connection with customer service and support</li> </ul>	<ul style="list-style-type: none"> <li>Identification data and contact data</li> <li>Information you provide to us</li> </ul>	<p><b>Balancing of interests</b> <i>Our legal basis for the processing is our legitimate interest in being able to communicate with you, for example, in order to answer and manage questions from you.</i></p>
<p><b>Retention period:</b> We store your personal information for one year after we have concluded our communication. The personal data may also be stored for a longer period of time for other purposes. See these storage times under each purpose above.</p>		

### Document version history

Version	Approval Date	Changes
2.0	2020-05-08	Initial wording
2.1	2021-04-19	Update re: supplementary measures for third country transfers
2.2	2026-05-01	Update regarding recording of telephone calls, IP-Only Produktion AB.

