



## Better Business Integrity Policy

Better Business World Wide (BBWW) is following the new GDPR legislation which is replacing PUL (Swedish Personal Data Legislation) in May 2018. GDPR is short for General Data Protection Regulation <http://www.eugdpr.org/>. This means that we never give out Mystery Shoppers' (MS) personal data to unauthorized entities. BBWW's Integrity Policy can be updated if procedures and processes are developed. BBWW's current Integrity Policy is always available at BBWW's website and is communicated only in this format. MS personal data is available only for individuals in BBWW's organization and its partners which have a need to access the data in order to be able to fulfil their task. All these individuals are also tied by non-disclosure agreements. BBWW has appointed "gate keepers" for each of our processes and systems that include personal data, who are responsible for assuring that we follow the GDPR.

### **MS data in BeOnline**

BeOnline is BBWW's system for planning, follow up, reporting, grading, reimbursements for assignments and similar administration. The more complete MS personal profile is in BeOnline, the better chance it is that BBWW can match MS for relevant assignments. MS chooses which data she writes about myself in my personal profile, however, the data must be accurate, and MS can at any time print and update the data.

BeOnline's data is stored at our supplier Shopmetrics in Bulgaria, which is within EU and hence also comprises under the GDPR. BeOnline's web system has a secure login supported by a SSL-certificate (https). Client's data is stored in BeOnline as long as the client can motivate their need to the data. Our supplier's server is located in Sofia in Bulgaria, and back up is stored both in Sofia and Toledo, USA. Shopmetrics has a Privacy Shield certificate, which assures that they treat all data according to GDPR.

<https://www.privacyshield.gov/participant?id=a2zt0000000TNLvAAO&status=Active>

### **MS data to bank and authorities**

MS personal data will appear in encrypted files which are sent to the bank for payment of fees and reimbursements for assignments, and encrypted files which are sent to the Tax Authorities with MS' annual income and tax statement, after the end of each year. If BBWW is required by A-kassa (unemployment benefit office), Arbetsförmedlingen (the official unemployment agency), Försäkringskassan (the official insurance Agency) or similar authorities, to present personal data, only the information that is requested will be given.

### **MS data to BBWW's clients**

MS id number in BeOnline is visible in client reports, but the client has no access to information about who the MS id number belongs to. MS personal data can be forwarded to BBWW's clients ONLY if MS has approved to that in advance, AND it has a significant relevance for the selection of a suitable MS for a very specialized assignment.

### **MS data in BBWW's other systems**

MS personal data can in exceptional cases be included in a statistical summary e.g. for purpose of showing the overall split in MS gender and age, for an assignment where gender and age are preconditions for the scheduling process and for completion of the assignment. Individuals are not identifiable in the statistics, and the statistic is only available for those that have authority to the specific assignment. These files are stored at BBWW's file server.

Written communication between BBWW and MS is stored at BBWW's mailserver.

The fileserver as well as the mailserver is managed by a Hosting company based in Sweden and all data is stored in Sweden, therefore this data is also protected under the GDPR.

### **Data access**

MS (the data subject) can maximum once a year, request a copy of the personal data that BBWW has stored about her. The request should be made in writing on paper, and be signed in person by the data subject. The data will be sent to the data subject by post or e-mail within one month after the request has arrived to AB Better Business World Wide, Vargmötesvägen 4, 18630 Vallentuna, SWEDEN.

### **Data storage**

According to the legislation and obligation for Swedish companies to keep accounts, BBWW is required to store verifications for payments for seven years, therefore also assignments and reimbursement data has to be saved in BeOnline during this period, for MS who have conducted assignments. BBWW will also store MS profiles in the system for the same period, in case MS applies to be reactivate. BBWW will completely delete MS-profiles for MS who have not conducted any assignment, and has not been logged in in BeOnline for nine months.

This Integrity Policy is updated

2017-10-19

Lina Schölin  
VD, Better Business World Wide