

How we process your personal data when you use Microsoft 365 digital services

This information applies to you as an employee, consultant or as an external guest when using SEK's services within Microsoft 365.

General

Swedish Export Credit Corporation (publ) ("SEK") uses certain digital services within Microsoft 365 provided by Microsoft. Microsoft 365 is a cloud service, which means that information managed and saved in Microsoft 365 is not stored in SEK's server halls and is instead saved with external suppliers.

Who is the data controller?

SEK is the data controller for personal data for **identity management**, as well as for **personal data processing in the service**. Microsoft is the data processor.

Microsoft is the data controller for data processed for **Microsoft's business operations**.

What categories of personal data do we process and why do we process your personal data?

The main purposes for processing the data are as follows:

- i. **Identity management:** SEK processes your personal data to be able to identify you and provide you with access to Teams and other services in Microsoft 365. The data comprises your email address, your username, name and surname as well as multi-factor authentication (MFA) details. MFA is also used for external parties invited as guests in SEK's environment, but not used if you are only invited as a guest to a Teams meeting. In cases where you do not need to log in, the only personal data processed is any data that you provide personally.
- ii. **Processing of personal data in the service:** your personal data may be processed when you use the Microsoft 365 service. The processing depends on what information you share as a user and requires that you determine what information may be processed in Microsoft 365. If you enter, modify, delete or share information or documents containing personal data in the service, this data will also be processed. Therefore, please consider limiting your processing so that personal data is only processed to the extent necessary for the specific uses for which the service is intended.
- iii. **Microsoft's business operations:** Microsoft processes data for Microsoft's business operations. This data is generated from the use of the service and comprises the user's IP address, the time of the activity containing login details, web address and the user's email address. The data is pseudonymized and aggregated. The purposes include invoicing and

account management, remuneration (e.g., calculation of staff commission or partner incentives), internal reporting and business modeling (e.g., projections, revenue, capacity planning and product strategy) and financial reporting.

- iv. **Security:** If you are an employee of SEK, your personal data is also processed by SEK and Microsoft when you use the security service Microsoft 365 Defender in order to increase security in terms of users':
- a) identities (your user profile);
 - b) email
 - c) endpoints (information about your computer (computer name, operating system), file data (file name, size), network details (e.g., IP); and
 - d) applications(metadata and activity history).

Legal grounds

After balancing interests, SEK has assessed that the processing is necessary for purposes pertaining to SEK's interests.

Storage period

Identity management:

- stored as long as the user is active; and
- for 90 days after the account is deleted.

Personal data processing in the service:

- up to 90 days after the expiry/termination of the subscription.

Microsoft's business operations:

Until the objectives of Microsoft's business operations have been fulfilled.

Security:

- (a) identities
 - Trace log: 90 days
 - When a user has been removed from the organization, the user profile and any related network activity is automatically deleted within one year
- (b) email
- (c) end points
 - 180 days
- (d) applications
 - Activity log: 180 days
 - Identification data: 90 days
 - Alerts: 180 days
 - Governance log: 120 days

Avoid

Avoid processing sensitive personal data and extra sensitive data in M365.

Sensitive personal data may include, for example, a person's ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, a person's sex life or sexual orientation, genetic data or biometric data.

Extra sensitive data comprises data such as personal identity numbers, co-ordination numbers, criminal data (information that a person is suspected of committing a crime or has committed a crime), financial and social circumstances, judgments, evaluations, test results, tests, and information relating to a person's private sphere or social circumstances.

Is personal data transferred to third countries?

Personal data for identity management and personal data processed in the service are processed and stored on servers located in the EU/EEA.

While data for Microsoft's business operations is not necessarily transferred outside the EU/EEA, Microsoft has the right to transfer data to Microsoft Corporation in the US, and to its subcontractors. Such data is pseudonymized and aggregated, but could contain information that is possible to attribute to an individual. Data for Microsoft 365 Defender is delivered from data centers in the EU, and the personal data is primarily stored in the EU/EEA, but may be processed in pseudonymized form centrally in the US. Any such transfer is based on the European Commission's Standard Contractual Clauses and a data processor agreement. Read more here about [Microsoft's processing of personal data](#).

Exercising your rights

You have the right to receive information from the data controller on how to exercise your rights. You have the right to know what personal data is being processed about you. If you think that any of your personal data is being processed incorrectly, you can request the rectification, erasure or restriction of your data. You can also object to the processing.

Contact

If you have questions concerning SEK's processing of your personal data, please contact the Data Protection Officer via email dataprotectionofficer@sek.se or by phone +46 (0)8-613 83 00.

If you wish to find out which of your personal data that we process, please send a written, signed request in which you state your wishes and registered address, as well as including a certified copy of your ID to:

Aktiebolaget Svensk Exportkredit
Data Protection Officer
Box 194
SE-101 23 Stockholm, Sweden

Complaints

If you have concerns about how your personal data is processed within SEK, you can also contact the Swedish Authority for Privacy Protection. Information on how to proceed and contact details is available on their website [Making a complaint under the GDPR | IMY](#)