

Privacy Policy – Begravningsbyrå Momento Aktiebolag

Briefly about our message

- This privacy policy applies when we, Begravningsbyrå Momento Aktiebolag, process your personal data in connection with your visiting our website, using or ordering our services and when you are in contact with us.
- Begravningsbyrå Momento Aktiebolag, reg.nr 556417-2210, Box 4036, 102 61
 Stockholm is responsible for personal data unless otherwise stated. More information can be found here.
- We process personal data that you share with us, that we observe about you and data that we collect from someone else. More information can be found here.
- We process personal data that is necessary for us to be able to offer you and your company our products and services. If someone is planning a funeral for a relative of yours, you can appear in a family investigation. More information can be found here.
- We only store your personal data for as long as is required for each processing. More information can be found here.
- We may share your personal data with suppliers, partners and companies within the group in order to, for example, be able to deliver the service you request or to develop our services. More information can be found here.
- In connection with us sharing your personal data as above, certain data may be transferred to third countries. More information can be found here.
- As a registered user, you always have certain rights in relation to our processing of your personal data. You shall receive information, access, rectification, erasure, restriction of processing, right to object, data portability, automated decision-making, and complaints. More information can be found here.
- When you have given your consent for us to process your personal data, you have the right to withdraw your consent. More information can be found here.
- We protect your personal data. More information can be found here.
- We use cookies, which you can read more about below and in our <u>Cookie text</u>.
- The information in this privacy policy may be updated continuously. You will always find the latest version on this page.



• If you have any questions about how we handle your personal data, please contact our data protection officer at dataskyddsombud@momentobyraerna.se.

You will find complete information about the processing of your personal data under the headings below.

Why do we have a privacy policy?

We protect your personal privacy. Through this message, we want to inform you about how we process your personal data and our use of so-called cookies.

Detta meddelande gäller för alla personuppgifter som samlas in i samband med att du:

This policy applies to all personal data collected in connection with you:

- Leave your contact details and other personal data via personal contact with us.
- Fill in your contact details digitally on one of our websites.
- Use any of our digital services, e.g. when applying for a job, reporting systems, etc.
- · Visiting our websites.

Who does this policy apply to?

This Privacy Policy ("Privacy Policy" or "Policy") explains how Fonus processes your personal data when you are a customer of ours or a relative of one of our customers, visit our website or use one of our digital services. The Policy also describes how your personal data is processed if you participate in a funeral ceremony that is broadcasted live.

Who is responsible for what?

Begravningsbyrå Momento AB, reg. no. 556417-2210, with the address Ringvägen 100, 118 60 Stockholm, postal address Box 4063, 102 61 Stockholm, ("Momento") is responsible for personal data unless otherwise stated below.

The Company Group

Momento is part of a company group together with, among others, Fonus and Familjens Jurist, who may contact you for related services. The processing of your personal data at Fonus and Familjens Jurist is regulated according to their privacy policy.

Other collaboration partners

Momento exists in a network of related services consisting of our affiliates and other collaboration partners. As a starting point, Momento is responsible for the processing of your personal data as our customer. Sometimes we share your personal data with partners, for example when you explicitly ask us to do so to use advantageous offers.



In these cases, these partners will be responsible for your personal data in accordance with their respective privacy policies. We always enter into appropriate agreements for the sharing of your personal data with our partners and we never sell your personal data.

Data Protection Officer

If you have questions regarding the handling of your personal data, please contact our Data Protection Officer at the following address:

Data Protection Officer
Begravningsbyrå Momento Aktiebolag
Mailing address: Box 4036, 102 61 Stockholm
E-mail: dataskyddsombud@momentobyraerna.se



Personal data processed by Momento

Privacy policies can be difficult to overview and we do our utmost to be as transparent as possible. In this section, we describe which personal data we process in two different ways.

First, we divide the information into categories of personal data. Second, we divide the information based on where it comes from.

Categories of personal data

Momento processes different types of personal data about you, which we choose to categorize as follows:

- Identity information (for example, first and last name and your personal identity number)
- Contact details (e.g. email address, phone number and address)
- Payment information (for example information about your bank and your account details)
- Case data (for example, information about ongoing and closed cases)
- Device information (eg IP address and browser settings)
- Work-related data (for example, occupation and workplace for contact persons related to transport)
- Information about next of kin (for example, contact person and name of children)
- Sensitive personal data (e.g. health data and information about misconduct)

From where we obtain personal data

Information you provide to us

When you interact with Momento in various ways, for example by submitting a plan via the funeral planner or by booking an appointment with one of our advisors, you will provide information to us directly. Exactly what information we receive depends on the context of our interaction.

As an example, we will always request your name, personal identity number and contact details when you, as a customer, book an appointment or enter into an agreement with us.

The customer of our services can enter contact details for a co-planner when booking. You can also, in the role of co-planner, leave information about yourself when attending a meeting. For example when you authenticate your identity digitally with BankID so that we connect you to the right case.



Information we gather about you

In connection with the case/booked appointment, we will create a case linked to you where we continuously update what we are doing in the case on your behalf. In addition to information that you actively provide us with, you provide information to us in other ways, knowingly or unknowingly. For example, we use various types of tracking technology on our website and in our e-mails that aim to provide us with statistics and help us improve our services and our offer.

You can find more information about how our website uses cookies and how to deactivate them here.

Information we receive from other sources

We may obtain information about you from publicly available sources. For example, information is obtained from public registers (SPAR) to be sure that we have the correct address information. We collect information about your family history from the Swedish Tax Agency. We can also collect information about creditworthiness from credit bureaus, banks or information companies, in cases where it is necessary.

When we carry out transport assignments, we are informed by staff at the hospital or nursing home where to pick up the deceased.

We collect information about you as a co-planner from the client and may also receive information from other relatives.

When you order a tombstone or text completion of an existing tombstone, we also collect information about who is the holder of burial rights from the Church of Sweden, the cemetery administration or the client (in cases when the client is someone other than the holder of burial rights).

Why do we process your personal data?

Processing of personal data "depends on"

In order to create an overview of how we process your personal data for various different purposes, we have created overview maps at the end of this privacy policy that specify our purposes (why we process your data), legal basis (our right to process your personal data), storage time (for how long we save your personal data) as well as categories of personal data and recipients of personal data.

Purpose and legal basis

Momento processes your personal data for specific purposes. This means that we always define "why" we process your personal data. For each purpose, we have identified a legal basis.

The most common legal bases for our personal data processing are:



- Agreement with you;
- Legal obligations and;
- Momento's legitimate interest.

In exceptional cases, for example to inform you about several of our services through marketing, we obtain your explicit consent to process your contact information for this purpose. In these cases, you can withdraw your consent at any time and then we will stop processing your personal data for this purpose.

For more information about why we process your personal data and what legal basis we rely upon in each processing, we have created the overview maps at the end of this privacy policy.

You can also always contact our Data Protection Officer with questions at dataskyddsombud@momentobyraerna.se.

Case management at Momento

Momento offers you opportunities to order products and services, use our digital services and book a personal meeting for, for example, funeral advice. When you want to book an appointment and fill in a free text field in a form on one of our websites, the advisor uses the information for your appointment. We continuously record your case in order to be able to administer, plan and carry out our mission for you. We also do this so that we can invoice you correctly and meet requirements according to the Swedish Accounting Act, protect ourselves against complaints, keep statistics and offer related services to you.

If you order Insurance Inventory (Försäkringsinventering), we collect information from other sources to investigate what insurances the estate, or, if you order Private Insurance Inventory, you hold. In order to carry out an insurance inventory for an estate, information about the surviving spouse/common-law partner or registered partner as well as a death certificate with family investigation from the Swedish Tax Agency is required. Address refers to the deceased, but due to the fact that kinship is also shown, it can be shared by a relative.

In addition to the information you provide to us for our case management, we may also collect technical information such as your IP address and technical information about the equipment used if this is required.

About Mina Sidor

Via Mina Sidor (My pages), you get a digital customer folder with information about the funeral and documents needed to administer the estate (such as agreements, death certificates with family investigation, etc.). In Mina Sidor there is also a common area for you as a client and any co-planners.

Once you have started and saved a plan in the funeral planner, you can log in to Mina Sidor to resume planning or to submit it to Momento for a scheduled appointment. After the meeting, you can log in to Mina Sidor, see your case, get a digital version of the customer folder and reach a common area. During the meeting with Momento, you can give access to the funeral matter to more, so-called co-planners.



Anyone can use BankID to log in to Mina Sidor. At the first login, the user needs to approve Fonu's privacy policy and enter their contact details. As a co-planner, you can, after the client or you yourself state that you are a co-planner in a case, identify yourself digitally with BankID and thus be linked to the right case in Mina Sidor. Without an ongoing funeral case or if it has been at least seven (7) years since a funeral was planned via Momento, Mina Sidor are empty.

If you are a customer, the legal basis for the processing is the fulfillment of an agreement for the processing of your personal data in Mina Sidor. Otherwise, the legal basis is Momento's legitimate interest in processing personal data belonging to co-planners, burial rights holders and/or the persons listed on the "Death certificate with family investigation" as well as in processing the data to be able to follow statistics.

About live ceremonies

We offer relatives who cannot physically attend the ceremony the opportunity to participate digitally. You will receive information about possible live broadcasting of the ceremony on the deceased's memorial page as well as in the form of signs in the ceremony room and via our attending representative who is responsible for broadcasting the ceremony. It can also be stated in the obituary according to relatives wishes.

We record the live funeral ceremony to ensure quality in the event of the receiver's poor network or other problems such as insufficient quality of equipment or handling errors at the receiver, or if a relative is in another time zone or for health reasons is unable to see the funeral. In these exceptional cases, we provide a later broadcast that is available by code.

Momento also conducts random checks to ensure that our procedures for live ceremonies are followed. This is done by having an employee with special responsibility for live ceremonies twice a month check the information text, placement of stands and the sound. We also check that none of the relatives are identifiable on the film. No recorded ceremonies are saved for longer than thirty (30) days.

About Vita Arkivet

In Vita Arkivet (White Archive), you can enter your thoughts and wishes that your loved ones will be able to access from your time on earth. You can also enter information that will make the planning easier for your relatives. You can write down the type of funeral you want, what should happen to any pets, or what the relatives should do with your letters and diaries. Often there are also practical things that are good to know, such as where keys and important papers are kept.

The use of Vita Arkivet is free of charge and available with the help of BankID for everyone over 16 years of age.

The legal basis for the processing of your personal data in Vita Arkivet is the fulfillment of a contract provided that you accept our terms of use. However, you can



delete your account at any time directly in the service. You delete your account by clicking on "Mitt konto" on the homepage and then on "Radera mitt Vita Arkiv".

About member benefits

The Fonus Company Group is owned and controlled by a large number of organizations, our "members". Among these are large cooperative companies, condominium associations, trade unions and a variety of interest associations around Sweden. As a member of our members, you are entitled to benefits at our funeral homes and at Familjens Jurist.

To use such a benefit, you need to state which organization you or another relative is a member of. For the vast majority of organizations, we only make a note in the form of "membership benefit activated" in your profile. We therefore do not register information about any trade union affiliation or other involvement that could potentially be considered sensitive. For some larger organizations, we register your membership partly to activate the membership benefit, partly to keep statistics on how these benefits are used.

The organizations in which we register membership are the following:

- HSB
- Hyresgästföreningen, Riksförbundet
- Riksbyggen ekonomisk förening
- Folksam ömsesidig livförsäkring
- Folksam ömsesidig sakförsäkring
- Kooperativa förbundet KF (Coop-medlemmar)
- PRO, Pensionärernas Riksorganisation
- SKPF Pensionärerna
- Föreningen svenskar i världen

The legal basis for us processing information about your membership is the fulfillment of an agreement. The legal basis for our registration of the current member organization for statistical purposes is Fonus' legitimate interest in informing these organization about how their members use the price reductions with us.

About Minnessidorna

Momento's memorial pages are a digital gathering place where you as a family member, friend or loved one can remember the deceased. On the memorial pages, you can also get information about the funeral, register for a possible memorial service, order flowers or a memorial gift.

We process limited personal data about relatives in connection with the provision of the memorial pages. We may process information about memorial gifts, flower orders and registrations for memorial services that we provide to the person ordering the funeral.

If you choose to publish a greeting on the memorial pages, we will process the personal data that you enter yourself in the free text fields. When registering for a memorial service, we also ask you to indicate dietary preferences.



<u>Personal data processing is also regulated by our provider of the service, Rapid Data AB, and their personal data policy which you can find here</u>

About our whistleblowing feature

Momento has a reporting system to be able to receive information from you about possible irregularities in our operations and to be able to follow up on these cases.

We process the information you report, which may be information about misconduct including criminal suspicion and/or sensitive personal data. Information about reported misconduct including criminal suspicions is necessary to fulfill our legal obligation under The Swedish Whistleblower Act. Sensitive personal data that is reported must prove a wrongdoing and is needed to establish legal claims.

If you choose to be anonymous, we ensure your anonymity through both technical and organizational measures. If you choose not to be anonymous, our system provider processes your personal data to be able to make an initial assessment of how the case should be taken further. All information reported that is not relevant will be deleted by the supplier.

When a reported matter has had to be followed up, the personal data in the matter is deleted no later than two (2) years after the end of the matter.

Additional purposes

This privacy policy describes how and why we process your personal data, by the section above, as well as through the concluding overview maps. If Momento would nevertheless like to use your personal data in any way that does not comply with this policy, we will inform you of such intended use before, or, at the latest, when your data is collected.

How we share your personal data

Categories of recipients

We only disclose your personal data to you or the parties who need it for various legitimate reasons. We never give out or share your data without specific legal basis. Each organization we disclose information to is responsible for managing your personal data securely and in accordance with the law. Below we have categorized the recipients with whom we share or may share your personal data into seven (7) different categories. For more information about when we share your personal data with others, contact our Data Protection Officer at dataskyddsombud@momentobyraerna.se.



Parishes

We share personal data about you as a relative in the capacity of client or contact person to the relevant parish or cemetery administration in connection with, for example, booking a funeral ceremony or burial.

Authorities

We may share personal data about you with authorities when we are required to do so or when you specifically ask us to do so. For example, we will share your contact details with the relevant region when we carry out funeral transport for them.

Within the Fonus group

Sometimes Momento needs to share your personal data with other companies within the Fonus Group. For example, it could be that you want help with probate in connection with your funeral matter and you ask us to pass on your contact details to Familjens Jurist.

Owner organizations

Momento owned by a number of organizations that in some cases want statistics on how their members have used their benefits with us, for example price reductions on funerals.

Social Media

Momento uses Facebook, Linkedin and Instagram and when you interact with us via these channels and these companies will receive your personal data. For the actual sharing of your data, we are responsible together with them, but these actors are then themselves responsible for how they process your personal data after they have received it. This processing is regulated by the respective social media company's own personal data policy.

Vendors

Sometimes we need to share your personal data with companies that process your personal data according to our instructions, so-called personal data processors. This category of recipient involves vendors as well as business consultants.

Collaboration partners

Momento cooperates with both local business owners (for example florists and musicians) and national companies for real estate brokerage so that you get favorable offers on funeral services and home valuations, among other things. We mainly share your contact information as a contact person or customer to our partners.

Third country transfers

We strive to only process your personal data within the EU/EEA. When we need to



share your personal data with recipients outside the EU/EEA, we ensure that it only happens to countries that are sufficiently secure (have an adequate level of protection) or that we take other appropriate protective measures. These appropriate safeguards include, among other things, that we use standard contracts approved by the European Commission (EU Commission standard contractual clauses) and that we always analyze and evaluate the legislation of the recipient country at our own discretion. When we consider that the laws of the recipient country do not provide sufficient protection for your personal data, we take special measures so that the protection of your data remains when it is transferred to the relevant country outside the EU/EEA.

For more information about our transfers and protective measures when transferring personal data to recipients outside the EU/EEA, you can contact our Data Protection Officer at dataskyddsombud@momentobyraerna.se.

Your rights

You have a number of rights according to the data protection regulation. As a controller, we are responsible for having procedures in place to handle your request to exercise your rights. Your rights are as follows:

- Right to be informed You have the right to receive information about how we process
 your personal data. We inform you through this policy and by responding to questions
 from you. You will find more about the right to information on the Swedish Authority of
 Privacy Protection's webbsite.
- Right of access You have the right to access your personal data. You will find more
 information about the right of access on the Swedish Authority of Privacy Protection's



webbsite.

- Right to rectification You have the right to have incorrect personal data corrected and
 the right to have incomplete data supplemented. You will find more information about the
 right to correction on the Swedish Authority of Privacy Protection's webbsite.
- **Right to erasure** As a registered user, you have the right to have your personal data deleted by us to a certain extent. For more information about the right to erasure, visit the Swedish Authority of Privacy Protection's <u>website</u>.
- Right to restriction of processing You have the right to demand that the processing be restricted if the data is processed incorrectly, e.g. not correct, if the processing is illegal, if the data is no longer needed for the purposes but you need it to be able to establish, enforce or defend legal claims. The right also applies pending an assessment of whether the alleged error exists. You can find more information about the right to erasure on the Swedish Authority of Privacy Protection's website.
- Right to object For personal reasons, you have the right to object to processing based on public interest, exercise of authority or legitimate interest. In such a situation, the processing ceases unless there are compelling legitimate reasons that outweigh your interests or if the purpose of the processing is to establish, exercise or defend legal claims. Processing that takes place for direct marketing ends if you object to such processing. You will find more information about the right to object on the Swedish Authority of Privacy Protection's website.
- Right to data portability In some cases, you have the right to obtain information that
 you have provided to us and to have the information transferred to another personal data
 controller. The right applies when we process personal data automatically and with the
 support of your consent or on the basis of an agreement. You will find more information
 about the right to data portability on Swedish Authority of Privacy Protection's website.
- Automated decision-making As a registered user, you have the right not to be subject to automated decision-making that has legal consequences or similarly affects you to a significant degree. The right does not exist if it is necessary for the performance of a contract, permitted by Union law or national law applicable to us or is based on your consent. You will find more information about your rights in the event of automated decision-making on the Swedish Authority of Privacy Protection's website.
- Right to file a complaint You have the right to file a complaint with a supervisory
 authority if you believe that the processing is in violation of the regulation. The current
 supervisory authority for our processing of your personal data is the Swedish Authority of Privacy Protection.

Contact our data protection officer at <u>dataskyddsombud@momentobyraerna.se</u> if you want to assert your rights or if you discover that the processing of your personal data infringes the data protection regulation.



Security and data storage

For how long do we store your data

We save your personal data as long as necessary to fulfill the agreement with you and to fulfill legal requirements in, for example, the Swedish Accounting Act. This means that we retain your personal data related to the performed funeral services for a maximum of seven (7) years.

Security and non-disclosure

It is important for us to protect the personal data about you that Momento processes. Therefore, we have taken appropriate technical, organizational and administrative security measures to ensure that your personal data is only processed correctly. This means, among other things, that we limit access to your personal data so that only those who need it have access to it.

Momento tests and evaluates our security measures annually and in the event of any type of security incident to constantly assure us that your data enjoys the high level of protection it deserves.

We protect your personal data through technical and organizational security measures. We have a process for resolving security-related complaints as well as a designated person to address security breaches, written procedures for granting and deactivating permissions, and a password policy. In addition, personnel are also trained in IT security. Furthermore, businesses have implemented certain security mechanisms such as the use of encryption technology, two-factor authentication, security applications, firewalls, backups, etc. Security measures for each processing are documented in our record list.

Updates and changes

Momento is constantly working to develop our business and our digital services. This means that we will also update this privacy policy on an ongoing basis when we plan to change how we use your personal data. When we make major updates to how we process your personal data, for example for the purposes of the processing, we will specifically contact you about this before the processing begins.

Version number	Date of change	Description of change
V1	2024-01-19	New Privacy Policy in
		English (translated from
		Swedish version)



Overview maps

Purpose	Categories of personal data	Legal basis	Categories of recipients
Provide funeral services including gravestone matters	 Identity information Contact details Payment information Case data Device information Work-related data (e.g. healthcare personnel on transport assignments) Information about next of kin Sensitive personal data (e.g. information about allergies in connection with registration for a memorial service) 	Mainly agreements. The sharing of your personal data with specified categories of recipients takes place when we are obliged by law or the agreement with you.	 Within the Fonus Group Parishes Vendors Collaboration s partners Authorities

Storage period
We process your personal data for a maximum of seven (7) years to meet requirements in the Swedish Accounting Act.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Provide digital services (funeral planner, tombstone planner, book online)	 Identity informatio n Contact details Case data Device informatio n Information 	Agreement	 Leverantörer Samarbetspa rt ners Församlingar (kyrkogårdsför valtning)
	about next of kin		

Storage period

We process your personal data for a maximum of seven (7) years.



Purpose	Categories of personal data	Legal basis	Categories of recipients
Vita Arkivet	 Identity information Contact details Case data Device information Work-related data Information about next of kin Sensitive personal data 	Agreement	N/A

Storage period

We save your account until further notice or until you delete it yourself. You also have the right to revoke your account in paper form, you do this via your nearest Fonus office, which you can find here.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Comply with legal requirements	Contact detailsPayment information	Fulfill legal obligations incumbent on Fonus, for example according to the Swedish Accounting Act.	 Parishes Vendors Collaboratio n partners Authorities Within the Fonus group

Storage period

Personal data that Fonus must save according to applicable law, such as accounting legislation, is saved for seven (7) years.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Respond to legal claims	Contact detailsPayment informationCase data	It is a legitimate interest for Fonus to be able to respond to any legal claims that are	AuthoritiesWithin theFonus GroupParishes
	 Information about next 	directed against our operations.	VendorsCollaborative partners

Storage period

We process your personal data for a maximum of seven (7) years to meet requirements in the Swedish Accounting Act.



Purpose	Categories of personal data	Legal basis	Categories of recipients
Secure our services and our website	Device information Information about how you use our services and our website	It is a legitimate interest for Fonus to secure our services and our website, for example through backup to ensure business continuity and disaster preparedness.	• Vendors

Storage period
This processing takes place during the time you use a service. After that, Fonus saves visit and usage logs for a maximum of 30 days.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Fulfill agreements with partners	Contact details;	It is a legitimate interest for Fonus to fulfill our contractual obligations with third parties.	VendorsAuthoritiesVendorsWithin the Fonus group

Storage period

Agreements are terminated after seven (7) years plus the current year.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Develop our business	Contact detailsPayment informationCase data	It is a legitimate interest for Fonus to constantly improve our offer to our customers and to develop our business.	VendorsAuthoritiesWithin the Fonus group



Storage period

We process your personal data for a maximum of seven (7) years.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Promote our products and services	 Identity information; Contact details 	We rely on your consent to make digital mailings and on our legitimate interest to notify you as our customer about related services and products that the Fonus Group provides. You can unsubscribe from mailings at any time by clicking on the link at the bottom of the email.	 Vendors Authorities Within the Fonus Group Social Media (LinkedIn, Instagram, Youtube and Facebook)

Storage period

We save your personal data to promote our business for a maximum of two (2) years since you were last a customer with us, or until you withdraw your consent to marketing or unsubscribe from mailings via the link in the e-mail. You can always delete any comments on our social media posts yourself.

Purpose	Categories of personal data	Legal basis	Categories of recipients
Communicate with you	 Identity information; Contact details; Case data; 	It is a legitimate interest for Fonus to be able to communicate with you as our customer, for example through our chat on fonus.se or email to update you on how your case with us is progressing.	Vendors Social Media (LinkedIn, Instagram, Facebook)

Storage period

We save your personal data as long as we have a need to communicate with you, in principle until your case is closed, and at the latest for a maximum of (7) years in accordance with the Swedish Accounting Act. You can object at any time to us using your personal data to communicate with you and then we will still not do so unless we have compelling reasons to do so. You can always delete any comments on our social media



posts yourself.			



	Categories of personal data	Legal basis	Categories of recipients
Order goods and services from you	Contact details;Identity information;Work-related data	Agreement	Parishes

Storage period
We process your personal data for a maximum of seven (7) years to meet requirements in the Swedish Accounting Act.