



## Better Business Integrity Policy

Better Business World Wide (BBWW) is following the new GDPR legislation which replaced PUL (Swedish Personal Data Legislation) in May 2018. GDPR is short for General Data Protection Regulation <http://www.eugdpr.org/>. 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.

BBWW will never give out Mystery Shoppers' (MS) personal data to unauthorized entities. MS personal data is available only for individuals in BBWW's organization and its partners which have a legitimate need to access the data in order to be able to fulfil their task. All these individuals and companies are also tied by non-disclosure agreements. BBWW has appointed internal "gate keepers" who are responsible for assuring that we follow the GDPR in each of our processes and systems that include personal data.

### **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 herself in her personal profile, however, the data must be accurate, and MS can at any time print and update the data.

BeOnline's is BBWW's unique version of Shopmetrics/Research Metrics program application which is a well established system especially designed for the mystery shopping industry. Shopmetrics office is in Sofia, Bulgaria and Toledo, USA. Shopmetrics are certified in accordance with ISO 9001:2015 Quality Management, ISO 27001:2013 Information Security and ISO 20000-1:2018 IT - Service Management. MS data in BeOnline is stored in Shopmetrics datacenters within EU and Shopmetrics is utilizing Standard Contractual Clauses within the organization to assure that all data is handled according to the GDPR.

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

MS personal data will also 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' income and tax amounts. If BBWW is required by A-kassa (unemployment benefit office), Arbetsförmedlingen (the official unemployment agency), Försäkringskassan (the official insurance Agency) or similar authorities to forward 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 mail server.

The fileserver as well as the mail server 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, Box 165, 18623 Vallentuna, SWEDEN.

### **Data storage**

Verifications for payments will be stored as long as required according to the legislation and obligation for Swedish companies to keep accounts, therefore also MS profile and data about assignments and reimbursements has to be saved in BeOnline during this period, for MS who have conducted assignments. BBWW also has a legitimate need to store MS profiles in the system 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

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