Data Controller’s Instruction for the processing of Personal Data

In addition to what is already stipulated in the Data Processing Agreement, the Data Processor shall, via its libraries, also follow the instructions set out below:

|  |
| --- |
| **1. Purposes, object and type** |
| The purpose of the respective Processing is to: register users in the systems provided by the Controller (also named MTM) and on MTM’s behalf, edit user accounts and user data, order and download media as well as to support users in their use of MTM’s virtual Library Legimus. |
| **2. The Processing involves the following types of Personal Data** |
| • Social security number  • Coordination number  • LMA number (LMA stands for *Lag om mottagande av asylsökande*, which is the Reception of Asylum Seekers Act)  • First name, last name  • Email address  • Library affiliation  A requirement for a person to become a Legimus registered reader/user is that the individual has reading impairment due to visual impairment - or other disability that leads to reading impairment, and thus need to have a printed book adapted in some way to be able to read it. This means that data on the individual’s health is implicitly processed by the Data Processor`s library. |
| **3. The Processing shall include the following categories of Registered Persons:** |
| * Registered reader/user – reading impaired person * Guardians in cases where the Registered reader/user is under the age of 18 * Library Clerk – a person with the at least a percent of their employment at the Data Processor´s libraries. |
| **4. Specify special security processing requirements that will apply to the Processing of Personal Data that is carried out by the Data Processor(s)** |
| MTM screens and deletes personal data in accordance with the guidelines of the General Data Protection Regulation (GDPR) and the Swedish Archives Act (1990:782). |
| **5. Specify technical and organizational security measures that apply to the Processing of Personal Data by the Data Processor(s)** |
| In order to protect the Processing of Personal Data against unauthorized access, destruction or alteration, the Data Processor shall ensure that its libraries take the necessary technical and organizational security measures to prevent dissemination of Personal Data and maintain an appropriate level of security. The Data Processor shall ensure that its libraries staff know and comply with the Data Processing Agreement and the instructions given by MTM, and furthermore that the staff is kept aware and up-to-date on the General Data Protection Regulation.  The Data Processor shall promptly notify MTM upon detection of any attempted or successful unauthorized access, destruction or alteration of Personal Data. The Data Processor shall, via its libraries, ensure that:   * Personal data always be handled prudently and that only the specific staff who needs access to Personal Data, should have it. * Contac information on the Data Processor`s libraries staff, such as Clerks *(Registrerare)* or Speech Books Managers *(talboksansvariga*), are always up to date and that MTM is prompt and properly informed whenever a person who has a Legimus roll is disengaged from Legimus or from the Data Processor`s organisation. * There are practical routines to prevent unauthorized access to Personal Data. * Library’s Clerks always log out or lock their computer or other devices when leaving them unattended. * Sensitive Personal Data is never handled by e-mail. * Personal data, as far as possible, is never printed or made into physical copies. * Passwords to systems containing Personal Data are never written down to post-its, notes or others alike. * The Clerk and other personal who works with Legimus has individual logins and do not share those with others * Personal equipment is never used when Processing Personal Data. * Personal Data is never processed on external storage means such as USB, mobiles, tablets, hard drives, etc. |
| **6. Specify special requirements relating to Logs that apply to the Processing of Personal Data, as well as who will be having access to these.** |
| No additional measures in addition to the DPA are required. |
| **7. Localization and transferring to Personal Data to a Third Country** |
| Legimus related Personal Data shall only be processed by representatives (sub processors) established within the EU/EEA. |
| **8. Other Instructions regarding the Processing of Personal Data performed by Personal Data Processor(s)** |
| The Data Processor shall follow MTM`s every issued instruction regarding application to a library or clerk account. Further information is published on legimus.se. |