

# Privasee SEAL

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SCOPE – SKL/FAMILJEHEMSVERIGE.SE



# Threshold Assessment

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1. Personal data collected includes sensitive data pertaining to financial, physical and mental health of the applicant and family members.
2. The type of personal data collection makes this a 'high privacy risk' category.

# Roles & Definitions

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SKL has been tasked by the kommuns to take the role to provide a channel for applications to offer homes to unaccompanied refugee children. The portal covered in the scope of the Privasee SEAL is purely a 'secure routing' conduct for these applications. SecureMailbox has provided this function.

The applications are captured in their entirety encrypted into pdf, after extraction of the name of the receiving kommun. They are only decrypted upon access by an authorised personnel from the principality tasked to process the application.

Roles can be defined as follows:

- ❑ Data Controller – kommun
- ❑ Processor1 – SKL
- ❑ Processor2 - SecureMailbox

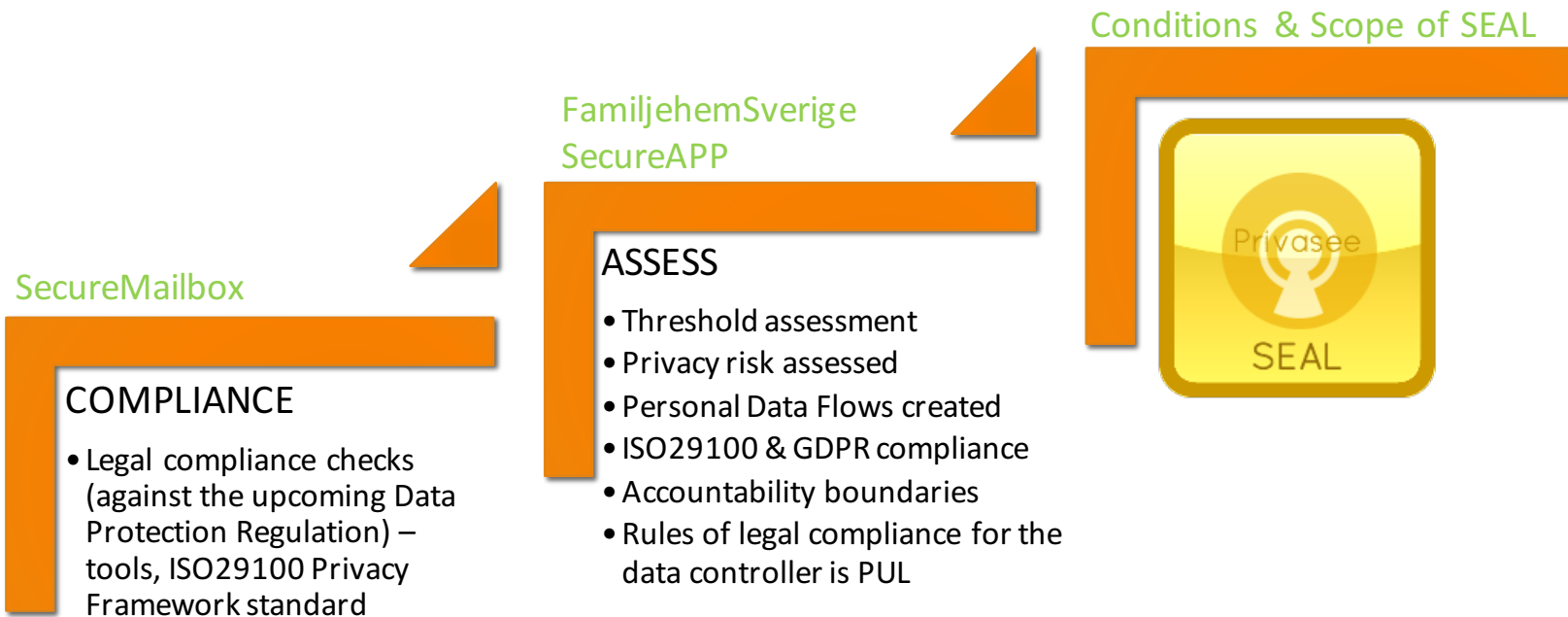
# Scope

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Types of data	Types of privacy	Legislation
Personal and sensitive data pertaining to financial, physical and mental health of the applicant and family members	Information privacy	Familjehem.se portal – GDPR Kommuns - PUL

# SKL/FamiljehemSverige.se Privasee SEAL

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# SKL/FamiljehemSverige.se - SEAL Scope

SecureMailbox Service – Privasee SEAL - 2016-01-31



Encryption keys shared between SKL & SecureMailbox

Applications stored encrypted (pdf) in Amazon AWS cloud

## SKL Portal – FamiljehemSverige.se



Entry point for application

Name of receiving 'kommun' extracted

Application encrypted in into pdf

Encrypted application routed through to the receiving 'Controller'

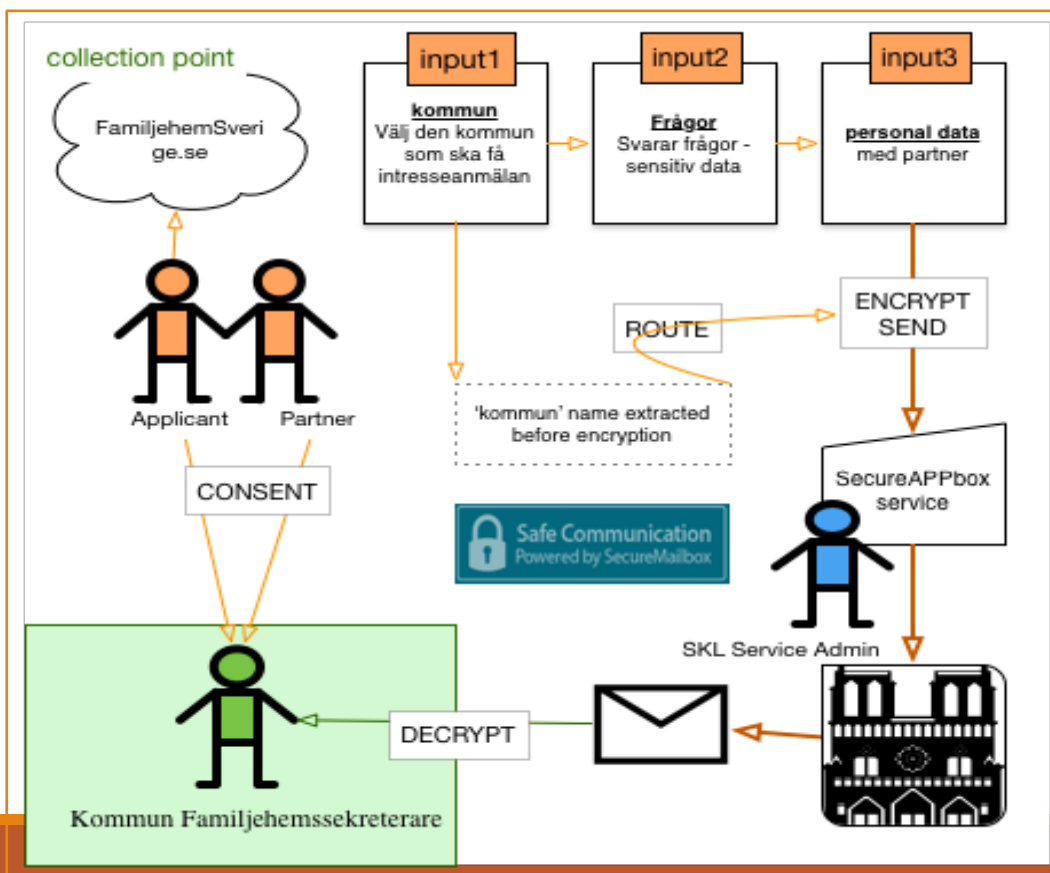
### Data Controller = Kommun

Encrypted application receiving in Inbox

Application opened (and downloaded) decrypted by authorized personnel (Familjehemssekreterare )

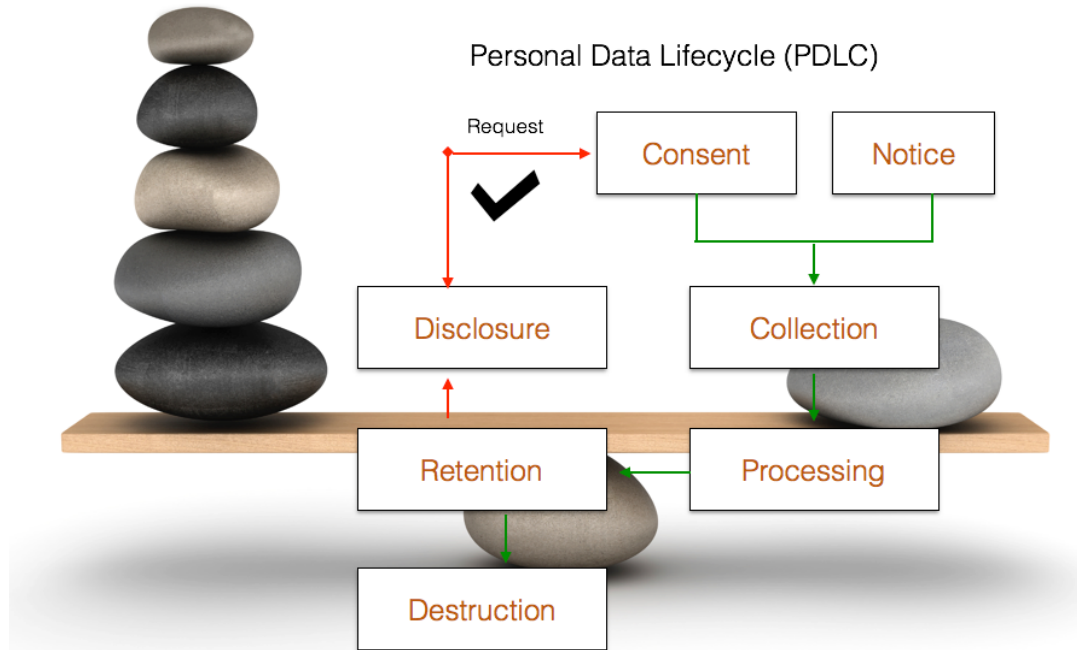
Legal compliance - PUL

# ISO/IEC 29100 Accountability Matrix



ISO/IEC 29100 - Privacy Framework	APPBox	SKL	Kommun
Consent and choice		✓	✓
Purpose legitimacy and specification		✓	
Collection limitation	✓	✓	
Data minimization	✓	✓	✓
Use, retention and disclosure limitation			✓
Accuracy and quality			✓
Openness, transparency and notice	✓	✓	✓
Individual participation and access			✓
Accountability			✓
Information security	✓	✓	✓
Privacy compliance	GDPR	PUL	PUL

# FamiljehemSverige.se - PDLC



Privacy **Notice** Privacy provided at portal.

**Consent** is provided before application is submitted. The personal data is **collected** and captured in an encrypted 'pdf' and directed through to the 'kommun' selected by the applicant via the SecureAppBox service.

The personal data is decrypted upon opening in the SecureAppBox by authorized personnel, as assigned by the Controller, i.e. Familjehemssekreterare of the receiving 'kommun'.

From hereon processing and management of personal data is in accordance with Personallupplysningslagen (PUL)



# Legal Compliance GDPR

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FamiljehemSverige.se Portal (SecureAppBox) is fully compliant with the GDPR as far as can be assessed January 2016.

- Detailed assessment available in supporting report;
- Digital evidence issued separately.

In 2018 a reassessment against the finalized GDPR implementation once the infrastructure for the Data Protection Commission is implemented will be done.

