

Privacy Policy

Hola Gato AB · Version 1.0 · Updated 19 October 2026

This policy explains which personal data Hola Gato processes, why, for how long and what rights you have. You may be, for example, a contact person at a client, a person who appears in an assignment, a participant in a training session or someone who has contacted Hola Gato.

Summary

Who is responsible	Hola Gato AB is the controller. Contact: helena@holagato.se . See section 1.
What data and why	Mainly name, contact details, employer and role, to perform assignments, invoice, run conflict checks and deliver training. See section 2.
How long	As long as needed for the purpose. Accounting records are kept for 7 years and assignment records for 10 years. See section 2.
Who has access	Suppliers that help Hola Gato with email, document storage, AI support and bookkeeping. Hola Gato never sells personal data. See section 6.
Automated decisions	None. A human always reviews. See section 9.
Cookies	holagato.se uses no cookies and no analytics tools.
Your rights	You can find out which data is held about you, have it corrected or erased, and complain to IMY. See section 10.
Right to object	You can always object to processing based on legitimate interest and to direct marketing. See section 11.

1. Who is responsible

Hola Gato AB, reg. no. 559587-4834, Frödings allé 15, 443 31 Lerum, Sweden, is the controller for the processing described in this policy. If you have questions about your personal data, email helena@holagato.se.

Hola Gato has no data protection officer, because the General Data Protection Regulation does not require one for Hola Gato's business. Send questions about data protection to the same address.

2. What data is processed, why and for how long

The table shows whose data Hola Gato processes, for what purpose, on what legal basis and for how long the data is kept. Where the basis is legitimate interest, the interest is stated.

Who	Data	Purpose	Legal basis	How long
Contact persons at clients	Name, role, employer, email, phone and communications	Perform and administer the assignment	Legitimate interest: Hola Gato's and the client's interest in the assignment being performed	During the assignment and 10 years after it ends

Who	Data	Purpose	Legal basis	How long
Contact persons at clients	Name, employer and invoicing details	Invoice and keep accounts	Legal obligation under the Swedish Accounting Act, bokföringslagen (1999:1078)	7 years after the end of the calendar year in which the financial year ended
People who appear in assignments, for example client employees and counterparties	Name, contact details and the data contained in documents from the client	Provide advice in the assignment	Legitimate interest: the client's interest in receiving advice and Hola Gato's interest in performing the assignment	10 years after the assignment ends
Clients and counterparties in assignments	Names of companies, people and assignments	Run conflict checks	Legitimate interest: to avoid conflicts of interest	10 years after the assignment ends
Participants in training and seminars	Name, employer and email	Deliver the session and send material	Legitimate interest: to deliver the session booked by the employer or organiser	12 months after the session
People who contact Hola Gato and potential clients	Name, employer, contact details and communications	Answer questions and provide quotes	Legitimate interest: to answer questions and develop business relationships	2 years after the last contact
Contact persons at clients and potential clients	Name, employer and email	Direct marketing, see section 5	Legitimate interest: to inform about Hola Gato's services	Until you object, and at most 2 years after the last contact
Suppliers and partners	Name, role, contact details and communications	Administer the collaboration	Legitimate interest: to be able to collaborate and pay for services	During the collaboration and 2 years after it ends

If you are a client yourself. If you are a client as a sole trader, the legal basis is contract instead of legitimate interest, where the data is needed to enter into or perform the contract with you.

Sensitive personal data. Documents from clients may contain sensitive personal data, for example data about health or trade union membership. Hola Gato processes such data only when necessary to establish, exercise or defend legal claims.

Data that Hola Gato processes on behalf of a client. If Hola Gato processes personal data on behalf of a client, Hola Gato is a processor. The client is then the controller, and the client's privacy policy and the data processing agreement between Hola Gato and the client apply.

The website. holagato.se uses no cookies and no analytics tools, and Hola Gato does not collect any personal data through the website. The website is hosted by GitHub, which logs visitors' IP addresses for security purposes. GitHub is responsible for that logging under GitHub's privacy policy.



3. Where the data comes from

Hola Gato receives personal data from the following sources:

- from you, when you contact Hola Gato or take part in an assignment or a session,
- from your employer or a client, when you are a contact person or appear in the documents in an assignment,
- from the organiser, when you attend a training session or seminar that someone else has booked, and
- from public sources, for example the Swedish Companies Registration Office, your employer's website or LinkedIn.

4. Do you have to provide data?

There is no legal requirement for you to provide personal data to Hola Gato. However, without contact details Hola Gato cannot enter into or perform an assignment, and without invoicing details Hola Gato cannot invoice in accordance with the Swedish Accounting Act. If the data is missing, Hola Gato therefore cannot take on the assignment.

5. Direct marketing

Hola Gato may send information about services, seminars and invitations to contact persons at clients and potential clients. Mailings are sent only to work-related email addresses. Hola Gato does not carry out any profiling for marketing.

You can opt out of mailings at any time by replying to a mailing or emailing helena@holagato.se. Hola Gato will then immediately stop sending you marketing.

6. Who has access to the data

Hola Gato never sells personal data. Hola Gato shares data only with the following recipients, and only to the extent needed:

Recipient	What they do
Email service	Proton, for email
Documents and storage	Microsoft 365, for writing and storing documents
AI service	Claude from Anthropic, for analysis and drafting. The agreement means that the data is not used to train AI models.
Bookkeeping and invoicing	Bokio, for bookkeeping and invoicing
Subconsultants	Consultants that Hola Gato engages in an assignment. They are bound by confidentiality.
Authorities and courts	When required by law, a decision of an authority or legal proceedings, for example the Swedish Tax Agency.

Suppliers that process data on Hola Gato's behalf do so under a data processing agreement and may only use the data according to Hola Gato's instructions.

7. Transfers outside the EU and EEA

Some of Hola Gato's suppliers are located outside the EU and EEA. Hola Gato only transfers personal data there if there is a safeguard approved under the General Data Protection Regulation.

Supplier	Country	Safeguard
Anthropic	USA	The European Commission's standard contractual clauses, included in Anthropic's data processing agreement
Microsoft	USA	Documents are stored within the EU. If data is transferred to the USA, the EU-US Data Privacy Framework and the European Commission's standard contractual clauses apply.
Bokio	Sweden. Some subcontractors may be located outside the EU and EEA.	The European Commission's adequacy decisions, or the European Commission's standard contractual clauses
Proton	Switzerland	The European Commission's decision that Switzerland provides an adequate level of protection

You can get a copy of the safeguards by emailing helena@holagato.se.

8. How the data is protected

Hola Gato protects the data with technical and organisational measures, for example two-step verification, encrypted email, access control and services that do not train AI models on what Hola Gato shares. Hola Gato and all subconsultants are bound by confidentiality.

9. Automated decisions and profiling

Hola Gato makes no decisions based solely on automated processing that have legal effects for you or similarly affect you. Hola Gato does not carry out profiling. AI services are used as support in the work, and a human always reviews the result.

10. Your rights

You have the following rights under the General Data Protection Regulation:

Right	What it means for you
Access	You can get a copy of the data held about you and information about how it is processed.
Rectification	You can have incorrect data corrected and incomplete data completed.
Erasure	You can have data erased, unless it must be kept, for example under the Swedish Accounting Act.
Restriction	You can ask for processing to be restricted, for example while a question of rectification or objection is being investigated.



Right	What it means for you
Objection	You can object to processing based on legitimate interest and to direct marketing. See section 11.
Data portability	You can receive data that you have provided yourself in a machine-readable format, where the processing is based on a contract with you.

Hola Gato does not process any personal data on the basis of consent. If Hola Gato asks for your consent in the future, you can always withdraw it. This does not affect the processing carried out before you withdrew your consent.

Email helena@holagato.se to exercise your rights. Hola Gato may need to verify your identity before handling the request. Hola Gato responds within one month. If the request is extensive, the time may be extended by at most two months, and you will be told so within one month.

11. Right to object

You have the right to object at any time to processing based on legitimate interest, on grounds relating to your particular situation. Hola Gato will then stop processing the data, unless Hola Gato can demonstrate compelling legitimate grounds that override your interests, or the data is needed to establish, exercise or defend legal claims.

You always have the right to object to direct marketing. Hola Gato will then immediately stop using your data for marketing.

Email helena@holagato.se to object.

12. Complaints to the Swedish Authority for Privacy Protection

If you think Hola Gato is processing your data incorrectly, you can complain to the Swedish Authority for Privacy Protection, IMY. IMY is the Swedish supervisory authority for data protection. IMY can investigate complaints, decide on measures and impose administrative fines. You can reach IMY at imy.se. You can also complain to the supervisory authority in the EU country where you live or work.

13. Changes to this policy

Hola Gato may update this policy. The latest version is always available at holagato.se. The date and version are shown at the top. In the event of major changes, Hola Gato will inform clients directly.