



Privacy policy

We are committed to protecting your privacy. Through our privacy policy, we inform you about how we process your personal data and our use of cookies.

To exercise your rights under the GDPR, please fill out our form, which can be found at www.momentobyraerna.se/integritetspolicy.

Executive summary

- Begravningsbyrå Momento AB, org.nr 556417-2210, ("Momento") is the data controller unless this privacy policy states otherwise.
- This privacy policy describes how Momento processes your personal data when you visit our website or interact with us in various ways.
- We process personal data necessary to provide you with our products and services.
- We share your personal data with suppliers, partners and companies within the Fonus Group, for example, to be able to deliver the service you request.
- In the course of sharing your personal data as described above, some data may be transferred to third countries.
- As a data subject, you always have certain rights in relation to our processing of your personal data.
- The information in this privacy policy may be updated from time to time. 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 dataskyddsbud@momentobyraerna.se.

You can find full information on the processing of your personal data under the headings below.

Introduction

Who does the policy apply to?

This privacy policy explains how Momento processes your personal data when you are a customer of ours or a relative of one of our customers, visit our website or use any of our digital services. The policy also describes how your personal data is processed if you participate in a funeral ceremony that is broadcast live.



Who is responsible for what?

Begravningsbyrå Momento AB, corporate identity number 556417-2210, with address Ringvägen 100, 118 60 Stockholm and postal address Box 4063, 102 61 Stockholm, ("Momento") is the data controller unless otherwise stated below.

The Fonus Group

Momento is part of a group together with Fonus and Familjens Jurist, among others. The processing of your personal data by Fonus and Familjens Jurist is governed by their privacy policies.

Other co-operation partners

Momento exists in a network of related services consisting of group companies and other 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 in order to take advantage of favourable offers. These partners will then be responsible for your personal data in accordance with their personal data policies.

We always enter into appropriate agreements for the sharing of your personal data with our partners and we never sell your personal data.

Contact details

Momento's address is Ringvägen 100, 118 60 Stockholm and its postal address is Box 4063, 102 61 Stockholm.

To monitor how we process personal data, we have appointed a Data Protection Officer whom you can always contact with questions regarding the processing of your personal data, preferably by e-mail to dataskyddsbud@momentobyraerna.se.

Personal data processed by Momento

Privacy policies can be difficult to understand and we endeavour to be as transparent as possible. In this section, we describe what personal data we process about you in two different ways.



Firstly, we divide the information into categories of personal data. Secondly, we divide the information according to where it comes from. We make these distinctions precisely to make this privacy policy understandable.

Categories of personal data

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

- Identity information (e.g. first and last name and your national identity number)
- Contact details (e.g. e-mail address, telephone number and address)
- Payment information (such as your bank and account details)
- Case data (e.g. information on ongoing and closed cases)
- Device information (such as IP address and browser settings)
- Work-related data (e.g. profession and workplace of you as a contact person in connection with transport assignments)
- Information about the relative (e.g. contact person and name of child)
- Sensitive personal data (e.g. health and abuse data)

Where do we get personal data from?

Our goal is to make you feel safe when you provide us with your personal data. We are committed to respecting and protecting your personal data and privacy in accordance with applicable laws, industry agreements or industry practices. To help you better understand how we process information about you, we set out below our basic principles for processing personal data.

Information you provide to us

In the course of interacting with Momento in various ways, for example by submitting a plan through the funeral planner or by booking a funeral planning appointment, with one of our customer advisors, you will provide information to us directly. Exactly what information we receive depends on the context of our interaction.

For example, we will always ask for your name, social security number and contact details when you book an appointment or enter into a contract with us.

The person ordering our services can provide the contact details of a co-planner when booking or, in the role of co-planner, you provide your information yourself at a meeting you attend. You do this so that you can then legitimise yourself digitally with BankID in order to be linked to the right funeral case on My Pages.



Information we record 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 the information you actively provide to us, you provide us with information in other ways, knowingly or unknowingly. For example, we use different types of tracking technologies on our website and in our emails to provide us with statistics and help us improve our services and offerings.

[For more information on how our website uses cookies and how to switch them off, click here.](#)

Information we receive from other sources

We may obtain information about you from publicly available sources. For example, we obtain information from public registers (SPAR) to ensure that we have the correct address details for you. We obtain information about you in the form of a family history report from the Swedish Tax Agency. We may also collect information on your creditworthiness from credit agencies, banks or credit reference agencies, where necessary.

When we carry out transport missions, we can get the information from staff at, for example, the hospital or care home where we 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 headstone or a text supplement for an existing headstone, we also obtain information about who is the holder of the burial rights from the Church of Sweden, the cemetery administration or the client (in cases where the client is someone other than the holder of the burial rights).

Why do we process your personal data?

Personal data processing "depends on"

In particular, the following describes some of the purposes for which we process personal data. To provide an overview of how we process your personal data, we have also produced overview maps at the end of this privacy policy that specify our personal data processing operations. In the overview maps further down, you can



read more about the purposes of the processing, legal basis, retention period, as well as categories of personal data and recipients.

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 incumbent on Momento; and
- the legitimate interest of Momento.

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

For more information on why we process your personal data and what legal basis we rely on for each processing operation, we have produced the overview maps at the end of this privacy policy.

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

Case management at Momento

Momento offers you the possibility to order products and services, to use our digital services and to book a personal meeting for funeral planning. When you want to book a meeting and fill in a free text box in a form on one of our websites, the adviser uses the information for your meeting. We take notes on your funeral case on an ongoing basis in order to be able to administer, plan and carry out our work for you. We also do this so that we can invoice you correctly and fulfil the requirements of the Accounting Act, protect ourselves against complaints, keep statistics and offer you related services.

If you order the Insurance Inventory, we will obtain information from other sources to investigate the insurance policies held by the estate. In order to carry out the Insurance Inventory, information about the surviving spouse, cohabitant or registered partner is required, as well as a death certificate with a family report from the



Swedish Tax Agency. The address refers to the deceased, but due to the fact that kinship is also shown, it may be common to 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 required.

Specific to My Pages

My Pages is an information site related to funeral planning where you have a digital client folder containing documents about the funeral as well as documents needed to administer the estate (such as agreements, death certificates with family reports, etc.). My Pages also includes a shared area for you as the client and any co-planners.

Once you have started and saved a plan in the Funeral Planner, you can log in to My Pages to resume the planning or to submit it to Momento. If you have saved a plan but not submitted it to us, your data will be deleted after 180 days.

If you have signed an agreement with us, you can log in to My Pages to view your case, access a digital version of the client folder and use the shared area. We store your personal data for seven (7) years plus the current year.

During or after your meeting with Momento, you can grant others access to the funeral case as co-planners. As a co-planner, once you have been registered as such in a case by the client or yourself, you can identify yourself digitally using BankID and thereby be linked to the correct case in My Pages. If you accept the invitation as a co-planner, you can log in to My Pages to view the case, access a digital version of the client folder and use the shared area. If you choose to accept the invitation, we store your personal data for seven (7) years plus the current year. If you decline the invitation on My Pages or do not respond, your personal identity number will be deleted after 30 days.

Momento has a contract as the legal basis for processing your personal data on My Pages if you are the client. Otherwise, we have a legitimate interest in processing personal data belonging to co-planners, burial rights holders and/or the persons listed on "Death certificate with family report," as well as in processing the data for statistical purposes.

Specifically on live ceremonies

We offer relatives who cannot attend the ceremony in person the opportunity to participate digitally. You will be informed of any live broadcast of the ceremony on the



deceased's memorial page and in the form of signs in the ceremony room, as well as via our representative present who is responsible for broadcasting the ceremony. It can also be included in the obituary if the relatives so wish.

We record the live funeral ceremony to provide quality assurance in the event of the recipient's poor network or other problems, such as insufficient quality of equipment or handling errors on the part of the recipient, or if a relative is in a different time zone or is unable to watch the funeral for health reasons. In these exceptional cases, the service is forwarded. A code is required for forwarding.

Momento also conducts spot checks to ensure that our procedures for live ceremonies are followed. This is done by an employee with special responsibility for live broadcast ceremonies twice a month checking the information text, placement of tripods and the sound. We also check that none of the relatives are identifiable (except in the event of a farewell during the ceremony) in the broadcast. No recorded ceremonies are kept for longer than thirty (30) days.

Specific to the White Archive

The personal data processed in the White Archive is the case data you choose to register in your White Archive. In the White Archive, you can fill in thoughts and wishes that your loved ones should share from your time on earth and to make it easier for your relatives. You can write down the type of funeral you want, what should happen to any pets, or what relatives should do with your letters and diaries. There are often practical things to know too, such as where keys and important papers are kept.

The Digital Vita Archive is available to anyone with a BankID. However, we recommend the service for people aged 18 and over. The use of the White Archive is free of charge, both for the physical White Archive (including storage) and the digital White Archive.

The legal basis for the processing of your personal data in the White Archive is contractual, provided that you accept our terms of use. However, you can delete your digital White Archive directly in the service at any time, if you need help please contact us. If you want to revoke your physically stored White Archive, you need to contact us and identify yourself.

Specifically on Activation of membership benefits

The Fonus Group is owned and governed by a large number of organisations, our "members". These include large cooperative companies, housing associations, trade



unions and a variety of interest groups around Sweden. As a member of our owner organisations, you are entitled to benefits at our funeral homes, at Fonus and at Familjens Jurist.

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

The organisations for which we register membership are the following:

- HSB
- Tenants' Association, National Union
- Riksborgen Cooperative Society
- Folksam mutual life insurance
- Folksam mutual property insurance
- Cooperative Federation KF (Coop members)
- PRO, the national organisation for pensioners
- SKPF Pensioners
- Association of Swedes in the World

The legal basis for us processing data about your membership in order for you to be able to utilise membership benefits is contractual. The legal basis for our registration of the relevant member organisation for statistical purposes is Momento's legitimate interest in informing these organisations about how their members use the price reductions with us.

Special about the Memorial Pages

Momento's memorial pages are a digital meeting 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, sign up for a memorial service, order flowers or give a memorial gift.

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



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

[The processing of personal data is also regulated by our service provider, Rapid Data AB, and their specific privacy policy which you can find here.](#)

Specifically on the lighting of candles at All Saints' Day

Every year on All Saints' Day, we light candles for people who are unable to do so themselves in cemeteries around Sweden. In order for us to carry out the candle lighting, we need to save and process personal data about you in the form of name, telephone number or e-mail address. We do this so that we can confirm your order for a candle lighting and, if necessary, communicate with you about the candle lighting. You can choose to have a confirmation with a picture of the lit candle sent to you.

The legal basis for processing your personal data at the light switch-on is contractual and we will keep your personal data for as long as necessary to fulfil the contract and for a maximum of 30 days from the scheduled light switch-on to be able to deal with any issues around specific light switch-ons.

Specifically about our whistleblowing channel

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

We process the data you report, which may be data on misconduct including criminal suspicions and/or sensitive personal data. Data on misconduct reported including criminal suspicions is necessary to fulfil our legal obligation under the so-called Whistleblower Act (Act on the Protection of Persons Reporting Misconduct). Sensitive personal data reported must substantiate misconduct and be needed to establish legal claims.

If you choose to remain anonymous, we ensure your anonymity through both technical and organisational security measures. If you choose not to remain anonymous, our system provider will process your personal data in order to make an initial assessment of how to proceed. Any data reported that is not relevant will be deleted by the provider. [Read more about whistleblowing here.](#)

When a reported case has needed to be followed up, the personal data in the case is deleted at the latest two (2) years after the case is closed.



Additional purposes

This Privacy Policy describes how and why we process your personal data, through the section above, as well as through the concluding overview maps. If Momento nevertheless wishes to use your personal data in any way that is not consistent with this policy, we will inform you of such intended use before, or at the latest, when your data is collected. In exceptional circumstances, where we have failed to inform you of such further use at the time of collection of your data, but before we start using your personal data in such a way.

How we share your personal data

Categories of recipients

We will only disclose your personal data to you or to those parties who need it for various legitimate reasons. We never disclose or share your data without a specific legal basis. Each organisation we disclose data to is responsible for managing your personal data securely and in accordance with the law.

We have categorised below the recipients with whom we share or may share your personal data into seven (7) different categories. For more information on when we share your personal data with others, please contact our Data Protection Officer at dataskyddsbud@momentobyraerna.se.

Parishes

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

Authority

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

Group companies

Sometimes Momento needs to share personal data about you as a relative in the capacity of an orderer or contact person with other companies within the Fonus



Group. For example, you may want help with an estate inventory in connection with your funeral and you ask us to pass on your contact details to Familjens Jurist.

Suppliers

Sometimes we need to share your personal data with companies that process your personal data according to our instructions, so-called data processors. This category of recipients may include system providers and business consultants.

Co-operation partners

Momento works with local businesses (such as caterers and musicians) as well as national estate agencies to provide you with favourable offers on services such as funeral services and property valuations. We mainly share your contact details as a contact person or client with our partners.

Third country transfers

We endeavour to process your personal data only within the EU/EEA. When we need to share your personal data with recipients outside the EU/EEA we ensure that it only goes to countries that are safe enough (have adequate level of protection) or that we take other appropriate safeguards. These appropriate safeguards include, among others, the use of standard contractual clauses approved by the European Commission (European Commission standard contractual clauses) and always analysing and evaluating the legislation of the recipient country on our own initiative. Where we consider that the laws of the recipient country do not provide an adequate level of protection for your personal data, we take specific measures to ensure that the protection of your data is maintained during the transfer to the relevant non-EU/EEA country.

For more information on our transfers and safeguards for the transfer of personal data to recipients outside the EU/EEA, please contact our Data Protection Officer at dataskyddsbud@momentobyraerna.se.

Your rights

The GDPR gives you as an individual a number of different rights to your personal information. Momento has procedures in place to enable you to exercise your rights. In addition, you always have the right to lodge a complaint with the Swedish Data Protection Authority (IMY) if you believe that the processing of your personal data is



unlawful. More general information on your data protection rights can be found on the [IMY's website](#), together with its contact details.

If you wish to exercise your rights, or have questions about your rights in relation to Momento, please contact our Data Protection Officer at dataskyddsbud@momentobyraerna.se.

Right of access

You have the right to be informed that we are processing your personal data and to have access to your personal data, i.e. you can obtain a so-called register extract of the processing operations carried out. You also have the right to receive certain information about the processing as such (e.g. for what purpose we process the data).

Right to information

You have the right to be informed about how we process your personal data. We will inform you through this privacy policy and by answering your questions.

Right to rectification

The personal data we process about you must be accurate and up-to-date. You have the right to have inaccurate personal data about you rectified and to have incomplete data completed.

Right to erasure ("right to be forgotten")

As a data subject, you have certain rights to have your personal data erased by us. Please note that this does not apply to data that we need for the purpose of complying with legal obligations or defending ourselves against legal claims, as well as information that we need to fulfil a contract if you are or have been a customer of ours.

However, you may have the right to have your personal data erased if your personal data are no longer necessary for the purposes for which they were processed or if the processing is based on your consent and you withdraw it without there being any other legal basis for continued processing. You may also have the right to erasure if processing is based on a balance of interests and there are no compelling legitimate grounds that override your interests. Furthermore, you can request erasure if the processing is for direct marketing purposes and you object to this. You also have the



right to have your personal data erased if it has been processed unlawfully, or if erasure is necessary to comply with a legal obligation.

Right to object

You have the right to object to Momento's processing of personal data that is based on one of our legitimate interests. If you object to such processing, we may only continue to process the data if we demonstrate that there are compelling legitimate grounds for us to process the data and where our interests outweigh your interests, for example where the processing is carried out for the establishment, exercise or defence of legal claims.

Objecting to direct marketing

Processing for direct marketing purposes will cease immediately if you object to such processing. Please note that you always have the right to withdraw your consent to receive advertising from us. You can do this either by clicking "unsubscribe me from mailings" at the bottom of any email you receive from us or by contacting us or our Data Protection Officer.

Where you have objected to direct marketing, we will keep this information on our internal opt-out list in order to fulfil your request not to be contacted by us.

Right to restriction of processing

You have the right to request that our processing of your personal data be restricted if the data is processed incorrectly, for example, if the data is not accurate, if the processing is unlawful, if the data is no longer needed for the purposes. If you have objected to the processing of your personal data based on our legitimate interest, you can request that we restrict the processing while we investigate whether we are entitled to continue with it. This right also applies pending an assessment of whether the alleged error exists. When a restriction ends, you have the right to be informed.

Right to data portability

In certain cases, you have the right to obtain the data you have provided to us and to have it transferred to another controller. This right applies when we process personal data by automated means and on the basis of your consent or on the basis of a contract.



Right to withdraw consent

If our processing of personal data has been based on your explicit consent, you have the right to withdraw it at any time. However, the withdrawal does not affect the lawfulness of the processing carried out based on the consent before the withdrawal. You can withdraw your consent, for example, by contacting our Data Protection Officer at dataskyddsbud@momentobyraerna.se.

Security and data retention

How long do we keep your personal data?

We save your personal data for as long as it is needed to fulfil the agreement with you and to meet legal requirements in, for example, the Accounting Act. This means that we save your personal data for funeral services performed for a maximum of seven (7) years plus the current year.

Security and confidentiality

It is important for us to protect the personal data about you that Momento processes. Therefore, we have taken appropriate technical, organisational and administrative security measures to ensure that your personal data is only processed correctly. This includes restricting 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 ensure that your data enjoys the high level of protection it deserves.

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 as 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 notify you at least 30 days before the change takes effect by email, text message, through the Service, or by publishing a new version on our website.

The information on this page was last updated on 2026-04-10.



Overview maps

To provide an overview of how we process your personal data, our personal data processing operations are described below in overview maps. In the overview charts, we specify the purpose of the processing, the personal data processed for the purpose, the legal basis for the processing, the external parties that may access the personal data, and how long the personal data is processed for the purpose.

Purpose: to provide funeral services including tombstone matters

Categories of personal data:

- Identity information
- Contact details
- Payment information
- Case data
- Unit information
- Work-related data (e.g. medical staff in transport missions)
- Information on family members
- Sensitive personal data (e.g. allergy information when registering for a memorial service)

Legal basis:

Mainly contracts. The sharing of your personal data with specified categories of recipients takes place when we are obliged by law or the contract with you.

Categories of recipients:

- Group companies
- Parishes
- Suppliers
- Co-operation partners
- Authorities (e.g. when social services are the client)



Retention period:

We keep your personal data for a maximum of seven (7) plus the current year to fulfil the requirements of the Accounting Act.

Purpose: Providing digital services (My Pages, Funeral Planner, Gravestone Planner, online booking)

Categories of personal data:

- Identity information
- Contact details
- Case data
- Unit information
- Information on family members

Legal basis:

Contract. It is in our legitimate interest to also process data on, for example, co-planners and relatives in order to provide the service.

Categories of recipients:

- Suppliers
- Co-operation partners
- Parishes/cemetery administrations

Retention period:

We keep your personal data for a maximum of seven (7) plus the current year to fulfil the requirements of the Accounting Act.

Purpose: White Archive

Categories of personal data:

- Identity information
- Contact details
- Case data (data that you put in your White Paper)
- Unit information
- Information on family members



- Labour-related data

Legal basis:

Agreement.

Categories of recipients:

- Supplier

Retention period:

We will keep your White Archive until further notice or until you delete it yourself. [You also have the right to withdraw your White Archive in paper form, which you can do via your nearest Momento office, which you can find here.](#)

Purpose: Lighting of candles at All Saints' Day

Categories of personal data:

- Identity information
- Contact details

Legal basis:

Contract.

Categories of recipients:

- Supplier

Retention period:

We will keep your personal data for as long as necessary to fulfil the contract and for a maximum of 30 days after the scheduled light switch-on.

Purpose: Securing our services and our website

Categories of personal data:

- Unit information
- Information about how you use our services and our website



Legal basis:

It is in Momentos's legitimate interest to secure our services and website, for example through backups to ensure business continuity and disaster recovery.

Categories of recipients:

- Service provider

Retention period:

This processing lasts for the time you use a service. After that, Momento saves visit and usage logs for a maximum of 30 days.

Purpose: Developing our business

Categories of personal data:

- Name of the organisation
- E-mail address
- Unit information
- Judgement made

Legal basis:

It is in our legitimate interest to measure customer satisfaction with the advice provided in order to better understand the customer experience and help us improve our services and offer.

Categories of recipients:

- Service provider

Retention period:

Personal data is stored for a maximum of two (2) years after completion of the customer survey.



Purpose: fulfilment of agreements with partners

Categories of personal data:

- Identity information
- Contact details
- Case data
- Details of deceased relative (for funeral transport)

Legal basis:

It constitutes a legitimate interest for Momento to fulfil our contractual obligations with third parties.

Categories of recipients:

- Suppliers
- Authorities (e.g. region in transport company)
- Group companies

Retention period:

Contracts are kept for as long as they are valid and then for up to seven (7) years.

Purpose: Marketing our products and services

Categories of personal data:

- Identity information
- Contact details

Legal basis:

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 provided by the Fonus Group. You can unsubscribe from mailings at any time by clicking on the link at the bottom of the email.



Categories of recipients:

- Suppliers
- Authorities
- Group companies

Retention period:

We save your personal data for marketing our business for a maximum of two (2) years since you were last our customer, or until you withdraw your consent to marketing or unsubscribe from mailings via the link in the email.

Purpose: Communicating with you

Categories of personal data:

- Identity information
- Contact details
- Case data

Legal basis:

It is a legitimate interest for Momento to be able to communicate with you, for example as our customer, for example by e-mail to update you on the progress of your case with us.

Categories of recipients:

- Suppliers

Retention period:

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



Purpose: Ordering goods and services from you

Categories of personal data:

- Contact details
- Identity information
- Labour-related data

Legal basis:

Agreement.

Categories of recipients:

- Suppliers
- Partners (such as Parish e.g. for delivery to a memorial service)

Retention period:

We keep your personal data for a maximum of seven (7) years plus the current year to fulfil the requirements of the Accounting Act.