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CREATIVA SECURITY CONSULTING – OPERATIONAL CHARTER

*THE FOUNDATIONAL DIRECTIVE DEFINING PURPOSE, AUTHORITY, AND
LONG-HORIZON INTENT FOR THE CREATIVA CENTER UNIVERSE.*

CREATED BY

EUSL AB

Care to Change the World



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Creativa Security Consulting – Operational Charter

INTRODUCTION

Creativa Security Consulting AB is established as a licensed commercial security provider operating under Swedish law and, where applicable, European Union law. The Company's activities—guarding, patrols, monitoring, incident response, access control, and associated corporate-security services—are conducted within the statutory framework governing private security enterprises in Sweden, including the requirement to obtain authorisation (*auktorisering*), to appoint an approved operational manager, and to ensure that personnel meet suitability and competence standards. Authorisation and attendant personnel approvals are administered by the County Administrative Boards (*Länsstyrelsen*) pursuant to the Swedish Act on Private Security Companies (*Lag (1974:191) om bevakningsföretag*).

The Company's handling of personal data and the deployment of surveillance and access-control technologies are governed by Regulation (EU) 2016/679 (GDPR) and Sweden's Camera Surveillance Act (*Kamerabevakningslag (2018:1200)*), as amended. From 1 April 2025, permit requirements for many forms of publicly accessible camera surveillance were eased; however, operators must document necessity and proportionality through a legitimate-interest assessment and remain subject to ex post supervision by the Swedish Authority for Privacy Protection (IMY).

As an employer, the Company is further bound by Sweden's Work Environment Act (*Arbetsmiljölagen (1977:1160)*) and relevant regulations of the Swedish Work Environment Authority, ensuring safe working conditions, risk assessment, and incident management for guarding and monitoring personnel.

Within this legal setting, the Company functions as the licensed, operational arm of CCU's security architecture, ring-fenced from the non-commercial Creativa Protective Security Unit, and committed to a civilian, lawful, ethical, and safeguarding-compatible service model.

CHAPTER 1 — PURPOSE AND MANDATE

The purpose of Creativa Security Consulting AB is to deliver lawful, licensed, and professionally governed private security services in Sweden and, where appropriate, in other EU Member States, with priority given to Creativa entities and properties such as EUOS environments and ECHO infrastructure. The Company's mandate is commercial in form but restrained in scope, reflecting the heightened legal, ethical, and reputational duties inherent in youth-oriented, educational, and community settings.

The Company's activities are expressly distinguished from the internal functions of the Creativa Protective Security Unit. The Protective Security Unit is non-commercial and strategic; it does not perform licensed guarding and does not sell services. By contrast, the Company is the authorised operator for guarding, patrols, monitoring, and incident response, undertaking work for Creativa entities under compliant service arrangements and, selectively, for third parties whose environments and terms align with the Company's standards.

The mandate prioritises four outcomes: lawful protection of people and property; safeguarding-compatible presence in youth and mixed-community environments; integrity-driven monitoring and access control consistent with GDPR and the Camera Surveillance Act; and disciplined



coordination with public authorities. The Company's commercial growth remains subordinate to legality, competence, workforce welfare, and the preservation of CCU's institutional credibility.

CHAPTER 2 — LEGAL LICENSING AND COMPLIANCE REQUIREMENTS

The Company may not conduct guarding or related activities without prior authorisation under *Lag (1974:191) om bevakningsföretag*. Authorisation is contingent upon demonstrating an appropriate organisation and plan of operations; appointing an approved operational manager (*föreståndare/verksamhetsansvarig*); and ensuring that the enterprise will conduct itself in accordance with industry good practice. Personnel—guarding and non-guarding alike—must be individually approved by the County Administrative Board on the basis of law-abiding conduct, civic reliability, and overall suitability. The authority also receives annual reports and supervises changes such as the replacement of the operational manager.

The scope of activities authorised is specified in the authorisation decision, and separate strands of work—such as personal protection, fixed-site guarding, or valuables transport—are captured within that decision. Any training functions connected to guarding roles are also regulated under the Act. Non-compliance with authorisation conditions, suitability thresholds, or reporting duties may trigger supervisory measures.

Where the Company deploys surveillance or processes personal data in the course of guarding and monitoring, it acts as a controller under GDPR and must meet the principles of lawfulness, purpose limitation, data minimisation, storage limitation, integrity, and accountability. DPIAs are required where surveillance is likely to result in high risk to individuals; records of processing must be maintained; access to footage must be controlled; and retention must be limited to what is necessary for the stated security purpose.

Sweden's Camera Surveillance Act complements GDPR by defining camera surveillance and setting conditions for its lawful use. Following 1 April 2025 amendments, prior permits have been removed for many public-space scenarios; nonetheless, organisations must document their legitimate-interest balancing and remain subject to IMY's ex post supervision and guidance on proportionality, scoping, signage, and periodic reassessment.

The Company also complies with the Work Environment Act, implementing systematic work environment management, risk assessments, training, and after-incident procedures appropriate to guarding operations, night work, and exposure to conflict or distressing events.

Insurance and financial safeguards are maintained at levels commensurate with licensed guarding operations, workforce obligations, and technology deployment risks, including general liability, employer's accident insurance, and motor liability where vehicles are used. While specific coverages are tailored to the Company's activities, Swedish practice requires adequate liability and employer insurances for operating businesses and vehicles.

Through this composite regime—authorisation, personnel approvals, GDPR and camera-surveillance compliance, work-environment obligations, and appropriate insurance—the Company preserves a licensing posture that is robust, auditable, and aligned with Swedish supervisory expectations.

CHAPTER 3 — SERVICE PORTFOLIO

The Company's portfolio consists of licensed, civilian security services designed to support EUOS, ECHO, and selected third-party environments without compromising safeguarding, legality, or data-protection



obligations. The services are delivered by authorised personnel, supervised by an approved operational manager, and integrated with lawful monitoring and reporting protocols.

Property protection and fixed-post guarding constitute the core offering, providing reception control, patrols, alarm response, and incident containment within the limits of private security authority. Where personal protection is undertaken, it is executed as a licensed guarding function directed at preventing harm through planning, presence, and de-escalation; under Swedish law, “protection of an individual person” is an identified strand of private security service within the statute.

Monitoring and observability services include CCTV oversight, intrusion and access-control integration, and alarm-receiving coordination conducted under GDPR and the Camera Surveillance Act. The Company documents legitimate-interest assessments, minimises data collection, restricts access, applies retention limits, and ensures signage and transparency commensurate with IMY guidance.

Patrol and alarm response services are performed under authorisation, with clear incident categories, proportional escalation to public authorities, and contemporaneous documentation. Executive movement coordination within Sweden and the EU is conducted unarmed, with risk-based routing and, where justified, armoured transport arranged lawfully. In youth-oriented EUOS environments, guarding presence is explicitly safeguarding-compatible: de-escalatory, respectful, and integrated with designated safeguarding officers and property-level protocols.

To clarify applicability, the service set can be expressed—as a policy statement rather than a marketing claim—as prioritising internal CCU environments while permitting carefully screened external engagements. Surveillance and access-control elements accompanying these services remain constrained by GDPR and the Camera Surveillance Act and are subject to DPIAs and periodic review as the environment changes.

The portfolio is thus defined by lawful authorisation, disciplined scope, and ethical execution: services are offered where the Company can maintain statutory compliance, workforce standards, safeguarding integration, and the trust of public authorities.

CHAPTER 4 — GOVERNANCE AND OVERSIGHT

The governance structure of Creativa Security Consulting AB is designed to ensure full compliance with Swedish law, particularly the requirements of *Lag (1974:191) om bevakningsföretag*, which mandates that any authorised security company must demonstrate an appropriate organisation, plan of operations, and the appointment of an approved operational manager. This statutory requirement reflects the supervisory role of the County Administrative Boards (*Länsstyrelsen*), which review organisational suitability when granting authorisation and supervise ongoing conduct through annual reporting obligations.

The Board of Directors appointed by Creativa Center AB provides strategic and fiduciary oversight. Board members must satisfy suitability requirements under Swedish law, as *Lag (1974:191)* requires that directors and the designated operational manager meet thresholds of lawful behaviour, civic reliability, and overall suitability for participation in a security enterprise. Failure to meet these standards may result in withdrawal of approval or supervisory intervention by *Länsstyrelsen*.

Operational leadership is vested in a Chief Executive Officer supported by a management team responsible for staffing, compliance, operations, technology, and safeguarding integration. A legally mandated operational manager (*föreståndare/verksamhetsansvarig*)—approved by *Länsstyrelsen*—



serves as the legally accountable party for ensuring compliance with authorisation conditions, staff approvals, reporting duties, and operational conduct. Any change in this role triggers a mandatory notification process to the competent County Administrative Board, which reviews and approves the replacement before the change takes legal effect.

In addition to statutory governance, the Company appoints a Compliance Officer responsible for data-protection governance under GDPR and Sweden’s Camera Surveillance Act (*Kamerabevakningslag (2018:1200)*). Under the 2025 amendments, the Company must carry out, document, and periodically reassess its legitimate-interest assessments for surveillance, ensuring proportionality, data minimisation, and accountability in accordance with the Swedish Authority for Privacy Protection (IMY) guidance issued on 31 March 2025.

The Company maintains internal audit functions aligned with CCU governance protocols. These audits cover licensing compliance, personnel suitability, safeguarding integration, workplace safety under the Work Environment Act (*Arbetsmiljölagen (1977:1160)*), and camera-surveillance governance. Under the Work Environment Act, employers must conduct systematic risk assessments, implement measures to prevent ill-health and accidents, and ensure a safe environment for staff; these duties are embedded into the Company’s workforce oversight mechanisms.

A Risk and Oversight Committee, established within the CCU governance structure, receives periodic reports on regulatory compliance, internal audit findings, safeguarding concerns, and international partner performance. This Committee ensures that the Company’s operations remain ethically and legally aligned with Creativa Center’s standards and that no aspect of its activity risks reputational or statutory breach.

Through this governance and oversight structure, the Company maintains legal integrity, organisational reliability, and regulatory confidence across Swedish and EU environments.

CHAPTER 5 — RELATIONSHIP WITH THE PROTECTIVE SECURITY UNIT

The relationship between Creativa Security Consulting AB and the Creativa Protective Security Unit is governed by principles of strict legal separation, functional complementarity, and reciprocal restraint. This separation is legally necessary to preserve the distinction between *licensed commercial guarding*, regulated under *Lag (1974:191)*, and *internal protective services*, which fall outside the Act’s scope so long as they do not conduct guarding “for another party.” The law clearly defines a private security company as one that provides protective services “for another’s account,” thereby requiring authorisation. The Protective Security Unit performs no such commercial service.

The Company carries out licensed activities—guarding, patrols, monitoring, alarm response, and certain personal protection functions—while the Protective Security Unit conducts internal risk assessments, executive movement planning, safeguarding oversight, and crisis coordination. The two entities cooperate, but never merge their operational mandates.

Information sharing follows the principles of necessity, proportionality, and data-minimisation under GDPR and the Camera Surveillance Act. IMY guidance emphasises that surveillance and personal data must only be processed for specific, justified purposes and retained no longer than necessary. The Protective Security Unit may request information from the Company only where justified by an internal protective need; conversely, the Company may provide operational data only where lawfully permissible and relevant.



Command authority remains separate. The Protective Security Unit cannot direct licensed guarding activities, as this could undermine the legal accountability of the operational manager required under Swedish law. Conversely, the Company cannot assume any internal strategic functions or safety-governance roles reserved for the Protective Security Unit.

This structured interface ensures legal compliance, reduces institutional risk, and preserves the civilian, non-militarised, and governance-driven posture of both entities.

CHAPTER 6 — EXPANSION PATHWAY

The Company's expansion pathway is governed by legality, capacity, risk, and alignment with CCU's institutional mission. Growth is incremental, not volumetric, with an emphasis on maintaining full compliance with *Lag (1974:191)*, GDPR, and the Camera Surveillance Act.

Domestically, expansion proceeds first through service delivery to EUOS properties and Creativa Center entities, followed by selective external contracts with organisations whose operations align with safeguarding principles and compliance standards. Swedish law requires that any new form of guarding must fall within the authorised operational categories defined in the *auktorisering* decision, which may be expanded only through formal application to *Länsstyrelsen*.

In the EU, expansion is guided by national licensing rules, which vary but generally mirror Sweden's requirements for authorisation, personnel vetting, and compliance. GDPR applies uniformly across Member States, ensuring consistent obligations regarding data processing, retention, surveillance, and lawful monitoring.

International expansion outside the EU, including in African jurisdictions where Creativa operates ECHO and SFPSEI missions, is non-commercial and strictly constrained. The Company does **not** act as a guarding provider abroad and does **not** carry weapons. Instead, expansion takes the form of:

- establishing vetted local partnerships with licensed security providers;
- conducting due-diligence consistent with corporate-security norms;
- coordinating non-armed components of movement, routing, and logistics; and
- ensuring compliance with host-country law.

This model reflects international practice among development organisations and multinational actors operating in high-risk contexts, while preventing the Company from entering any category resembling paramilitary or prohibited security activity.

Future specialisations—such as safeguarding-oriented security for youth environments, advanced monitoring integration, or ECHO-site asset-protection design—may be developed where consistent with the Company's ethical posture and statutory obligations.

Expansion is therefore deliberate, lawful, and institutionally conservative, ensuring that the Company grows only where its standards can be upheld without compromise.

References

- *Lag (1974:191) om bevakningsföretag* – [Sveriges riksdag \(official text\)](#); consolidated commentary at lagen.nu.



- County Administrative Boards (Länsstyrelsen) – Authorisation and personnel approvals for private security companies: [Länsstyrelsen Stockholm – Bevakningsföretag](#).
- GDPR – Regulation (EU) 2016/679 (consolidated official text): [EUR-Lex](#).
- Camera Surveillance Act (*Kamerabevakningslag (2018:1200)*) and 2025 practice updates: [Riksdag – Act](#); [IMY – Video-surveillance guidance](#); practice notes on 2025 changes ([Setterwalls](#); [Digital Policy Alert – IMY guidance](#); Snellman tracker](<https://digitalcompliance.snellman.com/new-swedish-camera-surveillance-rules-take-effect-on-1-april-2025/>)).
- Work Environment Act (*Arbetsmiljölagen (1977:1160)*) – Authority presentation and non-official translations: [Arbetsmiljöverket presentation](#); [ILO NatLex – English consolidation](#).
- Business and employer insurance context (general practice in Sweden): [If – Business insurance](#); [CE Sweden – Mandatory and recommended business insurance](#).