

# Privacy policy for Wallenstam AB (publ) Information about our processing of personal data

For us at Wallenstam, it is important that you feel safe with the processing of your personal data that may take place when you are in contact with us in various contexts. This privacy policy applies when you visit our website, use our services, contact our customer service or when you are in contact with us in other ways. When entering into a contract to rent an apartment or premises and during other occasions where personal data may be processed, we will particularly inform you about the specific personal data processing that applies in those cases. This privacy policy describes how we gather and process your personal data in general, what rights you have and where you can contact us for further questions.

In order to offer you the best service and to be able to help you if you have questions, we may need to save personal data about you, which are relevant for achieving this purpose and for the purposes specified below. Our primary focus is always to protect your privacy. Therefore we never save the personal data for longer than we need.

All processing of your personal data is done in accordance with the General Data Protection Regulation (GDPR) and applicable legislation, case law and guidelines regarding personal data available at any given time. This means, inter alia, that we always process your personal data with the technical and organisational security measures which are required in each individual case and that you always have the right to contact us in order to find out what personal data we have saved about you. You can read more about your rights below. You can also visit <a href="www.imy.se/en">www.imy.se/en</a> to read more about your rights regarding processing of your personal data.

If you have any questions about our processing of personal data, you are always welcome to contact us.

#### Controller

Wallenstam AB (publ), corporate identity no. 556072-1523, together with the legal entities (Group companies) specified at any given time in the Group company list on <a href="www.wallenstam.se/en">www.wallenstam.se/en</a> ("Wallenstam", "us" and "we") is the controller of the processing of the personal data provided via our website and otherwise provided in connection with your contacts with Wallenstam. Wallenstam has also appointed a Data Protection Officer, whose task is to help Wallenstam comply with the applicable data protection legislation, case law and guidelines regarding personal data.

# Personal data

Personal data refers to all information relating to an identifiable natural person.

## Personal data that we save

When you provide information on <a href="www.wallenstam.se/en">www.wallenstam.se/en</a>, use our services, contact our customer service or are in contact with us in another context, you may need to provide personal data.

The personal data collected can be, for example; name, address, e-mail address, telephone number, personal identity number, IP address or other information, that is necessary to offer you the best service and to be able to help you with questions.

## Lawfulness of processing personal data

In order for us to have the right to collect and process your personal data, we rely on different legal grounds depending on the situation in which the personal data are collected and processed.

One such legal ground is when the processing is necessary for the purposes of a legitimate interest. In these cases, our legitimate interest must override your interests or fundamental rights and freedoms. A legitimate interest is, for example, that we answer your questions and communicate with you in order to be able to help you and give you the best service when you are in contact with us, without it being about fulfilling an agreement, or that we send out offers where our legitimate interest is to market our services.

In other cases, the processing is necessary to be able to fulfill an agreement you want to enter into, for example as a tenant or supplier.



The processing may also be necessary to fulfill a legal obligation or protect your interests or those of third parties.

In certain cases, you need to give consent. If processing of your personal data should require such consent, we will obtain it separately. You can withdraw a given consent at any time.

You can also consent to the use of cookies and other similar technology (see separate cookiepolicy on www.wallenstam.se/en).

If you do not accept what is stated in this information, please do not use our digital channels or our services.

#### The purposes for processing your personal data

In order to offer you the best service and to be able to help you if you have questions, your personal data may be used to administer your cases with us, offer secure and easy use of our website, communicate in connection with various types of offers and information, prepare, administer and fulfill agreements, handle and administer communication with you when you otherwise are in contact with Wallenstam, conduct market research, develop our services, review and analyze the use of our services, compile statistics on the use of our services and visits to our digital channels, follow up internal routines and policies, provide housing rental, letting of premises, registration of interests, housing queue, the "Mina Sidor" (My Pages) service and our website.

The data may also be coordinated with other registers for the above purposes in order to maintain good customer and register care. The data may also be used for the purpose of detecting and preventing fraud, comply with requirements according to law, regulations or orders of public authorities and to establish or corroborate any legal claims.

In connection with entering into an agreement, there may be more detailed information about the processing of personal data, which in that case is stated in the agreement.

#### Access to the personal data

We want you to feel secure letting Wallenstam process personal data about you. The persons at Wallenstam who are directly concerned with the personal data in order to achieve the purposes for which the personal data are intended will have access and authorization to the collected personal data about you.

Wallenstam also uses suppliers such as payment processors and data warehousing suppliers in order to provide services to you. In some cases, suppliers are also used, for example, to get help with administration or support for our IT systems. In these cases, Wallenstam has entered into agreements regarding the supplier's responsibility as a data processor to Wallenstam since this may involve access to your personal data.

The data processing agreement ensures that your personal data are protected. When Wallenstam shares your personal data, these will be used for the same purposes that Wallenstam initially collected them for. In the event of a corporate merger, consolidation, restructuring or sale of essentially all shares and/or assets or other reorganization, personal data may be disclosed to a subsequent owner or part owner and their advisors in connection with the reorganization.

Otherwise, Wallenstam only shares your personal data with third parties if this is a requirement according to law, regulation, order of a public authority or in order to protect the legitimate interests of third parties.

## Transfers to third countries

Your personal data will not be transferred to countries outside the EU/EEA unless this is specifically stated when you provide your personal data. In such cases, this is done in accordance with particularly strict requirements and agreements where there is either an adequacy decision by the European Commission that the country ensures an adequate level of protection or that the transfer is covered by such appropriate safeguards as stipulated in the General Data Protection Regulation. You will then concurrently receive information about to which countries outside the EU/EEA that the transfer occurs and where and how you can gain access to or obtain documents regarding the safeguards that apply to the transfer to these countries.



#### Retention periods

We do not store your personal data for a longer period than necessary with regard to the purposes of the processing of your personal data. This means that we delete your personal data according to applicable legislation. If you have solely been in contact with us to ask a general question, your personal data will generally be erased when the case has been closed. If you terminate your use of our services or in another way terminate a customer relationship with us, your personal data will normally be stored for up to two years from the date of deregistration. Exceptions may apply when documentation needs to be retained in accordance with the Swedish Bookkeeping Act, other laws or if there is a legitimate interest. If it is suspected that fraud may have occurred or other unlawful use of our services, we reserve the right to store these data for a longer period until the suspicions have been investigated.

## Security

It is important that your personal data are protected. Therefore, we work effectively with taking all proper technical and organizational security measures required in order to protect the personal data against unauthorized access, change or destruction, such as protecting our physical servers and protecting our systems through firewalls etc. We also work in a way where only those that must have access to your personal data in order to fulfill the purposes for which the processing is taking place are given authorization to access the personal data. However, there is always a risk of disclosing personal data on digital channels since it is not possible to completely protect technical systems from intrusion.

#### Your rights

Wallenstam takes great care to ensure that you are aware of your rights and that you can contact us at any time for the exercise of the rights below. Under the heading "Contact information" below, there is information about where you can contact us.

#### Right to withdraw consent

You have the right to withdraw your consent at any time. If you want to withdraw a given consent we ask you to contact Wallenstam as soon as possible. Withdrawal of consent does not affect the legality of data processing performed before the withdrawal occurred.

## Right to request access to personal data

Wallenstam always wants to be transparent with how we are processing your personal data. If you want confirmation of whether personal data concerning you is being processed or to gain an insight into which personal data Wallenstam is processing about you, you have the right to request access to your personal data. You will then concurrently receive information about the purposes of the processing, which personal data the processing applies to, the recipients or categories of recipients to which the personal data have been provided or will be disclosed to and if possible, the envisaged period for which your personal data will be stored or, if not possible, the criteria used to determine that period. Information about additional rights is concurrently provided and you will receive a copy of the personal data that are being processed.

## Right to rectification of personal data

You have the right to request rectification of inaccurate personal data without undue delay. You also have the right to complete such personal data that are incomplete and that are relevant with regard to the purposes of the personal data processing.

#### Right to erasure of personal data

You have the right to have your personal data erased. Wallenstam will without undue delay erase the personal data at your request to the extent possible under applicable law. This right applies, for example, when the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, if you withdraw your consent, object to the processing, the personal data have been processed unlawfully or if the personal data must be erased to comply with a legal obligation, as long as there are no grounds under applicable law that make the processing necessary. Processing may, for example, be necessary in order to exercise the right to freedom of expression and information, fulfill a legal obligation or perform a task of public interest or for the establishment, exercise or defence of legal claims.



## Right to restriction of processing

You have the right to restrict Wallenstam's processing of your personal data. You can do this, for example, if you dispute the accuracy of the personal data, if the processing is unlawful, if the personal data are no longer needed for the purposes of the processing but you need them to be able to establish, exercise or defend legal claims or pending possible verification of whether Wallenstam's legitimate grounds override your legitimate grounds.

#### Right to object to processing

You also have the right at any time to object to Wallenstam's processing of your personal data regarding, for example, direct marketing or for reasons relating to your specific situation when the processing is based on a legitimate interest.

#### Right to data portability

Under certain conditions, you have the right to receive your personal data in a structured, commonly used and machine-readable format and transmit those data to another controller when this is technically feasible, a so-called right to data portability. This applies when the processing of your personal data is based on consent or an agreement and the processing occurs automatically.

## Right to lodge a complaint

If you believe that Wallenstam has processed your personal data incorrectly, you have the right to lodge a complaint with a competent supervisory authority (in Sweden the Swedish Authority for Privacy Protection).

#### Contact information

If you have any questions about Wallenstam's processing of personal data or want to exercise your rights, please contact us at:

Wallenstam AB Attn: Data Protection Officer 401 84 Gothenburg Telephone: +46 31 20 00 00

Telephone: +46 31 20 00 00 dataskydd@wallenstam.se

#### Update of information about personal data processing

Wallenstam has the right to make changes to this information on an ongoing basis. A new version becomes effective when it is made available here on <a href="www.wallenstam.se/en">www.wallenstam.se/en</a>. We will also provide a notification of this when you log into "Mina Sidor" (My Pages) and into our other digital channels.

This website information about Wallenstam's personal data processing was updated on December 13, 2022. Version 1.5

Wallenstam AB (publ)