This document is a translation from the original Swedish document, and in the event of any discrepancies, the Swedish version shall prevail.



Privacy Policy for Commercial Leasing

General

Samhällsbyggnadsbolaget i Norden AB (organization number: 556981-7660) ("SBB", "we" or "us") processes personal data about you when you apply for a job with us. It is important to us that you feel secure about how we handle your personal data. In this privacy policy ("Policy"), we therefore describe how we process your personal data, what personal data we process, and why.

"Personal data" means any information that can be linked to you as an individual, such as name, address, and contact information such as phone number and email address. "Processing" refers to any action we take regarding your personal data, such as collection, organizing, storage, modification, reading, and dissemination.

Data Controller

Samhällsbyggnadsbolaget i Norden AB (organization number: 556981-7660) is the data controller for the processing of your personal data according to this Policy. If you have questions about our processing of your personal data, you can contact us at gdpr@sbbnorden.se.

Our Processing

Below we describe how we process your personal data, including for what purposes we process your personal data, what personal data we process, on what legal basis we process your personal data, and for how long.

Purpose of the Processing	Categories of Personal Data	Legal Basis	Processing Time
Application and management of lease	requests		
Application for lease, conclusion of lease agreements, and management of leasing relations	Name Contact details Other personal data such as: company affiliation and position Other information you provide Information about the need for facilities (e.g., regarding wheelchair ramps)	Our legitimate interest (Article 6.1 f GDPR)	Until the lease agreement is awarded. Processing ceases if you are no longer the contact person for the business.
Enabling property viewings. Administration and conclusion of lease or lease agreements	Name Contact details Other personal data such as: company affiliation and position Other information you provide Information about the need for facilities (e.g., regarding wheelchair ramps)	Our legitimate interest (Article 6.1 f GDPR)	Until the end of the leasing relationship.

To manage and sometime large si		Our logitimate interest in security	Hotiltho and of the leaster relative
To manage and conclude lease or lease agreements (e.g., for leasing	Name	Our legitimate interest in manag- ing and entering into lease agree-	Until the end of the leasing relationship.
premises, garages, and parking	Contact details	ments (Article 6.1 f GDPR).	sinp.
spaces).	Other personal data such as: company affiliation and position Other information you provide Information about the	,	
	need for facilities (e.g., regarding wheelchair ramps) - Registration number (re- lated to parking space rental) - Other information you provide to us		
Administration and management of keys and receipts	Name Other personal data such as details on Issued keys, cards or tags Possibly a power of attorney when collecting keys, cards or tags Any remarks upon returning keys, cards or tags	Our legitimate interest (Article 6.1 f GDPR)	Until the leasing relationship ends and issued items are returned.
Management and administration of payments and rental invoices	 Name Contact details Personal identification number Other personal data such as Details on the rental object Company registration no Direct debet registration Bank and payment details 	Our legitimate interest (Article 6.1 b GDPR) The processing of personal identification numbers is necessary considering the purpose of the processing.	Until the end of the leasing relationship.
Management and administration of debt collection matters	Name Contact details Other personal data such as Details on the rental objekt Payment details	Our legitimate interest (Article 6.1 f GDPR)	Until the debt is settled.
Management and administration of systems and common facilities within the property (e.g., intercom systems)	Name Contact details Other personal data such as Key tag or pass card numbers Logs	Our legitimate interest (Article 6.1 f GDPR)	Until the leasing relationship ends. Logs are processed for up to three months after they are created.
Management and handling of fault reports, queries, and other cases or complaints	Name Contact details Custumer number	Our legitimate interest (Article 6.1 f GDPR)	Up to five years after the case is closed.

	Other personal data such as – details on the rental object – Other information you provide or that arises during the case		
To provide the business you represent with relevant information as a tenant/leaseholder (including, e.g., market and satisfaction surveys).	Name Contact details Other personal data such as Information related to the lease agreement Other information you provide to us	Our legitimate interest (Article 6.1 f GDPR)	Personal data is processed until the lease relationship has ended.
To conduct property transactions.			
To create and administer tenant lists for the purpose of assessing the extent of property rental and continuously reviewing the property portfolio to forecast revenues and expenses for the purpose of conducting property transactions.	Name Contact details Other personal data such as Information about the rental object Information about company affiliation and position	Our legitimate interest (Article 6.1 f GDPR) The processing of personal identification numbers is necessary considering the purpose of the processing.	Personal data is processed for up to one year after the transaction is completed.
Legal obligations and claims			
For presenting and defending ourselves against legal claims (including, e.g., claims for damages, disputes regarding rent or other payments, and claims under other legislation).	Name Contact details Personal identification number Other personal data such as Information from credit checks Information about the lease relationship and rental object Bank and payment details Other information you provide to us or that arises during the lease relationship	Our legitimate interest (Article 6.1 f GDPR) The processing of personal identification numbers is necessary considering the purpose of the processing.	Personal data related to the lease relationship or possible payment obligations are processed for up to ten years after the event giving rise to the claim, in accordance with the statute of limitations law (1981:130). In the event that we need to process personal data due to an expected or ongoing dispute, such data will be processed until the dispute is finally settled or the parties agree to a settlement.
To fulfill our legal obligations regarding accounting.	Possible personal data disclosed through:	Fulfillment of a legal obligation (Article 6.1 c GDPR)	Personal data is processed for seven years after the end of the calendar year in which the accounting year ended, in accordance with the Accounting Act (1999:1078).

To enter into and fulfill agree-	Name	Our legitimate interest (Article	Personal data is processed until
ments with consultants, partners, contractors, suppliers, and other independent entities.	Contact details User ID for IT systems Personal identification number Photograph Possible personal data disclosed through: Information about the lease relationship Company affiliation and position Other information you provide to us	6.1 f GDPR) The processing of personal identification numbers is necessary considering the purpose of the processing.	the relevant contract has ended.

Who has access to your personal data?

We may engage our service providers to perform certain processing on our behalf. These service providers then act as our data processors. This is the case, for example, with some of our IT providers. We may also disclose your personal data to authorities and other entities if required by law or regulatory decisions. Additionally, we may disclose personal data to our advisors, such as law firms or auditing firms. Please note that this Policy does not apply when we disclose your personal data to entities that are themselves data controllers, such as law firms or auditing firms. These entities may have their own terms for processing your personal data.

Processing of your personal data outside the EU/EEA

Some of our service providers may have all or part of their operations located in countries outside the EU/EEA (so-called third countries). Transfer of personal data only occurs to such countries that the EU Commission has assessed to have an adequate level of protection, in accordance with GDPR Article 49. You can find a list of such countries on the EU Commission's website: www.commission.europa.eu. In some cases, we may be required to use providers that transfer personal data to countries not covered by an ade-

cases, we may be required to use providers that transfer personal data to countries not covered by an adequacy decision. In these situations, we ensure that the transfer is subject to appropriate safeguards, such as the EU Commission's standard contractual clauses for transfers to third countries (2021). The EU Commission's standard contractual clauses are available on the EU Commission's website: www.commission.europa.eu.

Your rights regarding our processing of personal data

Below are the rights you have regarding your personal data. If you wish to exercise any of these rights, please feel free to contact us at gdpr@sbbnorden.se.

Right to access

You have the right to request information about whether we process your personal data, what personal data we process, and how the personal data is processed. You also have the right to request a copy of the personal data we process about you (so-called record extract).

Right to rectification

You have the right to request correction of inaccurate personal data, for example, if you have changed personal data or if your personal data is incomplete.

Right to object

You have the right to object to processing of personal data based on the legal basis of legitimate interest, GDPR Article 6.1 f). Please note that if we can demonstrate that our legitimate interest in the processing outweighs your interests and rights, we may continue processing despite your objection.

Right to erasure

You have the right to request that we erase your personal data if:

- The personal data is no longer necessary for the purposes for which it was collected,
- You withdraw your consent (if the processing is based on consent),
- You object to the processing and there are no overriding legitimate grounds for us to continue the processing,
- The processing is unlawful, or
- The personal data must be erased to comply with a legal obligation incumbent upon us.

Right to restriction

You have the right to request that we restrict the processing of your personal data (which means that we stop using certain personal data) if:

- You dispute the accuracy of the personal data (however, the restriction only applies during the period we verify the accuracy of the data),
- The processing is unlawful, and you request that the processing be restricted instead of the data being erased,
- The personal data is no longer necessary for the purposes for which it was collected, but you need it to establish, exercise, or defend legal claims, or
- You have objected to the processing, but we have not yet determined whether our legitimate interests outweigh your interests and rights.

Right to data portability

You have the right to have your personal data transferred to another data controller and to have the data provided in a structured, commonly used, and machine-readable format.

Right to withdraw consent

Om behandlingen är grundad på samtycke har du rätt att vid vilken tidpunkt som helst återkalla ditt lämnade samtycke. Notera dock att återkallande av samtycke inte påverkar lagligheten av den behandling som utförts innan samtycket återkallades.

Right to lodge a complaint

If you wish to lodge a complaint about our processing of your personal data, you can contact the Swedish Data Protection Authority (IMY). You can read more about your rights and how to lodge a complaint on IMY's website: www.imy.se.

If you wish to exercise any of these rights, please feel free to contact us at gdpr@sbbnorden.se.

Policy changes

We may occasionally make changes to this policy. The latest version of the Policy is always available on our website (www.sbbnorden.se).

Contact details

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