

# PRIVACY POLICY

#### INFORMATION ON THE PROCESSING OF PERSONAL DATA

We process your personal data when you apply for housing with us, when you become one of our tenants, and even for a period of time after your tenancy ends. We also process your personal data when visit our website, apply for a job with us or interact with us in some other manner in accordance with this privacy policy (hereinafter "Privacy policy"). Because your integrity is important to us, we ask that you read the remainder of this Privacy policy to learn more about it.

Personal data comprehends all information that can be associated with you as a person (e.g. your name and address) and your contact details (e.g. phone number and email address).

#### DATA CONTROLLER

Samhällsbyggnadsbolaget i Norden AB 556981-7660, Box 11405, 404 29 Göteborg ("**SBB**" or "**We**") serves as the data controller responsible for the processing of your personal data, which we perform ourselves or outsource in full accordance with this Privacy policy.

# WHEN YOU NOTIFY INTEREST OR REGISTER IN THE QUEUE FOR HOUSING

When you notify interest or register yourself in the queue for our residences, we collect and process your personal data, which includes your name, social security number, contact details and the item of interest/queue. Processing is required in order to exercise our legitimate interest in administering your application or queue place. The legal basis for processing is a balancing of interests. We obtain personal data directly from you or a real estate agent. If you provide health information, we will obtain your consent to process this type of information.

The information remains in our possession for as long as your interest is registered or you are waiting in the queue. If you would like to withdraw your notification of interest or queue place, you may request that we erase your personal data.

# WHEN YOU ARE OFFERED HOUSING

When you are offered housing with us, we need to process additional information on you. In such cases, we require, for example, information on your finances and employment as well as a record of previous places of residence and rent payments. We will not be able to make a rental agreement with you without your personal data. If you provide health information, we obtain your consent to process this type of information.

In the course of processing your personal data, we also check your credit history, obtain information from debt collection agencies and the Swedish Enforcement Authority, and examine employment certificates, other certificates and information from personal references that you submit to us. If you have an administrator or trustee, we are required to process their data. If you are offered a separate residence or group residence, we obtain a decision from the Social Welfare Board. If you are offered a student residence, we process your school registration certificate and student union membership or other certificates verifying that you will be studying during the rental period. If you have protected personal data, we will process your information in accordance with our standard procedures for such data.

We retain your personal data for as long as it is relevant and current for the rental process or until the agreement with you is concluded. We do not retain your credit history, information from debt collection agencies and government authorities that we collected for the purpose of approving your tenant application. If your application for a residence with us is rejected on the basis that we cannot accept you as a tenant, we retain your personal data for a period of six months after the date of the rejection decision.

# **DURING AND AFTER THE RENTAL AGREEMENT**

During your tenancy, we will process your personal data, such as your name, personal data, user ID/customer number, address, contact details, financial situation, housing situation, rental agreements, consumption data, and other information that comes to light during the rental period. We process this personal data in order to fulfil and administer our obligations as landlord and contracting party. We will not be able to fulfil our obligations under the rental agreement with you without your personal data.

For example, we process your personal data when: we send out rental invoices and process your payments; we collect consumption data for electricity, water and heating; we provide you with access to the residence and public premises in connection with your residence; we negotiate the rent; and we send you the information you require as a tenant. We also process your personal data, e.g. flat number, maintenance request history and other data you submit that enables us to provide our services to you under the rental agreement, such as to receive and respond to maintenance requests. We may also need to update your personal data against public records to ensure their accuracy. For example, if you live in a student residence, we will check that you are officially enrolled for study. If you have protected personal data, we will process your information in accordance with our standard procedures for such data.

We also process your personal data for our legitimate interest in providing services to you when you submit questions and opinions to us. The legal basis for processing is a balancing of interests. The data that may be processed is the name, social security number and address, in accordance with your enquiry.

We also process your personal data when it is necessary to make a legal claim. We may need to do this if, for example, there are disturbances in the residence, late rental payments or defaults, or damage to the flat. The legal basis is our legitimate interest. We may also need to submit your personal data to the Social Welfare Board or other concerned public authorities. We also process your personal data to fulfil our legal obligations as a landlord and contracting party, for example, where accounting is concerned.

We will retain your personal data for as long as it is relevant to fulfil our contractual obligations and for up to three months after the end of the rental period. We may retain certain personal data for a longer period of time if it is necessary to safeguard our legal obligations as a landlord and contracting party. Data pertaining to you that is contained in our accounting materials, such as concerning payments, will be saved for seven years, including the current year. A guarantee or decisions on an administrator or trustee will be deleted two years after the guarantee or decision has expired.

#### **SALE OF REAL ESTATE**

In the event that the property where you live or, in some cases, have previously lived, is sold, your personal data may be processed and transferred from or to the selling and buying company, respectively. Processing is necessary for our legitimate interests as well as those of the selling or buying company in order to carry out the transaction. The legal basis is a balancing of interests. The data is kept for up to one year after the transaction is completed.

#### WHEN YOU OR THE COMPANY YOU REPRESENT ENTER INTO AN AGREEMENT WITH US

If you enter into a supplier or co-operation agreement with us, we will process your personal data to enter into and fulfil agreements with you. The personal data to be processed may be names, contact details and positions. If you invest in one of our projects, we may also process your social security number, place of residence, nationality, ID, bank and account details, beneficial owner, status as a Politically Exposed Person (PEP) and other necessary information. We collect your personal data from you. If you do not provide us with your personal data, we will not be able to enter into or fulfil the agreement. We may also obtain personal data from third parties, such as public authorities or publicly available sources.

If you act as a contact person for or represent a company that enters into an agreement with us, the legal basis for our processing of your personal data above is instead a balancing of interests. Processing is necessary to safeguard our legitimate interests and those of the company in entering into and fulfilling the agreement with the company you represent.

We can also process personal data in order to fulfil the legal obligations incumbent upon us under applicable laws on accounting, taxation and money laundering.

We will retain your personal data for as long as the applicable contractual relationship requires. In order to fulfil our legal obligations under applicable laws, such as those on accounting and money laundering, personal data may in some cases be kept up to 10 years after termination of the contractual relationship

#### WHEN YOU SUBSCRIBE TO PRESS RELEASES

If you have expressed interest in receiving our press releases, we will process your personal data to send you such press releases. The data we process for this purpose are name and e-mail address. This processing is based on the consent you give when you subscribe to the press releases. You have the right to withdraw your consent at any time by clicking "unregister" in the press release or contact us at gdpr@sbbnorden.se. Your personal data is stored for as long as you agree to its processing.

#### WHEN YOU APPLY FOR EMPLOYMENT WITH US

When you apply for employment with us, we will process your personal data. Personal data that may be processed are names, social security numbers, addresses, e-mail addresses, phone numbers, educational background, work experience and other information you provide in your application. Processing data is necessary for our legitimate interest in administering and processing your application. The legal basis is a balancing of interests.

We will save your personal data for up to one year from the end of the recruitment process. In order to defend ourselves against claims for violation of the Discrimination Act, we retain personal data for two years from the date on which the alleged violation took place or should have taken place.

#### WHEN YOU CONTACT OR VISIT US

For those who visit and communicate with us on our website and social media platforms, use networks on our premises, or contact us via email or phone, we will process your data to offer you a better experience or process your request as needed. Communication takes place directly on our website, on our social media platforms or by email and phone. Personal data that may be processed includes your username (which may also be your full name), email address, information on the device used, phone number, IP address, location and contact information, and other information you provide when contacting us. We may also process the personal data of other persons mentioned in your contact with us.

Processing is necessary for our legitimate interest in offering you a better experience or processing your request as needed. Details of your connection to our guest network will be saved for 24 hours. Data on social media is reviewed annually and deleted within 30 days of some comments being considered as no longer relevant. When you visit our website, we will save your IP address for three months. Other data will be reviewed within no more than six months.

# WITH WHOM YOUR PERSONAL DATA IS SHARED

We may use a processor to process your personal data. A processor may be, for example, a contractor to repair something in your apartment, a company that provides broadband or electricity, a debt collection company, or a company that manages our IT systems. Some partners and suppliers may run part of their operations in non-EU/EEA countries (so-called third countries). Transfers are made only to those countries which, in the opinion of the EU Commission, have an adequate level of protection or where the supplier has a legally binding and enforceable instrument guaranteeing the security of the data.

We also disclose your personal data to authorities with regard to laws or government decisions. If all or part of our business is sold or integrated with another company, we may also disclose your personal data to advisers and potential buyers. Please note that this Privacy policy does not apply when we disclose your personal data to stakeholders serving as controllers.

#### **YOUR RIGHTS**

You have the right to obtain, upon request, information on which personal data about you we process and request a copy (extract from the register) and correct or supplement your personal data.

You have the right to receive information on the assessment we have made regarding our processing that is based on our legitimate interests. You also have the right, under certain circumstances, to have your personal data erased, to object and request restrictions on processing, and to have your personal data transferred to another controller (data portability).

Contact us at gdpr@sbbnorden.se if you would like to exercise any of your rights.

You also have the right to complain about how we process your personal data to the Swedish Authority for Privacy Protection (IMY). For more information on how to proceed, visit www.imy.se.

# **CONTACT INFORMATION**

If you have any questions regarding our personal data processing, please contact us at: Samhällsbyggnadsbolaget i Norden AB

Strandvägen 1

114 51 Stockholm

gdpr@sbbnorden.se

# **CHANGES TO THE PRIVACY POLICY**

We may make changes to the Privacy policy from time to time. The latest version of the Privacy policy is always posted on our website.