

Privacy Policy

General

We at Balder care about your privacy and are continuously working to improve the protection of your personal data. In this policy, we describe how we process your personal data when you:

- visit our website;
- contact us via, for example, email or social media;
- represent an organisation which is our potential, current and former supplier or partner;
- participate in our contests, events, or respond to our market surveys; or
- appear in our collaborative work on creating security.

If you are a buyer or prospective buyer in any of our new construction projects, we will inform you separately about how we process your personal data in "Privacy Policy for New Construction".

If you are a tenant with us, we will inform you separately about such processing in "Privacy Policy for Renting to Individuals". If you are a representative of a commercial tenant, we will inform you about such processing in "Privacy Policy for Commercial Leasing".

If you are a shareholder or proxy for a shareholder at the Annual General Meeting, if you receive insider information regarding Fastighets AB Balder or if you are part of our boards of directors, we inform you separately about how we process your personal data in "Privacy Policy for Shareholders, Directors, and Persons with insider information".

Data controller

Fastighets AB Balder, reg.no. 556525–6905, Parkgatan 49, 411 38 Gothenburg ("**Balder**" or "**we**") is the data controller for the processing of your personal data when you visit our website, participate in our events and contests, contact us via the contact form on our website or our social media or if you represent an organisation that is our potential, current, and former supplier or partner.

Each respective company in the Balder Group subject to accounting obligation is the data controller for personal data processed for accounting purposes.

If you have any questions about our processing of your personal data or if you want to exercise your rights as described below under the heading "Your rights in relation to our personal data processing", you are welcome to contact us at dataskydd@balder.se. You can also call us on +46 774-49 49 49.

Summary of Balder's processing of your personal data

The following is a summary of how we process your personal data. Further down in this document, you will find more detailed information. Click on the links below to jump to the detailed information.

- We process several categories of personal data about you, such as your name and your contact details. We usually receive the personal data directly from you or the organisation you represent.
- We have compiled [detailed information in tables](#) below. This will give you a detailed description of our purposes, what personal data we process about you, our legal grounds, and our retention periods.
- [Your personal data is processed by us within the Balder Group.](#) In order for us to conduct our business activities, we need to share your personal data with other companies in certain situations, such as our IT suppliers, public authorities and third parties who help us improve our websites and in connection with marketing.
- [Your personal data may be transferred outside the EU/EEA.](#)
- [You have several rights in relation to our processing of your personal data,](#) such as the possibility to complain to the Swedish Authority for Privacy Protection (IMY) and the possibility to obtain an extract from the register showing what personal data we process.

Detailed information about the processing of your personal data

In the tables below, you can read more about what personal data we process about you, why we process your personal data, how long we save your personal data, and what lawful basis we have for our processing.

For our communication

Below you will find information about how we process your personal data when you contact us, visit our website or social media, or when we send marketing to you.

| When communicating with you | | |
|--|--|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Communicate with you who contact us via email, telephone, our website, or social media. | <ul style="list-style-type: none"> Name Email address Telephone number Company affiliation, if any Social media username (only for communication via social media) Other information you choose to provide us with | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to communicate with you and maintain our customer service and answer your questions.</p> |
| <p>Retention period: We save your data as long as our legitimate interest remains after we have completed our communication.</p> <p>On social media, your comments and our communication remain until you delete the comments and/or communication yourself. Materials that may be perceived as inappropriate or offensive will be removed earlier than this on a regular basis in accordance with our social media policy.</p> | | |

| To send newsletters | | |
|--|---|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Sending newsletters with offers and information via email that you have announced that you want. | <ul style="list-style-type: none"> Email address | <p><i>Consent</i></p> <p>We obtain your consent to provide you with relevant information about Balder and our projects through our newsletters.</p> |
| <p>Retention period: We will continue to send you newsletters until you unsubscribe or otherwise ask us to stop sending newsletters.</p> <p>You can decline marketing from us at any time. If you decline, your personal data will be stored in our deregistration register until further notice. You can read more about this processing below in this policy.</p> | | |

Press Release & Press Room

| Purpose of the processing | Personal data being processed | Lawful basis |
|---|---|--|
| Sending press releases to you who are a journalist. | <ul style="list-style-type: none"> Name Email Telephone number | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to provide information about events and news concerning Balder.</p> |
| To administer subscribers who have signed up to receive Balder's interim reports, annual reports, and press releases. | <ul style="list-style-type: none"> Name Email address Company affiliation (optional) | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to send interim reports, annual reports, and press releases to people who have chosen to subscribe to our mailings.</p> |

Retention period: We save your data until the press release is sent. If you have signed up for our press room, we save your personal data until you choose to deregister.

To analyse how our website is used

| Purpose of the processing | Personal data being processed | Lawful basis |
|---|--|--|
| View and analyse visitor statistics on our website and improve the functionality on the same. | <ul style="list-style-type: none"> IP address and other technical information about your device | <p><i>Consent</i></p> <p>We obtain your consent in connection with your visit.</p> |

Retention period: We save your data for a maximum of 26 months.

To show personalised offers from us on other pages you visit

| Purpose of the processing | Personal data being processed | Lawful basis |
|---|--|---|
| <p>Market Balder by showing offers and new projects we believe are of interest to you. We show marketing tailored for you on Google and/or Facebook as well as other websites that you visit. We do this based on such information that these parties already have about you and such information that we have collected.</p> <p>We may display offers by using marketing services from Google and/or</p> | <ul style="list-style-type: none"> IP address Your geographical location <p>Afterwards, you will see search results and banner ads based on:</p> <ul style="list-style-type: none"> Analysis of how you use our website Information that the marketing services already have about you, e.g. from which website you found us | <p><i>Consent</i></p> <p>We obtain your consent to provide you as a customer and other potential customers with personalised marketing relevant to you based on the information we have collected about you, e.g., things you have shown an interest in on our website.</p> <p>Here you can make a choice about the marketing you see from Google and here on Facebook under the heading "How can you control your Information?" you can choose which</p> |

| | |
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| Facebook . | marketing you want to see on Facebook. |
| Retention period: You will see marketing from us for 6 months from your last visit to our website. | |
| Google and/or Facebook will continue to process your personal data as independent data controllers. You can read about how long Google and/or Facebook store your personal data in their respective privacy policies. | |

Profiling: We use automated decision-making, so-called profiling, to show you the offers that we believe are best suited for you and to provide personalised marketing. Profiling is done because we would not otherwise be able to show or send you relevant offers and marketing. Without this profiling, you would be seeing offers that are not relevant to you. You have the right to object to profiling. You can read more about your right to object to our processing of your personal data in the section below that deals with your rights.

Partners and suppliers

Below, you will find information about how we process your personal data when you represent one of our suppliers or partners.

| Contact with suppliers and partners | | |
|--|---|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Communicate with you who represent an organisation that is a potential, existing, or former supplier or partner to us. | <ul style="list-style-type: none"> • Name • Email address • Telephone number | <i>Balancing of interests</i> Our legitimate interest is to contact a potential, existing, or previous supplier and partner. |
| Retention period: We delete your data if you no longer represent the organisation or if your contact details are no longer relevant. If we have concluded an agreement with your organisation, we save your contact details in accordance with what is stated below under "Agreements with suppliers and partners". | | |

| Tenders for projects | | |
|---|--|--|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Submit and receive tenders for our projects | <ul style="list-style-type: none"> • Name • Email address • Telephone number • Information in CV | <i>Balancing of interests</i> Our legitimate interest is to be able to procure for a project. |
| Retention period: We save your data until the warranty period for the project in question has expired, as a general rule, ten years after the approved final inspection. However, if we do not proceed with the tender where your data is relevant, we delete your data. | | |

| Agreements with suppliers and partners | | |
|---|--|-------------------------------|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Negotiate, conclude, and administer agreements with | <ul style="list-style-type: none"> • Name | <i>Balancing of interests</i> |

| | | |
|---------------------------------|---|---|
| the organisation you represent. | <ul style="list-style-type: none"> • Email address • Telephone number • Personal identity number if you operate as a sole trader | <p>Our legitimate interest is to fulfil our agreement with your organisation.</p> <p>If you are a sole trader, we process your personal identity number to ensure that we enter into an agreement with the right party.</p> |
|---------------------------------|---|---|

Retention period: We save your data until the agreement with the organisation you represent has expired or if we learn that you no longer represent the organisation in question. If your personal data in the form of your signature is included in the agreement, it will generally be deleted after ten years from the conclusion of the agreement.

However, your information may be stored longer for other purposes, such as accounting purposes, see more below.

Manage invoicing

| Purpose of the processing | Personal data being processed | Lawful basis |
|-------------------------------------|---|--|
| To manage and administer invoicing. | <ul style="list-style-type: none"> • Name • Email address • Telephone number • Personal identity number if you operate as a sole trader | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to fulfil our agreement with your organisation.</p> <p>If you are a sole trader, we process your personal identity number to ensure that you are the correct contracting party.</p> |

Retention period: We save your personal data until the payment is completed.

However, the information may be stored longer for accounting purposes, see more below.

Manage projects

| Purpose of the processing | Personal data being processed | Lawful basis |
|--|---|--|
| Manage projects, such as residential real estate projects, and communicate with you who represent an organisation involved in the project. | <ul style="list-style-type: none"> • Name • Email address • Telephone number | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to complete our projects.</p> |

Retention period: We save your data until the project is completed.

However, we delete your data earlier if we learn that you no longer represent the organisation.

Carry out contests, events, and market research

Below, you will find information about how we process your personal data when you participate in our contests, in connection with our events, and when we conduct market research and evaluations.

| Contests | | |
|--|---|--|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Organise and administer physical or digital contests. | <ul style="list-style-type: none"> • Name • Email address • Telephone number • Other information you have provided as part of the contest, such as social media names or photos | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer and organise contests and market Balder as well as our services and offers.</p> |
| <p>Retention period: We save your data until the contest is over.</p> | | |

| Carry out events | | |
|---|--|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Invite you to our events. | <ul style="list-style-type: none"> • Name • Email address • Telephone number | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to invite you to our events.</p> |
| Organise our events. | <ul style="list-style-type: none"> • Name • Email address • Telephone number • Information about your dietary preferences if you have specified this | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to organise events.</p> <p><i>Consent</i></p> <p>If we process dietary preferences that can be linked to health or religion, we obtain your consent.</p> |
| Take photos/videos at events to publish on our social media. | <ul style="list-style-type: none"> • Photographs or videos where you appear. | <p><i>Consent</i></p> <p>For this processing, we obtain your consent.</p> |
| <p>Retention period: We save your data until the event is completed. We save photographs or videos where you appear as long as the relevant consent remains valid.</p> | | |

| Market research and evaluations | | |
|--|---|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Send market surveys or evaluations to you who have participated in one of our contests or events. | <ul style="list-style-type: none"> • Name • Email address • Telephone number • The answers you provide in the market survey | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to evaluate our events and improve future events, contests, and our business activities.</p> |
| <p>Retention period: We save your data for this purpose until the survey is completed and six weeks thereafter.</p> | | |

Our image bank

Below you will find information about how we process your personal data if you appear in our image or video material.

| Images/films | | |
|---|---|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Take photographs/videos to publish on our social media, on our website, or in other marketing channels. | <ul style="list-style-type: none"> • Photographs or videos where you appear. | <p><i>Fulfil agreements</i></p> <p>The processing is done if we have concluded a model or film contract with you.</p> |
| <p>Retention period: How long we use and save materials where you appear is set out in each respective model contract. The starting point is that we save the images for five years.</p> | | |

Our crime prevention and security-creating collaboration

Below, you will find information on how we process your personal data if you are involved in our crime prevention and security-creating work for any reason.

| Crime prevention and security creation | | |
|--|--|---|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Individually and in collaboration with other stakeholders report, investigate, and evaluate unsafe incidents and/or places, as well as planning and implementation of measures regarding such incidents and/or places, linked to our properties and/or projects. | <ul style="list-style-type: none"> • Information stated in connection with the reported incident/place, e.g., street address. | <p><i>Balancing of interests</i></p> <p>Our legitimate interest is to participate in the work of creating a safe community for our tenants and tenant-owners.</p> |
| <p>Retention period: We save your data for as long as our legitimate interest remains.</p> | | |

Legal obligation

Below, you will find information about how we process your personal data when we must process your personal data to fulfil our legal obligations such as accounting purposes and in relation to the Marketing Act.

| Accounting | | |
|---|---|--|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Comply with accounting legislation. | <ul style="list-style-type: none"> • Name • Payment history, transactions, and other material that constitutes accounting records | <p><i>Legal obligation</i></p> <p>The processing is necessary to comply with the Swedish Accounting Act.</p> |
| <p>Retention period: We save data in accounting records up to and including the seventh year after the end of the calendar year in which the financial year ended.</p> | | |

| If you have asked us to stop sending marketing | | |
|---|---|--|
| Purpose of the processing | Personal data being processed | Lawful basis |
| If you have announced that you do not wish to receive our marketing, we will store a notice to that effect in a "deregistration register" to ensure that we do not market ourselves to you. | <ul style="list-style-type: none"> • Email address | <p><i>Legal obligation</i></p> <p>We have an obligation under the Marketing Act to ensure that you do not receive mailings that you have requested not to receive.</p> |
| <p>Retention period: You will be in our deregistration register until further notice.</p> | | |

Legal matters

Below, you will find information about how we process your personal data when we or you have a legal claim or when we otherwise are in contact regarding legal matters

| Legal matters | | |
|--|--|--------------------------------------|
| Purpose of the processing | Personal data being processed | Lawful basis |
| Handle legal matters and claims, such as warranties, payments, or other matters. | <ul style="list-style-type: none"> • Name • Address • Information relevant to the case, | <p><i>Balancing of interests</i></p> |

| | | |
|--|------------------------------|---|
| | such as an inspection record | Our legitimate interest is to defend ourselves against and defend our legal claims. |
| Retention period: As a starting point, we save your data for the entire warranty period or until the matter is finally settled. | | |

What does the balancing of interests mean?

As stated above, in certain situations we process your personal data based on the balancing of interests. The balancing of interests means that we process your personal data when the processing is necessary for purposes related to our legitimate interests. Our legitimate interests will only constitute a lawful basis for the processing of your personal data if your interests and fundamental rights and freedoms do not outweigh our legitimate interests.

If you would like to know more about how we have made this assessment or object to it, you are welcome to contact us at the contact details provided above.

In certain situations, we process your personal data after you have given your consent to the processing. These situations are described above and you can withdraw your consent at any time. If you withdraw all or part of your consent, we will cease processing for that purpose.

With whom do we share your personal data?

We share your personal information with companies within our group and with our partners and suppliers as below.

- If you represent an organisation that is our potential, current, and previous supplier or partner, we share your personal data with the company in our group relevant to the contact or agreement in question;
- Our IT suppliers who process personal data on our behalf as data processor;
- Public authorities and courts when we have a legal obligation to do so or in cases where we have a legal claim;
- Social media if you participate in a contest or if we publish an image in which you participate;
- Google, which analyses your use of our website to improve the functionality of the website and provide you with relevant marketing;
- Facebook to provide you with relevant marketing;
- Other third party we use to provide you with personalised marketing through digital channels; and
- External partners who help us administer our marketing.

If you would like more information about how we share your personal data, you are welcome to contact us at the contact details provided above.

Processing of your personal data outside the EU/EEA

The IT suppliers we use may transfer personal data outside the EU/EEA. This is done if the transfer is supported by the EU General Data Protection Regulation (GDPR). This means that the transfer can be based on, for example, European Commission decisions or standard contractual clauses with additional security measures.

If you would like more information about how your personal data is processed outside the EU/EEA, you are welcome to contact us at the contact details provided at the beginning of this Privacy Policy.

Your rights

You have several rights in relation to our processing of your personal data. To exercise your rights, you are welcome to contact us. Our contact details are provided at the beginning of this policy.

Right of access

You have the right to receive confirmation of whether we process your personal data and the right to access information about how the personal data is processed, such as the purposes of the processing and what categories of personal data the processing applies to. You also have the right to a copy of the personal data we process about you.

Right to rectification and right to object to processing

You have the right to have inaccurate personal data corrected without undue delay (for example, if you have changed contact details) and the right to have incomplete personal data supplemented.

You can object to personal data processing based on a balancing of interests at any time. If we can demonstrate that our legitimate interests in the processing outweigh your interests and fundamental rights and freedoms or if our processing is for the determination, exercise, or defence of legal claims, we may continue our processing despite your objection.

Right to erasure (right to be forgotten)

You have the right to request erasure of your personal data if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing and there are no legitimate grounds for continuing our processing;
- the personal data have been unlawfully processed; or
- the personal data must be erased for compliance with a legal obligation to which we are subject.

Right to restriction of processing

You have the right to request that the processing of your personal data be restricted if:

- you dispute the accuracy of the personal data (however, the limitation only applies during the period we verify the accuracy of the personal data);
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- you need the personal data for the establishment, exercise, or defence of legal claims even though we no longer need the personal data for the stated purpose of the processing; or
- if you have objected to the processing and we have not verified whether our legitimate interest in processing your personal data overrides your legitimate interest in restricting the processing of your personal data.

Right to withdraw consent

If you have given your consent to a particular processing of your personal data, you can withdraw all or part of your consent at any time.

Right to data portability

You have the right, under certain conditions, to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format and the right to transmit these to another data controller (data portability).

Right to complain

You have the right to complain about our processing of your personal data to a competent supervisory authority. The competent supervisory authority in Sweden is the Swedish Authority for Privacy Protection (IMY), www.IMY.se.

The Privacy Policy was adopted by Balder on 26 November 2021.