

Privacy Policy for Commercial Leasing

We at Balder care about your privacy and are continuously working to improve the protection of your personal data. This policy describes how we process your personal data when the business you represent rents premises, parking space, garage, or storage units from us at Balder.

Summary of our 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 your personal data, such as your name, contact details, as well as other information about you as representative of the business who has a tenancy relationship with us at Balder. If the business is a sole proprietorship, we will process more personal data about you, such as personal identity number and, in some cases, a credit report. Usually, we receive the personal data directly from you or from the business 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. In these tables, the categories of personal data in *italics* only apply when the business is a sole proprietorship.
- Your personal data is processed by us within the Balder Group. In order for us to conduct our rental activity and handle your matters, we may need to share your personal data with other companies in some situations, such as our IT suppliers and the company that provides various personal services in our rental properties.
- Your personal data may be transferred outside the EU/EEA.
- [You have certain 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.

Data controller

When the business you participate in applies for or have a tenancy agreement regarding premises, a parking space, garage, or storage unit with us, 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.

The company within the Balder Group who is party to the tenancy agreement is the data controller for personal data processed for accounting purposes. This is because each company is responsible for its own accounting obligations.

If you have any questions about Balder's processing of your personal data or if you wish to exercise your rights described below, please contact us at dataskydd@balder.se. You can also call us on +46 774-49 49 49.

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.

During the application procedure

When the business you represent applies for and concludes a tenancy agreement regarding premises, garage, parking space, or storage unit with us, we process your personal data as set forth below.

Application for premises & communication on vacant objects		
Purpose of the processing	Personal data being processed	Lawful basis
To manage administration regarding our rental activities.	<ul style="list-style-type: none"> Name Contact details The business you represent <i>Personal identity number</i> <i>UC</i> <i>Other information you provide on requests regarding the premises</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to assess the application as well as communicate with you as representative to conclude a tenancy agreement.</p> <p><i>We process your personal identity number when required to ensure the identity of the sole proprietorship.</i></p>
<p>Retention period: We cease to process your personal data for this purpose when the business no longer desires premises. As a rule, also when the business has concluded a tenancy agreement, but then the personal data will be processed for other purposes during the tenancy.</p> <p>We will also cease to process the personal data for this purpose if we receive information that you are no longer a contact person for the business.</p>		

Viewing premises		
Purpose of the processing	Personal data being processed	Lawful basis
In order for us to enable the viewing of the premises.	<ul style="list-style-type: none"> Name Contact details 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to show the premises the business is interested in.</p>
<p>Retention period: We cease to process your personal data for this purpose when the business no longer desires premises. As a rule, also when the business has concluded a tenancy agreement, but then the personal data will be processed for other purposes under the tenancy.</p>		

We will also cease to process the personal data for this purpose if we receive information that you are no longer a contact person for the business.

Conclusion of tenancy agreement

Purpose of the processing	Personal data being processed	Lawful basis
To manage and conclude a tenancy agreement.	<ul style="list-style-type: none"> • Name • Contact details • <i>Personal identity number</i> • <i>Information about deviations from our rental policy</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to conclude a tenancy agreement with the business you represent.</p> <p><i>We process your personal identity number when required to ensure the identity of the sole proprietorship.</i></p>

Retention period: We will stop processing your personal data for this purpose after the end of the tenancy.

In certain situations, we will continue to process your personal data after the tenancy has ended in the manner described below, for example in the context of our accounting obligations.

Renting of garage/parking/storage unit

Purpose of the processing	Personal data being processed	Lawful basis
To process and conclude rental agreements regarding garage, parking space, or storage unit we provide.	<ul style="list-style-type: none"> • Name • Contact details • <i>Personal identity number</i> • <i>UC, if applicable</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to conclude a tenancy agreement with the business you represent.</p> <p><i>We process your personal identity number when required to ensure the identity of the sole proprietorship.</i></p>

Retention period: We will stop processing your personal data for this purpose after the end of the tenancy.

In certain situations, we will continue to process your personal data after the tenancy has ended in the manner described below, for example in the context of our accounting obligations.

Key receipt

Purpose of the processing	Personal data being processed	Lawful basis
To administer and manage keys and receipts for premises, garage, parking space, or storage unit.	<ul style="list-style-type: none"> • Name • Number of keys • Any power of attorney for another to collect the key on your behalf 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to fulfil the tenancy agreement</p>

Retention period: We will stop processing your personal data for this purpose after the end of the tenancy and when the keys have been returned.

During the tenancy

In connection with the business you represent renting premises, garage, parking space, or storage unit from us, we will process your personal data in accordance with the following.

Communication & mailings, e.g. via Mitt Balder		
Purpose of the processing	Personal data being processed	Lawful basis
To enable and administer the business' access to Mitt Balder.	<ul style="list-style-type: none"> • Data associated with the tenancy agreement • Name • Contact details • Login details to Mitt Balder 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to be able to communicate with you as representative of our tenant.</p>
To share relevant information with the business you represent in its capacity as tenant.	<ul style="list-style-type: none"> • Data associated with the tenancy agreement • Name • Contact details 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to be able to communicate with the business in its capacity as tenant.</p>
<p>Retention period: We will stop processing your personal data for this purpose after the end of the tenancy.</p> <p>We will also cease to process the personal data for this purpose if we receive information that you are no longer a contact person for the business.</p>		

Payments & notices		
Purpose of the processing	Personal data being processed	Lawful basis
To manage and administer payments and rental invoices.	<ul style="list-style-type: none"> • Name • Contact details • Information on the premises • <i>Data from direct debit notification, if any</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to fulfil the tenancy agreement.</p>
To manage and administer any deviations from the contractual rental fee.	<ul style="list-style-type: none"> • Name • Contact details • Information on the premises • What the deviation refers to, such as cause 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to enable and administer deviation from the contractual rental fee.</p>
To manage and administer direct debit payments.	<ul style="list-style-type: none"> • <i>Name</i> • <i>Contact details</i> • <i>Personal identity number</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to enable and administer direct debit payments.</p>

	<ul style="list-style-type: none"> • <i>Information on the premises</i> • <i>Bank, clearing number, and bank account number</i> 	We process your personal identity number to ensure secure identification in case of a sole proprietorship.
To manage and administer unpaid rental fees and debt collection.	<ul style="list-style-type: none"> • Data from the tenancy agreement and unpaid rental invoices • Information regarding the unpaid rental fees that emerges from discussion with the business as a tenant 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to establish and make legal claims.</p> <p>We process your personal identity number to ensure secure identification in case of a sole proprietorship.</p>

Retention period: We stop processing your personal data based on this purpose seven years after the end of the calendar year in which the financial year ended. The data is saved for this period due to our accounting obligation.

Data processed for direct debit ceases to be processed when direct debit is no longer used.

If the business has debts that are sent to debt collection, we generally delete your personal data for this purpose three years after the debt is settled.

In certain cases, we cease to process the personal data for this purpose if we receive information that you are no longer a contact person for the business.

Digital boards, entry phone, access control system & booking system

Purpose of the processing	Personal data being processed	Lawful basis
To manage and administer which businesses are located in the property.	<ul style="list-style-type: none"> • Name • The telephone number connected to the entry phone (not displayed to visitors) 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to enable visits and to display who occupies the property in the stairwell.</p>
To manage and administer access control systems within the property.	<ul style="list-style-type: none"> • Name • Tag number • Logs 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer access control systems.</p>
To manage and administer booking systems within the property, such as joint facilities.	<ul style="list-style-type: none"> • Name • Tag number • Logs 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer booking systems and provide access to shared facilities.</p>

Retention period: We stop processing your personal data for this purpose if the business in which you participate moves out of the premises. The logs are always deleted four weeks after they were generated, at the latest.

In certain cases, we also cease to process the personal data for this purpose if we receive information that you are no longer a contact person for the business.

Error reports, questions & other matters

Purpose of the processing	Personal data being processed	Lawful basis
To administer and manage your error reports and questions as well as other matters or complaints that you report to us.	<ul style="list-style-type: none"> • Name • Contact details • Information that you or others in the business provide us in the matter • Information arising during the course of the matter 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to fulfil the tenancy agreement.</p>
<p>Retention period: We stop processing your personal data for this purpose five years after the matter has been handled.</p>		

Transfer of rental premises

Purpose of the processing	Personal data being processed	Lawful basis
To process the application for transfer of the business' premises and verify whether our requirements on transfer of premises are met.	<ul style="list-style-type: none"> • Name • Contact details • <i>Personal identity number</i> • <i>Removal date</i> • <i>Reasons for transfer</i> • <i>UC</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to process and evaluate the application for transfer of rental premises.</p> <p><i>We process your personal identity number to ensure secure identification in case of a sole proprietorship.</i></p>
<p>Retention period: We will stop processing your personal data for this purpose after the end of the tenancy.</p> <p>In certain situations, we will continue to process your personal data after the tenancy has ended in the manner described below, for example in the context of our accounting obligations.</p>		

Administration of subleasing

Purpose of the processing	Personal data being processed	Lawful basis
<p>To process application for subleasing the premises and to verify whether our requirements for subleasing of premises are met.</p> <p>We also process data regarding the contact person for the proposed subtenant.</p>	<ul style="list-style-type: none"> • Name • Contact details • <i>Personal identity number</i> • <i>Address during the rental period</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to process and evaluate the tenant's application for subleasing.</p> <p><i>We process your personal identity number to ensure secure identification in case of a sole proprietorship.</i></p>
To manage and investigate cases of illegal subleasing.	<ul style="list-style-type: none"> • Name • Information to support suspected 	<p><i>Balancing of interests</i></p>

	illegal subleasing	Our legitimate interest is to establish and make legal claims.
<p>Retention period: We will stop processing your personal data for this purpose after the end of the tenancy.</p> <p>In certain situations, we will continue to process your personal data after the tenancy has ended in the manner described below, for example in the context of our accounting obligations.</p> <p>If we process your personal data due to suspicion of unlawful subleasing, we stop processing your personal data for this purpose when the grounds for suspicion cease to exist or when the matter has been finally settled.</p>		

Disturbance case		
Purpose of the processing	Personal data being processed	Lawful basis
<p>To manage and administer disturbance cases.</p> <p>The data is processed both if the business commits the disturbance and if the business reports the disturbance.</p>	<ul style="list-style-type: none"> • Data from the tenancy agreement to be able to charge the business as tenant if you have committed the disturbance • Name • Contact details • Description of the disturbance 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer disturbance cases.</p> <p><i>We process your personal identity number to ensure secure identification in case of a sole proprietorship.</i></p>
<p>Retention period: We stop processing your personal data for this purpose two years after the report of the disturbance or when any legal process is completed. Continuous disturbances throughout the tenancy may justify saving the documents for longer than two years.</p>		

Accounting obligation		
Purpose of the processing	Personal data being processed	Lawful basis
<p>In order for us to fulfil our legal obligations regarding accounting.</p>	<ul style="list-style-type: none"> • Supporting documents for payments, such as reference data in the form of your name 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to be able to fulfil our legal obligations.</p>
<p>Retention period: We stop processing your personal data based on this purpose seven years after the end of the calendar year in which the financial year ended.</p>		

Termination of tenancy agreement

In connection with the termination of the tenancy agreement, we process your personal data in accordance with the following.

Termination of tenancy agreement		
Purpose of the processing	Personal data being processed	Lawful basis

<p><i>Termination of the tenancy agreement by the tenant</i></p> <p>To process a termination of the tenancy agreement by the business you represent.</p>	<ul style="list-style-type: none"> • Name • Contact details • <i>Personal identity number</i> • <i>Removal date</i> • <i>If there is a garage, parking space, or storage unit</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer the business' termination of the tenancy agreement and to establish and exercise legal claims.</p> <p><i>We process your personal identity number to ensure secure identification in case of a sole proprietorship.</i></p>
<p><i>Termination of the tenancy agreement by Balder</i></p> <p>To administer and manage terminations of the tenancy agreement due to neglect or for other reasons.</p>	<ul style="list-style-type: none"> • Name • Contact details • <i>Personal identity number</i> • <i>If there is a garage, parking space, or storage unit</i> • <i>Reason for the termination</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer our termination of the tenancy agreement and to establish and exercise legal claims.</p> <p><i>We process your personal identity number to ensure secure identification in case of a sole proprietorship.</i></p>
<p>Retention period: We stop processing your personal data for this purpose as soon as there are no outstanding claims.</p>		

Removal inspection		
Purpose of the processing	Personal data being processed	Lawful basis
<p>To administer and manage the preliminary inspection and final inspection when vacating the premises.</p>	<ul style="list-style-type: none"> • Name • <i>Notes from the inspection</i> 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to establish and exercise legal claims.</p>
<p>Retention period: We stop processing your personal data for this purpose as soon as there are no outstanding claims.</p>		

Return of keys		
Purpose of the processing	Personal data being processed	Lawful basis
<p>To manage and administer the return of keys.</p>	<ul style="list-style-type: none"> • Name • Number of keys • Signature • Power of attorney for another person to return the keys on your behalf, if applicable 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer and ensure the return of keys.</p>

Retention period: We stop processing your personal data and the previous receipts for this purpose as soon as the keys have been returned.

Accounting obligation		
Purpose of the processing	Personal data being processed	Lawful basis
In order for us to fulfil our legal obligations regarding accounting.	<ul style="list-style-type: none"> Supporting documents for payments, such as reference data in the form of your name 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to be able to fulfil our legal obligations pursuant to the Swedish Accounting Act.</p>
<p>Retention period: We stop processing your personal data based on this purpose seven years after the end of the calendar year in which the financial year ended.</p>		

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.

Who has access to your personal data?

We share your personal information with companies within our group and with our partners and suppliers in the manner described below.

- We share your personal data with the company in our group that rents out the premises, garage, parking space, or storage unit in question.
- We use various service providers who process your personal data on our behalf and according to our instructions, e.g., suppliers of access control systems and telephone services.
- To have a functioning IT system and to conduct our business efficiently, we share your personal data with our IT suppliers, who process your personal data on our behalf and according to our instructions.
- In certain situations, we disclose personal data to authorities, such as the disclosure of data to the Swedish Police in connection with a police report and to the Regional Rent Tribunal (Hyresnämnden) in connection with a tenancy case.
- In case of non-payment, we provide personal data to debt collection agencies that are independent data controllers of their debt collection activities.

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 September 2021.