

Privacy Policy for New Construction Projects

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 are interested in or buy a newly constructed residence in one of Balder's new construction projects.

Summary of Balder's processing of your personal data

The following is a summary of how Balder processes 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, and information provided in your notice of interest that we need to conclude a residential purchase agreement with you. Usually, you provide us your personal data directly, but we also process personal data that we receive from brokers who work with us during the sales process.
- 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 sales work and manage the construction of the newly constructed residences, we need to share your personal data with other companies in certain situations, such as our IT suppliers and brokers in connection with the sales process.
- 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.

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 submit a notice of interest or buy one of our newly constructed residences.

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 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.

Tenant-owners' association's data controllership

Upon construction of new residences, Balder establishes each tenant-owners' association. Balder is the data controller for the personal data as set out in this Privacy Policy until Balder has handed over the responsibility for the tenant-owners' association at a so-called *takeover meeting*. After that, the tenant-owners' association is operated by the association's members and each respective tenant-owners' association is independently responsible for the personal data processing. The tenant-owners' association will notify you separately about how the tenant-owners' association processes your personal data after the takeover meeting. Balder will continue to be the data controller only for certain purposes, described below.

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.

In connection with your notice of interest for a newly constructed residence		
Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> To receive and process notices of interest. To send you information and communicate with you about the specific project that you have expressed your interest in. If the project belongs to an area with several projects: To send information and communicate with you about the geographical area to which the project belongs. 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Object of interest and geographical area of interest 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to process the notices of interest for the newly constructed residences and to send information about the project and geographical area of interest that you have expressed an interest in.</p>
<ul style="list-style-type: none"> To analyse and obtain information about where our interested parties live. 	<ul style="list-style-type: none"> Postal code (optional) 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to analyse and obtain information about where our interested parties and customers live if you have chosen to provide us with your postal code.</p>

<ul style="list-style-type: none"> • In order for us to collect additional personal data about you from a third party to obtain more information about our interested parties and thus know how to target our marketing. The personal identity number will be transferred to the third party, who will provide us with further information about you. 	<ul style="list-style-type: none"> • Personal identity number (optional and only in connection with your consent to relevant processing) • With your personal identity number, we can obtain information from third parties about address, household income, number of persons in the household, age of persons in the household, cars in the household, family situation, marital status, and country of birth. 	<p><i>Consent</i></p> <p>To process your personal identity number and share it with third parties, we obtain your consent.</p>
<ul style="list-style-type: none"> • To analyse how our marketing is working and how interested parties find each project. 	<ul style="list-style-type: none"> • Information about your browsing history, such as which ad you clicked on to get to a specific project and which website you visited before Balder. 	<p><i>Consent</i></p> <p>To process this information about you, we obtain your consent when you visit our website.</p>

Retention period: We delete your personal data for this purpose when the sale of a specific project is completed and occupancy has taken place. Until then, the personal data can be processed if any buyer cancels their purchase and Balder needs to contact more interested parties. If the project for which you have registered your interest belongs to an area with several projects, your personal data will only be deleted for this purpose when the entire geographical area is completed.

If you proceed in the process and enter into a residential purchase agreement, we will continue to process your personal data in accordance with what is stated below.

If you have chosen to provide your postal code, we will process it for 30 days from the collection. After that, we will remove the link between the postal code and your personal data.

If you have given your consent to the processing of your personal identity number, we will process it for six months from the collection.

If you have given your consent to us collecting information about your browsing history, we will save that information for three months.

In connection with the sales start		
Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • To manage and administer sales start and order of the interested parties. 	<ul style="list-style-type: none"> • Name • Contact details (email and telephone number) • Your position in the order of priority for the specific object • Information that you provide us or the broker, such as your specific requests or information about viewing <p><i>Data collected during the sales process may be collected by us at</i></p>	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to manage the sales start for the newly constructed residences.</p>

Balder or by the broker for the project in question.

Retention period: We delete your personal data for this purpose when the sale of a specific project is completed and occupancy has taken place. Until then, the personal data can be processed if any buyer cancels their purchase and Balder needs to contact more interested parties. If the project for which you have registered your interest belongs to an area with several projects, your personal data will only be deleted for this purpose when the entire geographical area is completed.

If you proceed in the process and enter into a residential purchase agreement, we will continue to process your personal data in accordance with what is stated below.

Administer reservation agreements

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> To enter into and administer reservation agreements for the purchase of a residence including payment of fees in connection therewith. Manage any termination or cancellation of reservation agreements. 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Address Personal identity number Specific object information Account number Loan commitment and UC credit score and sometimes supplement with employer's certificate, salary and bank account details. Any other information you choose to provide us with, such as the reason for withdrawal. 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to conclude and manage reservation agreements concluded between companies within the Balder Group and you as an interested party regarding a newly constructed residence.</p> <p>We process your personal identity number to ensure that you are the right person when administering the reservation agreement.</p>

Retention period: The reservation agreements and the data collected in connection therewith are deleted when prior agreements are concluded. We store data from accounting records in accordance with what is stated below under "Compliance with the Swedish Accounting Act".

If we process your personal data for the withdrawal from a reservation agreement, we save your personal data linked to this for 12 months. In addition, only for accounting purposes.

Administer prior agreements

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> To enter into and administer prior agreements for the purchase of a residence including payment of fees in connection therewith. Manage any termination or 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Address Personal identity number 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to conclude and manage prior agreement concluded between you and the relevant tenant-owners' association for the newly constructed residence.</p> <p>We process your personal identity</p>

cancellation of prior agreements.	<ul style="list-style-type: none"> • Specific object information • Account number • Loan commitment and UC credit score and sometimes supplement with employer's certificate, salary and bank account details. • Any other information you choose to provide us with, such as the reason for withdrawal. 	number to ensure that you are the right person when administering the prior agreement.
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Retention period: Balder hands over the prior agreements to the relevant tenant-owners' association in connection with the takeover meeting. In connection herewith, data controllership is transferred from Balder to the tenant-owners' association.

However, data in supporting documents will be stored at Balder for our accounting purposes in accordance with what is stated below.

If we process your personal data for the withdrawal from a prior agreement, we save your personal data linked to this for 12 months. In addition, only for accounting purposes.

Manage grant agreements

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> • To enter into and administer grant agreements for the purchase of a residence including final payment in connection therewith. 	<ul style="list-style-type: none"> • Name • Contact details (email and telephone number) • Address • Personal identity number • Specific object information • Loan commitment and UC credit score and in some cases supplement with employer's certificate, salary and bank account details. • Account number 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to administer a grant agreement between you and the relevant tenant-owners' association for the newly constructed residence.</p> <p>We process your personal identity number to ensure that you are the right person when administering the grant agreement.</p>

Retention period: Balder hands over the grant agreements to the relevant tenant-owners' association in connection with the takeover meeting. In connection herewith, data controllership is transferred from Balder to the tenant-owners' association.

However, data in supporting documents will be stored at Balder for our accounting purposes in accordance with what is stated below.

Send surveys after taking possession

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Investigate and evaluate our sales process. 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Address Your survey responses 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to follow up, evaluate, and improve our sales process.</p>

Retention period: The data is anonymised within six weeks of the completion of the survey.

Administrative and technical management of the tenant-owners' association - until the takeover meeting

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> Manage the administration of the tenant-owners' association, such as drawing up membership and apartment lists, fees, applications for subletting, and board work. Manage technical administration of the tenant-owners' association, such as error reports and disturbances. Enter into agreements on behalf of the tenant-owners' association. 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Personal identity number Specific object and information about the residence Information in board minutes Other information you choose to provide us with 	<p><i>Balancing of interests</i></p> <p>Necessary for our legitimate interest in administering the relationship with the tenant-owner before the takeover meeting has been held and fulfill a legal obligation that the association has under the Tenant Ownership Act.</p> <p>We process your personal identity number to ensure that you are the right person in matters where necessary.</p>

Retention period: Balder provides the personal data to the relevant tenant-owners' association in connection with the takeover meeting. In connection herewith, data controllership is transferred from Balder to the tenant-owners' association.

Carry out inspections

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> To carry out an inspection of the property and the individual residences. 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Specific object Information that emerges during the inspection 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to carry out an inspection.</p>

Retention period: We delete your personal data for this purpose after ten years or, at the latest, when any dispute regarding errors has been settled.

Insurance, warranty matters and legal cases

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> To handle insurance and warranty matters. To administer, initiate, and defend legal cases. 	<ul style="list-style-type: none"> Name Contact details (email and telephone number) Personal identity number Information about the specific object and the matter 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to fulfil our warranty obligations and necessary for our legitimate interest in looking after and defending legal claims and fulfilling our obligations related to warranty commitments.</p> <p>We process your personal identity number to ensure that you are the right person in connection with insurance, dispute, and warranty matters.</p>

Retention period: We delete your personal data based on this purpose when the warranty period has ended, which is normally ten years after taking possession of the housing project. If a dispute has arisen, we will process your personal data until the dispute is finally settled.

Fulfill accounting obligations

Purpose of the processing	Personal data being processed	Lawful basis
<ul style="list-style-type: none"> To fulfill our legal obligations regarding accounting. 	<ul style="list-style-type: none"> Supporting documents 	<p><i>Legal obligation</i></p> <p>To fulfil our legal obligations under the Swedish Accounting Act. For this purpose, each respective company within Balder's group is the data controller for their accounting. The tenant-owners' association is also a separate data controller for processing linked to its accounting obligation.</p>

Retention period: We delete your personal data based on this purpose seven years after the end of the calendar year in which the financial year ended.

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.

With whom do we share your personal data?

We share your personal data with companies within the Balder Group and with our partners and suppliers in the manner described below.

- We share your personal data with the company within Balder's group that owns the project and to the tenant-owners' association established in connection with the project. Prior to the takeover meeting, Balder is also the data controller for the processing that takes place within the tenant-owners' association.
- If we engage brokers in connection with the sales process, we share information about you as an interested party with the broker in question.
- In order to have a functioning IT system and telephony and to conduct our business efficiently, we share your personal data with our IT and call center suppliers who process your personal data on our behalf and according to our instructions.
- If you have given your consent, we share your personal data with a third party who provides us with additional information about you as an interested party.
- Public authorities and courts when we have a legal obligation to do so or in cases where we have a legal claim.
- Companies responsible for managing your residence.
- Insurance companies in the event of an insurance matter.

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 29 October 2021.