O BAL DER

Privacy Policy Renting to individuals

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 in connection with the renting of a residence, parking space, garage, and storage unit.

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, and information you need to provide in connection with your application. Usually, we receive the personal data from our partner HomeQ, where you filed your application, but in some cases we also collect data directly from you or from others, for example, from your references or if you are listed as a co-applicant.
- We have compiled <u>detailed information in tables</u> 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.
- <u>Your personal data is processed by us within the Balder Group.</u> 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.
- 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 you apply for a residence, garage, parking space, or storage unit with us or contact us while you are a tenant and sometimes afterwards, 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 you conclude a tenancy agreement with 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

If we are in contact with you during the time you apply for and enter into a rental agreement for a residence, garage, parking space, or storage unit with us, we process the personal data you provide to us through HomeQ and our other communications with you. In some situations, we process your personal data when we receive information from references that vou have provided.

Residential Rental Application		
Purpose of the processing	Personal data being processed	Lawful basis
To handle the administration related to your application to rent a residential apartment, including assessing the applicant's suitability. If you have linked your account to a co-applicant or guarantor, their personal data will also be processed.	 Name Contact details Personal identity number Personal letter Current form of housing and existing landlord, if any How many people live in the household If you own any real property unit Income and any allowances UC Employment contract and payslip Queuing time at HomeQ Other information you provide in your personal letter 	Balancing of interests Our legitimate interest is to assess your application to conclude a tenancy agreement We process your personal identity number because it is necessary to ensure that you are the right person.

Retention period: We will stop processing your personal data for this purpose when you, as an applicant, have notified us that you no longer desire a residence or are not offered the residence in question. Usually also when you have obtained a residence, but then the personal data will be processed for other purposes as you have become our tenant.

Viewing of residence		
Purpose of the processing	Personal data being processed	Lawful basis
To enable viewing of the residence.	NameContact details	Balancing of interests Our legitimate interest is to show you the residence you are interested in

Retention period: We will stop processing your personal data for this purpose when you, as an applicant, have notified us that you no longer desire a residence or are not offered the residence in question. Usually also when you as an applicant have obtained a residence or that viewing has taken place. If a tenancy agreement is concluded, the personal data will continue to be processed for other purposes.

Conclusion of a residential tenancy agreement		
Purpose of the processing	Personal data being processed	Lawful basis
To manage and conclude a residential tenancy agreement with you. If you have a co-applicant or a guarantor, their personal data will also be processed.	 Name Contact details Personal identity number Any information on deviations from our rental policy 	Balancing of interests Our legitimate interest is to conclude a residential tenancy agreement We process your personal identity number because it is necessary to ensure that we conclude the agreement with the right person

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 space/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.	 Name Contact details Personal identity number UC, where applicable Place in the queue, where applicable 	Balancing of interests Our legitimate interest is to conclude a tenancy agreement with you We process your personal identity number because it is necessary to ensure that we conclude the agreement with the right person

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 your residence, garage, parking space, or storage unit.	 Name Number of keys Power of attorney for another to sign for the keys, if applicable 	Balancing of interests Our legitimate interest is to fulfil the tenancy agreement

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.

While you are renting a residence from us

In connection with renting a residence, garage, parking space, or storage unit from us, we process your personal data in accordance with the following.

Communication & mailings to you, e.g. via Mitt Balder		
Purpose of the processing	Personal data being processed	Lawful basis
In order to provide you with relevant information and communicate with you.	 Name Contact details Current residence, such as object number 	Balancing of interests Our legitimate interest is to be able to communicate with you as a tenant

Retention period: We process your personal data for this purpose for as long as your tenancy agreement is valid.

Payments & notices		
Purpose of the processing	Personal data being processed	Lawful basis
To manage and administer payments and rental invoices.	 Name Contact details Current residence, such as contract number and object number Data from direct debit notification, if any 	<i>Balancing of interests</i> Our legitimate interest is to fulfil the agreement.
To manage and administer direct debit payments.	NameContact details	Balancing of interests

	 Personal identity number Current residence, such as contract number and object number Bank, clearing number, and bank account number 	Our legitimate interest is to enable and administer direct debit payments. We process your personal identity number to ensure secure identification in connection with the administration of direct debit payments.
To manage and administer unpaid rental fees and debt collection.	 Data from the tenancy agreement and unpaid rental invoices Information regarding the unpaid rental fees that emerges from discussion with you as a tenant 	Balancing of interests Our legitimate interest is to establish and make legal claims. We process your personal identity number to ensure that you are the right person.

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. The data is saved for this period due to our accounting obligation.

Data processed for direct debit ceases to be processed when you no longer use direct debit.

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

Digital boards, entry phone, access control system & booking system		
Purpose of the processing	Personal data being processed	Lawful basis
To manage and administer which residents are inside the property.	 Name Apartment number The telephone number connected to the entry phone (not displayed to visitors) 	Balancing of interests Our legitimate interest is to enable visits and to display who lives in the property in the stairwell.
To manage and administer access control systems within the property.	 Apartment number Tag number Logs	Balancing of interests Our legitimate interest is to administer the access control system in the property.
To manage and administer booking systems within the property, such as the laundry room.	 Apartment number Tag number Logs	Balancing of interests Our legitimate interest is to administer booking systems and provide you with access to shared facilities.

Retention period: We will delete your personal data for this purpose if you move out of the residence. Logs are deleted after four weeks.

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.	 Name Contact details Current residence, such as object number Information that you provide us on the matter Information provided by us or others on our behalf during the handling of the matter 	<i>Balancing of interests</i> Our legitimate interest is to fulfil the tenancy agreement

Retention period: We delete your personal data for this purpose no later than five years after the matter has been handled.

Exchanges & transfers		
Purpose of the processing	Personal data being processed	Lawful basis
Exchange of residence with another Balder tenant To process your application for exchange of residence and to verify whether our requirements for exchange of residence are met. We process data from both you as the moving tenant and the proposed tenant	 Name Contact details Personal identity number and population registration certificate Current residence Which residence you wish to move to Reasons for exchange of residence Desired exchange date Annual income and employer's certificate of the proposed tenant Direct debit notification, if any Declaration of truth 	Balancing of interests Our legitimate interest is to process and evaluate your application for exchange of residence with another tenant of ours. We process your personal identity number to ensure that the exchange is made with the right person.
Transfer to third party To process your application for the transfer of your residence to a third party and to verify compliance with our requirements for the renting of a residence. We also process data about the proposed tenant as well	 Name Contact details Personal identity number and population registration certificate Current residence New address 	Balancing of interests Our legitimate interest is to process and evaluate the application for transfer of a rental residence. We process your personal identity number only when it is clearly justified by the purpose of the processing.

as their references and employer.	 Removal date Reasons for transfer Employer's certificate Direct debit notification, if any 	
Change to another Balder residence To process your application for change to another residence and to verify whether our requirements for exchange of residence are met. If you have a co-applicant or a guarantor, personal data relating to them will be processed.	 Name Contact details Personal identity number Current residence Number of persons in the household Occupation time in residence provided by us Information about deviations from our rental policy 	Balancing of interests Our legitimate interest is to process and evaluate the application for change to another residence. We process your personal identity number to ensure that we conclude the agreement with the right person.

Retention period: We will delete 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.

Administration of subleasing		
Purpose of the processing	Personal data being processed	Lawful basis
To process your application for subleasing and to verify whether our requirements for subleasing of residence are met. We also process data regarding the proposed subtenant and their references.	 Name Contact details Personal identity number Current residence Current rental fee Reasons for the subleasing and documents supporting such reasons Address during the rental period Reference, such as contact details and the information provided by the reference regarding the proposed tenant Direct debit notification, if any 	Balancing of interests Our legitimate interest is to process and decide on your application for subleasing. We process your personal identity number to ensure that we conclude an agreement with and process the application for the right person.
To manage and investigate cases of illegal subleasing.	 Name Current residence, such as contract number and object number Information to support suspected illegal subleasing 	Balancing of interests Our legitimate interest is to establish and make legal claims.
Retention period: We will delete 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.

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.

Disturbance cases		
Purpose of the processing	Personal data being processed	Lawful basis
To manage and administer disturbance cases in our properties. The data is processed both regarding the person suspected of committing the disturbance and regarding the person reporting the disturbance.	 Data from the tenancy agreement to be able to charge the cost of the call-out/visit to the person who committed the disturbance Name Contact details Description of the disturbance 	<i>Balancing of interests</i> Our legitimate interest is to receive reports and handle disturbance cases

Retention period: We delete 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.

Accounting obligation		
Purpose of the processing	Personal data being processed	Lawful basis
In order for us to be able to fulfill our legal obligations regarding accounting.	 Supporting documents for payments 	Balancing of interests Our legitimate interest is to be able to fulfil our legal obligations pursuant to the Swedish Accounting Act.

calendar year in which the financial year ended.

Termination of tenancy agreement

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

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

Termination of the tenancy agreement by the tenant To process a termination of the tenancy agreement by you as a tenant.	 Name Contact details Personal identity number Current residence or rental object, such as contract number and object number Removal date If there is a garage, parking space, or storage unit 	Balancing of interests Our legitimate interest is to administer your termination of the tenancy agreement and to establish and exercise legal claims. We process your personal identity number to ensure that you are the right person in connection with the termination of the tenancy agreement.
Termination of the tenancy agreement by Balder To administer and manage terminations of the tenancy agreement due to neglect or for other reasons.	 Name Contact details Personal identity number Current residence, such as contract number and object number Removal date If there is a garage, parking space, or storage unit Reason for the termination 	Balancing of interests Our legitimate interest is to administer our termination of the tenancy agreement and to establish and exercise legal claims. We process your personal identity number to ensure that you are the right person in connection with the termination of the tenancy agreement.

Retention period: We delete your personal data for this purpose as soon as the termination is finally processed and there are no outstanding claims.

Removal inspection		
Purpose of the processing	Personal data being processed	Lawful basis
To administer and manage the preliminary inspection and final inspection when vacating a residence.	 Name Current residence, such as contract number and object number Date of inspection Notes from the inspection 	<i>Balancing of interests</i> Our legitimate interest is to establish and exercise legal claims.

Retention period: We delete your personal data for this purpose as soon as there are no outstanding claims.

Return of keys		
Purpose of the processing	Personal data being processed	Lawful basis
To manage and administer the return of keys.	NameNumber of keysSignature	Balancing of interests Our legitimate interest is to administer and ensure the return of keys.

 Power of attorney for another person to return the keys on your behalf, if applicable 	
---	--

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

Showing the residence to a new tenant		
Purpose of the processing	Personal data being processed	Lawful basis
To administer and manage the viewing of your property to a potential new tenant physically or via video.	Contact detailsFilm from the residence	Balancing of interests Our legitimate interest is to show the apartment to conclude an agreement with a new tenant.

Retention period: We delete your personal data for this purpose as soon as the viewing is completed or, at the latest, when the residence is rented to a new tenant. We also delete your personal data for this purpose if you withdraw your consent.

Provide reference at your request		
Purpose of the processing	Personal data being processed	Lawful basis
To provide reference data upon your request as former tenant.	 Name Reference data about you as former tenant 	Balancing of interests Our legitimate interest is to accommodate your request to receive reference data about you as former tenant from us

Retention period: We delete your personal data for this purpose as soon as the reference data has been provided.

Accounting obligation		
Purpose of the processing	Personal data being processed	Lawful basis
In order for us to be able to fulfill our legal obligations regarding accounting.	 Supporting documents for payments 	Balancing of interests Our legitimate interest is to be able to fulfil our legal obligations pursuant to the Swedish Accounting Act.

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.

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 residence, 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, maintenance emergency services, 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 a number of situations, we disclose personal data to public authorities, such as providing information to the Swedish Tax Agency, Försäkringskassan and the Enforcement Authority, to Social Services in connection with a report of concern, 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), <u>www.IMY.se</u>.

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