

Privacy Policy

Shareholders, Directors, and Persons with insider information

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 a shareholder, if you have a role in which you access insider information, and if you are a member of one of our boards of directors, e.g., a member of a construction board of directors in one of our new construction projects or in one of our companies.

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.

- Depending on your relationship with Balder and the information you have accessed, we process your personal data. We collect some personal data directly from you and some personal data we obtain from others, for example from the Swedish Central Securities Depository, Euroclear. 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 to carry out our work and comply with our obligations, we may need to share your personal data with other companies in certain situations, such as our IT suppliers who provide our insider portal.
- [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 are registered in our insider list or when you hold shares in Fastighets AB Balder.

For obligations under company law, each respective company within the Balder Group is the data controller for the processing required by each respective company for legal compliance.

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.

For you with insider information

Personal data in the insider portal		
Purpose of the processing	Personal data being processed	Lawful basis
To enable us to log the persons who have access to insider information for the purpose of combating insider trading and to inform you about our insider portal.	<ul style="list-style-type: none"> Name and surname at birth Contact details Personal identity number Current place of work and title Related parties and children living at home What information you have access to Other companies linked to you 	<p><i>Legal obligation</i></p> <p>The processing is necessary for us to fulfil a legal obligation under the Market Abuse Regulation (and supplementary legislation).</p> <p>We process your personal identity number due to the importance of secure identification. We need to know that the right person is registered on our insider list.</p>
<p>Retention period: We will delete your personal data for this purpose after five years from public disclosure or from the termination of the project to which the insider information relates.</p> <p>If you have permanent access to insider information because of your role, the data will be saved as long as you hold a post or position that means you always have access to insider information.</p>		

For you as a shareholder or proxy

Personal data processing pursuant to company law		
Purpose of the processing	Personal data being processed	Lawful basis
Fulfil our obligations towards you as a shareholder under the Articles of Association and the Companies Act.	<ul style="list-style-type: none"> Name Address Personal identity number Shares: which company, number of shares, and type of shares Number of votes 	<p><i>Legal obligation</i></p> <p>The processing is necessary for us to fulfil our obligations towards you as a shareholder under the Companies Act.</p> <p>We process your personal identity number due to the importance of secure identification. We need to know that the right person is</p>

		registered as owner.
<p>Retention period: We delete your personal data for this purpose ten years after the company has been dissolved.</p>		

Administering invitation to general meeting		
Purpose of the processing	Personal data being processed	Lawful basis
To invite and administer the registration for and participation in the general meeting.	<ul style="list-style-type: none"> • Name • Address • Contact details • Personal identity number • Information on shareholding: which company, number of shares, and type of shares • Number of votes • Information on power of attorney, if any 	<p><i>Legal obligation</i></p> <p>The processing is necessary for us to fulfil a legal obligation under the Companies Act.</p> <p>We process your personal identity number due to the importance of secure identification of you as a shareholder.</p>
<p>Retention period: We delete your personal data for this purpose as soon as the general meeting is completed. However, if required by applicable law, data may be saved for a longer period of time, e.g., personal data in the share register must be saved for ten years after the company has been dissolved.</p>		

Hold a general meeting		
Purpose of the processing	Personal data being processed	Lawful basis
Organise the general meeting and administer your participation and subsequent work.	<ul style="list-style-type: none"> • Name • Address • Contact details • Personal identity number • Information on shareholding: which company, number of shares, and type of shares • Number of votes • Information on how you voted and the voting list (if it is possible to link the votes to you) • Information in minutes • Information in power of attorney if 	<p><i>Legal obligation</i></p> <p>The processing is necessary for us to fulfil a legal obligation under the Companies Act.</p> <p>We process your personal identity number due to the importance of secure identification of you as a shareholder.</p>

	you voted by proxy	
<p>Retention period: We save such data that is only needed to conduct the general meeting until the general meeting is completed.</p> <p>Some of your data will be processed for longer than this if required by law, e.g., information in minutes is saved until further notice.</p>		

Voting by proxy		
Purpose of the processing	Personal data being processed	Lawful basis
Enable shareholders to vote by proxy at the general meeting.	<ul style="list-style-type: none"> Information in the power of attorney about you as proxy, such as your name, address, telephone number, email address, personal identity number, and information about the shareholder you are representing 	<p><i>Legal obligation</i></p> <p>The processing is necessary for us to fulfil a legal obligation under the Companies Act.</p>
<p>Retention period: We save such data that is only needed to conduct the general meeting until the general meeting is completed</p> <p>Some of your data will be processed for longer than this if required by law, e.g., information in minutes is saved until further notice.</p>		

Compilation of shareholders in interim reports		
Purpose of the processing	Personal data being processed	Lawful basis
To provide information on the ten largest shareholders in interim reports.	<ul style="list-style-type: none"> Name Participating interest 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to provide information about Balder's ten largest shareholders.</p>
Obtain information on participating interest from the Swedish Central Securities Depository, Euroclear.	<ul style="list-style-type: none"> Personal identity number Name Participating interest 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to obtain shareholder information.</p> <p>We process your personal identity number because of the importance of secure identification and to link holdings with the right person.</p>
<p>Retention period: We delete your personal data based on this purpose in the seventh year after the end of the calendar year in which the financial year ended.</p>		

For you as a director or authorised signatory

Administration of the Board		
Purpose of the processing	Personal data being processed	Lawful basis
To appoint a board of directors, implement corporate changes and carry out the board work, such as construction boards in our new construction projects.	<ul style="list-style-type: none"> • Name • Contact details • Address • Personal identity number • Other information from board minutes or other documents 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to fulfil our obligations, conduct our business activities, and create effective boards of directors.</p>
<p>Retention period: Information on directors is stored in minutes and documentation, e.g., information on who has participated and made decisions. For construction boards in new construction projects, personal data at Balder is generally purged at the takeover meeting.</p> <p>Some of your data will be processed for longer than this if necessary to conduct our business or required by law, e.g., information in minutes is saved until further notice.</p>		

Sign agreements (authorised signatories and authorisations)		
Purpose of the processing	Personal data being processed	Lawful basis
To administer authorisations to conclude agreements.	<ul style="list-style-type: none"> • Name • Address • Personal identity number • Which organisation the individual is a signatory for • Powers of attorney, if any 	<p><i>Balancing of interests</i></p> <p>Our legitimate interest is to be able to manage who is authorised to conclude agreements.</p>
<p>Retention period: Updated continuously but processed for as long as necessary to conduct our business activities and for the duration of the agreement in question.</p> <p>We will process some of your data for longer than this if required by law.</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 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 our IT suppliers, recipients of our interim reports, and with public authorities when we are obligated to do so. See more information below.

- If you are registered on our insider list, the IT supplier of our insider portal will process your personal data as our data processor. See the purpose of the insider list.
- Finansinspektionen in cases where they request our insider list. See the purpose of the insider list.
- To have a functioning IT system and to conduct our business efficiently, we share your personal data with our other IT suppliers, who process your personal data on our behalf and according to our instructions.
- If you are a director on a construction board in one of our new construction projects, we will share your personal data with the tenant-owners' association. See the purpose of board administration.

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 in relation to our personal data processing

You have certain 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 telephone number) 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.