

HUFVUDSTADEN
PRIVACY POLICY
March 14, 2022



1. GENERAL

This privacy policy describes how the Hufvudstaden AB Group, corporate identity number 556012–8240, NK 100, 111 77 Stockholm, collects, uses, discloses and stores personal data.

1.1 This privacy policy applies when Hufvudstaden undertakes communication activities and customer promotions.

1.2 With this privacy policy, we want to demonstrate how we ensure that personal data is processed in accordance with current personal data legislation.

2. PERSONAL DATA RESPONSIBILITY

Hufvudstaden AB is responsible for the personal data it collects.

3. WHEN DO WE PROCESS PERSONAL DATA?

Hufvudstaden collects and processes personal data having received consent from recipients of communication and customer promotions.

4. WHAT PERSONAL DATA DO WE PROCESS?

Hufvudstaden collects and processes the following personal data:

- Names
- Email addresses

5. WHY DO WE PROCESS PERSONAL DATA?

Hufvudstaden processes personal data for various purposes. Hufvudstaden mainly processes personal data in order to:

- Provide information and perform direct marketing
- Provide relevant information and customised promotions in newsletters and online
- Improve our offering, for example through the development of services and functions

Data may also form the basis of market and tenant analyses, market surveys, statistics, business follow-up and the improvement of business activities.

6. THE LEGAL BASIS AND PURPOSES FOR PROCESSING PERSONAL DATA

Hufvudstaden bases its processing of personal data on the legal definition of consent.

If you submit personal data via forms on the Hufvudstaden website or in other channels, these will be used to market Hufvudstaden's, our partners' or the Group's goods, services and promotions and to send invitations to seminars and events. Personal data is stored as long as valid consent exists.

7. PROFILING

7.1 Hufvudstaden may process personal data through profiling for marketing purposes. Information is analysed about how recipients use our services and promotions and which of our services and promotions recipients are interested in, which of our newsletters recipients interact with and which of our events recipients have signed up to receive promotions that we believe are suitable and to invite recipients to future events.

7.2 Recipients may object to the processing of personal data through profiling at any time by contacting Hufvudstaden customer service or the trustee. Once Hufvudstaden has received such a notification, Hufvudstaden will cease to process personal data for this purpose.

8. HOW LONG DO WE STORE DATA?

Personal data is only stored for as long as there is a need to do so, or as long as there is valid consent to fulfil the purposes for which the data was collected in accordance with this privacy policy.

9. TO WHOM DO WE DISCLOSE PERSONAL INFORMATION

9.1 Hufvudstaden may disclose personal information to third parties, such as Hufvudstaden Group companies and other partners.

9.2 Hufvudstaden never transfers personal data to countries outside the EU/EEA.

9.3 We do not sell personal data to third parties.

10. CHANGES TO THIS POLICY

Hufvudstaden reserves the right to make changes to this privacy policy as it is presented here.

11. PROTECTION OF PERSONAL DATA

It is important that people always feel safe when they submit personal data to us on our website or in other channels. Hufvudstaden has therefore taken the necessary security measures to protect personal data from unauthorised access, alteration, and deletion.

12. YOUR RIGHTS

12.1 Hufvudstaden is responsible for ensuring that personal data is processed in accordance with applicable legislation.

12.2 Hufvudstaden will, on request or on its own initiative, correct, deidentify, delete or supplement data that is discovered to be incorrect, incomplete, or misleading.

12.3 You have the right to request:

- a. Access to your personal data. This means that you have the right to request an extract from the register of the processing we carry out regarding your personal data.
- b. Correction of personal data. We will, on request, correct incorrect or incomplete your personal data we process as soon as possible.
- c. Deletion of personal data. This means that you have the right to request the deletion of your personal data if it is no longer necessary for the purpose for which it was collected.
- d. Purpose limitation. This means that personal data is designated such that it may only be processed for certain limited purposes.

12.4 Hufvudstaden will notify each recipient to whom personal data has been disclosed in accordance with point 9 above if any corrections or deletion of personal data and limitation of processing of data occurs.

12.5 You have the right to data portability. This entails a right to, under certain conditions, obtain and transfer your personal data in a structured, widely used and machine-readable format to another personal data controller.

12.6 You have the right to submit any complaints regarding the processing of personal data to the Swedish Authority for Privacy Protection.

13. CONTACT INFORMATION

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