

## PRIVACY NOTICE - NEWSEC GROUP

### **What is the scope and purpose and with this notice?**

This Privacy Notice (this "Notice") applies to the processing of Personal Data carried out by the Newsec Group ("Newsec"), including Newsec AB, a corporation organized and existing under the laws of Sweden with Company Registration No. 556644-2348, having its principal office at Humlegårdsgatan 14, 114 46 Stockholm, and its subsidiaries performing property asset management and advisory services in the Nordic and Baltic countries (hereinafter referred to as "Newsec", "us" or "we").

This Notice provides information on what Personal Data that is collected about you, why the Personal Data is collected, how the collected Personal Data is used and your rights as a Data Subject. The purpose is to protect your rights as Data Subject, ensure equal and secure treatment of your Personal Data and inform you about your rights.

If you are a client, tenant, employee or consultant or a representative or contact person of a service provider, supplier, consultant, real estate owner or any other contracting party, you will have received information separately on how we process your Personal Data.

All processing of Personal Data takes place in accordance with current data protection legislation, including the General Data Protection Regulation 2016/679 ("GDPR").

### **What is Personal Data and processing of Personal Data?**

The term "Personal Data" as used in this Notice is any type of information that, either on its own or together with any other information, can be connected to a living individual, and any other data that qualifies as Personal Data in accordance with the laws applicable to Newsec. Processing of Personal Data means Personal Data that in any form is kept, stored, collected, transferred, disclosed or otherwise handled.

### **What Personal Data do we process and what is the purpose, legal basis and retention time for such processing?**

Newsec only processes and stores Personal Data that we have legal basis for and clear purposes. The general type of data we process, the general purpose and legal basis for the processing and the retention time are described in Appendix 1. In case we process your Personal Data for other purposes than the general ones set out in Appendix 1, we will inform you in accordance with the requirements of GDPR.

## **To what categories of third parties will the Personal Data be disclosed?**

### **Newsec Group Companies**

Newsec carries out business activities in Sweden, Norway, Finland, Denmark and the Baltics. Hence, Personal Data may be transferred to such affiliates and subsidiaries.

### **Companies engaged by Newsec**

Your Personal Data may also be transferred to and processed by third party providers and suppliers which perform services for Newsec (data processors), to enable these companies to perform the services requested by Newsec. Such services may be recruitment services, marketing services and IT services (such as CRM system providers). We enter Data Processing Agreements with all our data processors and only necessary Personal Data will be provided to these companies.

## **Is your Personal Data transferred to countries outside EU/EES (a "third country")?**

We do not transfer your Personal Data to a third country. However, when you visit our webpages, we use cookies that can carry data that can be traced back to you as individual. Such data can be transferred to a third country, provided you have explicitly consented to the transfer. You can always change or withdraw a cookie consent. For more information, please see our cookie policy.

## **Your rights**

You, as a Data Subject, have certain rights relating to how Newsec process your Personal Data. Your rights include:

### **The right to access and rectification**

You have the right to request access to the Personal Data that Newsec processes relating to you, called a register extract. Such a register for instance includes what kind of Personal Data we process about you and what purposes. You also have the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete.

### **Right to erasure**

You have the right to be forgotten and request deletion of your Personal Data when the processing is no longer necessary for the purpose for which it was collected. Note, however, that we will not be able to delete certain Personal Data even if you want to since we sometimes have to save Personal Data, e.g. because we have an agreement with you or

that there are legal obligations we must fulfill. We will delete the Personal Data as soon as we no longer are required to process it.

### **Right to object and restriction**

You can request to restrict the processing of your Personal Data, and to object to the processing of Personal Data on the following basis: if the processing is no longer necessary for the purposes it was collected for or otherwise processed, if you believe the Personal Data may not be correct, if you believe that the processing is unlawful and/or if you have opposed to the processing based on our legitimate interest, where we do not have an overriding interest in relation to your privacy interest. As soon as we become aware of any inaccurate Personal Data being processed, we will always rectify such Personal Data without undue delay and notify you accordingly.

### **Right to Data Portability**

We may provide you with the data that you have submitted to us or that we have received from you in connection with a contract that we have entered with you or where you have given us consent. You will receive your information in a commonly used and machine-readable format that you can transfer to another Controller, where technically manageable.

### **How to exercise your rights**

If you wish to exercise any of your above rights, please contact us at [dataprotection@newsec.com](mailto:dataprotection@newsec.com). Please note that Newsec may contact you and ask you to confirm your identity to ensure that Newsec does not disclose your Personal Data to any unauthorized person. Newsec may ask you to specify your request before Newsec performs any actions. When your identity is confirmed, Newsec will handle your request in accordance with applicable law.

### **What should you do if you have any complaints?**

You can always contact us at [dataprotection@newsec.com](mailto:dataprotection@newsec.com) if you have any questions regarding our processing of your Personal Data.

You always have the right to lodge a complaint with the relevant data supervisory.

Following is a list of the relevant data supervisory authorities where Newsec operates:

- Sweden: The Swedish Authority for Privacy Protection / Integritetsskyddsmyndigheten ([www.imy.se](http://www.imy.se));
- Norway: The Norwegian Data Protection Authority / Datatilsynet ([www.datatilsynet.no](http://www.datatilsynet.no));

- Denmark: The Danish Data Protection Authority / Datatilsynet ([www.datatilsynet.dk](http://www.datatilsynet.dk));
- Finland: The Data Protection Ombudsman/Tietosuojavaltuutetun Tomisto ([www.tietosuoja.fi](http://www.tietosuoja.fi)); and
- Latvia: The Data State Inspectorate / Datu valsts inspekcija ([www.dvi.gov.lv](http://www.dvi.gov.lv))
- Lithuania: The Data State Inspectorate / Datu valsts inspekcija ([www.vdai.lrv.lv](http://www.vdai.lrv.lv))

## Updates to this Notice

In order to ensure that Newsec complies with applicable law, this Notice may be changed by us at any time. Newsec will publish any changes made on our website.

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Latest update on Mar 2022.

**Appendix 1**

**1. General Personal Data Processing List**

Personal Data type and source	Purpose	Legal basis	Retention time or criteria
<p><b>Contact information</b> - i.e. the information provided by you to Newsec such as name, postal address, email address and telephone number. A lot of our communication takes place via telephone or video calls and email, which essentially always entail processing of Personal Data. As a rule, if you take part in a telephone- or video call or sends us an email, you provide us with Personal Data that can be attributed to you as an individual.</p> <p><b>Source:</b> Directly from you</p>	<p>To enable Newsec to administer and respond to requests from website visitors, such as enquires sent to us through our online platform.</p>	<p><b>Contract</b> - we will be able to perform obligations and undertakings in relation to you on which we have a contract or for preparations prior to entering into a contract.</p> <p><b>Legitimate interest</b> - the Personal Data is processed based on a balance of interests. Our legitimate interests of processing your Personal Data is to manage and administer requests and physical visits by you and respond to such initiatives. We consider that our interest in</p>	<p>Newsec will store the information as long as the information is relevant in order to handle your requests or questions.</p>
	<p>To enable Newsec to manage and administer visits in our office premises, and for security reasons.</p>		
	<p>To provide and manage information, products and services which have been requested from Newsec. For example, information related to ongoing projects or questions from the public and related correspondence.</p>		
	<p>To provide information about services to potential clients which Newsec think may be of interest.</p>		
	<p>To evaluate offers from potential suppliers and service providers.</p>		

		processing Personal Data for the purpose outweighs the individual's interest in having their privacy protected.	
<p><b>Information related to job applications</b> - i.e. photo, cover letter, certificates, credentials and resumé.</p> <p><b>Source:</b> Directly from you as a job applicant, or through recruitment services (which you have been informed by).</p>	To administrate and respond to job applications.	<p><b>Legitimate interest</b> - The Personal Data is processed based on a balance of interests. Our legitimate interests of processing your Personal Data is to administrate and respond to job applications. We consider that our interest in processing Personal Data for the purpose outweighs the individual's interest in having their privacy protected.</p>	Newsec will store the information as long as the information is relevant to respond to your application but in no event longer than 24 months after the end of the recruitment process.
<b>Information that we need to be able to fulfil our obligations towards you</b>	Managing the customer relationship and fulfilling the obligations and undertakings that we have towards our customers.	<b>Contract</b> - we will be able to perform obligations and undertakings in relation to	

		you on which we have a contract or for preparations prior to entering into a contract.	
<p><b>Information created by cookies when visiting the website</b> - your IP-address, duration of your visit, number of pages viewed, the choices you make on the website and how you found Newsec.</p>	<p>Your Personal Data is processed for the purpose of ensuring that you as visitor can use the website in the by us intended way and to gather statistics.</p>	<p><b>Legitimate interest</b> - The Personal Data is processed based on a balance of interests. Our legitimate interests of processing your Personal Data is to give you a good user experience when visiting a Newsec website and our commercial interest in receiving information about you as visitor. If you do not want to allow the setting of cookies, you can change the settings of your browser to block cookies.</p>	<p>The time during which we process your Personal Data depends on which cookie that is placed on your browser. Permanent cookies remain on your computer until you delete them, or the expiry date passes and you return to our website. Session cookies do not have an expiration date and are store temporarily on your computer during the time you visit the site. Possible session cookies are removed when you close your browser.</p>