

SkandiaMäklarna's Privacy Policy

Information on the Processing of Personal Data.

General Information

SkandiaMäklarna is one of Sweden's largest real estate brokerage firms with some 500 employees and over 100 offices in Sweden and abroad. SkandiaMäklarna acts as a broker in connection with the purchase and sale of both private homes and commercial properties. This brochure describes the processing of your personal data by SkandiaMäklarna, and its purpose is to describe how we collect, use and screen personal data.

SkandiaMäklarna's offices, i.e. the various franchise companies, (hereinafter referred to as 'SkandiaMäklarna', 'we', 'us', 'our') are jointly data controllers for the majority of the processing described herein. In those cases where the franchisees are not jointly responsible for the processing of personal data, they are instead severally responsible.

Our objective with this brochure is to show you how we ensure that your personal data are processed with respect and in compliance with the applicable data protection laws.

SkandiaMäklarna reserves the right to update or change the content of this brochure at any time.

Who Is the Data Controller?

SkandiaMäklarna is usually the data controller for the majority of the data processing set forth in this Privacy Policy.

A list of our offices and their contact details can be found on the following page: <https://www.skandiamaklarna.se/kontor>.

SkandiaMäklarna has a common e-mail address which you can use with regard to everything that relates to the processing of personal data: dataskydd@skandiamaklarna.se

Purposes and Legal Basis of the Processing

Contact Form, etc. via skandiamaklarna.se

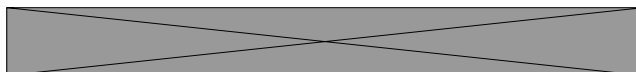
SkandiaMäklarna collects personal data for several different purposes. Forms for, for example, house monitoring, booking of open house, appraisal of existing housing or any other contact, are available to fill in on our website, www.skandiamaklarna.se. The legal basis for such processing is our legitimate interest.

When Participating in an Open House

When holding an open house, it is common for the broker to offer or, (for safety reasons) to demand, that visitors to the open house be registered in a list of visitors or interested parties. Keeping such a list is typically justified by security considerations, with the purpose of giving the broker control of who takes part in the open house and allow them to contact you and other people in order to enquire about your interest in the viewed property. To be able to communicate information about either your property of interest or another property that we think would be suitable for you within the framework of SkandiaMäklarna's business area, your personal data may come to be shared with our various offices. We normally collect the names and telephone numbers of any visitors. The processing of such data is based on legitimate interest, since both the client (seller) as well as SkandiaMäklarna are strongly interested in getting the property sold. The same goes for lists of visitors kept for security reasons, where the seller has a legitimate interest in knowing which persons have visited the property in the event that, for example, any damage has occurred during the open house.

When Selling

We process your personal data when a brokerage agreement is signed between you as a seller and us. This personal data



may include communication with you, publication of details and pictures of the property on www.SkandiaMäklarna.se and websites of any cooperation partners as well as management of everything that has to do with a possible sale. The legal basis for this type of processing is that the processing necessary for fulfilling the obligations incumbent on the broker pursuant to the brokerage agreement and the Swedish Real Estate Agents Act. However, keep in mind that if we process the personal details of any other person than the formal contract party to the brokerage agreement (e.g., a cohabitant who is not co-owner of the property), this other person's personal data will not be processed on the same legal basis. The legal basis for such processing is legitimate interest.

Collecting Facts and Marketing of Properties.

To be able to act as a broker for a property, we need to prepare a property description for the respective property. In connection with this, we need to collect information on, e.g., useful floor area, different types of costs related to the property as well as other information that is necessary to describe the property in the best way possible. Since information related to the property can, in most cases, be attributed indirectly to a physical person, such information constitutes personal data. The legal basis for processing of personal data in relation to fact-gathering and marketing of the property is performance of the brokerage agreement.

Once all facts about the property have been gathered and a property description has been compiled, the information will be published in connection with the marketing of the property. Marketing typically uses a number of channels, e.g., Hemnet, paper magazines or SkandiaMäklarna's common website. Such publication is primarily aimed at fulfilling the obligations that rest on the broker and SkandiaMäklarna pursuant to the brokerage agreement. As regards publication of information about the property, in addition to what is provided for in the brokerage agreement, we also have a legitimate interest in republishing or otherwise taking advantage of the summary, in order to market SkandiaMäklarna. This means that information about the property is published based on two legal bases: performance of (brokerage) agreement and legitimate interest.

Also note that if personal data that are processed for this purpose can be traced back to a person who is not a contractual party, e.g., a cohabitant, the legal basis will then be SkandiaMäklarna's legitimate interest.

Auction

If you take part in an auction, your personal data will be recorded, and thereby processed, when you submit a quote. Pursuant to the Swedish Real Estate Agents Act, each bidder must be recorded in a list of bids, and the list of bids must be handed over to the buyer once the contract is signed. Thus, the processing is necessary for fulfilling a legal obligation.

Contract Signing and Management of Purchase

Once the auction has been carried out and a bidder has become a buyer, the parties (buyer and seller) sign contract. The seller's personal data is processed pursuant to the brokerage agreement and the Swedish Real Estate Agents Act. If there is no formal agreement between us and the buyer, the legal basis for the processing of the buyer's personal data cannot rest on the legal basis of contractual performance. Nevertheless, pursuant to the Swedish Real Estate Agents Act, the broker is under a duty to safeguard the buyer's interest, e.g., to help the buyer draw up the documents required for the assignment. Personal data of buyers are therefore processed upon signing the contract and administration of the purchase because of a legal obligation.

As regards the handling of the deposit, an agreement is signed between the buyer and the seller and then also signed by the broker. Since this is an agreement to which one of our brokers is a formal party, the legal basis for the processing is performance of deposit agreement.

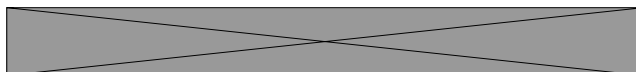
The personal data for the purposes above will be processed during the purchasing process and will then be saved for up to 10 years after the purchase agreement in order to be able to defend, claim and exercise legal claims in the event of a dispute or complaint.

Measures against money laundering and financing of terrorism

Real estate brokers are covered by the Swedish Act on Measures against Money Laundering and Financing of Terrorism (the Money Laundering Act), which means that real estate brokers are, among other things, under a duty to carry out due diligence checks. This is valid for both buyers and sellers. Since the obligation to conduct these checks is statutory, the information is processed for the purpose of fulfilling a legal obligation.

Takeover

On takeover, we may need information about the buyer and



the seller's financial standing, e.g., in order to be able to administer the transfer of the final payment. This means that we may come to process information about the seller's loans, pledges as well as other bank-related details, for example, in order to be able to administer the redemption of loans. The information about the buyer that needs to be processed normally includes the intended type of financing and other information attributable to the financing solution (amount, bank account number), pledge and selection of bank. In pursuance of the Swedish Real Estates Agents Act, the broker is obliged to also safeguard the buyer's interest and therefore processes the buyer's personal data on takeover based on a legal obligation.

Processing the sellers' data for this purpose complies with both the brokerage agreement and the Swedish Real Estates Agents Act.

Future Properties and Direct Marketing

Many times bidders who do not win the particular bidding or open house visitors who do not take part in the bidding are interested in continuing their search for a new home. Thus, such people can be interesting in getting information about similar properties offered by SkandiaMäklarna. Therefore, SkandiaMäklarna has a legitimate interest in keeping a prospective buyers register in order to be able to notify such people (and other people who have expressed interest in a certain type of property) of other properties we offer. The storage period for personal data processed for marketing purposes varies depending on how active or passive relationship we have had with the prospective buyer, but the data are never stored longer than permitted.

It is worth noting that you can always choose to decline our direct marketing by following the unsubscribe link in connection with each such message.

Recruitment

The processing of your personal data in connection with recruitment is based on SkandiaMäklarna's legitimate interest in being able to receive and process applications and evaluate your suitability for the position that you seek. Your consent entitles SkandiaMäklarna to also evaluate your suitability for future employment. We also process personal data so that we can inform you about vacancies and fulfil administrative functions.

Personal data in connection with recruitment is obtained primarily from you, but may come to be combined with

information obtained from other sources, for example, social media for professional purposes and/or your references.

If we opt to hire you, your personal data will be processed in accordance with SkandiaMäklarna's privacy policy for employees.

If SkandiaMäklarna opts not to hire you, your personal data will be erased as soon as the recruitment process is over; however, with reservations for cases where we have obtained your consent to evaluate your suitability for future employment. Read more below about how you withdraw your consent.

Personal Data Obtained from Sources Other Than Yourself

In certain cases, SkandiaMäklarna obtains your contact details from publicly available sources like public registers, e.g., SPAR, in order to offer you some of our services. Such processing is based on our legitimate interest in marketing and selling our services.

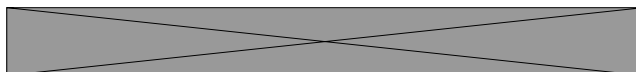
To Whom do We Disclose Your Personal Data?

When we communicate with you, we can come to offer you different services. If you are looking for a home, we can offer you to, for example, create a user account for you at one of cooperation partners dealing with brokerage of housing. Other times we can come to forward your contact details and information, if you have recently made a purchase or sale through SkandiaMäklarna, to companies in the energy and inspection industry so they can offer you affordable services for your new home.

We can come to use your e-mail address for the purpose of marketing us and our products to other potential customers. We do this by forwarding your e-mail address to, for example, Facebook, which in turn offers a service that uses your e-mail address to identify potential new customers via advertising. Note here that we have contractual assurances that your e-mail will not be used for any other purposes than this one.

SkandiaMäklarna is a nationwide organisations of franchisees from across the country. In cases where brokers who belong to different franchisees need to share data with each other, this will also be done in accordance with the common personal data liability that is incumbent on SkandiaMäklarna.

Transfers Outside EU/EEA



SkandiaMäklarna uses a supplier from outside the EU/EEA (so-called third countries) for the processing of personal data. We have taken the requisite measures to ensure that your personal data are protected by approved mechanisms during such transfers to third countries, which quite specifically means that we have applied standard contractual clauses adopted by the EU Commission (see here). If further transfers of data to recipients in third parties in the future become relevant, such transfers will also naturally be protected through approved safeguard mechanisms.

You are welcome to contact us if you would like to have more information on transfers to third countries or if you would like to get acquainted with the security measures we have adopted.

How long are the personal data kept for?

We do not keep your and other people's personal data longer than what we need them for, whether based on our or on somebody else's legitimate interest, performance of agreement or statutory reasons. SkandiaMäklarna continuously works to erase personal data from the system when such data are no longer needed. We also take measures to gradually restrict access to personal data after the conclusion of a brokerage agreement. The purpose of the processing is decisive for determining how long the information will be kept for and under what certain circumstances we need to keep the data longer.

The criteria applied for determining how long the data will be kept for have been accounted in the sections above. Below you will find how long this time will be for most types of processing that you may come to be subjected to.

- We will keep your personal data for marketing purposes for as long as we have a legitimate interest in this, however, not longer than one (1) year after the latest marketing measure.
- In pursuance of the Swedish Real Estate Agents Act, deeds, bookkeeping and other documentation pertaining to the brokerage engagement are kept for seven (7) years after the end of the brokerage engagement.
- Based on the legitimate interest of being able to establish, claim and defend legal claims, deeds, bookkeeping and other documentation pertaining to the brokerage engage-

ment are kept for ten (10) years.

- In pursuance of the Swedish Act on Measures against Money Laundering and Financing of Terrorism (2009:62), measures for preventing money laundering are kept for five (5) years.

What rights do you have with regard to the processing of your personal data?

Right to Access (Also Referred to as register extract).

SkandiaMäklarna are open and transparent about how we process your personal data. If you would like to ascertain how we process your personal data, you can request that you obtain such a record, including information about the purpose of the processing, categories of personal data, categories of recipients, storage periods, information about the source for the information and existence of automated decision-making.

Please note that if we receive such a request, we can come to ask you for additional information to ensure the safe and effective handling of your request and that the information is provided to the right person.

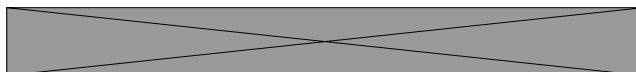
Right to Rectification.

If you discover that the data are inaccurate, you can request that your personal data be rectified. Within the framework of the stated purpose, you are also entitled to add any incomplete personal data.

Right to Erasure.

You may request the erasure of the personal data we process with regard to you in the following cases:

- if the data are no longer necessary for the purposes for which they have been collected or processed.
- if you object to a processing that we conduct based on our legitimate interest, where the reason for your objection weighs more heavily than our legitimate interest.
- if you object to data processing for direct marketing purposes.
- if the personal data are processed unlawfully.
- if the personal data must be erased to fulfil a legal obligation to which we are subject to.
- if personal data have been collected about a minor (under 18 years of age) that you have parental responsibility for, and
- if the personal data have been collected in relation to an offer of information society services (e.g. social media).



Please note that we cannot erase data, which we must keep in order to fulfil a legal obligation resulting from, for example, the bookkeeping, tax or money laundering legislation. Processing may also be necessary to be able to determine, claim or defend legal claims.

Right to Restriction of Processing.

If you contest the accuracy of the personal data we are processing, you may request a restriction of processing for the period that we need to verify the accuracy of the personal data. Erasing data constitutes processing of personal data within the meaning of the law, and if we no longer need your personal data, but you need them/need us to keep them in order to be able to establish, claim or defend a legal claim, you can request that we do not erase your data.

If you object to a processing that is based on our or anyone else's legitimate interest, you can request a restriction of processing for the period of time that we need the information in order to determine whether our or anyone else's legitimate interest outweighs your interest in having the data erased.

Right to Data Portability.

If we process your personal data based on either your consent or the performance of an agreement, you are entitled to request to have the data that relates to you, and that you have provided to us, transferred to another data controller.

A prerequisite for this data portability is that the transfer be possible and can place automatically.

Right of Objection

If the legal basis for a processing is based on our or anyone

else's legitimate interest, you are always entitled to object to the processing. In order to be able to continue to process personal data on the basis of a legitimate interest, we need to be able to demonstrate a legitimate reason for the respective processing that outweighs your interests, rights and freedoms. For example, you are always entitled to avoid direct marketing.

You can revoke your consent at any time

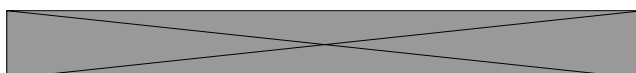
If a processing of your personal data is based on consent, you may revoke this consent at any time whatsoever. The revocation of consent will not affect the lawfulness of processing of the personal information that is based on this consent until it has been revoked. To revoke it, contact us on the telephone or by e-mail.

You are always entitled to file a complaint with the Swedish Data Protection Authority or a corresponding supervisory authority

The Swedish Data Protection Authority is the supervisory authority that is entitled to supervise and administer data protection legal cases in Sweden. If you want to file a complaint about how we process your personal data, you can turn to the Swedish Data Protection Authority, www.datainspektionen.se.

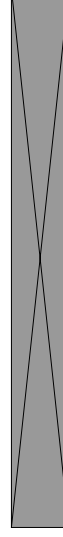
List of types of personal data processing which are SkandiaMäklarna's responsibility

Note that list may come to be updated or modified at any time.



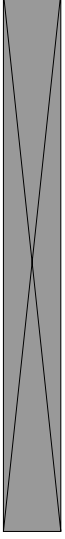
Client (seller)

Purpose	Personal data	Storage time	Time	Legal basis
Direct marketing	E-mail address, telephone number, address, name	1 year after our most recent contact with you	Since the completion of SkandiaMäklarna's brokerage engagement for the seller	SkandiaMäklarna has, alone or together with cooperation partners, a <i>legitimate interest</i> in sending you quotes for home-related services and products.
Accounting purposes	Name, contact details, information about paid fees and other transactions with the seller.	7 years (kept pursuant to the Swedish Accounting Act (1999:1078))	From the end of the calendar year when the respective financial year has ended.	The processing is necessary so we can fulfil a <i>legal obligation</i> .
Measures for preventing money laundering and financing of terrorism	Name, account details, personal ID number, contact details and copy of ID document.	5 years (kept in pursuance of the Swedish Act (2009:62) on Measures against Money Laundering and Financing of Terrorism)	From instituting the customer due diligence measure.	The processing is necessary so we can fulfil a <i>legal obligation</i> .
Performance of the brokerage engagement, including transfer of purchase price and takeover.	Name, personal ID number, address, e-mail, telephone number, bank account details, information about the home (for example, pictures and sales price)	7 years (the Swedish Real Estate Agents Act (2011:666) with reference to the Swedish Accounting Act (1976:125))	When the purchase agreement is signed between the seller and the buyer.	The processing is necessary so we can perform the brokerage agreement, but also to comply with the Swedish Real Estates Agents Act. Thus, the legal basis is <i>performance of contract</i> .
				As real estate brokers, we also have a legal obligation to provide the information and documents that are requested by the Swedish Estate Agents Inspectorate (FMI) in connection with inspections. Therefore, information attributable to the brokerage engagement for a longer period of time after the engagement has been completed (7 years). Legal basis for such disclosure is <i>legal obligation</i> .



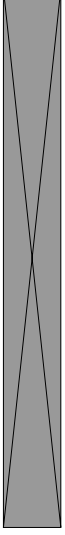
cont. Client (seller)

Purpose	Personal data	Storage time	Time	Legal basis
Performance of the brokerage engagement externally, e.g., publication of the sales price and pictures of the home on our website and the website of our cooperation partners.	Information attributable to the housing, such as address.	1 year However, with reservations for the length of the of brokerage engagement.	From the signing of the brokerage engagement.	The processing is necessary so that we can complete the brokerage agreement. Therefore, the legal basis is <i>performance of contract</i> .
Customer survey	Name, e-mail and telephone number	Until the statistics from the survey have been collected and processed	From the time when you put your answers on the survey form	SkandiaMäklarna has a <i>legitimate interest</i> in studying customer satisfaction for the purpose of quality-assuring our sales process
Marketing of the brand (SkandiaMäklarna) — after the transfer of the home.	Information pertaining to the home, such as address, final price, and the pictures that are used in connection with the brokerage of the home.	Up to 12 months	Since the date of completion of the brokerage engagement.	SkandiaMäklarna has, alone or together with cooperation partners, a <i>legitimate interest</i> in continuing to use information pertaining to the housing for marketing purpose even after the completion of the brokerage engagement.



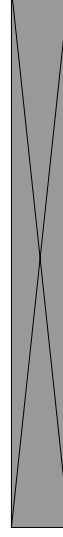
Potential seller/client

Purpose	Personal data	Storage time	Time	Legal basis
Administration of appraisal	Name, address, e-mail, information about the property	1 year	Since the submission of a request for appraisal.	SkandiaMäklarna has a <i>legitimate interest</i> in responding to your request for appraisal.
				When conducting appraisal, it is carried out based on an appraisal agreement signed between you and us, i.e. <i>performance of contract</i> .
Administration of contact/meeting with broker at prospective seller/client's request	Name, e-mail address, telephone number, address	1 year	Since you submit a request for contact.	SkandiaMäklarna has a <i>legitimate interest</i> in responding to your request for contact/meeting with broker (for an engagement agreement).
Direct marketing	Name, e-mail address, telephone number, address	1 year	Since the collection of the data	SkandiaMäklarna has a <i>legitimate interest</i> in making you offers.



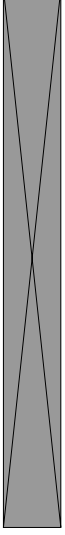
Prospective buyer

Purpose	Personal data	Storage time	Time	Legal basis
Direct marketing	Name, e-mail address, telephone number, address	3-12 months	Since the collection of the data	SkandiaMäklarna has a <i>legitimate interest</i> in making you offers.
Keeping a prospective buyers register and offering properties	Names, e-mail, telephone number	3-12 months	From open house	SkandiaMäklarna and the Seller have a <i>legitimate interest</i> in keeping a prospective buyers register for security reasons, but also for follow-up of interest.
Follow-up and administration after open house	Name, telephone number, e-mail and where applicable, address	3-6 months	From first contact	Based on the prospective buyers register, SkandiaMäklarna has a <i>legitimate interest</i> in contacting you in order to follow up on your interest in the displayed property.
Keeping a list of bids	Name, telephone number, e-mail, submitted bids	7 years (the Swedish Real Estate Agents Act (2011:666) with reference to the Swedish Accounting Act (1976:125))	Since the bidding was concluded	The processing is necessary so we can fulfil a <i>legal obligation</i> .
Administration of contact/meeting/open house with broker at prospective seller/client's request.	Name, e-mail address, telephone number, address	1 year	Since you expressed an interest in purchasing a home.	SkandiaMäklarna has a <i>legitimate interest</i> in responding to your interest in buying a home.



Buyer

Purpose	Personal data	Storage time	Time	Legal basis
Direct marketing	Name, e-mail address, telephone number, address	12 months	From the signing of the purchase agreement	SkandiaMäklarna has, alone or together with cooperation partners, a <i>legitimate interest</i> in sending you quotes for home-related services and products.
Measures for preventing money laundering and financing of terrorism	Account number, name, address, personal ID number, copy of ID document	5 years (kept in pursuance of the Swedish Act (2009:62) on Measures against Money Laundering and Financing of Terrorism)	From instituting the customer due diligence measure.	The processing is necessary so we can fulfil a <i>legal obligation</i> .
Administration of home brokerage	Name, personal ID number, address, e-mail, telephone number and bank details	7 years (the Swedish Real Estate Agents Act (2011:666) with reference to the Swedish Accounting Act (1976:125))	From the signing of the purchase agreement	Processing of personal ID numbers is necessary in relation to the purpose. SkandiaMäklarna and you have a <i>legitimate interest</i> in transferring your home to you. As real estate brokers, we also have a <i>legal obligation</i> to provide the information and documents that are requested by the Swedish Estate Agents Inspectorate (FMI) in connection with inspections. Therefore, information attributable to the brokerage engagement for a longer period of time after the engagement has been completed (7 years). Legal basis for such disclosure is <i>legal obligation</i> .
Customer survey	Name, e-mail and telephone number	Until the statistics from the survey have been collected and processed	From the time when you put your answers on the survey form	SkandiaMäklarna has a <i>legitimate interest</i> in studying customer satisfaction for the purpose of quality-assuring our sales process



cont. buyer

Purpose	Personal data	Storage time	Time	Legal basis
Marketing of the brand (SkandiaMäklarna) — after the transfer of the home.	Information pertaining to the home, such as address, final price, and the pictures that are used in connection with the brokerage of the home.	12 months	Since the date of completion of the brokerage engagement.	SkandiaMäklarna has, alone or together with cooperation partners, a <i>legitimate interest</i> in continuing to use information pertaining to the information attributable to the housing, even after the house has been brokered and the deal has been closed.

