

## Niam Data Privacy Notice

### 1. General

This Data Privacy Notice (this "**Notice**") applies to Niam AB/ Niam AS/ Niam A/S, Niam Oy and any other subsidiary of Niam AB as part of the Niam company group ("**Niam**", "**us**" or "**we**") when we process personal data of persons that visit our webpage or contact us for general queries or other purposes.

If you are a representative of a tenant, investor or service provider, you will have received information separately on how we process your personal data.

Niam processes personal data in accordance with applicable legislation, including the General Data Protection Regulation 2016/679 ("**GDPR**").

We will process the personal data about you that you provide to us when you contact Niam through our website or otherwise interact with us, such as your name, email address, telephone number and other contact information. The use of such personal data is necessary for Niam to be able to respond to your questions, queries or to otherwise communicate with you. We must ask you to never provide any data to us that could be considered sensitive.

We are also using cookies in order to facilitate visits to our website and to be able to provide you with better services when you communicate with us and maintain security. For further information about how we use cookies and similar technologies, please see our cookie policy.

You have certain rights relating to how Niam process your personal data. Your rights include:

- access to and rectification of your personal data;
- objection to the processing of or the restriction of the processing of personal data;
- the right to request deletion of your personal data; and
- the right to data portability, where technically feasible.

Please note that your rights, for example to object and/or delete personal data about you, will vary depending on the processing purpose and our legal ground for processing your data. You can read more about your rights below, and if you have any questions about your rights as stated above, please see further how you can enforce your rights in section 7.

If you have any questions regarding Niam's processing of personal data, you are always welcome to contact Niam's data protection responsible individuals, on the contact details provided below:

Erik Tejler, erik.tejler@niam.se, +46708196838

Stureplan 3, P.O. Box 7693, 103 95 Stockholm, SWEDEN

You always have a right to lodge a complaint with a competent data protection authority if you are dissatisfied with how we process your personal data. See section 10 below.

This Notice includes the following sections:

1. General
2. What is "personal data" and "processing of personal data"?
3. Personal data processed by Niam in relation to external parties
4. How is the personal data processed?
5. To what categories of third parties will the personal data be disclosed?
6. To what countries will my personal data be transferred?
7. What are my rights with regards to my personal data?
8. How do you make use of your rights?
9. How will Niam act when receiving a request?
10. What should you do if you have any complaints?
11. Updates to this Notice
12. Contact details

## 2. What is "personal data" and "processing of personal data"?

The term "**personal data**" as used in this Notice is any piece of information that, either on its own or together with any other pieces of information, can be traced back to a living individual, and any other data that qualifies as personal data in accordance with the law applicable to Niam.

This Notice covers all personal data that is in any form processed, including personal data that is kept, stored, collected, transferred, disclosed or otherwise handled.

## 3. Personal data processed by Niam in relation to external parties

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<b>Contact information</b> - i.e. the information provided by you to Niam such as name, postal address, email address and telephone number.  <b>Source:</b> Directly from you	To enable Niam to administer and respond to requests from website visitors, such as enquires sent to us through our online platform.	Legitimate interest	Niam will store the information as long as the information is relevant in order to handle your requests or questions.
	To enable Niam to facilitate and register visitors in our office premises.		
	To provide and manage information, products and services which have been requested from Niam. For example information related to ongoing projects or questions from the public and related correspondence.		
	To provide information about investments to potential investors which Niam think may be of interest.		

	To evaluate offers from potential suppliers and service providers.		
	To protect, defend or enforce our legal rights, or those of others.		
	To respond to job applications.		
<p><b>Information related to job applications</b> – i.e. photo, cover letter, certificates, credentials and resume.</p> <p><b>Source:</b> Directly from you as a job applicant, or through recruitment services (which you have been informed by).</p>	To enable Niam to administrate job applications and to contact potential recruits.	Legitimate interest	Niam will store the information as long as the information is relevant to respond to your application but in no event longer than 8 months after the end of the recruitment process.
<p><b>IP address and other technical information related to your computer or mobile device</b> – i.e. text or number files collected in cookies placed on your computer or mobile device.</p> <p><b>Source:</b> indirectly from you (from your computer and/or mobile device).</p>	To make our website function and maintain its integrity.	Legitimate interest	Please see our cookie policy for more information.

## 4. How is the personal data processed?

Niam will only process personal data for the purposes for which it was submitted to us and as set out in section 3 above. Niam has taken appropriate technical and organizational measures for the protection of the personal data to ensure that only authorized persons are given access to the personal data.

## 5. To what categories of third parties will the personal data be disclosed?

### Niam Group Companies

Due to the fact that Niam has several affiliates and subsidiaries that carry out business activities in Sweden, Norway, Finland and Denmark, the personal data, depending on the reason for you contacting us, may be transferred to such affiliates and subsidiaries.

### Companies engaged by Niam

Your personal data may also be transferred to and processed by third party providers and suppliers which perform services for Niam (data processors), to enable these companies to perform the services requested by Niam. Services which may be requested include the provision of recruitment services, marketing services and IT services (such as CRM system providers). Only personal data that is necessary to fulfil the purposes stated in section 3, and to be able to handle your request or question, will be provided to these companies. All third party providers and suppliers must follow our instructions and applicable written data processor agreements and any other agreements that are in place between Niam and its third party providers/suppliers, and must implement appropriate technical and organizational measures for the protection of the personal data.

## **6. To what countries will my personal data be transferred?**

A legal entity that receives personal data may be located in a country that offers a lower level of protection for personal data than the country where you live. Personal data may be transferred to a country, that offers a lower level of protection for personal data, but only if it is ensured that the personal data is adequately protected by the receiving parties in such countries.

Personal data that you submit to us will currently not be transferred to third countries.

Should this change, further information regarding the safeguards that are in place to ensure any lawful transfer of the personal data may be requested, please see section 1 for contact details.

## **7. What are my rights with regards to my personal data?**

### **Right to access and rectification**

You have the right to request access to the personal data relating to you. This includes the right to be informed whether or not personal data about you is being processed, what personal data is being processed and the purpose of the processing. You also have the right to rectify or complete personal data if the personal data is inaccurate or incomplete.

### **Right to erasure**

You may also request that your personal data be erased if e.g. the personal data is no longer necessary for the purposes for which it was collected or otherwise processed, if we do not have an overriding legitimate interest to process your personal data any longer and you have objected to the processing based on our legitimate interest, if the personal data have been processed unlawfully by us, or your personal data have to be erased in order to be compliant with a legal obligation under applicable data protection legislation. Please note that we may reject your request if the processing is permitted or required according to applicable law or any other legal ground.

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

You are also entitled to request us to restrict the processing of your personal data, and to object to the processing of personal data if the processing is no longer necessary for the purposes it was collected 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**

If you request access to personal data about you that you yourself have provided and if the personal data is being processed automatically and/or in accordance with a contract between you and Niam, you may request that the data is provided in a structured, commonly used and machine-readable format and you may also request that the personal data is transmitted to another controller, if this is technically feasible.

## **8. How do you make use of your rights?**

Please send an email to the relevant contact person, as specified below in 1, if you want to make a request in relation to the processing of your personal data. Please note that Niam may contact you and ask you to confirm your identity to ensure that Niam does not disclose your personal data to any unauthorized person. Niam may ask you to specify your request before Niam performs any actions.

## **9. How will Niam act when receiving a request?**

Once Niam has confirmed your identity, Niam will handle your request in accordance with applicable law. Please note that even if you object to certain processing of personal data, Niam may still continue this processing if permitted or required to do so by law, for example to enable us to fulfil legal requirements, or fulfil obligations under a contract with you.

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

You always have the right to lodge a complaint with the relevant authority in particular where you live, work or where an alleged infringement of the GDPR has occurred. The relevant authorities in the Nordic are:

Sweden: Integritetsskyddsmyndigheten ([www.imy.se](http://www.imy.se));

Norway: Datatilsynet ([www.datatilsynet.no](http://www.datatilsynet.no));

Denmark: Datatilsynet ([www.datatilsynet.dk](http://www.datatilsynet.dk)); and

Finland: the Finnish Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi))

## **11. Updates to this Notice**

In order to ensure that Niam complies with data protection law, this Notice may be changed by us at any time. Niam will publish any changes made. Please notify Niam of any changes to the personal data relating to you to enable us to process personal data accurately and securely (see contact details below).

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Latest update on October 2022