

# **Retention policy**

#### Svensk Fastighetsförmedling

Svensk Fastighetsförmedling AB and the estate agent branches concerned (together referred to below as "Svensk Fastighetsförmedling") are jointly (joint controllers) responsible for the processing of *customers'*, sellers' and prospective buyers' personal data in accordance with this retention policy. A list of our estate agent branches and contact details for each branch can be found at svenskfast.se/hitta-maklare/ and svenskfast.se/spanien/maklare/.

In some cases, Svensk Fast Utland SL (Spain), N.I.F: B93741676, and the Spanish estate agent branches concerned (below "Svensk Fast Utland") are also joint controllers together with Svensk Fastighetsförmedling AB for processing of customers', sellers' and prospective buyers' personal data. A similar mutual arrangement also exists between Svensk Fastighetsförmedling and Svensk Fast Utland.

However, Svensk Fastighetsförmedling AB is solely responsible for the processing of *users'* personal data at svenskfast.se.

We retain your personal data only for the time necessary for us to be able to fulfil the purposes of our processing of your personal data. Below we state how long we store your personal data for each purpose.

#### **Seller**

When you engage Svensk Fastighetsförmedling to sell your property, we save your personal data as shown below.

Purpose	Information category	Storage time
Management of sale of residential property or service, including communication regarding the assignment, publication of information and photos of the property on our own and partners' websites and administration of downpayments, as well as administration of customer databases	<ul> <li>Name</li> <li>Personal identity number</li> <li>Address</li> <li>Email</li> <li>Phone number</li> <li>Account number</li> <li>Purchase contract, including prospectus</li> <li>Information about the property, such as photos and sales price</li> <li>Communication, e.g. by email</li> </ul>	During the mediation assignment and up to ten years thereafter to establish, exercise and defend legal claims.
Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.	<ul> <li>Email</li> <li>Phone number</li> <li>Address</li> <li>Name</li> <li>Visitor statistics</li> <li>Year of birth</li> </ul>	Our services and products Until the estate agent's assignment for the seller ceases and up to one year thereafter, in order to provide you with up-to- date communications.  Partner services and products If you have registered an interest in such communication, your

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Purpose	Information category	Storage time
		personal data will be stored for this purpose until further notice.  Please note that you always have the right to unsubscribe from the communication, regardless of whose products and services it concerns.
Communication of sales prices and addresses in various channels, e.g. through mailings, publication on our own and partners' websites, and on social media in order to market Svensk Fastighetsförmedling	Information about the property, such as photos and sales price	Until the estate agent's assignment for the seller ceases and up to two years thereafter, in order to communicate sales prices and addresses.
Conducting surveys	<ul> <li>Name</li> <li>Contact details (e.g. email address)</li> <li>Information in the response to the survey</li> </ul>	During the time that the survey is conducted and for a period of three months thereafter in order to compile the results of the survey. We then erase or render anonymous your personal data from the survey.
Implementation of controls to prevent money laundering and terrorist financing	<ul> <li>Name</li> <li>Account number</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Copy of ID document</li> </ul>	Five years from the time the measures to achieve customer due diligence have been taken in order to fulfil our legal obligations under the Swedish Act on Money Laundering and Terrorist Financing (Prevention).  If necessary, in order to prevent, detect or investigate money laundering or terrorist financing, we are also entitled to save your personal data for a further five years.
Insurance mediation pursuant to the Swedish Insurance Distribution Act (2018:1219)	<ul> <li>Name</li> <li>Personal identity number</li> <li>Address</li> <li>Email</li> <li>Phone number</li> <li>Property designation</li> </ul>	Eleven years from ordering insurance, in order to comply with documentation requirements in accordance with applicable regulations from the Swedish Financial Supervisory Authority.



# **Potential seller**

If you contact Svensk Fastighetsförmedling to request valuation of a property or for us to be able to submit offers to you, we will save your personal data as shown below.

Purpose	Information category	Storage time
Managing a request for valuation assignment or sales assignment	<ul> <li>Name</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about the property, e.g. type of property</li> <li>Communication, e.g. by email</li> </ul>	Twelve months from the time you contacted us, in order to process your request.
Conducting valuation assignment	<ul> <li>Name</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about the property, e.g. type of property</li> <li>Communication, e.g. by email</li> </ul>	During the valuation assignment and ten years thereafter, for the purpose of establishment, exercise or defence of legal claims.
Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Visitor statistics</li> <li>Year of birth</li> </ul>	Our services and products Two years from the time you contacted us, in order to provide you with up-to-date communications.  Partner services and products If you have registered an interest in such communication, your personal data will be stored for this purpose until further notice.  Please note that you always have the right to unsubscribe from the communication, regardless of whose products and services it concerns.
Conducting surveys	<ul> <li>Name</li> <li>Contact details (e.g. email address)</li> <li>Information in the response to the survey</li> </ul>	During the time that the survey is conducted and for a period of three months thereafter in order to compile the results of the survey. We then erase or render anonymous your personal data from the survey.
Communication of offers of our own housing-related products and services, by phone or by letter after obtaining contact details from public databases	<ul> <li>Name</li> <li>Year of birth</li> <li>Contact details (e.g. address and phone number)</li> </ul>	Up to three months after obtaining the information in order to provide you with up-to-date communications.



# Buyer

When you buy a property with Svensk Fastighetsförmedling as the estate agent, we save your personal data as shown below.

Purpose	Information category	Storage time
Administration of mediation of property sale and administration of customer database, e.g. in order to inform you about the property and bids received and to manage contract writing	<ul> <li>Name</li> <li>Personal identity number</li> <li>Account details</li> <li>Committed mortgage offer from bank</li> <li>Bids</li> <li>Address</li> <li>Email</li> <li>Phone number</li> <li>Communication, e.g. by email</li> </ul>	Until the property has been mediated and up to ten years thereafter in order to establish, exercise or defend legal claims.
Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.	<ul> <li>Email</li> <li>Phone number</li> <li>Address</li> <li>Name</li> <li>Visitor statistics</li> <li>Year of birth</li> </ul>	Our services and products From the date of taking possession and up to one year thereafter, in order to provide you with up-to-date communications.  Partner services and products If you have registered an interest in such communication, your personal data will be stored for this purpose until further notice.  Please note that you always have the right to unsubscribe from the communication, regardless of whose products and services it concerns.
Conducting surveys	<ul> <li>Name</li> <li>Contact details (e.g. email address)</li> <li>Information in the response to the survey</li> </ul>	During the time that the survey is conducted and for a period of three months thereafter in order to compile the results of the survey. We then erase or render anonymous your personal data from the survey.
Implementation of controls to prevent money laundering and terrorist financing	<ul> <li>Name</li> <li>Personal identity number</li> <li>Account number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Copy of ID document</li> </ul>	Five years from the time the measures to achieve customer due diligence have been taken in order to fulfil our legal obligations under the Swedish Act on Money Laundering and Terrorist Financing (Prevention).  If necessary, in order to prevent, detect or investigate money laundering or terrorist financing,



Purpose	Information category	Storage time
		we are also entitled to save your personal data for a further five years.
Communication of sales prices and addresses in various channels, e.g. through mailings, publication on our own and partners' websites, and on social media in order to market Svensk Fastighetsförmedling	Information about the property, such as photos and sales price	Until the date of taking possession and up to two years thereafter, in order to communicate sales prices and addresses.
Insurance mediation pursuant to the Swedish Insurance Distribution Act (2018:1219)	<ul> <li>Name</li> <li>Personal identity number</li> <li>Address</li> <li>Email</li> <li>Phone number</li> <li>Property designation</li> </ul>	Eleven years from ordering insurance, in order to comply with documentation requirements in accordance with applicable regulations from the Swedish Financial Supervisory Authority.

# **Prospective buyers**

When you contact Svensk Fastighetsförmedling regarding a property you are interested in, we save your personal data as shown below.

Purpose	Information category	Storage time
Managing expressions of interest for a specific property, including communications regarding the property, e.g. interest expressed by other prospective buyers and bids received	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Bids</li> <li>Communication, e.g. by email</li> </ul>	From the time you contact us until the property has been mediated, in order to manage your expression of interest.
Communication regarding other property types based on previously expressed interest, e.g. by email or SMS text message.	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Property types in which you have expressed interest</li> </ul>	Two years from our latest contact with you, e.g. visited viewing, in order to provide you with up-to-date communications.
Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Visitor statistics</li> <li>Year of birth</li> </ul>	Our services and products Two years from your latest contact with us, e.g. at a property viewing, in order to provide you with up-to-date communications.  Partner services and products If you have registered an interest in such communication, your personal data will be stored for this purpose until further notice.



Purpose	Information category	Storage time
		Please note that you always have the right to unsubscribe from the communication, regardless of whose products and services it concerns.
Conducting a survey regarding a visit to a property viewing	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information in the response to the survey</li> </ul>	During the time that the survey is conducted and for a period of three months thereafter in order to compile the results of the survey. We then delete or anonymise your personal data from the survey.
Keeping a list of bids	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information regarding bids made</li> </ul>	Ten years from the end of the bidding process, for the purpose of establishment, exercise or defence of legal claims.

# **Users of the website**

When you visit Svensk Fastighetsförmedling's website, we save your personal data as shown below.

Purpose	Information category	Storage time
Processing of property and valuation monitoring, as well as newsletters and My Pages	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about registered property monitoring</li> </ul>	From registration of the service until you unsubscribe or after twelve months of inactivity on My Pages, in order to manage property and value monitoring as well as newsletters and My Pages.
Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.	Name     Contact details (e.g. email address and phone number)	Our services and products From registration of the service until you unsubscribe or after twelve months of inactivity on My Pages.  If you do not have an account on My Pages until further notice from the time you registered your interest in the communication.  Partner services and products If you have registered an interest in such communication, your personal data will be stored for this purpose until further notice.  Please note that you always have the right to unsubscribe from the communication, regardless of



Purpose	Information category	Storage time
		whose products and services it concerns.
Conducting surveys	<ul> <li>Name</li> <li>Contact details (e.g. email address)</li> <li>Information in the response to the survey</li> </ul>	During the time that the survey is conducted and for a period of three months thereafter in order to compile the results of the survey. We then erase or render anonymous your personal data from the survey.
Personalised communications and marketing of properties and services in digital channels, e.g. social media, for example using cookies and similar tracking tools based on the use of the website	<ul> <li>User-generated data, e.g. visitor and click history</li> <li>User ID</li> </ul>	For information concerning how long your personal data is stored for this purpose, see our information about cookies.  Reports at an overarching level that do not contain personal data and statistics are saved until further notice.
Evaluate and follow up use of our digital channels, e.g. using cookies and similar tracking tools	<ul> <li>User-generated data, e.g. visitor and click history</li> <li>User ID</li> </ul>	For information concerning how long your personal data is stored for this purpose, see our information about cookies.  Reports at an overarching level that do not contain personal data and statistics are saved until further notice.
Improve the user experience in our digital channels, e.g. using cookies and similar tracking tools	Technical information, e.g. type of device you are using, browser version and operating system	For information concerning how long your personal data is stored for this purpose, see our information about cookies.  Reports at an overarching level that do not contain personal data and statistics are saved until further notice.
Ensure technical functionality and security in our digital channels, e.g. using cookies and similar tracking tools	• User ID	Personal data is stored during the same period as stated relative to the respective purpose for the processing.  Personal data in logs is retained for troubleshooting and incident management for a period of 13 months from the time of the log event.



# Other processing

The other types of processing listed below apply to all categories of individuals covered by this retention policy, but it is not certain that all types of processing apply to you specifically. The types of processing that apply to you depend on how you have interacted with us.

Purpose	Information category	Storage time
Conducting follow-up and evaluation of completed assignments, services provided, etc.	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information on completed assignments, e.g. sales prices, area etc.</li> </ul>	Three months from when the survey was conducted in order to compile the responses.
Answer questions and provide customer service	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Communication, e.g. by email</li> </ul>	Twelve months from when the case was closed or the time of the last communication concerning the same case.
Ensure good database maintenance, e.g. to ensure updating of our customer database that contains information about sellers, potential sellers, buyers, prospective buyers and users of the website	<ul> <li>Name</li> <li>Contact details</li> <li>Personal identity number</li> </ul>	The personal data is stored for this purpose as long as the information is registered in our customer database.  Seller During the mediation assignment and up to ten years thereafter.  Potential seller If we have performed a valuation assignment, ten years thereafter and otherwise up to two years.  Buyer Until the property has been mediated and up to ten years.  Prospective buyers Two years from our latest contact with you, e.g. a visit to a viewing.  Users of the website From registration of the service until you unsubscribe or after twelve months of inactivity on My Pages.



Purpose	Information category	Storage time
Facilitate communication to sellers of offers in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products relating to the seller's new housing.	Information about the acquired property, e.g. address, property designation, type of dwelling, size, etc.	Our services and products Until the estate agent's assignment for the seller ceases and up to one year thereafter, in order to provide you with up-to- date communications.  Partner services and products If the seller has registered an interest in such communication, their personal data will be stored for this purpose until further notice.
Establish, exercise and defend legal claims, e.g. in order to manage complaints and in conjunction with legal disputes	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about the property, e.g. type of property and extract from the land register/apartment database</li> <li>Personal identity number</li> <li>Information on performed assignment</li> <li>Communication, e.g. by email</li> <li>Other personal data that is relevant for the purpose in question, depending on what the legal claim relates to</li> </ul>	Normally up to ten years from the event in question that has given rise to a dispute, for example, in order to establish, exercise or defend legal claims.
Management and protection of our IT systems and services	<ul> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Personal identity number</li> <li>Log information, e.g. user ID, date of event, type of event</li> </ul>	13 months from the time of the log event, in order to manage and protect our IT systems and services.
Development and improvement of our IT systems and services	All personal data specified in this information text and that is necessary for the purpose.	Reports at an overarching level that do not contain personal data and statistics are saved until further notice.
Fulfil legal obligations, e.g. according to the Swedish Accounting Act (1999:1078), the Swedish Money Laundering and Terrorist Financing (Prevention) Act (2017:630), the Swedish Estate Agents Act (2011:666) and GDPR.	<ul> <li>Name</li> <li>Account number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about fees paid and other financial</li> </ul>	Swedish Accounting Act At least seven years from the end of the calendar year in which the relevant financial year has ended, with the purpose of fulfilling our obligations according to the Swedish Accounting Act.



Purpose	Information category	Storage time
	transactions with the registered person  Other information that is necessary in order to fulfil the legal obligation.	Money laundering and financing of terrorism Five years from the time the measures to achieve customer due diligence have been taken in order to fulfil our legal obligations under the Swedish Act on Money Laundering and Terrorist Financing (Prevention).  If necessary, in order to prevent, detect or investigate money laundering or terrorist financing, we are also entitled to save your personal data for a further five years.  Swedish Estate Agents Act Normally during the mediation assignment and until such assignment has been completed.

# Your rights

According to current data protection legislation, you have a number of rights in relation to the processing of your personal data. Below we explain your rights and the conditions under which you have the opportunity to assert them. In order for this to be as clear as possible for you, we have opted to report the rights and regulations that we deem to be relevant to you in the light of the types of processing we perform. For a comprehensive description of the rights under Chapter III of the GDPR, please see the information on rights on the website of the Swedish Authority for Privacy Protection (IMY).

You have the right to:

Request access (a register extract) (article 15 of GDPR)

The right of access includes a right for you to request to:

- (i) receive *confirmation* from us regarding whether or not we process personal data concerning you: and if this is the case
- (ii) receive *information* regarding the processing in question concerning the purpose of the processing, categories of personal data and recipients of this, retention periods, your other rights under Chapter III of the GDPR, from where personal data were gathered and any third country transfers; and
- (iii) receive a *copy* of the personal data that we process about you, known as a register extract.

Please note that we have the right to refuse you all or part of a copy of your personal data if we deem that the disclosure of such a copy would adversely affect any other person's freedoms and rights, including ours. This may be the case, for example, if a document with your personal data were to contain information about another individual.

Request rectification (article 16 of GDPR)



Furthermore, if you believe that information about you is incorrect or incomplete, you have the right to request rectification. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Note that a historical record is not automatically considered incorrect, as it may have been accurate at the time the information was recorded.

### • Withdrawal of consent with future effect (article 7 of GDPR)

To the extent that we process your personal data based on your consent (article 6.1 (a) of GDPR), you have the right at any time to withdraw your consent to the processing with future effect. This means that if you withdraw your consent, we must, as a basic premise, stop the processing based on such consent. On the other hand, the legality of previous processing based on such consent is not affected retroactively by the fact that you have withdrawn your consent.

#### Right to object to processing for direct marketing purposes (article 21 of GDPR)

You also have the right at any time to object to our processing of your personal data for direct marketing purposes, including for profiling if this takes place in conjunction with such direct marketing, and to unsubscribe from future mailings. You can unsubscribe from mailings by notifying us, for example, by clicking on a deregistration link in the mailing. This applies, for example, to processing (see above) where we communicate offers by email and SMS test message relating to our own and partners' housing-related services and products. If you object to processing for direct marketing purposes, we are obliged to discontinue such processing and we will then no longer send you any direct marketing.

#### • Right to object to processing based on a balance of interests (article 21 of GDPR)

You also have a general right to object to processing carried out on the basis of a balance of interests (article 6.1 (f) of GDPR). However, we may continue to process your data, even though you have objected to the processing, if we can demonstrate an essential legitimate reason for the processing that overrides your privacy interest or if the processing in question is necessary in order to establish, exercise or defend legal claims.

Depending on the type of processing you have objected to, our assessment of whether or not an essential legitimate reason exists may vary. If your privacy interest is overriding, we are obliged to erase your personal data that are subject to the relevant processing.

See the tables above regarding the processing we perform that is based on a balance of interests so that you better understand when the right to object applies.

#### • Right to erasure (article 17 of GDPR)

In addition to the right to object to processing that may result in us being obliged to stop the processing (see more about the right to object above), in certain circumstances, you have the right to have your personal data erased. This is the case, for example, if:

- (i) the personal data we process is no longer necessary for a specific purpose or is otherwise being unlawfully processed;
- (ii) the processing is based on consent (article 6.1 (a) of GDPR) and you withdraw this consent, unless we have the opportunity to process the personal data on the basis of a different legal basis in GDPR; or
- (iii) the personal data must be erased for compliance with a legal obligation.



If you have the right to erasure for personal data that we have published, we will, depending on the circumstances in the individual case (e.g. costs and technical conditions), contact other personal data controllers who process your personal data to make them aware that you have requested erasure.

However, our obligation to erase your personal data and notify other personal data controllers does not apply if we must save your personal data in order to, for example:

- (i) comply with a legal obligation which we are bound by;
- (ii) keep statistics (where erasure would make it difficult or impossible to keep statistics); or to
- (iii) establish, exercise or defend legal claims.

#### Right to request restriction of processing (article 18 of GDPR)

You also have the right to request that the processing of your personal data be restricted in certain circumstances. With the exception of storage, if your personal data is restricted, we are normally only permitted to process such personal data with your consent or to establish, exercise or defend legal claims. Please note, however, that if you request that the processing of your data be restricted, this may mean that we cannot fulfil our possible obligations to you during the time the processing is restricted.

You have the right to demand that processing be restricted:

- (i) during the time that we check whether your personal data is accurate, as a result of you questioning the accuracy of the personal data;
- (ii) if the processing is unlawful but you have objected to us erasing personal data and instead requested that the use of the data be restricted;
- (iii) if you have objected to the processing (see further information about this right above) and during the period when we assess whether we have essential legitimate reasons that override your privacy interest.

#### Right to data portability (article 20 of GDPR)

Finally, you have the right to receive a copy of the personal data concerning you in a structured format and the right to have this data transmitted to another personal data controller if this is technically feasible (data portability). Note that your right to data portability does not affect your right to request erasure of personal data.

Unlike the right of access to register extracts, the right to data portability only covers data that we process with your consent (article 6.1 (a) of GDPR) or a contract with you (article 6.1 (b) of GDPR), e.g. the assignment agreement, and which you yourself have provided to us. This normally includes information on name, personal identity number and contact details.

#### Automated decision-making (article 22 of GDPR)

We do not perform so-called automated decision-making that has legal consequences or otherwise significantly affects you.

#### Manage your rights

If you wish to manage your rights, e.g. order an extract from the register or request rectification or erasure of your personal data, please download our form. This makes it easier for us to handle your request. However, this is not a requirement.



It usually takes us 30 days to process your request from the time we receive the request. Send your request to <a href="mailto:dataskydd@svenskfast.se">dataskydd@svenskfast.se</a>. When you send the form, please use the email address that you may have registered with us.

When you submit a request for the exercise of your rights regarding your personal data, we need to confirm your identity to ensure that we are in contact with the right person. This is so we avoid disclosing personal data to an unauthorised person, for example, or incorrectly erasing personal data concerning an individual. If we do not have enough information to confirm your identity, we may request that you provide additional information about yourself to confirm your identity. We only request the information that is reasonable and necessary to confirm your identity. The time to respond to your request starts after we have confirmed your identity.

#### Who do I contact if I have questions?

If you have any questions about the processing of your personal data, you are welcome to contact us. In the event of a complaint, you also have the right to contact the Swedish Authority for Privacy Protection (IMY), which is the responsible supervisory authority under GDPR in Sweden. You will find their contact details here.

For the processing where Svensk Fast Utland is joint personal data controller with Svensk Fastighetsförmedling pursuant to this retention policy, you also have the right to contact the Spanish supervisory authority, Agencia Española de Protección de Datos (Spain). You can find the contact details for the Spanish supervisory authority <a href="https://example.com/here">here</a>.

#### **Contact details**

Svensk Fastighetsförmedling AB, corporate identity no. 556090-2313

Postal address: Vasagatan 28, 111 20 Stockholm

Email: <u>dataskydd@svenskfast.se</u> Phone number: +46 8-505 358 00