

Brunswick Real Estate Data Privacy Notice

1. General

This Data Privacy Notice (this "**Notice**") applies to Brunswick Real Estate AB or any of its subsidiaries and affiliates ("**Brunswick**", "**us**" or "**we**") when we process personal data, such as name, telephone number and email, 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.

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

For information about how we use cookies and similar technology, please see section 11 herein.

We will process the personal data about you that you provide to us when you contact Brunswick 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 Brunswick 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.

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

- to object to the processing of your personal data;
- access to and rectification of your personal data;
- the restriction of the processing of personal data;
- the right to request deletion of your personal data; and
- the right to data portability.

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.

Brunswick will transfer your personal data to third parties under certain lawful circumstances, as stated in this notice, and in some instances to a different country to the country in which you live or work. Such country may be located outside the EU/EEA. Please see sections 5 and 6 for further information.

If you have any questions regarding Brunswick's processing of personal data, you are always welcome to contact us at the following email address: privacy@brunswickrealestate.com.

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:

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2. What is "personal data" and "processing of personal data"?
3. Personal data processed by Brunswick in relation to external parties

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

This Notice covers all personal data that you provide to us when you visit our website or otherwise and that is in any form processed, including personal data that is kept, stored, collected, transferred, disclosed or otherwise handled.

3. Personal data processed by Brunswick in relation to external parties

The purpose with processing your personal data will depend on the reason for why you are contacting us. However, below we have set out some common purposes. In case we receive personal data from you and that we need to process for another purpose, we will inform you accordingly.

Personal data type and source	Purpose	Legal ground	Retention time or criteria
Contact information - i.e. the information provided by you to Brunswick such as name, postal address, email address and telephone number. Source: Directly from you	To enable Brunswick to administer and respond to requests from website visitors or that we receive by email.	Legitimate interest	Brunswick will store the information as long as the information is relevant in order to handle your requests or questions.
	To enable Brunswick to facilitate and register visitors in our office premises.		
	To provide and manage information, products and services which have been requested from Brunswick. For example, information related to ongoing projects or questions from the public and related correspondence.		

	To provide information about investments to potential investors which Brunswick think may be of interest.		
	To evaluate offers from potential suppliers and service providers.		
	To respond to job applications.		
<p>Information related to job applications – i.e. name, photo, cover letter, certificates, credentials and resume.</p> <p>Source: Directly from you as a job applicant.</p>	To enable Brunswick to administrate job applications and to contact potential recruits.	Legitimate interest	Brunswick will store the information as long as the information is relevant to respond to your application and up to 2 years if you do not get hired.

4. How is the personal data processed?

Brunswick will only process personal data for the purposes for which it was submitted to us and as set out in section 3 above. Brunswick 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?

Brunswick Group Companies

Due to the fact that Brunswick has several subsidiaries and affiliates that carry out business activities in, amongst other, Sweden, Luxembourg, Finland, Estonia, and U.K., the personal data, depending on the reason for you contacting us, may be transferred to such affiliates and subsidiaries in order to fulfil our purposes with the processing described herein.

Companies engaged by Brunswick

Your personal data may also be transferred to and processed by third party providers and suppliers which perform services for Brunswick (data processors), to enable these companies to perform the services requested by Brunswick. 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 processing personal data on our behalf must follow our instructions and applicable written data processor agreements and any other agreements that are in place between Brunswick 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?

Personal data may be transferred to a country that offers a lower level of protection for personal data than the country where you live, but only if it is ensured that the personal data is adequately protected by the receiving parties in such countries and the transfer can be made under applicable law. Adequate protection may typically be to impose on the receiving party contractual obligations,

stipulating that such party maintains the same high level of privacy and data security as practiced by Brunswick, according to applicable legislation and Brunswick Group's standards and policies. Such safeguards are e.g. the EU Commissions Standard Contractual Clauses (available here: https://ec.europa.eu/info/law/law-topic/dataprotection/data-transfers-outside-eu/model-contracts-transfer-personal-data-thirdcountries_en) or if transfer to the United States, provided that the recipient is certified under the EU-U.S. Privacy Shield (please see a list over certified recipients here: <https://www.privacyshield.gov/list>).

Further information regarding the safeguards that are in place to ensure lawful transfer of the personal data may be requested, please see below in section 12 for contact details.

7. What are your rights with regards to your personal data?

You have several rights when it comes to our use of your personal data. A summary of these rights are set out below.

If you want to make use of your rights you can do so by sending an email to the email address in section 1. You can also use that email address if you have any questions.

Right to object

A registered person has the right to object, on grounds relating to his or her particular situation, at any time to the processing of Personal Data relating to him or her when we base the processing on a legitimate interest.

If a registered person lodge an objection, we will no longer process the Personal Data related to that person that we process based on a legitimate interest unless we can demonstrate compelling and legitimate reasons for such processing that overrides the privacy interest of the registered person.

A registered person also has the right to object to processing for direct marketing purposes, including profiling to the extent it related to such marketing in which case processing of personal data for such purposes must be stopped.

Even if a registered person objects to certain processing, we may still continue such processing if permitted or obligated to do so under applicable legislation, for example to be able to fulfil legal requirements or to fulfil contractual obligations in relation to the registered person.

Right to access and rectification

A registered person always has the right to request access to the Personal Data relating to him or her. This includes the right to:

- be informed whether or not Personal Data about the registered person is being processed;
- what type of Personal Data that is being processed; and
- the purpose of the processing.

A registered person also has the right, upon request, to access information about any evaluation or assessment of the balancing test we are required to conduct when we process Personal Data about the registered person based on our legitimate interest.

Furthermore, a registered person has the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete. 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 erasure

You may also request that Personal Data should be erased if for example:

- the Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed;
- the registered person object to the processing of his or her Personal Data, in accordance with the "right to object" as set out above;
- we do not have an overriding legitimate interest;
- the processing is unlawful; or
- the Personal Data has to be erased to enable us to comply with a legal requirement.

If you have any questions about your right to erasure, please use the contact details stated above. However, please note that even if you require erasure of your data, we may still continue to process it if we have a legal ground to do so.

Right to restriction

You are also entitled to request us to restrict the processing of your personal data concerning you, if you contest the accuracy of the personal data, and we must restrict the processing for a certain period to enable us to verify the accuracy of relevant data, the processing is unlawful and you oppose the erasure of the personal data but instead request restriction of the use, we no longer need the personal data for the purposes of the processing as stipulated in section 3 in this notice, but the personal data is required by you for the establishment, exercise or defence of a legal claim, or you have objected to processing pursuant to what is set out under the section "right to object" above, and our verification of the legitimate grounds is pending.

Right to Data Portability

If you request access to personal data about you that you yourself have provided and (i) the Personal Data is being processed automatically, and (ii) in accordance with a contract between you and us, 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 contact us at the email address set out in section 1, if you want to make a request in relation to the processing of your personal data. Please note that Brunswick may contact you and ask you to confirm your identity to ensure that Brunswick does not disclose your personal data to any unauthorized person. Brunswick may ask you to specify your request before Brunswick performs any actions.

9. How will Brunswick act when receiving a request?

Once Brunswick has confirmed your identity, Brunswick will handle your request in accordance with applicable law. Please note that even if you object to certain processing of personal data, Brunswick may still continue this processing if permitted or required to do so by law, for example to enable us to fulfil legal requirements or to exercise, enforce or defend our business from legal claims.

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 data protection authority in each country can be found at http://ec.europa.eu/justice/article-29/structure/data-protectionauthorities/index_en.htm. The competent data protection authority in Sweden is Datainspektionen (www.datainspektionen.se).

11. Cookies

We are using so-called cookies and similar technology on our website to make the website function properly and in order to obtain information regarding visits on the website. We also use cookies in order to customise your user experience on our website and to conduct statistics.

According to applicable law, cookies may only be stored on your equipment and information may only be collected through cookies based on your consent, except for cookies that are strictly necessary in order to use our website. Thus, the purpose of this section is to provide you with necessary information regarding our use of cookies and the storage of such cookies on your device when you access our website. This to enable you to make a choice whether you wish to enable non-essential cookies to be placed on your device.

You may choose to avoid deployment of cookies on your device at any time, by adjusting your cookies settings through your web browser.

What are cookies?

A cookie is a small text file which is stored on your device and which contains information. The information stored is typically history of your movements within the website you have visited. Cookies are used to track such movements, but also to remember your preferences.

There are "persistent" types of cookies and "session" cookies. Persistent cookies consist of a text file sent by a web server to a web browser and will be saved on your device until the cookie expires according to its expiration date, or removed by you before that date. The other type of cookie, a session cookie, is a temporary cookie and will be set when you open a web browser on your device and will expire when you close the web browser.

Cookies can also be divided into "first party" and "third party" cookies. First party cookies are placed by our website on your device when you enter our website, while third party cookies are not placed by our website, but by other companies on other websites (such as advertising companies), which are used to assemble your movements on other websites in order to, for example, provide targeted advertising based on such movements on the current website you visit.

Please see below what cookies and similar technologies we use on this website.

What cookies do we use?

We use the following cookies for the following purposes:

- **Strictly necessary cookies.** Strictly necessary cookies are necessary for our website to function properly. These cookies do not collect any personal information. If you disable such strictly necessary cookies through your browser, you will not be able to use all the functions of the website. Please see the strictly necessary cookies that we use in the cookies table below.

- **Performance/analysis cookies.** Performance/analysis cookies are used to make the experience more user-friendly on our website for visitors. Information from these cookies is also used for statistical purposes, such as to maintain statistics regarding the use of the website and to optimise the use of the website.

Cookie name	Description of purpose	When do the cookie expire?	Type of cookie?
Strictly necessary cookies			
AcceptedCookies	To remember whether the user has accepted cookies or not.	180 days	First party
pll_language	To remember the user's language preference once selected.	1 year	First party
Performance/analysis cookies			
_ga	Used to distinguish users (Google Analytics).	2 years	Third Party
_gid	Used to distinguish users (Google Analytics).	24 hours	Third Party
_gat	Used to throttle request rate (Google Analytics). If Google Analytics is deployed via Google Tag Manager, this cookie will be named: <code>_dc_gtm_<property-id></code>	1 minute	Third Party
AMP_TOKEN	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service (Google Analytics).	30 seconds to 1 year	Third Party
gac<property-id>	Contains campaign related information for the user (Google Analytics). If you have linked your Google Analytics and Google Ads accounts. Google Ads website conversion tags will read this cookie unless you opt-out. Please read more here .	90 days	Third Party

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We use Google Analytics cookies to measure how users interact with our website and content. For more information about Google Analytics, please see below:

- Google ads preferences: <https://adssettings.google.com/authenticated?hl=en>

- Google privacy policy: <https://policies.google.com/privacy?hl=en-GB&gl=uk>
- To opt out of being tracked by Google Analytics visit <http://tools.google.com/dlpage/gaoptout>.

How can you avoid cookies?

When entering our website, you can choose to reject non-essential cookies in our cookie banner. Please note that strictly necessary cookies are necessary in order for you to use our website and if you disable such cookies, our website will not function properly.

You can also choose whether you wish to accept cookies in your web browser. By adjusting the web browser, you will avoid deployment of cookies on your device and you can also use your browser to delete cookies. The method used to block or delete cookies will depend on the web browser used, consult the "Help" menu in your web browser for instructions. Where you choose to allow us setting cookies on your device, we will collect information as stated above until you withdraw your consent, which can be done at any time by adjusting your cookie choices through your web browser.

To find out more about cookies, including how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. If you have any questions regarding your choices around cookies, please contact us on the below contact details.

12. Updates to this Notice

In order to ensure that Brunswick complies with data protection law, this Notice may be updated by us at any time. We will publish any changes made on our website.

Please notify Brunswick of any changes to the personal data relating to you to enable us to process personal data accurately and securely (see contact details below).

13. Contact details

Brunswick has a dedicated team to handle privacy related matters that are happy to answer any questions that you may have. Please contact them at the following email address: privacy@brunswickrealestate.com.

Latest update on 17 June 2020