

Tenant Data Privacy Notice

1. General

This Tenant Data Privacy Notice (the "**Privacy Notice**") sets out the general commitment of the Niam Group when collecting, using, disclosing, transferring and/ or otherwise processing any personal data in connection with the tenancy. "**Personal Data**" as used herein means any information that directly or indirectly can identify a person and any other information that qualify as personal data under applicable data protection legislation including the General Data Protection Regulation 2016/679 (the "**GDPR**").

The Personal Data processed in relation to our tenants relate to the tenant itself when the tenant is a physical person or to the representatives of the tenant when the tenant is a company.

The landlord as set out in the rent agreement with you ("**Landlord**", "**us**" or "**we**") is the data controller for the Personal Data processed in connection with the tenancy and is committed to fulfil the highest standards in relation to personal integrity. To enable us to fulfil our legal and contractual obligations related to our tenants, and to conduct business securely and efficiently and for other specific purposes as set out in this notice, we need to process certain Personal Data. This Privacy Notice outlines among other things the kind of Personal Data that is processed by us in relation to our tenants and the purpose of such processing. By entering into an agreement with us regarding a tenancy, the tenant confirms that the tenant has been informed about and read this Privacy Notice. The tenant also confirms that the persons that have been appointed contact persons of the tenant, that have signed the rent agreement or whose Personal Data has otherwise been provided to the Landlord by the tenant has received a copy of this Privacy Notice.

You as a Tenant have the right to enforce your rights according to applicable data protection legislation. Your rights are:

- access 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.

You always have a right to lodge a complaint with the data protection authority if you are dissatisfied with how we process your Personal Data. If you have any questions about your rights as stated above, please see further how you can enforce your rights in section 3 below. If you have any questions, please reach out to the Compliance & Governance Manager at Niam - contact details can be found on www.niam.com.

2. Type of Personal Data Processed

We may process the following categories of Personal Data related to Tenants:

- Contact information; such as name, address, email address, title and telephone number;
- Identity data, such as personal identification number;
- Bank details, such as name of bank and bank account details;

- Credit rating details collected from credit rating agencies; and
- Tenancy Contract Information such as contract terms, rental value, information about rent payments, contract dates, type of premises etc.

The same type of data may also be processed in relation to guarantors or pledgors when applicable, please refer to **Schedule 1** below.

The Personal Data that we process must be relevant and limited to what is necessary to fulfil the purpose of the processing. When the tenancy ends, we will as soon as possible delete the Personal Data unless there is any legal requirement to retain the Personal Data (such as for bookkeeping purposes) or the Personal Data must still be processed for another purpose (in which case it will not be deleted but only processed for such other purpose).

For more information on how we use your Personal Data, and for how long we store it, please see Schedule 1 below.

3. Rights of registered persons

Access and Rectification

A registered person always has the right to request access to the Personal Data relating to him or her, the type of Personal Data that is processed, and the purpose of such processing. A registered person also has the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete.

Restriction and Objection

A registered person has the right to request us to restrict the processing of Personal Data concerning him or her, and object to the processing of Personal Data if the processing is no longer necessary for the purposes it was collected or otherwise processed, the data is inaccurate, the processing is unlawful and/or if the data subject has opposed to processing based on our legitimate interest, where we do not have an overriding interest in relation to the data subject's 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 Erasure and Data Portability

A registered person has the right to request erasure of his or her Personal Data if the Personal Data is no longer necessary in relation to the purpose it was collected and/or 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. However, even if a registered person requires erasure of his or her data, we may still continue to process it if we have a legal ground to do so.

A person whose Personal Data is processed to fulfil a contract with such person also has the right to be provided with any Personal Data (data portability) that is being processed by automatic means, in a structured, commonly used and machine-readable format and/or that such Personal Data is transmitted to another controller.

The Right to Lodge Complaints

If a registered person is not satisfied with how we process Personal Data, he or she may contact the person identified in section 1. Once we have confirmed the person's identity, we will handle the request in accordance with applicable law. Please note that even if a registered person objects to certain processing of Personal Data, the Landlord may still continue this processing if permitted or required to do so by law, for example to be able to fulfil legal or contractual requirements.

A registered person always has the right to lodge a complaint with the relevant authority in particular where he or she lives, work or where an alleged infringement of the GDPR has occurred. The relevant authorities in the Nordic are:

Sweden: Integritetsskyddsmyndigheten (www.imy.se);

Norway: Datatilsynet (www.datatilsynet.no);

Denmark: Datatilsynet (www.datatilsynet.dk); and

Finland: the Finnish Data Protection Ombudsman (www.tietosuoja.fi)

4. Transfer and Disclosure of Personal Data

Niam AB and Other Group Companies

The landlord that you have a tenancy with is part of a group of several companies that are ultimately managed by Niam AB and its subsidiaries. Niam AB has subsidiaries in Sweden (Niam Project Development AB and others), Finland (Niam Oy), Norway (Niam AS) and Denmark (Niam AS) (together the "**Niam Group**").

Personal Data for which the landlord is a controller is usually not shared with or processed by the Niam Group for such companies own purposes. However, as the Niam Group monitors the landlord, Personal Data such as name and contact details of Tenants or contact persons at Tenants will from time to time be shared with companies within the Niam Group to the extent necessary for the Niam Group to properly administer and manage the investment in the landlord.

Service Providers

We use third party service providers ("**Service Providers**"). The Service Providers perform certain services as requested by us that involve the processing of Personal Data. Such services include the provision of support regarding your tenancy, IT systems and property management. A Service Provider must only process Personal Data to enable the Service Provider to perform the services requested by us. Only Personal Data that is necessary to fulfil the relevant purposes will be provided to the respective Service Providers. The Service Provider (as a data processor) will always be obliged, under a written agreement, to act in accordance with the Landlord's instructions, to follow applicable law and to implement appropriate technical and organizational measures for the protection of the Personal Data.

Authorities

Personal Data may also be disclosed to relevant authorities (e.g. the police, financial supervisory authorities, social insurance agencies and the tax authority) to fulfil legal obligations.

Please see [Schedule 2](#) and [Schedule 3](#) for more information regarding the transfer of Personal Data to other companies or authorities and for what purposes.

You are welcome to contact Niam AB at contact details provided in section 1 above if you have any questions related to the Niam Group's processing of Personal Data.

Companies Outside of EU/ EEA

Service Providers may be established in countries inside and outside the EU. Personal Data may be transferred to such companies but only if ensured that the Personal Data is adequately protected by the receiving parties in such countries. Adequate protection may typically be to impose on the receiving party contractual obligations that ensure that such party maintains the same high level of privacy and data security as practiced by your landlord, according to applicable legislation and Niam Group standards/ policies.

Further information regarding transfer of personal data to third countries and the safeguards that are in place to ensure lawful transfer of the Personal Data is set out in Schedule 2 herein.

Schedule 1

Data Processing Matrix

Personal data type and source	Purpose	Legal ground	Retention time or criteria
Contact information - i.e. name, address, telephone number, postal address and e-mail address Source: Directly from Tenants	In order for the Landlord to fulfil the contractual obligations with you as a Tenant (individuals)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i>)
	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)	Legitimate interest	
	To ensure proper financial reporting and management of the Landlord within the Niam Group		
	In order for Niam to provide information to companies interested in acquiring parts or all of the Landlord's business		
Bank details - i.e. name of bank, bank account information and rental levels Source: Directly from Tenants	In order for the Landlord to fulfil the contractual obligations with you as a Tenant (individuals)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i>)
	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)	Legitimate interest	
	To ensure proper financial reporting and management of the Landlord within the Niam Group		
Credit rating details – i.e. ratings related to your credit history Source: collected from credit rating agencies	In order for the Landlord to fulfil the contractual obligations with you as a Tenant (individuals)	Legitimate interest	Duration of rent agreement and thereafter as required under applicable legislation (such
	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)		

	To ensure proper financial reporting and management of the Landlord within the Niam Group		as bookkeeping legislation, in Sweden <i>Bokföringslagen</i>)
	In order for Niam to provide information to companies interested in acquiring parts or all of the Landlord's business		
Tenancy Contract Information – i.e. contract terms, rental value, information about rent payments, contract dates, type of premises etc. Source: the counterparty to a business arrangement or directly from Tenants.	In order for the Landlord to fulfil the contractual obligations with you as a Tenant (individuals)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i>)
	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)	Legitimate interest	
	To ensure proper financial reporting and management of the Landlord within the Niam Group		
	In order for Niam to provide information to companies interested in acquiring parts or all of the Landlord's business		

Schedule 2

Third Countries Transfer of Personal Data

Personal data type that will be transferred	The applicable countries involved in the transfer of personal data	Purpose and legal ground for the transfer of personal data	Safety measure(s) taken to ensure that the transfer of personal data complies with applicable law
Currently no such transfers	Currently no such transfers	Currently no such transfers	Currently no such transfers

Schedule 3

Categories of Recipients

Personal data type that will be transferred	The applicable recipients of the personal data	Use of the personal data	Location of recipients
All personal data types as set out in Schedule 1	Niam Group	Financial reporting and regulatory compliance, management/monitoring of Landlord	The Nordics (Sweden, Norway, Denmark, Finland)
All personal data types as set out in Schedule 1	Financial supervisory authorities and other authorities	Regulatory and tax compliance	The Nordics (Sweden, Norway, Denmark, Finland)
All personal data types as set out in Schedule 1	Service providers, such as property managers and their sub-contractors	Administration of Tenant and Landlord relationship (such as collecting rent and negotiating rent agreements), property management and financial reporting	The Nordics (Sweden, Norway, Denmark, Finland)

The following personal data types as set out in Schedule 1: Contact details, credit rating details and tenancy Contract Information.	Companies interested in acquiring parts or all of the Landlord's business	Evaluation of the Landlord's business	Depending on the location of the third party
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