

Niam Data Privacy Notice

1. General

This Data Privacy Notice (this "**Notice**") applies to Niam AB, Niam Denmark A/S, Niam AS and Niam Oy ("**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 customise your user experience on our website and to be able to provide you with better services when you communicate with us. 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:

- 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.

Niam 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 EEA. Please see sections 5 and 6 for further information.

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, Niam AB, 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
4. How is the personal data processed?
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6. To what countries outside EU will your personal data be transferred?
7. What are your rights with regards to your personal data?
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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 Niam.

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 Niam

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
<p>Contact information - i.e. the information provided by you to Niam such as name, postal address, email address and telephone number.</p> <p>Source: Directly from you</p>	To enable Niam to administer and respond to requests from website visitors or that we receive by email.	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 evaluate offers from potential suppliers and service providers.		
<p>IP address and other technical information related to your computer or mobile device – i.e. text or number files collected in cookies placed on your computer or mobile device.</p> <p>Source: indirectly from you (from your computer and/or mobile device).</p>	To analyse how our website is used and make it function.	Consent	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.

In addition, the following types of recipients may receive your personal data as stated above:

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 outside EU will your 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.

Personal data that you submit to us may be transferred to the following countries:

Personal data type that will be transferred	The applicable countries involved in the transfer of personal data	Safety measure(s) taken to ensure that the transfer of personal data complies with applicable law
Currently no third country transfers		

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 description of these rights are set out below. If you want to make use of your rights, you can do so by contacting us as stated in section 12 below.

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. A registered person also has the right to object to processing for direct marketing purposes, including profiling.

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. If a person objects to processing for direct marketing, we will no longer conduct such processing.

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

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 a right, upon request, to access information about any evaluation or assessment of the balancing test we are required to conduct when we process your personal data based on our legitimate interest.

Furthermore, 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, you object to the processing of your personal data, in accordance with your right to object as set out above and we do not have an overriding 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. If you have any questions about your right to erasure, please contact the responsible contact person stated in section 12 below.

Right to restriction

You are also entitled to request us to restrict the processing of your personal data, 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 if the personal data is being processed automatically and 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 send an email to the relevant contact person, as specified below in section 12, 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.

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 countries are:

Sweden: Datainspektionen (www.datainspektionen.se);

Norway: Datatilsynet (www.datatilsynet.no);

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

Finland: the Finnish Data Protection Ombudsman (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).

12. Contact details

The following individuals are responsible in respect of personal data processing of Niam and can answer questions related to such processing:

Sweden: Erik Tejler, erik.tejler@niam.se, Niam AB, Box 7693, 103 95 Stockholm, Sweden

Latest update on 22 May 2018