

Privacy policy for Magnolia Bostad AB org.nr 556797–7078

Introduction

Magnolia Bostad AB (publ), reg.no 556797–7078, with its visiting address at Döbelnsgatan 24 in Stockholm and postal address: Box 5853, 102 40 Stockholm ("**Magnolia Bostad**") is a company that develops new housing, rental properties, tenant-owned apartments and community service properties in attractive locations in Sweden's growth areas and major cities. The business is conducted in Magnolia Bostad and its subsidiaries.

Various personal data is processed within Magnolia Bostad and in the group. We value your privacy and always strive for a high level of data protection. Magnolia Bostad strives to ensure in all situations that personal data is processed in compliance with applicable laws and regulations, and that all employees or contractors who process personal data on behalf of Magnolia Bostad AB have the required qualifications and knowledge.

This privacy policy (the "**Policy**") sets forth the rules and guidelines for the processing of personal data by Magnolia Bostad in its capacity as data controller, regardless of the type of personal data in question and whose personal data it concerns. The policy explains how we collect and process personal information. It also describes your rights and how you can exercise them. You are always welcome to contact us with any questions; see contact details below.

What is personal data?

Personal data refers to any kind of information that can be directly or indirectly attributed to a physical person. For example, images and sound recordings that are processed on a computer can be personal data even if no names are mentioned. Encrypted data and various types of electronic identities (e.g. IP addresses) are considered personal data if they can be linked to an individual.

Processing of personal data refers to any action taken with personal data. Any action, whether automated or not, performed on personal data constitutes processing. Examples of common processing activities include collection, registration, organization, structuring, storage, processing, transmission and deletion.

Where do we process your personal data?

We always strive for your personal data to be processed within the EU/EEA and all our internal IT systems are located within the EU/EEA. In the case of systemic support and maintenance, however, we may have to transfer information to a country outside the EU/EEA, e.g. if we share your personal data with a personal data processor that, either itself or through a subcontractor, is established or stores information in a country outside the EU/EEA. In these cases, the assistant may only access the information that is relevant for the purpose (e.g. log files).

Regardless of the country in which your personal data is processed, we take all reasonable legal, technical and organizational measures to ensure that the level of protection is the same as within the EU/EEA.

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What personal data do we process about you?

The following section describes which personal data is processed on different occasions.

When you are employed by us or working as a consultant for us

See "Privacy policy for employees and consultants at Magnolia Bostad AB".

When you request information about a tenant-owned apartment project on our website

On Magnolia Bostad's website, you can register your interest in receiving information about a specific project for our tenant-owned apartments. Data collection takes place via Magnolia Bostad's website, or on one of our other official channels for contact.

The personal data is processed in order to: Administer expressions of interest for a specific tenant-owned apartment project by sending out ongoing information about the current project and to pass the data on to the relevant authorized broker. The personal data may also be used for market research by Magnolia Bostad and its data processors.

Personal data that is processed: Personal data that is processed by Magnolia Bostad includes: names, addresses, e-mail addresses, telephone numbers and in exceptional cases social security numbers. Legal basis: Consent of the data subject. You can opt-out of receiving information from us at any time by clicking "unsubscribe" in the e-mail and SMS communications that we send to you.

Storage period: The personal data must be deleted when the interested party has announced that they no longer wish to remain as an interested party and when the registered person has purchased a tenant-owned apartment.

When you request information about a rental project on our website

On Magnolia Bostad's website, you can register your interest in receiving information about a specific rental project. Data collection takes place via Magnolia Bostad's website, or on one of our other official channels for contact.

The personal data is processed to: Administer expressions of interest for a specific rental project by sending out ongoing information about the project in question and to pass on the information to the party managing the letting of the tenancy.

Personal data that is processed: Personal data that is processed by Magnolia Bostad includes: names, addresses, e-mail addresses, telephone numbers and in exceptional cases social security numbers.

Legal basis: Consent of the data subject. You can opt-out of receiving information from us at any time by clicking "unsubscribe" in the e-mail and SMS communications that we send to you.

Storage period: The personal data must be deleted when the interested party has announced that they no longer wish to remain as an interested party and when the tenant has been assigned an apartment.

When you are looking for housing or are a tenant

See "Privacy policy for tenants and housing applicants".

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When you want a newsletter about Magnolia Bostad

On Magnolia Bostad's website, you can register your interest in receiving information about the company via a newsletter. Processing takes place via Magnolia Bostad's website, or on one of our other official channels for contact.

The personal data is processed to: Distribute newsletters to individuals who have registered their interest via our website, in accordance with how they themselves chose to register their interest in newsletters.

Personal data that is processed: Personal data that is processed by Magnolia Bostad includes: names, addresses, e-mail addresses and telephone numbers.

Legal basis: Consent of the data subject. You can at any time refrain from receiving information from us by clicking "unsubscribe" in the e-mail and SMS communications that we send you.

Storage period: The personal data must be deleted when the interested party has announced that they no longer wish to receive information from Magnolia Bostad.

When you apply for an advertised position or otherwise seek employment with us

When you apply for employment with us, we may process certain personal data to handle applications, conduct interviews and make decisions in a recruitment procedure.

The personal data is processed to: The personal data that Magnolia Bostad holds about individuals is used to handle applications, conduct interviews and decision-making in a recruitment procedure.

Personal data that is processed: Personal data that is processed includes name, date of birth, address, information about experience and skills and possibly a photograph.

Legal basis: Consent of the data subject.

Storage period: Magnolia Bostad never stores data longer than necessary with regard to the purposes of the processing. However, Magnolia Bostad may need to store the personal data after that the recruitment procedure is completed if deemed necessary handle potential legal claims against Magnolia Bostad. The storage period in this case is two years. Unsolicited applications received when no position is advertised are deleted annually.

When you are a supplier, collaboration partner or other contractual party to us

When enter into agreements with suppliers, collaboration partners and other contractual parties, we may need to process individuals' personal data in written and/or digital form in our operations, in order to administer the agreements. We then process individual personal data for the person or persons who are representatives of the contractual party. It can e.g. be buyers and sellers of, and contractors, in our housing projects, but also framework agreement partners and consultants.

The personal data is processed in order to: The information that Magnolia Bostad holds about individuals with the representative of the contracting party is intended for the fulfilment of agreements and administration, but Magnolia Bostad may, from time to time, need to hand over information to relevant third parties (including, but not limited to, situations where Magnolia Bostad is legally required to do so).

Personal data that is processed: Personal data that is processed by Magnolia Bostad in such cases includes: names, addresses, e-mail addresses, telephone numbers and in exceptional cases social security numbers.

Legal basis: Fulfilment of legal obligation (if applicable) and legitimate interests.

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Storage period: The personal data will be retained until the relationship between the data controller and the counterparty has ended. Personal data used for general administration will be deleted after the contract ends. Certain data, such as name, work performed, and assignment period, will be kept during the period when a dispute may arise. Additionally, accounting records will be retained for seven years following the calendar year the fiscal year ended.

Events organized by Magnolia Bostad

We organize various events from time to time. Then we can invite individuals from our partners and our friends and acquaintances in the industry. Typically, an existing business relationship is required, and we use contact details provided to us or collected in connection with the individual.

The personal data is processed to: Administer invitations to events.

Personal data processed: Name, e-mail, company and any allergies.

Legal basis: Consent of the data subject or legitimate interests.

Storage period: You can opt out of receiving information from us at any time by clicking “unsubscribe” in your invitation and unsubscribing from future event mailings. The personal data must be deleted when the registered person has announced that he or she no longer wishes to receive information from Magnolia Bostad.

When you subscribe to press releases, Interim reports, and Annual reports

Magnolia Bostad has a separate website for IR information where interested parties can register to obtain so-called IR information: <https://om.magnoliabostad.se/en/subscribe>

The personal data is processed to: The information that Magnolia Bostad holds about individuals is intended to provide the individual with the information he signed up for. The information is saved solely for the purpose of communicating with you as an interested party.

Personal data processed: Personal data processed by Magnolia Bostad consists of e-mail addresses and telephone numbers.

Subscription conditions: The various subscription functions are based on the information you entered in your personal profile. You can e.g. not subscribe to the annual report via e-mail if you have not entered the e-mail address yourself under your address details. You are responsible for your subscription choices and Magnolia Bostad will not change these or send you information that deviates from the purpose of this service.

Legal basis: We process personal data based on the consent of the data subject.

Storage period: The personal data must be deleted when the interested party has announced that they no longer wish to receive information from Magnolia Bostad. You can administer and terminate your subscription yourself through your subscription service.

When reporting through our internal whistleblowing channel

Magnolia Bostad provides an internal whistleblowing channel for employees and individuals working for Magnolia Bostad (e.g., interns, temporary agency staff, consultants, contractors, or subcontractors); see the separate whistleblowing policy.

The personal data is processed to: receive the report, maintain contact with the reporting person during the handling of the case, follow up on what has been reported, and provide feedback to the reporting person. Personal data included in a report may also be processed for other purposes (e.g., if the follow-up of a report concludes that the matter should be handled within another internal or external procedure), provided that Magnolia has a legal basis for such processing (e.g., legal obligation, contractual obligation, or a legitimate interest in processing the data).

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Personal data processed: When a report is submitted, personal data of the reporting person are processed, provided the person has chosen not to remain anonymous. Personal data of the individual specified in the report, as well as any third parties, are also processed. The primary categories of personal data processed include name, position, contact details, and any other personal data related to the suspected wrongdoing and the circumstances of the case.

Legal basis: Compliance with a legal obligation (where applicable) and legitimate interest.

Storage period: Personal data that are clearly not relevant for the handling of a report must not be collected, and if collected by mistake (i.e., data that are not relevant to the case), they must be deleted as soon as possible. Personal data in a follow-up case are deleted after the investigation has been completed.

Holding of listed securities

If you are the owner of listed securities in Magnolia Bostad, your information in the shareholder register is managed by Euroclear Sweden AB, and they are the data controller for processing activities related to the assignment.

How long to we retain your personal data?

Personal data may not be stored for longer than is necessary with regard to the purposes of the processing. Magnolia Bostad therefore carries out regular reviews of stored personal data and removes data that is no longer needed. For more information regarding storage time, refer to the respective processing activities in the previous section.

To whom do we disclose your personal data?

Data processors

In cases where it is necessary for us to be able to offer our services, we share your personal data with companies that are so-called personal data assistants for us. A personal data processor is a company that processes the information on our behalf and according to our instructions. We have data processors who help us with:

- IT services (companies that manage the necessary operation, technical support, mailing and maintenance of our IT solutions).
- Brokerage of tenant-owned apartments.
- Marketing (print and distribution, social media, media agencies or advertising agencies).
- Statistics, market and customer analysis.
- IDX which administers the website website and distributes digital press releases, interim reports, and annual reports.
- MFN, which serves as our publication tool for press releases and additionally facilitates the digital distribution of press releases to individuals who have expressly requested such communications.

When your personal data is shared with personal data processors, it is only for purposes that are compatible with the purposes for which we have collected the data. We check all personal data processors to ensure that they can provide sufficient guarantees regarding the security and confidentiality of personal data. We have written agreements with all personal data processors through which they guarantee the security of the personal data that is processed and undertake to comply with our security requirements as well as restrictions and requirements that apply regarding the international transfer of personal data.

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Companies that are independent data controllers.

We also share your personal data with certain companies that are independent data controllers. The fact that the company is an independent data controller means that it is not us who control how the information provided to the company is to be processed. When your personal data is shared with a company that is an independent data controller, the company's privacy policy and personal data management apply. Independent data controllers with whom we share your personal data are:

- Government authorities (Police, the Swedish Tax Agency or other authorities) if we are obliged to do so by law or in cases of suspected criminal activity.
- Insurance companies.
- Authorized auditors.
- Housing associations when they process personal data in accordance with their legal obligations under laws such as the Swedish Cooperative Housing Act.
- Construction contractors with whom Magnolia Bostad collaborates on various projects.
- Real estate agents when they process personal data in accordance with their legal obligations under laws such as the Swedish Estate Agents Act.
- Technical and financial administrators when they independently control the processing of personal data.
- Landlord in the case of tenancy letting.
- Leasing agent for tenancy letting.
- Euroclear Sweden AB

If Magnolia Bostad acts as a data processor, the data processing will be carried out according to the instructions of the data controller.

Procedures for collecting personal data

General

Magnolia Bostad may process personal data in two ways: either by collecting or receiving the data directly and processing it independently, or by processing data on behalf of other companies. Magnolia Bostad may thus act both as a data controller and as a data processor. In all cases, Magnolia Bostad will process personal data in a manner that respects the privacy of the data subject.

Personal data, including data such as names and addresses, that you provide to Magnolia Bostad will be processed both manually and through automated data processing.

When Magnolia Bostad collects personal data and processes it, this must be done in a correct and appropriate manner. Magnolia Bostad's processing of personal data must in all situations meet the requirements for the processing of personal data.

Magnolia Bostad also ensures the protection of processed personal data at all times. Personal data must not be available to more people than is necessary. This applies both when Magnolia Bostad acts as a data controller and when Magnolia Bostad acts as a data processor. Employees at Magnolia Bostad must only share the information required to perform their job duties.

Magnolia Bostad may, from time-to-time, request that the individual review and update the personal data held by Magnolia Bostad. The individual is also welcome to review and update the information as needed. Magnolia Bostad must, at the request of the individual, correct information that is incorrect, incomplete or misleading. The individual also has the right once a year - upon a

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written request - to receive a register extract free of charge in order to verify what information is registered about him or her.

From which sources do we obtain your personal data?

In addition to the information, you provide to us yourself, or that we collect from you, we may also collect personal data from someone else (so-called third parties). The information we collect from third parties is as follows: Address information from public records to make sure we have the correct address information for you. Information on creditworthiness from credit rating agencies, banks or information companies when required for entering into an agreement.

Your rights

According to the data protection regulation, you have certain rights regarding your personal data that is processed. In short, these rights mean that you must receive information about when and how your personal data is processed and have control over your own personal data. Therefore, you have the right, among other things, to have your data corrected, deleted or blocked in certain cases, or to have your data removed or moved.

The right of access

You have the right to access the personal data that Magnolia Bostad has registered about you. Information about the processing of personal data must be provided by Magnolia Bostad both when the data is collected and when the data subject otherwise requests it (which can be obtained free of charge once a year).

The right to rectification

If we process incorrect data about you, you have the right to have it corrected. This also means that you have the right to supplement any missing information that is relevant for the purposes of the data processing.

The right to erasure

You may request the deletion of personal data that we process about you when:

- the data are no longer necessary for the purposes for which they have been collected or processed.
- you object to a legitimate interest processing we have made, and your reason for the objection outweighs our legitimate interest.
- the personal data must be deleted to fulfil a legal obligation to which we are subject to.

Please note that we may have the right to refuse your request if there are legal obligations that prevent us from immediately erasing certain personal data. These obligations come from accounting and tax laws, banking and anti-money laundering laws, as well as consumer protection laws. It may also occur that the processing is necessary to establish, assert, or defend legal claims. If we are unable to comply with a request for erasure, we will instead block the personal data from being used for any purposes other than the one preventing the requested erasure.

Right to restriction of processing

You have the right to request that our processing of your personal data be restricted. If you dispute that the personal data, we process is correct, you can request limited processing during the time we need to check whether the personal data is correct. If we no longer need the personal data for the stated purposes, but you, on the other hand, need them to be able to establish, assert or defend legal claims, you can request limited processing of the data from us. This means that you can request that we do not erase your data.

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If you have objected to a legitimate interest processing we have done as the legal basis for a purpose, you can request restricted processing during the time we need to verify whether our legitimate interests outweigh your interests in having the data deleted. If the processing has been restricted according to any of the situations above, we may only, in addition to the storage itself, process the data to establish, assert or defend legal claims, to protect the rights of someone else or if you have given your consent.

Right to object certain types of processing

You always have the right to opt out of direct marketing and to object to all processing of personal data based on a balancing of interests. You can at any time refrain from receiving information from us by clicking on "unsubscribe" in the e-mail and SMS communications that we send you. You are always welcome to contact us at the contact details below for help in refusing our communications.

The right to data portability

You have the right to demand that personal data be transferred from us to another company, authority or organization. This only applies to personal data that you have provided yourself.

Legitimate interest

In cases where we use a legitimate interest as the legal basis for a purpose, you have the right to object to the processing. In order to continue processing your personal data after such an objection, we must be able to demonstrate a compelling legitimate interest that outweighs your interests, rights, or freedoms. Otherwise, we may only process the data to establish, exercise, or defend legal claims.

How do we handle social security numbers?

We will only process your social security number when it is clearly justified regarding the purpose, necessary for secure identification or if there is some other considerable reason. We always minimize the use of your social security number as much as possible by, in cases where it is sufficient, using your date of birth instead.

Cookies

Cookies are small files that are stored on your computer when you visit a website. The files contain information about how you use the website and enable the website to function as intended. Some cookies are necessary for the functionality of the website, while others are used to enhance usability and your user experience. Cookies are temporarily saved in your computer's memory and are automatically deleted when the visitor closes their browser. We also use other types of cookies that are saved on your computer until you choose to delete them or when the cookie expires. Via your browser's settings, you decide which cookies are to be allowed, blocked and deleted. Keep in mind that functions on the website may be impaired if you choose not to allow cookies.

Contact details

If you wish to exercise your rights under this privacy policy above, or have any other questions, please contact:

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Box 5853
102 40 Stockholm

+46 8 470 50 80
info@magnoliabostad.se

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Update of the policy

We may make changes to our privacy policy as necessary. The latest version of the privacy policy is always available here on the website.

Adopted by: CEO

Prepared by: General Counsel

Interval: Annual review, changed if necessary