

PRIVACY POLICY

Introduction

Genesta Property Nordic AB (the “**Company**” or “**we**”) is the data controller for the processing of your personal data and is therefore responsible to ensure that all personal data is processed in a correct manner and in accordance with applicable data protection legislation.

This Privacy Policy (hereinafter the “**Privacy Policy**”) describes the Company’s processing of your personal data and has the purpose of ensuring you that we, in our capacity as controller of personal data, are processing the information about you in accordance with applicable data protection legislation. This Privacy Policy describes the Company’s processing of your personal data.

Personal data means all types of information which can, directly or indirectly, be associated with a living physical person. Within the Company’s activities there may occur personal data relating to given names and surnames, telephone numbers, addresses, postal codes, e-mail addresses, personal ID numbers, etc. (hereinafter collectively referred to as “**Personal Data**”). A full list of the Personal Data we process can be found below.

If you cannot find answers to your questions, please get in touch with us. You will find information about how to contact us under the heading “Contact Information” below.

1 FUND INVESTMENTS

Present Investors		
Purpose	Type of processing	Categories of Personal Data
<ul style="list-style-type: none">- To complete KYC processes and to comply with other government mandated filings and reporting.- To provide fund information to you and your company.- To generally manage your or your company’s investment in a Genesta managed fund.	<ul style="list-style-type: none">- Communication via mail, e-mail, phone and other forms of electronic communication.- Storing information and communication.- Provide information to a financier and regulatory agency.	<ul style="list-style-type: none">- Name- Corporate Title and Role within your company- Phone- Professional CV- E-mail address- Physical Address- Copies of passport or other government issued identification
From which sources will we collect your Personal Data: Personal Data is collected from you directly, from third party Marketing Professionals and from public records.		
Who will have access to the Personal Data? Genesta employees who need access to perform their tasks.		
Legal Grounds: The processing of your Personal Data is necessary for the performance of our contract with you or for our legitimate interest to perform		

our contract with a company affiliated with you. We have assessed that this interest is not overridden by your interests or fundamental rights and freedoms.

Storage time: Personal Data will be kept up to 11 years from the date the subject fund is terminated or liquidated.

Potential Future Investors		
Purpose	Type of processing	Categories of Personal Data
<ul style="list-style-type: none"> - To offer future fund investments. - To prepare a future fund investment. 	<ul style="list-style-type: none"> - Communication via mail, e-mail, phone and other forms of electronic communication. - Storing information and communication. - Completing KYC, due diligence and other processes associated with making a new investment. 	<ul style="list-style-type: none"> - Name - Corporate Title and Role within your company - Phone - Professional CV - E-mail address - Physical Address - Copies of passport or other government issued identification
<p>From which sources will we collect your Personal Data: Personal Data is collected from you directly or from third party Marketing Professionals.</p>		
<p>Who will have access to the Personal Data? Genesta employees who need access to perform their tasks.</p>		
<p>Legal Grounds: The processing of your Personal Data is necessary for our legitimate interest of sending offers to you and to prepare a fund investment. We have assessed that this interest is not overridden by your interests or fundamental rights and freedoms.</p>		
<p>Storage time: Except for information collected as a part of making a new investment into a fund, Personal Data will be kept up to 10 years from the last date you or your company have shown potential interest to invest in a Genesta Managed Fund.</p> <p>Information collected as a part of a new investment (a new investment or the purchase of existing shares), will be kept for 11 years, beginning from the date the subject Fund is closed or liquidated.</p>		

Your data may also be processed for other purposes, please see General Processing.

2 LEASE OF PREMISES

Present Tenants		
Purpose	Type of processing	Categories of Personal Data
<ul style="list-style-type: none"> - To manage, renew or generally modify existing lease agreements or enter into new lease agreements. - To facilitate the management (financial and non-financial) of the property and the company owning the property. - To facilitate KYC obligations of the owner of the property. - To facilitate various governmental mandated processes, declarations, reporting, filings or other similar activities. - To support the management of the existing financing provider or to facilitate the owner seeking new debt for the property where the tenant has a lease agreement. - To divest the property. 	<ul style="list-style-type: none"> - Communication via mail, e-mail and phone - Storing information and communication - Provide information to a potential buyer, financier, regulatory agency or property investor - Supplying and processing personal data for the owner and investors in the owner (and other investors in the ownership chain up to the ultimate beneficiary owners of the property where the tenant has a lease agreement). 	<ul style="list-style-type: none"> - Name - Corporate Title and Role within your company - Phone - E-mail address - Physical Address - Copies of passport or other government issued identification
<p>From which sources will we collect your Personal Data: Personal Data is collected from you directly, from third party Marketing Professionals and public records.</p>		
<p>Who will have access to the Personal Data? Genesta employees who need access to perform their tasks, third party Property Manager, third party Project Managers, third party Marketing Professional.</p>		
<p>Legal Grounds: The processing of your Personal Data is necessary for the performance of a contract with you, for our legitimate interest to perform a contract with a company affiliated with you or in order to fulfil legal obligations. We have assessed that our interest is not overridden by your interests or fundamental rights and freedoms.</p>		
<p>Storage time: Personal Data will be kept up to three months after the contract is terminated. Credit Information is kept up to three months after a credit check is performed</p>		

Potential Tenants		
Purpose	Type of processing	Categories of Personal Data
- To offer potential premises.	- Communication via mail, e-mail and phone. - Storing information and our communication.	- Name - Corporate Title and Role within your company - E-mail address - Phone
From which sources will we collect your Personal Data: Personal Data is collected from you directly, from third party Marketing Professionals and public records.		
Who will have access to the Personal Data? Genesta employees who need access to perform their tasks, third party Property Manager, third party Project Managers, third party Marketing Professional		
Legal Grounds: The processing of your Personal Data is necessary for our legitimate interest of sending offers to you. We have assessed that this interest is not overridden by your interests or fundamental rights and freedoms.		
Storage time: Personal Data will be kept up to twelve months after you have shown interest in our premises.		

Your data may also be processed for other purposes, please see General Processing.

3 TRANSACTIONS OF REAL ESTATE ASSETS

Market Partners (buyers, sellers, advisers)		
Purpose	Type of processing	Categories of Personal Data
- To execute real estate business	- Communication via mail, e-mail and phone - Storing our communication	- Name - Corporate Title and Role within your company - E-mail address - Phone
From which sources will we collect your Personal Data: Personal Data is collected from you directly, from third party Marketing Professionals and public records.		
Who will have access to the Personal Data? Genesta employees who need access to perform their tasks.		
Legal Grounds: The processing of your Personal Data is necessary for our legitimate interest to perform a contract with a company affiliated with you. It is also the affiliated company's legitimate interest that we process your Personal Data. We have assessed that this interest is not overridden by your interests or fundamental rights and freedoms.		
Storage time: Personal Data will be kept up to three months after the contract with your affiliated company is terminated or after the transaction is closed.		

Your data may also be processed for other purposes, please see General Processing.

4 CONTRACTING SUPPLIERS ETC.

Suppliers, contractors, banks, municipalities etc.		
Purpose	Type of processing	Categories of Personal Data
<ul style="list-style-type: none"> - To enter into contracts - To manage, renew and modify contracts - To facilitate the management (financial and non-financial) of the property and the company owning the property. - To facilitate KYC obligations of the owner of the property. - To facilitate various governmental mandated processes, declarations, reporting, filings or other similar activities. - To support the management of the existing financing provider or to facilitate the owner seeking new debt for the property where the tenant has a lease agreement. - To divest the property 	<ul style="list-style-type: none"> - Communication via mail, e-mail and phone - Storing communication, information and contracts - Supplying and processing personal data for the owner and investors in the owner (and other investors in the ownership chain up to the ultimate beneficiary owners of the property). 	<ul style="list-style-type: none"> - Name - Corporate Title and Role within your company - E-mail address - Phone number - Performance evaluation for supplier - Service provider surveys - Professional licenses - Physical Address - Copies of passport or other government issued identification
<p>From which sources will we collect your Personal Data: Personal Data is collected from you directly, governmental organizations, professional associations and other public sources.</p>		
<p>Who will have access to the Personal Data? Genesta employees who need access to perform their tasks.</p>		
<p>Legal Grounds: The processing of your Personal Data is necessary for our legitimate interest to perform a contract with a company affiliated with you and in order to fulfil legal obligations. We have assessed that our interest is not overridden by your interests or fundamental rights and freedoms.</p>		
<p>Storage time: For Genesta operating companies where the contract or service is not related to a Genesta Managed Fund, Personal Data will be kept up to 1 year after the contract is terminated.</p> <p>For contracts related to the management of a Genesta Managed Fund, Personal Data will be kept up to 11 years from the date the Fund was terminated or liquidated.</p>		

Your data may also be processed for other purposes, please see General Processing.

5 JOB APPLICATIONS

Job Applicants		
Purpose	Type of processing	Categories of Personal Data
- To evaluate if you are relevant for a vacancy	- Storing and reviewing application - Forwarding application to external recruitment company	- Name - Address - E-mail address - Phone - CV - Personal letter - Birthdate - Personal ID number - Psychological evaluation (might be sensitive) - Bank and financial information
From which sources will we collect your Personal Data: Personal Data is collected from you directly.		
Who will have access to the Personal Data? Genesta employees who need access to perform their tasks and third party Recruitment Companies.		
Legal Grounds: The processing of your Personal Data is necessary for the performance of our contract with you. Sensitive data is processed with your consent.		
Storage time: Personal Data will be kept up to six months after the recruitment process has been completed. Personal Data from spontaneous application will be kept up to six months after we received the application.		

Your data may also be processed for other purposes, please see General Processing.

6 GENERAL PROCESSING

Marketing		
Purpose	Type of processing	Categories of Personal Data
- To send relevant offers and promote Genesta.	<ul style="list-style-type: none"> - Analyse Personal Data to find which products or services you may be interested in - Communicating offers and marketing via mail, e-mail, or phone - Storing communication and information 	<ul style="list-style-type: none"> - Name - Corporate Title and Role within your company - E-mail Address - Phone number
From which sources will we collect your Personal Data: Personal Data is collected from you directly, from third party Marketing Professionals and public records.		
Who will have access to the Personal Data? Genesta employees who need access to perform their tasks and third party Marketing Professionals.		
Legal Grounds: The processing of your Personal Data is necessary for our legitimate interest of sending offers to you. We have assessed that this interest is not overridden by your interests or fundamental rights and freedoms.		
Storage time: Personal Data will be kept up to 1 year after you have shown interest in us.		

Legal requirements		
Purpose	Type of processing	Categories of Personal Data
<ul style="list-style-type: none"> - For bookkeeping purposes - For archiving purposes - To avoid money laundering - To defend against potential claims 	<ul style="list-style-type: none"> - Storage - Processing that is necessary according to legal requirements, judgments or authority decisions (e.g. the Accounting Act, Money Laundering Act). 	<ul style="list-style-type: none"> - All previous categories - Copy of identification documents
From which sources will we collect your Personal Data: Data is collected from all sources described previously.		
Who will have access to the Personal Data? Genesta employees who need access to perform their tasks.		
Legal Grounds: The processing is necessary in order for us to be able to fulfil any legal obligations or for our legitimate interest of being able to defend ourselves from potential claims. We have assessed that this interest is not overridden by your interests or fundamental rights and freedoms		
<p>Storage time: Personal Data will be kept as long as is necessary to fulfil our legal requirements.</p> <p>For job applicants: Personal Data will be kept up to two years after a position has been filled.</p> <p>For Genesta operating companies where the legal requirement is not related to a Genesta Managed Fund, Personal Data will be kept up to 10 year after the legal requirement is terminated.</p> <p>For legal requirements related to the management of a Genesta Managed Fund, Personal Data will be kept up to 11 years from the date the Fund was terminated or liquidated.</p>		

Recipients of Personal Data and transfers to third countries outside the EU/EEC

We may as controller of your Personal Data assign the processing listed above to a partner or supplier, e.g. IT service providers. Such processing will not be made for other purposes than as described below. Some partners and suppliers may have parts of their businesses in countries outside of the EU/EEC (so-called Third Countries). Transfer of Personal Data will only be made to such countries which offer an adequate level of data protection, as decided by the EU Commission, or if the supplier has a legally binding and enforceable instrument which guarantees the safety of the Personal Data.

Your rights as registered

You have the right to:

- Request information about which of your Personal Data we process and you can request a copy of these;
- Have incorrect Personal Data rectified and you can under certain circumstances have your Personal Data erased;
- Oppose against certain processing of your Personal Data and request that the processing is restricted,
- Have your Personal Data transferred to another controller (right to data portability), and
- If you are unsatisfied with our processing of your Personal Data, report our processing to the Swedish Data Protection Authority, who is the supervising authority. Contact details to the Swedish Data Protection Authority can be found here: www.datainspektionen.se/om-oss/kontakta-oss

Protection of the Personal Data

The Company has undertaken appropriate technical and organisational measures in order to protect Personal Data against loss, abuse, unauthorized access, revealing, alteration and destruction. Company employees and suppliers are bound by confidentiality agreements and are obligated to follow the Company's rules for information and IT security, this Privacy Policy and other internal rules and policies which regulate the processing of Personal Data.

Amendments to the Privacy Policy

The Company retains the right to amend this Privacy Policy as the Company sees fit. The date for the latest amendment is indicated at the end of this Privacy Policy.

Contact information

If you have any questions regarding the Privacy Policy or any other question regarding our processing, please feel free to contact us:

Genesta Nordic Property AB, reg. no. 556630-6089

Contact person: Per Ringius

Email: dataprivacy@genesta.eu

The Privacy Policy was adapted on 25th May 2018.