

## Triol Bostadskreditfond AB

PRIVACY POLICY

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## Definitions

EU/EEA	European Union/European Economic Area
GDPR	General Data Protection Regulation EU/2016/679
Recipients	Public authority, legal entity or natural person to whom Bostadskreditfonden may need to provide personal data.
PEP	Politically exposed person
Personal data	Refers to any information that can identify a living natural person, directly or indirectly
Data controller	Refers to the legal entity that alone or jointly with others determines the purposes and means of processing personal data
Data subject/Registered person	Refers to the person whose personal data is processed
The services	Refers to all services provided by Bostadskreditfonden
Third country	Refers to a country outside the EU/EEA
Bostadskreditfonden	The Company

## 1. Introduction

Bostadskreditfonden ("the Company") is the controller of your personal data. Furthermore, the Company is committed to protecting your individual rights and personal privacy. This privacy policy explains how the Company collects, uses, stores and shares personal data within the enterprise. We process your personal data with the utmost care in order to preserve your privacy in accordance with the General Data Protection Regulation EU/2016/679 ("GDPR").

The processing of personal data is compliant with the fundamental principles set out in points a to f of Article 5 of the GDPR.

The Company processes your personal data in order to fulfil the purpose between the Company and the Data Subject.

## 2. Personal data we collect, and how it is processed

### 2.1 Investors who are natural persons

#### Personal details and contact details

The name, personal identity number, email address, telephone number, registered address and country of citizenship are processed for investors who are natural persons.

#### ID data

A copy of a valid identification document, or a digitally signed agreement with BankID, is processed for investors who are natural persons.

#### Financial data

The investment amount, tax residence, origin of funds, bank details, and estimated deposits and withdrawals are processed for investors who are natural persons.

Information related to the Anti-Money Laundering and Terrorist Financing Act (2017:630) is also processed. Politically exposed persons ("PEPs") are identified and checked against sanctions registers in order to comply with this legislation.

The Company may store email conversations between Data Subjects and the Company in the event of meetings related to the said legislation.

### 2.2 Investors who are legal entities

#### Company details and contact details

Company name, company registration number, registered address, the company's geographical connection, telephone number, identification of beneficial owner, and legal form.

#### Deputy

Name, personal identity number, email address, telephone number and registered address.

### **Financial data**

Amount of investment, Origin of funds, Bank details, Estimated deposits and withdrawals.

Information related to the Anti-Money Laundering and Terrorist Financing Act (2017:630) is also processed. Politically exposed persons (“PEPs”) are identified and checked against sanctions registers in order to comply with this legislation.

The Company may store email conversations between Data Subjects and the Company in the event of meetings related to the said legislation.

## **2.3 Customer**

### **Personal details and contact details**

Registered address:

### **Financial information**

Credit monitoring.

### **Historical information**

If the Data Subject has previously been a customer of the Company or has an existing engagement, this will be checked in accordance with the Company’s data retention periods. Historical information that may be retained after engagement with the Company is linked to financial information.

## **2.4 Potential customer**

### **Personal details and contact details**

Name, personal identity number, email address, telephone number and registered address, country of citizenship.

### **ID data**

Copy of valid identification document, or digitally signed agreement with BankID.

### **Financial data**

Investment amount, tax residence, origin of funds, bank details, estimated deposits and withdrawals.

Information related to the Anti-Money Laundering and Terrorist Financing Act (2017:630) is also processed. Politically exposed persons (“PEPs”) are identified and checked against sanctions registers in order to comply with this legislation.

The Company may store email conversations between Data Subjects and the Company in the event of meetings related to the said legislation.

#### **Other information**

Extract from criminal records.

### **2.5 Pledgor and guarantor**

#### **Personal details and contact details**

Name, personal identity number, email address, telephone number, registered address and country of citizenship.

#### **ID data**

Copy of valid identification document, or digitally signed agreement with BankID.

#### **Financial data**

Investment amount, tax residence, origin of funds, bank details, estimated deposits and withdrawals.

Information related to the Anti-Money Laundering and Terrorist Financing Act (2017:630) is also processed. Politically exposed persons ("PEPs") are identified and checked against sanctions registers in order to comply with this legislation.

The Company may store email conversations between Data Subjects and the Company in the event of meetings related to the said legislation.

#### **Other information**

Extract from criminal records.

### **2.6 Supplier**

#### **Company details and contact details**

Company name, company registration number, registered address, email address, telephone number and contact person

### **2.7 Employee of the Company**

#### **Personal details and contact details**

Name, personal identity number, email address, telephone number and registered address.

#### **Financial data**

Income and bank details.



## 2.8 Jobseekers with the Company

### Personal details and contact details

Name, personal identity number, email address, telephone number and registered address.

### Other information

Extract from criminal records.

## 3. Use of the information

To process personal data, the Company needs to rely on a legal basis under Article 6(1) of the GDPR. Processing is not considered lawful if the Company does not have a legal basis under the said Article. The legal bases that the Company may use for the processing of personal data are outlined below.

### 3.1 Consent, point a)

Bostadskreditfonden may use consent as a legal basis to process your personal data for certain purposes. The enterprise always assesses whether consent is an appropriate legal basis for the specific situation. For consent to be valid, it must be voluntary, and you must always have the option to refuse consent. Voluntary consent means that the Data Subject has genuine choice and control over their personal data. Having the option to refuse consent means that you can refrain from giving consent, and that you can withdraw your consent just as easily as you gave it.

### 3.2 Performance of contracts, point b)

Bostadskreditfonden processes personal data primarily for the purposes of documenting, implementing and administering customer contracts. This may include actions requested by the customer prior to conclusion of the contract, execution of transactions via payment systems, customer relationship management, conducting internal credit and risk assessment in order to determine the terms and services that can be offered, and identification of the customer or the customer's representatives.

### 3.3 Legal obligation, point c)

Information on credibility may include data collected under the Anti-Money Laundering and Terrorist Financing Act (2017:630) and the Accounting Act (1999:1078). This data can be used to identify and verify the identity of the customer and their representatives, to determine the beneficial owner of an enterprise, and to check whether that beneficial owner or someone close to them is a politically exposed person (PEP). Transactions and trades may be monitored and reviewed in order to regularly monitor customer behaviour and detect and prevent money laundering and other criminality. Moreover, this information can be used to fulfil the obligation to report to the Swedish Financial Supervisory Authority, the Financial Intelligence Unit and the Swedish Tax Agency.

### 3.4 Legitimate interest, point f)

Personal data may be used based on a legitimate interest. The Company may process personal data for the purpose of improving business development: improving credit models and product development, and preventing the use of the Company's services for fraudulent purposes. Moreover, personal data may be processed for communication purposes; in order to communicate relevant information about the Data Subject's engagement with the Company.

#### 4. Who can access personal data

The Company may share personal data with other parties or transfer personal data to other parties. If the Company implements the aforementioned, all legal, technical and organisational measures will be implemented in accordance with the GDPR in order to ensure the correct processing of personal data.

##### 4.1 The Company

Personal data may be shared between employees as part of the Company's operations.

##### 4.2 Suppliers and subcontractors

The Company may share your personal data with suppliers acting as data processors, or with subcontractors functioning as sub-processors. These may, for example, include financial or legal consultants, as well as auditors, in order to fulfil our contractual obligations towards Data Subjects and for the other purposes set out in this policy. The Company ensures that the processing of personal data is always compliant with the GDPR and applicable Swedish legislation when the Company uses suppliers and their subcontractors.

The suppliers used by the Company may change over time. The Data Subject is welcome to contact the Company at [kontakt@bostadskreditfonden.se](mailto:kontakt@bostadskreditfonden.se) if they wish to obtain full information about the suppliers with whom their personal data is shared.

##### 4.3 Credit reference agencies.

The Company may share the Data Subject's personal data with credit reference agencies and other service providers in order to assess creditworthiness. The Company may need to carry out a credit check on the Data Subject when a customer applies for one of the Company's products. These services are necessary for the Company to be able to provide its services to the customer. The information and personal data obtained through the credit report may include civil registration details, creditworthiness, information about records of non-payment and/or debts with the Swedish Enforcement Authority, tax assessment information, and any other information that the Company needs in order to provide our services.

##### 4.4 Public authorities

The Company may need to provide information to authorities such as the Police, the Swedish Tax Agency, the Swedish Financial Supervisory Authority or other public authorities, if the Company is required to do so by law or if the Data Subject has given consent. One example of a statutory obligation to provide information relates to measures under the Anti-Money Laundering and Terrorist Financing Act (2017:630), but also in the investigation of offences or other irregularities. The Company may also share your personal data with public authorities if the Company is of the opinion that there is a legitimate interest; to enable the Company to defend, assert or establish legal claims, for example.

##### 4.5 Divestment

The Company may share personal data with third parties in the event of a sale of a business or assets. We may disclose your personal data to a potential purchaser or vendor if the Company sells the business or its assets. Should the Company or a significant part of its assets be purchased by a third party, personal data of the Company's customers may be transferred to that third party.

## 5. Where we process personal data, and for how long

### 5.1 Within the EU/EEA

The general rule is that personal data linked to the Company is processed in Sweden or within the EU/EEA. The Company's operations are within Sweden, and so there is no reason for the Company to share personal data for business purposes outside Sweden. Moreover, the Company may use data processors in the form of the Company's service providers or sub-processors. Personal data may be transferred and processed by data processors operating in a country other than Sweden, but within the EU/EEA. If personal data is to be processed in a country outside the EU/EEA, there must always be a decision by the EU Commission regarding an adequate level of protection for the transfer to take place.

### 5.2 Time interval

Personal data will be retained for as long as necessary for the stated purpose or as required by applicable law. Personal data stored for purposes other than contractual obligations may be different. To comply with requirements for anti-money laundering measures, accounting or regulatory capital requirements, personal data is stored only as long as deemed necessary and/or legally required for the specified purpose.

### 5.3 Anti-Money Laundering and Terrorist Financing Act (2017:630)

The Company always saves the counterparty's personal data for the duration of the contract for the purpose of preventing, detecting or investigating money laundering or terrorist financing. As a general rule, personal data is stored in accordance with Chapter 5(3) of the Anti-Money Laundering and Terrorist Financing Act for five years, or if necessary for a maximum of 10 years under Chapter 5(4) of the Anti-Money Laundering and Terrorist Financing Act, after the end of the customer relationship.

### 5.4 Accounting Act (1999:1078)

Personal data that needs to be processed for bookkeeping and accounting purposes will be retained for seven years plus the current year according to Chapter 7(2) of the Accounting Act.

### 5.5 Discrimination Act (2008:567)

Processing of personal data relating to job applications submitted to the Company is stored for two years in order to be able to defend any legal claim in accordance with the Discrimination Act (2008:567).

Besides the data referred to above, the Company may store personal data for a longer period of time but only if the Company deems this necessary to establish, exercise or defend legal claims.

## 6. Marketing

If the Data Subject has chosen to subscribe to the Company's newsletter, the Company will only use the email address selected to send the newsletter to which the Data Subject has subscribed. The Data Subject has the option of unsubscribing at any time by using the unsubscribe link provided in the newsletter.

## 7. Your rights as a Data Subject

### 7.1 Right to information

Whenever the Company collects personal data, the Data Subject has the right to be informed about how this data will be processed. You also have the right to be informed if the Company plans to use the personal data for any purpose other than that for which it was originally collected.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to information.

### 7.2 Right of access, Article 15

Data Subjects have the right to request, free of charge, a copy of the data held by the Company on the Data Subject in the form of an extract from the register, and also to obtain certain information on the processing of this data. This can be done free of charge at any time.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right of access.

### 7.3 Right to rectification, Article 16

Data subjects have the right to ask the Company to correct inaccurate and/or incomplete information.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to rectification

### 7.4 Right to erasure, Article 17 (right to be forgotten)

Data subjects have the right to ask for their personal data to be erased if the personal data is no longer necessary for the purpose for which it was collected. However, this is not an absolute right as the Company has obligations as a financial institution. The legal obligations to which the Company is subject as a financial institution prevent the Company from immediately erasing some of the Data Subject's personal data. The legal obligations preventing the Company from deleting personal data in certain cases are based on banking and anti-money laundering legislation and accounting and tax legislation.

The right to be erased may be revoked in cases where Data Subjects withdraw consent. This is applicable even if you have objected to the processing of the data and there are no more compelling legitimate grounds to continue its processing.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to erasure (right to be forgotten).

### 7.5 Right to restriction of processing, Article 18

The Data Subject has the right to restrict the processing of their personal data in certain cases. The right to restriction is applicable if, for instance, the Data Subject considers the data to be inaccurate and has requested rectification. If the Data Subject invokes the above, they may request that the processing of the data be restricted while the data is being rectified.

If the Company restricts the processing of the Data Subject's personal data following a request for restriction, the Company will only process the data (besides storing it) if the Company has obtained the Data Subject's consent, if there is an important public interest, to protect the rights of another legal entity or natural person, or to establish, exercise or defend legal claims.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to restriction of processing.

#### **7.6 Right to object, Article 21**

Data Subjects have the right to object at any time to the processing of their personal data by the Company if this is done on the basis of a balancing of interests. The Company must stop processing the data if the Company is unable to demonstrate that there are compelling reasons for the processing which override the interests of the Data Subject. There are exceptions, however: if, for example, the Company needs to continue processing the data in order to establish, exercise or defend a legal claim.

#### **7.7 Right to data portability, Article 20**

Data subjects have the right to request and use their personal data elsewhere: with another social media service, for example. The Company is obliged to facilitate such a transfer of personal data, provided that the Company processes the personal data pursuant to the Data Subject's consent or in order to fulfil a contract. However, the Company only needs to transfer the Data Subject's data if it is technically feasible to do so.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to data portability.

#### **7.8 Right to withdraw consent, Article 7(3)**

If the Company processes your personal data with your consent, then you have the right to withdraw this consent at any time, which means that the Company will cease processing your personal data. If the Data Subject withdraws their consent, it does not apply retroactively and does not affect the lawfulness of the processing based on the consent prior to withdrawal.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to withdraw consent.

#### **7.9 Right to lodge a complaint, Article 77**

If the Data Subject wishes to complain about the Company's processing of the Data Subject's personal data, the Company will accept any complaints at [kontakt@bostadskreditfonden.se](mailto:kontakt@bostadskreditfonden.se). The Data Subject also has the right to lodge a complaint with the Swedish Authority for Privacy Protection, which is the relevant supervisory authority for the processing of personal data by the Company.

The following are required for whatever you submit to the Company or the Swedish Authority for Privacy Protection to be regarded as a complaint:

- Your complaint concerns a shortcoming in the processing of personal data covered by the General Data Protection Regulation (GDPR) or the Crime Data Act (2018:1177)
- You, the complainant, are affected by the processing of the data
- The party that processed the data can be identified
- You, the complainant, provide information about who you are
- You provide contact details so that we can contact you.

See the [Swedish Authority for Privacy Protection website](#) for more information on your right to lodge a complaint.

## 8. How to exercise your rights, and what your rights are

### 8.1 Fees

As a general rule, the Data Subject is entitled to exercise their rights under the GDPR free of charge. However, the Company is entitled to charge a reasonable fee in order to cover administrative costs if the Data Subject wishes to exercise their rights several times with the Company.

See the [Swedish Authority for Privacy Protection website](#) for more information on fees.

### 8.2 Denied requests

The Data Subject has a number of rights that can be exercised under the GDPR, but in some cases the Company may refuse your request. Should this happen, the Company must provide a reasons within one month of receiving your request and explain why your request cannot be granted.

See the [Swedish Authority for Privacy Protection website](#) for more information on denied requests.

### 8.3 Time interval

The Company will generally deal with your request as a Data Subject as quickly as possible, and at the latest within one month of receiving your request. In certain cases, the Company is entitled to extend this deadline by a further two months, which means that the information has to be provided no later than three months after the Data Subject's request is received by the Company.

See the [Swedish Authority for Privacy Protection website](#) for more information on time intervals.

## 9. Contact details for the Company and the Supervisory Authority

The Data Subject may contact the Company with questions, requests for extracts from the register or other matters as a Data Subject, including if the Data Subject wishes to lodge a complaint regarding the processing of your personal data. If the Data Subject is of the opinion that the Company's processing of personal data violates the Data Subject's rights or interests under the GDPR, the Data Subject may lodge a complaint with the Swedish Authority for Privacy Protection via their website.

The Data Subject may contact the Company in respect of data protection issues by email [kontakt@bostadskreditfonden.se](mailto:kontakt@bostadskreditfonden.se) or telephone number 08 716 10 11, or at Birger Jarlsgatan 34, 114 29 Stockholm.

## 10. Changes to the Privacy Policy

The Company reserves the right to amend this Privacy Policy whenever the Company so deems it necessary. The information is updated regularly when new purposes of personal data processing are added, for example, or when additional personal data categories start to be processed. Therefore, the Company recommends that the Data Subject regularly reviews the Privacy Policy to ensure that the Company's processing of personal data is in line with the Data Subject's expectations.