

PRIVACY POLICY FOR VIDEO SURVEILLANCE

Heimstaden

1 GENERAL

This privacy policy covers all necessary information on how Heimstaden collects, processes, shares and retains personal data which have been collected by the means of video surveillance.

The policy also describes your rights under applicable data protection law and how you can exercise them. You are always welcome to contact us if you have any questions. You can find our contact details at the bottom of this policy.

2 DATA CONTROLLER OF YOUR PERSONAL DATA

Heimstaden AB, reg. no. 556670-0455, Heimstaden Bostad AB, reg. no. 556864-0873 and Heimstaden Förvaltnings AB, reg. no. 556615-4497, all having their registered address on Östra Promenaden 7A, 211 28 Malmö (jointly “Heimstaden”, “we” or “us”) are joint controllers of any processing of your personal data carried out by the companies and/or their subsidiaries.

3 PROCESSING OF PERSONAL DATA

3.1 How and when does Heimstaden carry out video surveillance?

Personal data collected and processed by the means of Heimstaden’s video surveillance are images and video footage, which are typically captured in public places such as recycling storerooms, common areas, stairwells, parking garages, basements, basement corridors, entrance halls of apartment buildings, courtyards and utility rooms.

3.2 For which purposes does Heimstaden carry out video surveillance?

We only use surveillance cameras in areas where we have experienced problems with crimes, *inter alia*, in the form of vandalism and sale of drugs, or in areas which are typically subject to high crime rates. The purpose of the video surveillance is thus to prevent and investigate crimes, to assist crime-investigative authorities in criminal investigations and to support legal claims.

4 LAWFUL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process your personal data captured by surveillance cameras on the basis of our legitimate interests. Where personal data are processed based on a balancing of interest, Heimstaden has made the assessment that the processing is necessary for purposes relating to Heimstaden’s legitimate interests, and such interests are not overridden by your interests or fundamental rights and freedoms. In respect of the video surveillance that we

carry out, our legitimate interests are, as described above, the prevention and investigation of crimes and support of legal claims. Our assessment is thus that these interests override any invasion of your privacy that the video surveillance may involve.

5 FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Your personal data will only be retained for as long as necessary in order to fulfil the purposes with the video surveillance. As a main rule, the retention period will be a maximum of four weeks.

In certain cases, personal data may be retained for a longer period of time than what is stated in the above paragraph, for example where images and video footage have been requested by the Police for purposes of preservation of evidence in an ongoing investigation, or where we need the personal data in order to protect our legal rights, for example if we are engaged in a lawsuit.

6 SECURITY MEASURES

Heimstaden has drafted policies and established standards to ensure that the processing of your personal data is carried out in a secure manner. As a main rule, access to personal data is only granted to employees of the company, who need such access in order to carry out their work tasks.

Our security systems are developed with a focus on your privacy and they provide high protection against intrusion, deletion and other modifications which could pose risks to your privacy.

We only transfer personal data in accordance with this policy.

7 TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

We may disclose your personal data to our suppliers of security services, IT suppliers and other business partners providing services on our behalf, to the extent necessary for them to perform their tasks. Some of our video surveillance is carried out by third parties on our behalf and this third party is then our data processor. Personal data may also be disclosed to crime-investigative authorities for the purpose of criminal investigations.

8 WHERE DO WE PROCESS YOUR PERSONAL DATA?

Your personal data will be processed within the EU/EEA. We never transfer personal data to countries outside of the EU/EEA and we do not sell personal data to any third parties.

9 YOUR RIGHTS

You have the right to receive confirmation regarding whether or not we process images and video footage in which you appear. If so, you also have a right of access to the recordings and information about how these are

processed by us. There are, however, exceptions to your right of access – if other persons appear in the footage as well, we are not obligated to provide you with a copy of the recording in the event that it, in our assessment, would entail an invasion of such other persons' privacy.

In the event that the process of identifying you in certain video footage would involve a disproportionate effort, we are not obligated to provide you with a copy of the recording. In order to avoid such a situation, we ask that you are as specific as possible when stating the time frame within which you were in the area where the video surveillance was carried out.

To a certain extent, you have the right to “be forgotten”, which means deletion of your personal data processed by us. However, we are entitled to deny such requests under certain conditions, e.g. if we need to process your personal data for compelling reasons.

You have the right to object to Heimstaden's video surveillance, including to our retention of the video footage. In such a case, Heimstaden may only carry out video surveillance and/or retain the video footage, if necessary due to compelling reasons.

Should you wish to exercise any of the rights mentioned above, please contact us by using the contact details below. When assisting you with such matters, we may ask you for identification to protect your privacy and your personal data. As the personal data covered by this privacy policy are images and video footage from recordings, you have to state, as specifically as possible, which areas that are covered by your request as well as the relevant time period during which you visited the area where we use surveillance cameras.

If you have objections to our processing of your personal data, you can file a complaint with the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*). For more information, please visit <https://www.imy.se/en/individuals/forms-and-e-services/file-a-gdpr-complaint/>.

10 CHANGES TO THE PRIVACY POLICY

We may change the terms of this privacy policy. The latest version of it is available on our website.

11 CONTACT DETAILS

If you have any questions related to this privacy policy or if you want to contact us regarding our processing of your personal data, please contact us at dataskyddsförordningen@heimstaden.com.