



DATA PROTECTION POLICY

JM safeguards privacy; consequently, our aim is always to protect personal data in the best possible manner and to comply with applicable data protection laws and regulations. Our intention with this Data Protection Policy is to convey how we process personal data. JM is the personal data controller when processing personal data and is responsible for ensuring that such processing is done in compliance with applicable legislation.

PERSONAL DATA THAT WE PROCESS

When in contact with JM, you will submit a certain amount of information to us. JM also receives personal data from third parties for the purpose of processing residential rental contracts and for direct marketing, and in some cases from your employer and suppliers to JM. JM processes personal data such as name, personal identity number, address, email address, financial information, etc.

PURPOSE AND LEGAL BASIS

JM's processing of personal data rests on four legal bases, and it is processed for several purposes. We process personal data if you have given consent for the purpose of processing, for example to provide information about, offer and market JM's projects, homes and residential services. We process personal data for the purpose of contract performance in relation to you as customer, supplier or employee, for example to sign, carry out, administer and execute the contractual relationship between you and JM, between you and the tenant-owners association or with you as an employee. In some cases JM has a legal obligation to process personal data. This applies to the personal data that we are legally obligated to process as stipulated by the Swedish Tenant-Ownership Act (bostadsrättslagen), Swedish Bookkeeping Act (bokföringslagen), Swedish Debt Recovery Act (inkassolagen) and Swedish Companies Act (aktieförlagslagen). Part of the personal data processing that we conduct is based on what is known as legitimate interest. Examples of legitimate interest include when we utilize partners or direct marketing, manage stakeholders or in order to enable general customer care and customer service. JM does not process sensitive personal data with the support of legitimate interest.

Direct marketing

JM processes personal data for marketing purposes. Personal data can be used for invitations to showings, expos, events and — for VIP customers —VIP information mailings by mail, email or text message, until such time you object to receiving direct marketing from us. Mailings will be sent by JM or other companies in the Group.

WHO HAS ACCESS TO YOUR PERSONAL DATA

Personal data will be processed by JM and the various Group companies.

In addition, your personal data may be shared with third parties who process personal data on our behalf, in the role of data processor. Third parties which might have access to your personal data include, for example, our IT and systems suppliers, real estate agents, providers of economic and technical management services to tenant-owners associations, insurance companies, banks, companies that manage payroll and cloud service providers. In the event of transfer to a third party, we protect personal data with a data processor agreement.

Personal data may also be transferred to the following players which are themselves personal data controllers when processing your personal data:

- Government authorities or other players in accordance with laws or collective bargaining agreements, municipalities, enforcement authority and tax authority.

TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY

We and our suppliers and partners as a rule only process personal data within the EU/EEA. In the event personal data is processed outside the EU/EEA, there will be either a decision from the Commission that the third country in question ensures an adequate protection level or appropriate protection measures in the form of standard contractual clauses, binding internal corporate rules or a Privacy Shield, which ensure that your rights are protected. If you would like to receive a copy of the protection measures that we have taken or information about where these measures have been made available, contact us via the channels specified below.

DATA PROTECTION

We, everyone in the Group and, when relevant, third parties have taken several precautionary measures to protect the personal data that is processed. We have firewalls and anti-virus programs in place to protect and prevent unauthorized access to our networks and systems. Our employees are under strict instructions to process all personal data in compliance with applicable laws and regulations. Only some of our employees have access to the spaces and systems where personal data is stored, and a password and user name are required to log into these systems.

HOW LONG DO WE SAVE PERSONAL DATA

We never process personal data longer than what is allowed by law, regulations, practice or government decision. Personal data that we process with the aim of executing our agreement with you is processed basically during the period it is necessary for us to be able to administer the contractual relationship, exercise our rights and fulfill our obligations to you. However, in order to fulfill the legal requirement that you must give consent for this or for us to do so with the support of legitimate interest, it may be necessary for us to save your personal data for a longer period of time.

RIGHTS OF NATURAL PERSONS

In accordance with applicable data protection legislation, you have the right to access information regarding which personal data we process about you and to request rectification of your personal data.

Under certain conditions, you also have the right to request erasure or restriction of your personal data or object to our processing. Under certain conditions you also have the right to receive the personal data concerning you which you provided to us in a structured, commonly used and machine-readable format, and you are entitled to request that this data be transferred to another personal data controller.

You have the right to withdraw at any time your provided consent for the processing of personal data, and the withdrawal goes into effect as of the time the withdrawal is made. You also have the right to object at any time to the processing of your personal data for direct marketing.

Should you have any complaints regarding our processing of your personal data, you are entitled to convey the complaint to the supervisory authority. Please contact us if you would like to exercise your rights in accordance with the above or otherwise would like to communicate with us regarding our processing of your personal data.

Stockholm, Wednesday, May 23, 2018

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