



Policy for personal data processing in Akademiska Hus AB

Summary

- Akademiska Hus Aktiebolag, hereinafter called Akademiska Hus, shall process personal data in a legal, correct and open way.
- Akademiska Hus shall implement appropriate technical and organisational measures to ensure and be able to demonstrate that processing is carried out in accordance with currently applicable legislation, such as the Personal Data Act and future Data Protection Regulations.
- Akademiska Hus shall ensure that no risk arises of infringement of personal privacy.

Processing personal data

Introduction and purpose

This policy shall describe how Akademiska Hus shall process personal data in accordance with currently applicable legislation. The policies intended to act as guidance for Akademiska Hus' application of applicable legislation including the implementation of the provisions of the Data Protection Regulations which come into force on 25 May 2018.

Scope

The policy covers Akademiska Hus and its operation. It is incumbent on Akademiska Hus to establish the purpose of personal data processing, as well as to ensure sufficient security and to decide on more detailed procedures in this area. Deviations from this policy may only be made if there is support for this in the legislation.

Background

Akademiska Hus may process personal data within the framework of its operation. In order to protect the registered's personal data and to protect the registered from processing that would infringe their privacy, the Personal Data Act, the Data Protection Regulations and other legislation in this area currently applicable shall be applied.

Guidelines

Data Controller

Akademiska Hus is, as a rule, the data controller for personal data processing which takes place within the framework of the company's operation, and shall, accordingly, determine the purposes for the respective processing of personal data. Akademiska Hus may transfer the processing of the actual *personal data processing* to, for example, employees, but can never transfer *its responsibility as data controller*.

Akademiska Hus shall ensure that all members of staff have the knowledge necessary to process personal data correctly. Akademiska Hus shall also ensure that there are

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administrative, technical and organisational procedures in place for processing personal data within the operation.

Persons and/or companies outside Akademiska Hus' organisation may come to process personal data on the instructions of Akademiska Hus. In the event of such processing, a Personal Data Processor Agreement shall be drawn up with each Personal Data Processor. In drawing up such an agreement, the necessary consideration shall be given in each individual case to the responsibility which the Personal Data Processor shall answer for to Akademiska Hus on the basis of the risk assessment carried out.

The purposes of personal data processing

Akademiska Hus shall, before the company collects personal data from the individual or otherwise obtains personal data from other sources, establish *the purpose or purposes* of the processing. Akademiska Hus may only process personal data in accordance with established purposes which have been communicated to the individual.

Legal grounds

Akademiska Hus shall ensure that the company has legal grounds for all personal data processing which takes place within the framework of the operation. Where the consent of the registered is required for processing to be permitted under the provisions of the Personal Data Act or the Data Protection Regulations, Akademiska Hus shall draw up procedures to ensure that such consent is obtained in each individual case.

Information for registered individuals

Akademiska Hus shall inform the registered of personal data processing which takes place in respect of the registered in accordance with the rules of the Personal Data Act or the Data Protection Regulations respectively.

If personal data is being collected directly from the register, Akademiska Hus shall inform the registered when the personal data has been received. If Akademiska Hus is, instead, obtaining personal data in another way from other sources, Akademiska Hus shall, no later than within a reasonable period after the personal data has been received, but, however, no later than within one month, provide information to the registered. If Akademiska Hus obtains personal data from other sources with the aim of using them Akademiska Hus shall, no later than on the date of the first communication with the registered, provide information to the registered. If Akademiska Hus obtains personal data from other sources and a disclosure to another recipient can be anticipated, Akademiska Hus shall, no later than when the personal data is disclosed for the first time, provide information to the registered.

Akademiska Hus shall drop procedures to ensure that the correct information is provided to the registered, and also that the information is provided at the right time.

Akademiska Hus shall post information on its website which – over and above statutory requirements – clearly explains the processing of personal data in day-to-day operations. Akademiska Hus shall, further, post information on its intranet which explains the processing of personal data in relation to the company's personnel. The information shall be characterised by openness in accordance with the requirements and purposes given expression through the Data Protection Regulations.

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Weeding

Akademiska Hus shall retain personal data only for so long as it is necessary to fulfil the company's purpose with the processing in each individual case. Thereafter, the personal data shall be weeded. More detailed weeding principles, which are in compliance with applicable legislation and practice, shall be produced for the personal data which is to be processed.

Akademiska Hus shall inform the registered of how long personal data is retained by Akademiska Hus.

Security measures

Akademiska Hus shall, in assessing the technical and organisational measures which it is appropriate to take to ensure and be able to demonstrate that processing is taking place in accordance with this regulation, take special account of the nature, scope, context and purposes of the processing, as well as the risks, of varying degrees of probability and seriousness, to physical persons' rights and freedoms.

Register of personal data register

Akademiska Hus shall keep a register of the processing of personal data carried out within the framework of the operation and under the company's responsibility. The register shall fulfil the currently applicable requirements and shall be updated regularly.

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