

# NREP Group - Privacy Policy

## summary

This policy reflects the Privacy Policy and Guidelines which the NREP Group and its employees adhere to

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## **Purpose and Objective**

NREP acknowledges the sensitive nature of the Personal Data it is entrusted by investors as well as employees and anyone else whose Personal Data it is Processing.

The purpose of this privacy policy is thus to establish the principles of how NREP shall ensure that all Processing, storage and use of Personal Data is handled fairly, lawfully, transparently and in accordance with The EU General Data Protection Regulation (GDPR).

## **Governance Structure and Responsibilities**

NREP has set up a governance structure to ensure compliance with the GDPR.

### **NREP AB Board**

- Ultimate responsible for NREP's compliance with the GDPR and this privacy policy
- NREP AB Board approves the privacy policy and instructs the CEO accordingly
- NREP AB Board appoints the Data Protection Officer

### **CEO**

- The CEO is operational responsible for NREP's compliance with GDPR

### **Data Protection Officer (DPO)**

- The DPO is appointed in accordance with GDPR
- The DPO acts independently and with outset in the information provided by the process owners and reports to the board of NREP AB
- The DPO is appointed to ensure compliance with GDPR and is the point of contact for any queries by the Supervisory Authority and the Data Subjects

### **Process Owners**

- The process owners are responsible within their function and reports to the DPO
- The process owners are responsible for keeping Personal Data updated and accessible to the Data Subject
- The process owners are responsible for identifying risks and ensuring that the necessary protective actions are taken

## **Principles for Processing Personal Data**

NREP Process Personal Data in accordance with the below listed steps to ensure compliance with the GDPR throughout the organization.

Processing means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **Purpose and Valid Use**

- Prior to collecting any Personal Data, NREP must ensure that there is a necessary, specific, explicit and legitimate purpose for processing the Data and that such Personal Data is only processed according to the original purpose.

#### Rights, Integrity and Data Quality

- By applying the relevant processes and routines, NREP ensures that the Personal Data is continuously kept accurate, correct and up to date.
- NREP ensures that the Data Subject is granted access to any Personal Data which NREP may store on the Subject if requested.

#### Adequacy

- By identifying the purpose, NREP will only collect such Personal Data as is necessary and adequate to achieve the specific purpose.

#### Confidentiality

- Based on an individual risk assessment as well as the nature, scope, context and purpose of Processing the Personal Data, NREP is ensuring appropriate technical and organizational security measures to protect all Personal Data against unauthorized Processing and destruction, data breaches or other unauthorized activities.

#### Transparency

- When collecting Personal Data NREP will inform the Data Subject of why the data is collected and how it is treated.
- NREP treats Personal Data in an open and transparent manner allowing the Data Subject to access the Personal Data at any time.

#### **International Transfer of Personal Data**

In the situation where a process owner, or others identify the need for a Transfer of Personal Data to a Third Country, the process owner will notify the DPO, who will ensure that all adequate measures of protection will be taken to best protect the Data Subject's Personal Data and compliance with the GDPR.

#### **Data Processing Agreements (DPA)**

NREP has entered into DPA's with relevant external parties whom are entrusted with Processing Personal Data on behalf of NREP.

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This is a summary of the Privacy Policy which is supplemented by Privacy Notice Guidelines, Data Protection Impact Assessment Guidelines and a Personal Data Breach Instruction which all employees have access to.

#### **Definitions**

All capitalized words in this document have the meaning as defined in the EU General Data Protection Regulation (Regulation (EU) 2016/679).