



## Tenant Data Privacy Notice

### 1. General

This Tenant Data Privacy Notice (the "**Privacy Notice**") sets out the general commitment of Enreal AB or any of its subsidiaries, as applicable, when collecting, using, disclosing, transferring and/ or otherwise processing any personal data in connection with the tenancy. "**Personal Data**" as used herein means any information that directly or indirectly can identify a person, such as name, telephone number and e-mail, and any other information that qualify as personal data under applicable data protection legislation including the General Data Protection Regulation 2016/679 (the "**GDPR**").

The Personal Data processed in relation to our tenants relate to the tenant itself when the tenant is a physical person or to the representatives of the tenant when the tenant is a company.

The landlord as set out in the lease agreement ("**Landlord**", "**us**" or "**we**") is the data controller for the Personal Data processed in connection with the tenancy and is committed to fulfil the highest standards in relation to personal integrity. To enable us to fulfil our legal and contractual obligations related to our tenants, and to conduct business securely and efficiently and for other specific purposes as set out in this Privacy Notice, we need to process certain Personal Data. This Privacy Notice outlines among other things the kind of Personal Data that is processed by us in relation to our tenants and the purpose of such processing. By entering into an agreement with us regarding a tenancy, the tenant confirms that the tenant has been informed about and read this Privacy Notice. The tenant also confirms that the persons that have been appointed contact persons of the tenant, that have signed the lease agreement or whose Personal Data has otherwise been provided to the Landlord by the tenant has received a copy of this Privacy Notice.

You as a Tenant have the right to enforce your rights according to applicable data protection legislation. Your rights include:

- to object to the processing of your Personal Data;
- access and rectification of your Personal Data;
- restriction of the processing of Personal Data;
- request deletion of your Personal Data; and
- data portability.

You always have a right to lodge a complaint with the data protection authority if you are dissatisfied with how we process your Personal Data. If you have any questions about your rights as stated above, please see further how you can enforce your rights in section 3 below.

We will transfer your Personal Data to third parties under certain lawful circumstances, as stated in section 4 in this Privacy Notice, and in some instances to a different country to the country in which you live or work. Such country may be established outside the EU/EEA.

If you have any questions regarding the Landlord's processing of personal data, you are always welcome to contact us, at the following email address: [privacy@enreal.se](mailto:privacy@enreal.se)

## 2. Type of Personal Data Processed

We may process the following categories of Personal Data related to Tenants:

- Contact information; such as name, address, email address, title and telephone number;
- Identity data, such as personal identification number;
- Bank details, such as name of bank and bank account details;
- Credit rating details collected from credit rating agencies; and
- Tenancy Contract Information such as contract terms, rental value, information about rent payments, contract dates, type of premises etc.

The same type of data may also be processed in relation to guarantors or pledgors when applicable, please refer to [Schedule 1](#) below.

The Personal Data that we process must be relevant and limited to what is necessary to fulfil the purpose of the processing. When the tenancy ends, we will as soon as possible delete the Personal Data unless there is any legal requirement to retain the Personal Data (such as for bookkeeping purposes) or the Personal Data must still be processed for another purpose (in which case it will not be deleted but only processed for such other purpose).

For more information on how we use your Personal Data, and for how long we store it, please see [Schedule 1](#) below.

## 3. Rights of registered persons

You have several rights when it comes to our use of your personal data. A summary of these rights are set out below.

If you want to make use of your rights you can do so by sending an e-mail to the e-mail address in section 1. You can also use that e-mail address if you have any questions

### *Right to object*

A registered person has the right to object, on grounds relating to his or her particular situation, at any time to the processing of Personal Data relating to him or her where processing is based on the legal basis of data processing in the public interest or when we base the processing on a legitimate interest.

If a registered person lodge an objection, we will no longer process the Personal Data related to that person that we process based on a legitimate interest unless we can demonstrate compelling and legitimate reasons for such processing that overrides the privacy interest of the registered person.

A registered person also has the right to object to processing for direct marketing purposes, including profiling to the extent it relates to such marketing in which case processing of personal data for such purposes must be stopped.

Even if a registered person objects to certain processing, we may still continue such processing if permitted or obligated to do so under applicable legislation, for example to be able to fulfil legal requirements or to fulfil contractual obligations in relation to the registered person.

### ***Right to Access and Rectification***

A registered person always has the right to request access to the Personal Data relating to him or her. This includes the right to:

- be informed whether or not Personal Data about the registered person is being processed;
- what type of Personal Data that is being processed; and
- the purpose of the processing.

A registered person also has the right, upon request, to access information about any evaluation or assessment of the balancing test we are required to conduct when we process Personal Data about the registered person based on our legitimate interest.

Furthermore, a registered person has the right to rectify or complete Personal Data if the Personal Data is inaccurate or incomplete. As soon as we become aware of any inaccurate Personal Data being processed, we will always rectify such Personal Data without undue delay and notify you accordingly.

### ***Right to Restriction***

A registered person has the right to request us to restrict the processing of Personal Data concerning him or her, if:

- the registered person contest the accuracy of the Personal Data, and we must restrict the processing for a certain period to enable us to verify the accuracy of relevant data;
- the processing is unlawful and the registered person oppose the erasure of the Personal Data but instead request restriction of the use;
- the processing is no longer necessary for the purposes it was collected or otherwise processed as stipulated in Schedule 1 in this Privacy Notice, but the Personal Data is required by the registered person for the establishment, exercise or defence of a legal claim; or
- the registered person has objected to processing pursuant to what is set out under the section "right to object" above, and our verification of the legitimate grounds is pending.

### ***Right to Erasure***

A registered person may also request that Personal Data should be erased if for example:

- the Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed;
- the registered person object to the processing of his or her Personal Data, in accordance with the "right to object" as set out above;
- we do not have an overriding legitimate interest;
- the processing is unlawful; or
- the Personal Data has to be erased to enable us to comply with a legal requirement.

If you have any questions about your right to erasure, please use the email stated in section 1 above. However, even if a registered person requires erasure of his or her data, we may still continue to process it if we have a legal ground to do so.

### ***Right to Data Portability***

If a registered person requests access to Personal Data about him or her that the registered person has provided, and (i) the Personal Data is being processed automatically and (ii) in accordance with a contract, or consent, between the registered person and us, the registered person may request that the data is provided in a structured, commonly used and machine-readable format and the registered person may also request that such Personal Data is transmitted to another controller, if this is technically feasible.

### ***The Right to Lodge Complaints***

If a registered person is not satisfied with how we process Personal Data, he or she may contact us at the email address set out in section 1. Please note that we may ask the person to confirm its identity to ensure that we do not disclose any Personal Data to any unauthorized person. Once we have confirmed the person's identity, we will handle the request in accordance with applicable law. We may ask you to specify your request before we perform any actions. Please note that even if a registered person objects to certain processing of Personal Data, the Landlord may still continue this processing if permitted or required to do so by law, for example to be able to fulfil legal or contractual requirements.

You always have the right to lodge a complaint with a supervisory authority, in particular in the EU/EEA member state where you live or work, or where you believe a violation of data protection law has occurred. The competent data protection authority in Sweden is Integritetsskyddsmyndigheten (<https://www.imy.se>).

## 4. Transfer and Disclosure of Personal Data

### *Asset Managers and Other Affiliated Companies*

The Landlord that you have a tenancy with is part of a group of several companies that are managed by Brunswick Real Estate AB and Cerium Invest AB ("**Asset Managers**"), and its respective affiliates. Personal Data for which the Landlord is a controller is usually not shared with or processed by the Asset Managers for such companies own purposes. However, Personal Data such as name and contact details of Tenants or contact persons at Tenants will from time to time be shared with companies within the Asset Managers to the extent necessary for to properly administer and manage the investment in the Landlord.

### *Service Providers*

We use third party service providers ("**Service Providers**"). The Service Providers perform certain services as requested by us that involve the processing of Personal Data. Such services include the provision of support regarding your tenancy, IT systems and property management. A Service Provider must only process Personal Data to enable the Service Provider to perform the services requested by us. Only Personal Data that is necessary to fulfil the relevant purposes will be provided to the respective Service Providers. The Service Provider (as a data processor) will always be obliged, under a written agreement, to act in accordance with the Landlord's instructions, to follow applicable law and to implement appropriate technical and organizational measures for the protection of the Personal Data.

### *Authorities*

Personal Data may also be disclosed to relevant authorities (e.g. the police, financial supervisory authorities, social insurance agencies and the tax authority) to fulfil legal obligations.

Please see [Schedule 2](#) and [Schedule 3](#) for more information regarding the transfer of Personal Data to other companies or authorities and for what purposes.

You are welcome to contact Enreal at the email address provided in section 1 above if you have any questions related to Enreal's processing of Personal Data. You can also refer to Enreal's General Privacy Policy <https://enreal.se/integritetspolicy/> if you want to know more about what type of Personal Data Enreal processes, and for what purposes.

### *Companies Outside of EU/ EEA*

Some of our Service Providers are located outside the EU/EEA. Personal Data may therefore be transferred to countries that do not have the same data protection laws as those within the EU/EEA. Such transfers will only be carried out in accordance with applicable data protection legislation and where appropriate safeguards are in place to ensure that your Personal Data remains adequately protected.

When Personal Data is transferred to the United States, transfers to U.S. organisations that participate in the EU–U.S. Data Privacy Framework (DPF) rely on the European Commission’s adequacy decision, which confirms that certified U.S. organisations ensure an adequate level of protection equivalent to that within the EU.

If a recipient is not certified under the DPF, or if the transfer concerns another third country without an adequacy decision, we will rely on appropriate safeguards under Article 46 GDPR. Such safeguards typically include the European Commission’s Standard Contractual Clauses (SCCs), which impose binding obligations on the receiving party to maintain a level of protection essentially equivalent to that in the EU.

Further information regarding international transfers and the safeguards applied is provided in Schedule 3 of this Privacy Notice, and additional details may be made available upon request.

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Last updated: 30 January 2026

## Schedule 1

## Data Processing Matrix

Personal data type and source	Purpose	Legal ground	Retention time or criteria
<b>Contact information</b> - i.e. name, address, telephone number, postal address and e-mail address  <b>Source:</b> Directly from Tenants	In order for the Landlord to fulfil the contractual obligations with corporate Tenant (Tenants representatives)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i> )
	To ensure proper financial reporting	Legal obligation	
	Management of the Landlord by Asset Managers	Legitimate interest	
	In order for Enreal to provide information to companies interested in acquiring parts or all of the Landlord's business		
<b>Bank details</b> - i.e. name of bank, bank account information and rental levels  <b>Source:</b> Directly from Tenants	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i> )
	To ensure proper financial reporting	Legal obligation	
	Management of the Landlord by Asset Managers	Legitimate interest	
<b>Credit rating details</b> – i.e. ratings related to your credit history  <b>Source:</b> collected from credit rating agencies	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i> )
	To ensure proper financial reporting	Legal obligation	
	Management of the Landlord by Asset Managers	Legitimate interest	
	In order for Enreal to provide information to companies interested in acquiring parts or all of the Landlord's business		
<b>Tenancy Contract Information</b> – i.e. contract terms, rental value, information about rent payments, contract dates, type of premises etc.  <b>Source:</b> the counterparty to a business arrangement or directly from Tenants.	In order for the Landlord to fulfil the contractual obligations with corporate Tenants (Tenant representatives)	Performance of contract	Duration of rent agreement and thereafter as required under applicable legislation (such as bookkeeping legislation, in Sweden <i>Bokföringslagen</i> )
	To ensure proper financial reporting	Legal obligation	
	Management of the Landlord by Asset Managers	Legitimate interest	
	In order for Enreal to provide information to companies interested in acquiring parts or all of the Landlord's business		
<b>All data as set out above</b>	To initiate or defend against potential claims.	Legitimate interest	Until any claim is time barred (under applicable legislation)

## Schedule 2

### Categories of Recipients

Personal data type that will be transferred	The applicable recipients of the personal data	Use of the personal data	Location of recipients
All personal data types as set out in Schedule 1	Asset Managers	Financial reporting and regulatory compliance, management/monitoring of Landlord	Sweden
All personal data types as set out in Schedule 1	Financial supervisory authorities and other authorities	Regulatory and tax compliance	Sweden
All personal data types as set out in Schedule 1	Service providers, such as property managers and their sub-contractors	Administration of Tenant and Landlord relationship (such as collecting rent and negotiating rent agreements), property management and financial reporting	Sweden
The following personal data types as set out in Schedule 1: Contact details, credit rating details and tenancy contract Information	Companies interested in acquiring parts or all of the Landlord's business	Evaluation of the Landlord's business	Depending on the location of the third party

Schedule 3

## Third Countries Transfer of Personal Data

Personal data type that will be transferred	The applicable countries involved in the transfer of personal data	Safety measure(s) taken to ensure that the transfer of personal data complies with applicable law
All personal data types as set out in Schedule 1	In terms of suppliers and service providers (e.g. IT systems, property management systems, or marketing services with third country servers), the applicable country of the service provider's establishment.	EU-U.S. Data Privacy Framework and Standard Contractual Clauses.