

## PRIVACY POLICY

### Regarding the processing of personal data within the service IntegrityLog

We at Genova Property Group AB (publ) (“**Genova**”, “**we**”, or “**us**”) are utilizing an online tool in order to establish a channel and procedure for internal reporting and follow-up of perceived or actual serious ethical violations and misconduct within our organization (the “**Service**”) provided by InsiderLog AB (the “**Service Provider**”).

The Service is designed to operate in a secure manner to ensure the confidentiality and protection of your identity as a reporting person as well as the identity of any third party mentioned in the report, and to prevent access thereto by non-authorized employees or other persons.

While protecting and keeping your identity confidential, submitting a report through the Service involves and requires processing of your personal data by our designated administrators of reports (as described below) and our Service Provider, for which we are the data controller. This privacy policy describes how your personal data (as defined in the General Data Protection Regulation (EU) 2016/679, the “**GDPR**”) is collected and used in conjunction with your submitting of a report, so called “whistleblowing”, through the Service. In accordance with the applicable regulations DIFS 2018:2, issued by the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*), reports of offences or suspected offences through a whistleblowing channel may only occur with respect to serious misconduct carried out by persons in key or leadership positions within the Genova group of companies. The legal basis for such processing is Genova’s legitimate interest to identify, investigate and protect the organisation’s vital interests or persons’ life and health. This privacy policy also describes your rights regarding your personal data and how to enforce such rights.

If you have any questions or comments on your privacy and our processing of your personal data as described herein, you can reach us by sending an email to [edvard.scheele@genova.se](mailto:edvard.scheele@genova.se) or contact us:

Genova Property Group AB (publ)  
Smålandsgatan 12, 111 46 Stockholm, Sweden

*In addition to our processing of your personal data as a data controller described herein, our Service Provider may, in conjunction therewith, process additional personal data (such as account login credentials) for which the Service Provider is the data controller. For more information hereof, please read the Service Provider privacy policy [here](#).*

## 1 **PERSONAL DATA THAT WE PROCESS, PURPOSE FOR THE PROCESSING AND THE LEGAL BASIS**

We will only process your personal data in order to:

- **Receive reports, communicate with you and take action on matters discovered through submitted reports.** We will process information submitted in your report (circumstances of the matter), as well as any information you submit through consequential messages to us within the Service. In the event your report leads to a follow-up investigation, your contact information (name, address, e-mail address and telephone number), may be used to ask you for additional information required to further investigate the matter. This includes primarily the name of the suspected wrongdoer(s), position, details of the wrongdoing and any other circumstances that form the basis for the report.  
The processing is necessary for our legitimate interest of counteracting ethical violations and wrongdoings within our organization, by means of providing a channel and procedure for internal reporting and follow-up of any such conditions.
- **To maintain documentation of reports.** Your personal data (submitted reports) will be processed for the purpose of documenting reported cases of misconduct. The processing is necessary to fulfil our legitimate interest to document written reports.
- **Protect our legitimate business interests and defend or enforce legal claims.** Your personal information may be used where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of policies, terms, and other policies. Processing for this purpose may be necessary to defend us against or enforce legal claims. The legal basis for this processing is our legitimate interest to protect us, you and others and for us to defend against or enforce legal claims.

## 2 HOW WE GATHER YOUR PERSONAL DATA

**Directly from you**, when submitting a report within the Service. You can also report misconduct by contacting a manager within Genova, or by contacting the Chief Financial Officer who is a member of the Genova whistleblowing working group.

You can also choose to submit a report within the Service on an **anonymous basis**.

**Indirectly**, if you are mentioned in a report submitted by others. We may also gather such personal data that you have made available to us in other ways, for example in the course of your employment.

## 3 HOW WE SHARE YOUR PERSONAL DATA

Your personal data may be shared with:

- **Designated administrators authorized to receive and follow up on reports.** Your personal data, such as your submitted report as well as your contact information in the event of a follow up-case, may only be shared with our designated employees that form part of the Genova whistleblowing working group consisted of the Chief Financial Officer, the board's audit committee and externally appointed legal counsel, authorized to receive and follow up on submitted reports. This also applies to any other information from which your identity as a reporting person may be directly or indirectly deduced.  
Designated administrators authorized to handle a follow-up case may not unauthorizably disclose information which may reveal your identity as a reporting person or of any other individual present in the case. The Genova whistleblowing working group reports to the Genova board.
- **Our Service Provider.** Your personal data will be shared with our Service Provider for hosting purposes. Our Service Provider are not authorized by us to use or disclose your personal data except as necessary to provide the Service or to comply with legal requirements. We do not permit any suppliers or subcontractors to use your personal data that we share with them for marketing purposes or for any other purpose than in connection with the services they provide to us.
- **Public authorities.** Your identity as a reporting person will be kept confidential in follow-up cases, inquiries and discussions in the case, unless we are obliged by law to disclose your identity as a reporting person, for example to respond to lawful requests from law enforcement authorities, regulatory authorities, and other public and government authorities, if needed to detect and prevent acts of crime or in connection with a legal process, to protect our rights or the rights of our affiliates, you or others.

## 4 WHERE WE PROCESS YOUR PERSONAL DATA

We always strive to process and store your data within the EU/EEA. However, your data may in certain situations be transferred to relevant recipients as described above, on a need-to-know basis. This could mean that your personal data is transferred to third countries outside the EU/EEA territory.

Please note that privacy laws in countries outside of the EU/EEA may not be the same as, and in some cases may be less protective than, privacy laws in your country. However, we always select our service providers carefully and take all the necessary steps to ensure that your personal data is processed with adequate safeguards in place in accordance with the GDPR.

## 5 HOW LONG WE KEEP YOUR PERSONAL DATA

We keep your personal data as long as necessary to fulfil the purposes for which it was collected. Once fulfilled, your personal data will be erased or anonymized.

Personal data that is obviously irrelevant for the investigation and handling of a particular report will be deleted as soon as possible if they have been collected by mistake.

Personal data in a follow-up case will not be processed for longer than two years after the case is closed.

## 6 YOUR RIGHTS

The following are your general rights under the GDPR. **However, please note** that applicable legal rights or obligations may prevent us from fulfilling your request in accordance with these rights, for example a request for restriction or erasure.

### YOUR RIGHTS UNDER THE GDPR

- **Right to information and access to your data.** You have the right to request information about how we process your data and a transcript of personal data processed by us. The first transcript may be requested free of charge, however if you make repeated and unreasonable requests for copies, we might charge you with an administrative fee.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure ('right to be forgotten').** You have the right to request that we erase personal data about you, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.

- **Right to restriction.** You are entitled to request that the processing of your personal data should be limited until inaccurate or incomplete information about you has been corrected, or until an objection from you have been handled.
- **Right to object.** You have right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests.
- **Right to withdraw your consent.** You may at any time withdraw any consent you have given us. However, please note that it will not affect any processing that has already taken place.
- **Right to complain.** You have the right to lodge a complaint to the Supervisory Authority in the country you live or work in, if you believe that we have not complied with our obligations regarding your personal data. In Sweden the Supervisory Authority is the [Swedish Authority for Privacy Protection](#).

Please contact us using the contact details at the top to exercise any of your rights.

## 7 CHANGES TO THIS PRIVACY POLICY

We might change and update this privacy policy. In case of any material changes to this privacy policy or our processing of your personal data, we will inform you of such changes.