

## PRIVACY POLICY

### SVENSK FASTIGHETSFÖRMEDLING SPAIN

Your trust is important for us. Svensk Fastighetsförmedling therefore takes technical and organisational measures to protect your personal data and to ensure that processing takes place in accordance with current data protection legislation and our internal guidelines, policies and procedures for processing personal data. We also have a data protection organisation which checks our compliance with current data protection legislation. This is in order for you to feel as secure as possible with our processing of your personal data.

For the processing of customers', sellers' and prospective buyers' personal data in accordance with this privacy policy, Svensk Fastighetsförmedling, Svensk Fast Utland SL and the estate agent branches concerned are jointly responsible for personal data. A list of our branches and contact details for each branch can be found at [svenskkfast.se/hitta-maklare/](https://svenskkfast.se/hitta-maklare/) and [svenskkfast.se/spanien/maklare/](https://svenskkfast.se/spanien/maklare/). However, Svensk Fastighetsförmedling is solely responsible for the processing of users' personal data at svenskkfast.se.

#### Which personal data do we process and why?

We process the following categories of personal data for the purposes stated below and on the basis of the legal grounds stated in relation to the respective processing.

#### Seller

In connection with you engaging Svensk Fastighetsförmedling to sell your property, we process your personal data as follows.

Purpose	Information category	Legal basis
<i>Management and execution of sale of property or service, including communication regarding the assignment, publication of information and photos on our own and partners' websites and administration of the down-payment, as well as administration of customer databases</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Account details</li> <li>Information about the property, such as photos and sales price and extract from the land register/ apartment database</li> </ul>	<p><i>Contract.</i> The processing is necessary in order to fulfil the assignment contract with you.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Communication of offers in various channels, e.g. via email, SMS text message and social media, for our own and partners' housing-related services and products.</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Visitor statistics</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest in providing you with offers on housing-related services and products.</p>

<p><i>Communication of sales prices and addresses in various channels, e.g. through mailings, publication on our own and partners' websites, and on social media in order to market Svensk Fastighetsförmedling</i></p>	<ul style="list-style-type: none"> <li>Information about the property, such as photos and sales price</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our interest in marketing Svensk Fastighetsförmedling and our operations.</p>
<p><i>Implementation of controls to prevent money laundering and terrorist financing</i></p>	<ul style="list-style-type: none"> <li>Name</li> <li>Account details</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Copy of ID document</li> </ul>	<p><i>Legal obligation.</i> The processing is necessary in order for us to fulfil our legal obligations according to the law.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>

**Potential seller**

If you contact Svensk Fastighetsförmedling to request a valuation of a property or for us to be able to submit offers to you, we will save your personal information as follows.

Purpose	Information category	Legal basis
<p><i>Handling a request for valuation assignment</i></p>	<ul style="list-style-type: none"> <li>Name</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about the property, e.g. type of property and extract from the land register/ apartment database</li> <li>Message</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest in responding to your request for a valuation.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<p><i>Performance of valuation assignment</i></p>	<ul style="list-style-type: none"> <li>Name</li> <li>Personal identity number</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about the property, e.g. type of property and extract from the land register/ apartment database</li> <li>Message</li> </ul>	<p><i>Contract.</i> The processing is necessary in order to fulfil the contract with you regarding valuation assignment.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<p><i>Communication of service offers in various channels, e.g. via email, SMS text message</i></p>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g.</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy</p>

<i>and social media, for our own and partners' housing-related services and products.</i>	address, email address and phone number) <ul style="list-style-type: none"> <li>• Visitor statistics</li> </ul>	our legitimate interest in marketing our services and providing you with offers on housing-related services and products.
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**Buyer**

When you buy a property with Svensk Fastighetsförmedling as the estate agent, we process your personal data as follows.

Purpose	Information category	Legal basis
<i>Administration of negotiation of property sale and administration of customer database</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Personal identity number</li> <li>• Account details</li> <li>• Contact details (e.g. address, email address and phone number)</li> </ul>	<p><i>Legitimate interest. The processing is necessary to satisfy our and your legitimate interest in negotiating the property sale for you.</i></p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Communication of offers in various channels, e.g. via email, SMS text message and social media, for our own and partners' housing-related services and products.</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details (e.g. address, email address and phone number)</li> <li>• Visitor statistics</li> </ul>	<p><i>Legitimate interest. The processing is necessary to satisfy our legitimate interest in providing you with offers on housing-related services and products.</i></p>
<i>Implementation of controls to prevent money laundering and terrorist financing</i>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Personal identity number</li> <li>• Account details</li> <li>• Contact details (e.g. address, email address and phone number)</li> <li>• Copy of ID document</li> </ul>	<p><i>Legal obligation. The processing is necessary in order for us to fulfil our legal obligations according to the law.</i></p> <p><i>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</i></p>
<i>Communication of sales prices and addresses in various channels, e.g. through mailings, publication on our own and partners' websites, and on social media in order to market Svensk Fastighetsförmedling</i>	<ul style="list-style-type: none"> <li>• Information about the property, such as photos and sales price</li> </ul>	<p><i>Legitimate interest. The processing is necessary to satisfy our interest in marketing Svensk Fastighetsförmedling and our operations.</i></p>

### Prospective buyers

In connection with you contacting Svensk Fastighetsförmedling regarding properties you are interested in, we process your personal data as follows.

Purpose	Information category	Legal basis
<i>Handling of expressions of interest for a specific property, including communication regarding the property, e.g. interest shown in other prospective buyers and bids received</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Offer</li> <li>Personal identity number</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our and the seller's legitimate interest in handling your expression of interest.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Communication regarding other property types based on previously shown interest</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our and the seller's legitimate interest in handling your expression of interest.</p>
<i>Performing a satisfaction survey regarding an attended viewing</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest to obtain information about your opinion of our services.</p>

### Users of the website

When you visit Svensk Fastighetsförmedling's website, we process your personal data as follows. Read more at [svenskfast.se/om-oss/cookies/](https://svenskfast.se/om-oss/cookies/).

Purpose	Information category	Legal basis
<i>Processing of property and valuation monitoring, as well as newsletters and My Pages</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about registered monitoring</li> </ul>	<p><i>Contract.</i> The processing is necessary in order to fulfil the contract with you regarding property and valuation monitoring, as well as newsletters and My Pages.</p>
<i>Communication of properties and services in digital channels, e.g. social media, based on use of the website</i>	<ul style="list-style-type: none"> <li>User-generated data, e.g. visitor and click history</li> <li>User ID</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our and the seller's legitimate interest in communicating relevant properties and services to you.</p>
<i>Evaluate and follow up use of our digital channels</i>	<ul style="list-style-type: none"> <li>User-generated data, e.g. visitor and click history</li> <li>User ID</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in evaluating and following up our digital channels.</p>

Other processing

Purpose	Information category	Legal basis
<i>Performance of follow-up and evaluation of completed assignments, services provided, etc.</i>	<ul style="list-style-type: none"> <li>Information on completed assignments, e.g. sales prices, area etc.</li> </ul>	<i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in performing follow-up and evaluation.
<i>Replying to requests</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> </ul>	<i>Legitimate interest.</i> The processing is necessary to satisfy our and your legitimate interest in answering enquiries from you.
<i>Establish, assert and defend legal claims, e.g. in order to manage complaints and in connection with legal disputes</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details</li> <li>Personal identity number</li> <li>Information on performed assignment</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in establishing, asserting and defending legal claims.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Management, protection and development of our systems and services</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Personal identity number</li> <li>Log information</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary in order to satisfy our legitimate interest in managing, protecting and developing our systems and services.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Fulfil legal obligations, e.g. accounting rules</i>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact details (e.g. address, email address and phone number)</li> <li>Information about fees paid and other financial transactions with the registered person</li> </ul>	<i>Legal obligation.</i> The processing is necessary for us to be able to fulfil legal obligations.

## For how long do we store your personal data?

We save your personal data only as long as we need the data to fulfil the purposes of the processing. For more information on how long we retain your data, see our [retention](#) times.

## From where do we collect data?

We collect personal data from various sources:

- **Yourself**

When you contact us for a valuation and estate agent assignment or to perform a service, e.g. monitor properties, express interest in a specific property, attend a viewing, place a bid on a property or contact us, we collect the information from you that is necessary for us to be able to carry out the assignment in question, provide the service or answer your enquiry.

- **Public registers**

Where applicable, we collect data from public registers in connection with an assignment.

An example of data that we collect from public registers for this purpose is information about the property.

To ensure that your data is up to date, we also regularly coordinate our customer database with the national population database.

## To which recipients do we transfer personal data?

When necessary we share your personal data with various recipients:

- **Other estate agent branches**

The personal data that an estate agent branch has collected from you, e.g. in connection with a viewing can be shared with the branch located in the area where you live to communicate offers to you. The processing is based on a balance of interests in order to satisfy our legitimate interest in marketing our services.

- **Service providers**

In order to fulfil the purposes of our processing of your personal data, we share personal data with service providers that we have engaged. These service providers provide IT services and marketing services, such as photography and printed material. The service providers may only process your personal data in accordance with our express instructions and must not use your data for their own purposes. They are also obliged by law and contract to take appropriate technical and organisational security measures in order to protect your data

- **Other recipients**

We may, where applicable, disclose your personal data to recipients other than those listed above, e.g. public authorities, if this is necessary for certain purposes.

Recipient	Purpose	Legal basis for the transfer
Public authorities	We may provide necessary information to public authorities if we are obliged to do so by law.	The processing is necessary in order to fulfil our legal obligations.

<p><b>Courts, counterparties, external advisers, etc.</b></p>	<p>In connection with a legal dispute, we may transfer data to other parties, e.g. courts, counterparties and external advisers.</p>	<p>The processing is necessary in order to satisfy our legitimate interest in establishing, asserting and defending legal claims.</p>
<p><b>Potential buyers and sellers of our operations</b></p>	<p>We may share information with potential buyers and sellers if we were to sell all or part of our operations or in the case of a merger.</p>	<p>The processing is necessary in order to fulfil our legitimate interest in executing the disposal or merger.</p>

**Where do we process your personal data?**

Your personal data is primarily processed by us, suppliers and partners within the EU/EEA. In cases where personal data is processed outside the EU/EEA, we ensure that our suppliers and partners have the same level of security and protection for their processing as is applied within the EU/EEA.

**Your rights**

According to current data protection legislation, you have a number of rights in relation to the processing of your personal data.

**You have the right to:**

**Request access (known as register extract)**

You have the right to request confirmation from us if we process personal data concerning you, and in such a case request access to the personal data we process about you, known as a register extract.

**Request correction**

Furthermore, if you believe that information about you is incorrect or incomplete, you have the right to request correction.

**Revoke consent with future effect**

To the extent that we process your personal data based on your consent, you have the right, at any time, to revoke your consent to the processing with future effect. This means that if you revoke your consent, we have the right to continue to process personal data already collected based on your previous consent.

**Right to oppose processing for direct marketing purposes**

You also have the right, at any time, to oppose our processing of your personal data for direct marketing purposes and to unsubscribe from future communications by notifying us of this, e.g. by clicking on a deregistration link in the email.

## **Right to oppose processing based on a balance of interests**

You have the right to oppose processing based on a balance of interests. However, we are permitted to continue processing your data, even though you have opposed the processing, if we have a crucial legitimate reason for the processing that outweighs the interest of privacy.

## **Right to deletion**

In certain circumstances, you have the right to have your personal data deleted, e.g. if the processing is based on consent and you revoke this consent. However, this does not apply if, for example, we are obliged by law to retain the data.

## **Right to request restriction of processing**

You also have the right to request that the processing of your personal data be restricted in certain circumstances. Please note, however, that if you request that the processing of your data be restricted, it may mean that we cannot fulfil our possible obligations to you during the time the processing is limited.

## **Right to data portability**

Finally, you have the right to receive a copy of the personal data that concerns you in a structured format (data portability). Unlike the right to a register extract, the right to data portability thus only covers data that we process with the support of your consent or a contract, e.g. assignment contract, and which you yourself have submitted to us, which normally includes information about name, personal identity number and contact details.

## **Manage your rights**

If you wish to manage your rights, e.g. order an extract from the register or request correction or deletion of your personal data, please download our form. It usually takes us 30 days to process your request from the time we receive the form. Send the completed form to [dataskydd@svenskfast.se](mailto:dataskydd@svenskfast.se) together with a copy of a valid ID document. This is so that we can be sure of your identity. Please use the email address that you may have registered with us when you send the form.

## **Who do I contact if I have questions?**

If you have any questions about the processing of your personal data, you are welcome to contact us. You also have the right to contact the Agencia Española de Protección de Datos (Spain) in the event of a complaint.

## **Contact details**

Svensk Fastighetsförmedling AB, 556090-2313

*Postal address:* Vasagatan 28, 111 20 Stockholm

*Email:* [dataskydd@svenskfast.se](mailto:dataskydd@svenskfast.se)

*Phone number:* +46 8-505 358 00