



Privacy policy

Svensk Fastighetsförmedling Spain

We value the trust you place in us. Svensk Fastighetsförmedling AB, corporate identity no. 556090-2313, 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 that checks our compliance with current data protection legislation, so that you feel secure regarding our processing of your personal data.

Responsibility for processing your personal data

Svensk Fastighetsförmedling AB and the estate agent branches concerned (together referred to below as "**Svensk Fastighetsförmedling**") are jointly (joint controllers) responsible for processing *customers'*, *sellers'* and *prospective buyers'* personal data in accordance with this privacy policy. A list of our estate agent branches and contact details for each branch can be found at svenskfast.se/hitta-maklare/ and svenskfast.se/spanien/maklare/.

Svensk Fastighetsförmedling AB and the estate agent branches concerned have entered into a mutual arrangement to share the responsibility between Svensk Fastighetsförmedling AB and the estate agent branches concerned regarding the processing of personal data and to ensure the protection of your personal data.

In some cases, Svensk Fast Utland SL (Spain), N.I.F: B93741676, and the Spanish estate agent branches concerned (below "**Svensk Fast Utland**") are also joint controllers together with Svensk Fastighetsförmedling AB for processing of customers', sellers' and prospective buyers' personal data. A similar mutual arrangement also exists between Svensk Fastighetsförmedling and Svensk Fast Utland. To the extent that personal data are processed in order to fulfil a legal obligation, Svensk Fastighetsförmedling and Svensk Fast Utland are, as a basic premise, sole controllers for personal data for their own individual processing.

You have the right to be informed of the main content of the above arrangements. In this case, contact us using the details provided in the section "Who do I contact if I have questions?" below. The content of this privacy policy also reflects these arrangements.

However, Svensk Fastighetsförmedling AB is solely responsible for the processing of *users'* personal data at svenskfast.se.

Explanation of concepts

Processing in this privacy policy refers to everything we do with your personal data, such as collection, registration, transfer, storage and processing.

GDPR in this privacy policy refers to the General Data Protection Regulation (EU) 2016/679.



Personal data in this privacy policy refers to all information that can directly or indirectly identify you, for example, your name, contact details or IP address.

Third country in this privacy policy refers to a country outside the European Union (EU) or the European Economic Area (EEA).

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

When you engage Svensk Fastighetsförmedling to sell your property, we process your personal data as shown below.

Purpose	Information category	Legal basis
<i>Management and execution of mediation of sale of residential property or service, including communications regarding the assignment, publication of information and photos of the property on our own and partners' websites and administration of down-payments, as well as administration of customer databases</i>	<ul style="list-style-type: none">• Name• Personal identity number• Contact details (e.g. address, email address and phone number)• Account details• Information about the property, such as photos and sales price and extract from the land register/ apartment database• Communication, e.g. by email	<p><i>Contract (article 6.1 (b) of GDPR)</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, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.</i>	<ul style="list-style-type: none">• Name• Contact details (e.g. address, email address and phone number)• Visitor statistics• Year of birth	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary to satisfy our legitimate interest in providing you with offers on housing-related services and products.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when we have deemed that the communication is of interest to you, that in some cases you have provided your consent in advance (pursuant to</p>



Purpose	Information category	Legal basis
		the Swedish Marketing Act 2008:486), and that you have the opportunity to unsubscribe from such mailings at any time by email and SMS text message.
<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"> Information about the property, such as photos and sales price 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary to satisfy our interest in marketing Svensk Fastighetsförmedling and our operations, including the public interest in being informed of sales statistics.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when the communication takes place due to our previous customer relationship with you.</p>
<i>Conducting surveys</i>	<ul style="list-style-type: none"> Name Contact details (e.g. email address) Information in the response to the survey 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in conducting surveys in order to gather your opinions about our operations and our goods and services. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose, particularly if you have participated in our survey voluntarily.</p>
<i>Implementation of controls to prevent money laundering and terrorist financing</i>	<ul style="list-style-type: none"> Name Account details Personal identity number Contact details (e.g. address, email address and phone number) Copy of ID document 	<p><i>Legal obligation (article 6.1 (c) of GDPR)</i></p> <p>The processing is necessary for compliance with our legal obligations under the Swedish Act (2017:630) on Money Laundering and Terrorist Financing (Prevention), as well as corresponding obligations in Spanish law.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>



Purpose	Information category	Legal basis
<i>Insurance mediation pursuant to the Swedish Insurance Distribution Act (2018:1219)</i>	<ul style="list-style-type: none"> • Name • Personal identity number • Contact details (e.g. address, email address and phone number) • Property designation 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in providing you with offers regarding insurance.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose.</p>

Potential seller

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

Purpose	Information category	Legal basis
<i>Managing a request for valuation assignment or sales assignment</i>	<ul style="list-style-type: none"> • Name • Personal identity number • Contact details (e.g. address, email address and phone number) • Information about the property, e.g. type of property and extract from the land register/ apartment database • Communication, e.g. by email 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary to satisfy our legitimate interest in responding to your request for a valuation or sale.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies because the measures we take are at your request and in your interests.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Conducting valuation assignment</i>	<ul style="list-style-type: none"> • Name • Personal identity number • Contact details (e.g. address, email address and phone number) • Information about the property, e.g. type of property and 	<p><i>Contract (article 6.1 (b) of GDPR)</i></p> <p>The processing is necessary in order to fulfil the contract with you regarding a valuation assignment.</p> <p>The processing of personal identity numbers is necessary</p>



	<p>extract from the land register/ apartment database</p> <ul style="list-style-type: none"> • Communication, e.g. by email 	<p>with regard to the purpose of the processing.</p>
<p><i>Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.</i></p>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) • Visitor statistics • Year of birth 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary to satisfy our legitimate interest in marketing our services and providing you with offers on housing-related services and products.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when we have deemed that the communication is of interest to you, that in some cases you have provided your consent in advance (pursuant to the Swedish Marketing Act 2008:486), and that you have the opportunity to unsubscribe from such mailings at any time by email or SMS text message.</p>
<p><i>Conducting surveys</i></p>	<ul style="list-style-type: none"> • Name • Contact details (e.g. email address) • Information in the response to the survey 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary in order to satisfy our legitimate interest in conducting surveys in order to gather your opinions about our operations and our goods and services. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose, particularly if you have participated in our survey voluntarily.</p>
<p><i>Communication of offers of our own housing-related products and services, by phone or by letter after obtaining contact details from public databases</i></p>	<ul style="list-style-type: none"> • Name • Year of birth • Contact details (e.g. address and phone number) 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary to satisfy our legitimate interest in providing you with offers on housing-related services and products.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your</p>



		personal data processed for this purpose. This particularly applies when we have deemed that the communication is of interest to you and that you, on request, can ask us to stop such communication.
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Buyer

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

Purpose	Information category	Legal basis
<i>Administration of mediation of property sale and administration of customer database, e.g. in order to inform you about the property and bids received and to manage contract writing</i>	<ul style="list-style-type: none"> • Name • Personal identity number • Account details • Committed mortgage offer from bank • Bids • Contact details (e.g. address, email address and phone number) • Communication, e.g. by email 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary to satisfy our and your legitimate interest in mediating the property sale for you.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies as otherwise we would not be able to mediate sale of the property to you as the buyer.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) • Visitor statistics • Year of birth 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary to satisfy our legitimate interest in providing you with offers on housing-related services and products.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when we have deemed that the communication is of interest to you, that in some cases you have provided your consent in advance (pursuant to</p>



Purpose	Information category	Legal basis
		the Swedish Marketing Act 2008:486), and that you have the opportunity to unsubscribe from such mailings at any time by email or SMS text message.
<i>Conducting surveys</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. email address) • Information in the response to the survey 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in conducting surveys in order to gather your opinions about our operations and our goods and services. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose, particularly if you have participated in our survey voluntarily.</p>
<i>Implementation of controls to prevent money laundering and terrorist financing</i>	<ul style="list-style-type: none"> • Name • Personal identity number • Account details • Contact details (e.g. address, email address and phone number) • Copy of ID document 	<p><i>Legal obligation (article 6.1 (c) of GDPR)</i></p> <p>The processing is necessary for compliance with our legal obligations under the Swedish Act (2017:630) on Money Laundering and Terrorist Financing (Prevention), as well as corresponding obligations in Spanish law.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</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"> • Information about the property, such as photos and sales price 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary to satisfy our interest in marketing Svensk Fastighetsförmedling and our operations.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when the communication takes place due to our previous business relations with you.</p>



Purpose	Information category	Legal basis
<i>Insurance mediation pursuant to the Swedish Insurance Distribution Act (2018:1219)</i>	<ul style="list-style-type: none"> Name Personal identity number Contact details (e.g. address, email address and phone number) Property designation 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in providing you with offers regarding insurance.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose.</p>

Prospective buyers

When you contact Svensk Fastighetsförmedling regarding properties you are interested in, we process your personal data as shown below.

Purpose	Information category	Legal basis
<i>Managing expressions of interest for a specific property, including communications regarding the property, e.g. interest expressed by other prospective buyers and bids received</i>	<ul style="list-style-type: none"> Name Contact details (e.g. address, email address and phone number) Bids Communication, e.g. by email 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our, the seller's and your legitimate interest in your expression of interest being managed.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies as otherwise we would not be able to manage the expression of interest that you have actively made to us.</p>
<i>Communication regarding other property types based on previously expressed interest, e.g. by email or SMS text message.</i>	<ul style="list-style-type: none"> Name Contact details (e.g. address, email address and phone number) Property types in which you have expressed interest 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our, the seller's and your legitimate interest in providing information about other property types, based on previously expressed interest.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies since we have deemed that the communication is of interest to</p>



Purpose	Information category	Legal basis
		you, and that you have the opportunity to unsubscribe from such mailings at any time.
<i>Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and business partners' housing-related services and products.</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) • Visitor statistics • Year of birth 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary to satisfy our legitimate interest in providing you with offers on housing-related services and products.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when we have deemed that the communication is of interest to you, that in some cases you have provided your consent in advance (pursuant to the Swedish Marketing Act 2008:486), and that you have the opportunity to unsubscribe from such mailings at any time by email or SMS text message.</p> <p>By expressing interest in a property, you are deemed to have given your consent to direct marketing in accordance with the Swedish Marketing Act.</p>
<i>Conducting a survey regarding a visit to a property viewing</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) • Information in the response to the survey 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary in order to satisfy our legitimate interest to obtain information about your opinion of our services.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies since the surveys are conducted in order to improve our treatment of you as a prospective buyer.</p>
<i>Keeping a list of bids</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) 	<p><i>Legal obligation (article 6.1 (c) of GDPR)</i> The processing is necessary in order to fulfil our legal obligations regarding keeping a</p>



Purpose	Information category	Legal basis
	<ul style="list-style-type: none">Information regarding bids made	list of bids pursuant to the Swedish Estate Agents Act (2011:666).

Users of the website

When you visit Svensk Fastighetsförmedling's website, we process your personal data as shown below. Read more at 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">• Name• Contact details (e.g. address, email address and phone number)• Information about registered property monitoring	<i>Contract (article 6.1 (b) of GDPR)</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 in accordance with our user terms and conditions .
<i>Communication of offers, information and surveys in various channels, e.g. by email, SMS text message and social media, for our own and partners' housing-related services and products.</i>	<ul style="list-style-type: none">• Name• Contact details (e.g. email address and phone number)	<i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary in order to satisfy our legitimate interest in providing you with offers on housing-related services and products, including conducting surveys. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies when we have deemed that the communication is of interest to you, that in some cases you have provided your consent in advance (pursuant to the Swedish Marketing Act 2008:486), and that you have the opportunity to unsubscribe from such mailings at any time by email or SMS text message.
<i>Conducting surveys</i>	<ul style="list-style-type: none">• Name• Contact details (e.g. email address)• Information in the response to the survey	<i>Legitimate interest (article 6.1 (f) of GDPR)</i> The processing is necessary in order to satisfy our legitimate interest in conducting surveys in order to gather your opinions about our operations and our goods and services. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose, particularly if you have participated in our survey voluntarily.
<i>Personalised communications and marketing of properties and services in digital channels, e.g. social media, for example using cookies and similar</i>	<ul style="list-style-type: none">• User-generated data, e.g. visitor and click history	<i>Consent (article 6.1 (a) of GDPR)</i> The processing takes place based on your consent and is necessary to communicate



Purpose	Information category	Legal basis
<i>tracking tools based on your use of the website</i>	<ul style="list-style-type: none"> User ID 	relevant properties and services to you. You give your consent when you agree to the use of cookies and similar tools for this purpose.
<i>Evaluate and follow up use of our digital channels, e.g. using cookies and similar tracking tools</i>	<ul style="list-style-type: none"> User-generated data, e.g. visitor and click history User ID 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in evaluating and following up our digital channels.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies since you have authorised the use of cookies for this purpose and you have the option to disable such cookies at any time.</p>
<i>Improve the user experience in our digital channels, e.g. using cookies and similar tracking tools</i>	<ul style="list-style-type: none"> Technical information, e.g. type of device you are using, browser version and operating system 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in improving your user experience in our digital channels.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies since you have authorised the use of cookies for this purpose and you have the option to disable such cookies at any time.</p>
<i>Ensure technical functionality and security in our digital channels, e.g. using cookies and similar tracking tools</i>	<ul style="list-style-type: none"> User ID 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in providing functioning and secure digital channels.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies as otherwise you will not be able to use our digital channels.</p>



Other processing

The other types of processing listed below apply to all categories of individuals covered by this privacy policy, but it is not certain that all types of processing apply to you specifically. The types of processing that apply to you depend on how you have interacted with us.

Purpose	Information category	Legal basis
<i>Conducting follow-up and evaluation of completed assignments, services provided, etc.</i>	<ul style="list-style-type: none">• Name• Contact details (e.g. address, email address and phone number)• Information on completed assignments, e.g. sales prices, area etc.	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in performing follow-up and evaluation.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies because the follow-up and evaluation are performed in order to improve our services to you.</p>
<i>Answer questions and provide customer service</i>	<ul style="list-style-type: none">• Name• Contact details (e.g. address, email address and phone number)• Communication, e.g. by email	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our and your legitimate interest in answering questions from you and providing customer service.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies as otherwise we would not be able to answer your questions.</p>
<i>Ensure good database maintenance, e.g. to ensure updating of our customer database that contains information about sellers, potential sellers, buyers, prospective buyers and users of the website</i>	<ul style="list-style-type: none">• Name• Contact details• Personal identity number	<p><i>Legal obligation (article 6.1 (c) of GDPR)</i></p> <p>The processing is necessary for us to be able to fulfil the principle of accuracy in the GDPR.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Facilitate communication to sellers of offers in various channels, e.g. by email,</i>	<ul style="list-style-type: none">• Information about the acquired	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p>



Purpose	Information category	Legal basis
<i>SMS text message and social media, for our own and partners' housing-related services and products relating to the seller's new housing.</i>	property, e.g. address, property designation, type of dwelling, size, etc.	<p>The processing is necessary in order to satisfy our legitimate interest in providing the seller with offers on housing-related services and products.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies since it regards indirect harmless personal data about you.</p>
<i>Establish, exercise and defend legal claims, e.g. in order to manage complaints and in conjunction with legal disputes</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) • Information about the property, e.g. type of property and extract from the land register/ apartment database • Personal identity number • Information on performed assignment • Communication, e.g. by email • Other personal data that is relevant for the purpose in question, depending on what the legal claim relates to 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in establishing, exercising and defending legal claims (for example, in conjunction with a dispute or other legal proceeding).</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies as otherwise we would not be able to safeguard our business-related interests.</p> <p>The processing of personal identity numbers is necessary with regard to the purpose of the processing.</p>
<i>Management and protection of our IT systems and services</i>	<ul style="list-style-type: none"> • Name • Contact details (e.g. address, email address and phone number) • Log information, e.g. user ID, date of event, type of event 	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in managing and protecting our systems and services.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies so that we can protect and manage your personal data in an appropriate way.</p>



Purpose	Information category	Legal basis
<i>Development and improvement of our IT systems and services</i>	<ul style="list-style-type: none">All personal data specified in this information text and that is necessary for the purpose.	<p><i>Legitimate interest (article 6.1 (f) of GDPR)</i></p> <p>The processing is necessary in order to satisfy our legitimate interest in developing and improving our IT systems and services.</p> <p>Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose. This particularly applies so that we can protect and manage your personal data in an appropriate way.</p>
<i>Fulfil legal obligations, e.g. according to the Swedish Accounting Act (1999:1078), the Swedish Money Laundering and Terrorist Financing (Prevention) Act (2017:630), the Swedish Estate Agents Act (2011:666) and the GDPR, and also the corresponding obligations in Spanish law.</i>	<ul style="list-style-type: none">NameAccount numberContact details (e.g. address, email address and phone number)Information about fees paid and other financial transactions with the registered personOther information that is necessary in order to fulfil the legal obligation.	<p><i>Legal obligation (article 6.1 (c) of GDPR)</i></p> <p>The processing is necessary for us to be able to fulfil the legal obligations to which we are subject.</p>

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 further 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. Examples of such information are your name, personal identity number, information about the property, contact details and information about bids.

- **Public databases**

Where applicable, we collect data from public databases in connection with an assignment, for example, the Swedish National Land Survey and the Swedish Tax Agency. An example of data that we collect from public databases for this purpose is information about the property.

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

In order to be able to contact you by phone and post with offers for estate agent services, we collect names and contact details, such as addresses and phone numbers, from public databases.

- **Co-operative housing associations**

When we carry out an assignment, we may collect information from the co-operative housing association to which the property belongs.

The information that we collect from the housing association is name, personal identity number, phone number, address, apartment number, information about mortgages.

- **Banks**

When, for example, booking a valuation through a bank and for a purchase in connection with a committed loan offer, we receive information from the bank comprising name, phone number, email and information about the loan offer (e.g. amount and bank).

To which recipients do we transfer personal data?

When necessary we share your personal data with various recipients:

- **Seller**

In order to satisfy our legitimate interest (article 6 (1) (f) of GDPR) of mediating sale of the property to the buyer, we will disclose the necessary information to the seller concerning the buyer, e.g. information about name, contact details and sales price. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose, particularly since this is a necessary measure in conjunction with the buyer's purchase of the property.

- **Buyer**

In order to fulfil the assignment agreement with the seller (article 6.1 (b) of GDPR), we will disclose the necessary information to the buyer about the seller, e.g. information about the seller's name, contact details and information about the property.



- **Partners in customised marketing**

In order to provide offers and marketing and communicate concerning ourselves, our businesses and our services on our website and in our social media, we share personal data about you (such as IP address, browser and user behaviour and click history on the website) with Meta Platforms Ireland Limited ("Facebook"). Such disclosure is based on your consent (article 6 (1) (a) of GDPR).

When we automatically share personal data through the use of cookies and similar tracking tools with Facebook, we and Facebook – where applicable – are jointly responsible for the collection and transfer of your personal data. We and Facebook, on the other hand, are solely and separately responsible for the subsequent use of your personal data.

We have entered into special arrangements with Facebook that describe the role and responsibility that we and Facebook have for the use of your personal data. You have the right to be informed of the main content of these arrangements (see the reference in the below paragraph). Information about Facebook's use of your personal data, including their legal grounds for processing and how you can exercise your rights vis-à-vis Facebook, can be found in their [Data Policy](#).

We have entered into a [Supplementary agreement on joint responsibility](#) to determine our respective responsibilities and roles in relation to the use of your personal data for which we and Facebook are jointly responsible.

- **Other estate agent branches**

The personal data that an estate agent branch has collected from you, for example, in connection with a viewing will be automatically shared with the branch located in the area where you live in order to communicate relevant offers to you. The processing is based on a balance of interests (article 6.1 (f) of GDPR) in order to satisfy our legitimate interest in marketing our services. Our assessment is that this legitimate interest overrides your right not to have your personal data processed for this purpose, particularly since we have deemed that the communication is of interest to you and that you are given the opportunity to unsubscribe from such mailings at any time, in connection with the communication.

- **Information providers**

It is important for us to ensure that your information is up to date. We therefore regularly link our customer database with the population database (SPAR) through information providers with which we have agreements. In order to check that your information is correct, we share names, contact details and, where applicable, personal identity numbers with the information provider. According to the principle of accuracy in the GDPR, personal data must be accurate and, if necessary, updated. The processing is thus necessary in order to fulfil a legal obligation (article 6 (1) (c) of GDPR).

- **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 that are processors of personal data. 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, e.g. Swedish Tax Agency or Swedish Police.	We may provide necessary information to authorities if we are obliged by law to do so.	The processing is necessary in order to fulfil our legal obligations (article 6.1 (c) of GDPR).
Courts, counterparties, external advisers, insurance companies, etc.	In order to safeguard our interests in conjunction with a legal dispute, we may transfer information (as necessary) to other parties, e.g. courts, counterparties or external advisers.	The processing is necessary in order to satisfy our legitimate interest in establishing, exercising and defending legal claims (article 6.1 (f) of GDPR).
Potential buyers and sellers of our operations	We may share relevant information with potential buyers and sellers if we were to sell all or parts of our operations or in the case of a merger.	The processing is necessary in order to fulfil our legitimate interest in executing the disposal or merger (article 6.1 (f) of GDPR).

Where do we process your personal data?

The basic premise is that your personal data is processed by us, suppliers and business partners within the EU/EEA.

Your personal data will also be transferred to certain third countries (i.e. outside the EU/EEA), as described in the table below. To ensure the protection of such personal data, appropriate measures have been taken in relation to each such transfer to a third country, for example, taking into account the law of the recipient country and the specific circumstances of the transfer in question.

If you would like further information about and/or access to the protection measures we have taken for a transfer to a third country that you are affected by, please contact us as shown at the end of this privacy policy. In the table below, we also refer to the transfer mechanisms that we rely on pursuant to Chapter V of the GDPR for transfers to third countries.

Depending on what kind of relationship you have with us, for example as a website visitor, buyer or seller, your personal data are mainly shared with the following third countries:

Third country	Transfer mechanism (Chapter V of GDPR)	Reference to transfer mechanism
USA	EU Commission standard contractual clauses (Article 46.1 (c) of GDPR), including necessary additional safeguards	EU Commission standard contractual clauses (2021/914)
UK	European Commission decision on adequate level of protection (Article 45 of the GDPR)	European Commission decision on the adequate protection of personal data by the United Kingdom



India	EU Commission standard contractual clauses (Article 46.1 (c) of GDPR), including necessary additional safeguards	EU Commission standard contractual clauses (2021/914)
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Your rights

According to current data protection legislation, you have a number of rights in relation to the processing of your personal data. Below we explain your rights and the conditions under which you have the opportunity to assert them. In order for this to be as clear as possible for you, we have opted to report the rights and regulations that we deem to be relevant to you in the light of the types of processing we perform. For a comprehensive description of the rights under Chapter III of the GDPR, please see the [information on rights](#) on the website of the Swedish Authority for Privacy Protection (IMY).

You have the right to:

- **Request access (a register extract) (article 15 of GDPR)**

The right of access includes a right for you to request to:

- receive *confirmation* from us regarding whether or not we process personal data concerning you: and if this is the case
- receive *information* regarding the processing in question concerning the purpose of the processing, categories of personal data and recipients of this, retention periods, your other rights under Chapter III of the GDPR, from where personal data were gathered and any third country transfers; and
- receive a *copy* of the personal data that we process about you, known as a register extract.

Please note that we have the right to refuse you all or part of a copy of your personal data if we deem that the disclosure of such a copy would adversely affect any other person's freedoms and rights, including ours. This may be the case, for example, if a document with your personal data were to contain information about another individual.

- **Request rectification (article 16 of GDPR)**

Furthermore, if you believe that information about you is incorrect or incomplete, you have the right to request rectification. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Note that a historical record is not automatically considered incorrect, as it may have been accurate at the time the information was recorded.

- **Withdrawal of consent with future effect (article 7 of GDPR)**

To the extent that we process your personal data based on your consent (article 6.1 (a) of GDPR), you have the right at any time to withdraw your consent to the processing with future effect. This means that if you withdraw your consent, we must, as a basic premise, stop the processing based on such consent. On the



other hand, the legality of previous processing based on such consent is not affected retroactively by the fact that you have withdrawn your consent.

- **Right to object to processing for direct marketing purposes (article 21 of GDPR)**

You also have the right at any time to object to our processing of your personal data for direct marketing purposes, including for profiling if this takes place in conjunction with such direct marketing, and to unsubscribe from future mailings. You can unsubscribe from mailings by notifying us, for example, by clicking on a deregistration link in the mailing. This applies, for example, to processing (see above) where we communicate offers by email and SMS test message relating to our own and partners' housing-related services and products. If you object to processing for direct marketing purposes, we are obliged to discontinue such processing and we will then no longer send you any direct marketing.

- **Right to object to processing based on a balance of interests (article 21 of GDPR)**

You also have a general right to object to processing carried out on the basis of a balance of interests (article 6.1 (f) of GDPR). However, we may continue to process your data, even though you have objected to the processing, if we can demonstrate an essential legitimate reason for the processing that overrides your privacy interest or if the processing in question is necessary in order to establish, exercise or defend legal claims.

Depending on the type of processing you have objected to, our assessment of whether or not an essential legitimate reason exists may vary. If your privacy interest is overriding, we are obliged to erase your personal data that are subject to the relevant processing.

See the tables above regarding the processing we perform that is based on a balance of interests so that you better understand when the right to object applies.

- **Right to erasure (article 17 of GDPR)**

In addition to the right to object to processing that may result in us being obliged to stop the processing (see more about the right to object above), in certain circumstances, you have the right to have your personal data erased. This is the case, for example, if:

- (i) the personal data we process is no longer necessary for a specific purpose or is otherwise being unlawfully processed;
- (ii) the processing is based on consent (article 6.1 (a) of GDPR) and you withdraw this consent, unless we have the opportunity to process the personal data on the basis of a different legal basis in GDPR; or
- (iii) the personal data must be erased for compliance with a legal obligation.

If you have the right to erasure for personal data that we have published, we will, depending on the circumstances in the individual case (e.g. costs and technical conditions), contact other personal data controllers who process your personal data to make them aware that you have requested erasure.

However, our obligation to erase your personal data and notify other personal data controllers does not apply if we must save your personal data in order to, for example:

- (i) comply with a legal obligation which we are bound by;
- (ii) keep statistics (where erasure would make it difficult or impossible to keep statistics); or to
- (iii) establish, exercise or defend legal claims.

- **Right to request restriction of processing (article 18 of GDPR)**



You also have the right to request that the processing of your personal data be restricted in certain circumstances. With the exception of storage, if your personal data is restricted, we are normally only permitted to process such personal data with your consent or to establish, exercise or defend legal claims. Please note, however, that if you request that the processing of your data be restricted, this may mean that we cannot fulfil our possible obligations to you during the time the processing is restricted.

You have the right to demand that processing be restricted:

- (i) during the time that we check whether your personal data is accurate, as a result of you questioning the accuracy of the personal data;
- (ii) if the processing is unlawful but you have objected to us erasing personal data and instead requested that the use of the data be restricted;
- (iii) if you have objected to the processing (see further information about this right above) and during the period when we assess whether we have essential legitimate reasons that override your privacy interest.

- **Right to data portability (article 20 of GDPR)**

Finally, you have the right to receive a copy of the personal data concerning you in a structured format and the right to have this data transmitted to another personal data controller if this is technically feasible (data portability). Note that your right to data portability does not affect your right to request erasure of personal data.

Unlike the right of access to register extracts, the right to data portability only covers data that we process with your consent (article 6.1 (a) of GDPR) or a contract with you (article 6.1 (b) of GDPR), e.g. the assignment contract, and which you yourself have provided to us. This normally includes information on name, personal identity number and contact details.

- **Automated decision-making (article 22 of GDPR)**

We do not perform so-called automated decision-making that has legal consequences or otherwise significantly affects you.

Manage your rights

If you wish to manage your rights, e.g. order an extract from the register or request rectification or erasure of your personal data, please download our form. This makes it easier for us to handle your request. However, this is not a requirement.

It usually takes us 30 days to process your request from the time we receive the request. Send your request to dataskydd@svenskfast.se. When you send the form, please use the email address that you may have registered with us.

When you submit a request for the exercise of your rights regarding your personal data, we need to confirm your identity to ensure that we are in contact with the right person. This is so we avoid disclosing personal data to an unauthorised person, for example, or incorrectly erasing personal data concerning an individual. If we do not have enough information to confirm your identity, we may request that you provide additional information about yourself to confirm your identity. We only request the information that is reasonable and necessary to confirm your identity. The time to respond to your request starts after we have confirmed your identity.



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. In the event of a complaint, you also have the right to contact the Swedish Authority for Privacy Protection (IMY), which is the responsible supervisory authority under GDPR in Sweden. You will find their contact details [here](#).

For the processing where Svensk Fast Utland is joint personal data controller with Svensk Fastighetsförmedling pursuant to this privacy policy, you also have the right to contact the Spanish supervisory authority, Agencia Española de Protección de Datos (Spain). You can find the contact details for the Spanish supervisory authority [here](#).

Contact details

Svensk Fastighetsförmedling AB, corporate identity no. 556090-2313

Postal address: Vasagatan 28, 111 20 Stockholm

Email: dataskydd@svenskfast.se

Phone number: +46 8-505 358 00