

## PRIVACY NOTICE

### 1 INTRODUCTION

When you act as a lessee of one of the subsidiaries of Promenaden Property AS ("**Promenaden**", "**we**" or "**us**") we will process personal data relating to your representatives, contact persons, employees or hired-ins, customers and any other of your visitors (hereinafter collectively referred to as "**Data Subjects**"). This Privacy Notice ("**Privacy Notice**") describes how Promenaden processes such personal data, as well as the purpose of and the legal basis for our processing activities. In addition, this Privacy Notice describes the Data Subjects' rights in connection with our processing of personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) and Norwegian data protection legislation (together "**Data Protection Legislation**").

We use Promenaden Management AS ("**Promenaden Management**") as our manager of property. This means that Promenaden Management assists us with the management, development, operation and lease of commercial property in central Oslo. Promenaden Management also assists us in the communication with our lessees and other business connections. In connection with its assistance, Promenaden Management will process personal data on our behalf, as our data processor.

Our processing of personal data is described in more detail in Section 3 below. As the "controller", Promenaden is responsible for complying with the Data Protection Legislation when processing such personal data.

### 2 GENERALLY ABOUT PERSONAL DATA

Personal data means any information relating to an identified or identifiable natural person (a "**data subject**", i.e., in this context a Data Subject as described in Section 1 above). Names, phone numbers, addresses, and e-mail addresses are examples of information that generally is regarded as personal data.

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

### 3 OUR PROCESSING OF PERSONAL DATA AND THE LEGAL BASES FOR THE PROCESSING

The following list includes information about the personal data which we process and the purposes for processing these personal data:

- **Administration of lease agreements.** In order to administer and fulfill the lease agreements we have entered into with our lessees and to administer our business relationships, we will process personal data about current and previous lessees, including their representatives and contact persons. Such personal data include name, contact information (telephone number, e-mail, address), title and place of work, as well as other personal data included in the communication between us and the representatives. The name and contact information of such representatives may also appear on invoices we send to our lessees. The legal basis for our processing of such personal data is our legitimate interest in administering the relationships with our lessees (Article 6f of the GDPR).

- **Camera surveillance.** We use camera surveillance for the purpose of ensuring the security of our lessee's employees and visitors, as well as to secure our properties and prevent criminal offences. This camera surveillance include video recordings/images of the Data Subjects, movements at and in the vicinity of the properties, as well as time of arrival and departure. The legal basis for our processing of such personal data is our legitimate interest in keeping our premises, lessee's employees and visitors safe, and our legitimate interest in preventing criminal offences (Article 6f of the GDPR).
- **Access control.** We use access control to ensure that no unauthorized persons gets access to our property or to the designated areas of our lessees. In order to access the property, including the designated areas of our lessees, the lessee's employees must use an entrance card. In this regard, we register information about the employees, including name, e-mail, phone number, place of work, PIN, as well as a profile picture if applicable. When the entrance card is used we will register the time and place for access. The legal basis for our processing of such personal data is our legitimate interest in keeping our premises, lessee's employees and visitors safe, and our legitimate interest in preventing criminal offences (Article 6f of the GDPR).
- **Fire alarm test.** In order to receive an entrance card, the employees of our lessees need to conduct a test at [www.branntest.no](http://www.branntest.no). The employees must register their names, telephone numbers and e-mail addresses to be able to log into the solution. The legal basis for our processing of such personal data is that it is necessary for compliance with legal obligations (i.e. fire regulations) to which we are subject (Article 6c of the GDPR).
- **Dalux.** Dalux is a platform where we communicate with our lessees. For instance, this platform enables our lessee's employees to communicate with our operations departments and/or operation companies. To gain access to this platform, employees must create a user ID and provide us with their personal data such as name, telephone number and e-mail address. Furthermore, we may process any personal data included in inquiries sent by the employees through the platform or through the Dalux App. The legal basis for our processing of such personal data is our legitimate interest in administering our lease relationships and our legitimate interest in responding to inquiries from our lessees (Article 6f of the GDPR).
- **Excite.** Furthermore, we use Excite to communicate with our lessee. To gain access to this platform, employees must create a user ID and provide us with their personal data such as name, telephone number and e-mail address. The legal basis for our processing of such personal data is our legitimate interest in administering our lease relationships and our legitimate interest in responding to inquiries from our lessees (Article 6f of the GDPR).

Please note that the processing activities described above, and the personal data processed by Promenaden, may vary depending on which of the subsidiaries of Promenaden Property AS the lessee has entered into a lease agreement with. Data Subjects may at any time request confirmation and/or information regarding the personal data which we process, by contacting us at the contact information set out in Section 10 below.

#### **4 THE USE OF DATA PROCESSORS AND THE TRANSFER OF PERSONAL DATA TO THIRD PARTIES**

As described in Section 1 of this Privacy Notice, Promenaden Management is our property manager, meaning that Promenaden Management will process personal data on our behalf, acting as our data processor. In addition to Promenaden Management, we use service providers to assist with IT services and other administrative services. These service providers will also act as data processors on behalf of Promenaden.

We have entered into data processing agreements with all of our data processors which inter alia obligates the data processor to implement technical and organizational measures to ensure an appropriate level of security, confidentiality and integrity, as well as to only process the relevant personal data in accordance with the Data Protection Legislation.

If any of our data processors are located in countries outside the EU/EEA, we will ensure that the personal data is adequately secured, for example by entering into Standard Contractual Clauses ("**SCC**") issued by the European Commission. We will not disclose any personal data to any other third parties than the third parties described above, unless required to do so under applicable law or as required under a court order.

## **5 DATA RETENTION**

We will delete or anonymize personal data when they are no longer necessary in relation to the purposes for which they were collected or otherwise processed, or as otherwise required under the Data Protection Legislation.

We will inter alia delete or anonymize personal data in accordance with the following procedures:

- **Newsletters.** We will delete or anonymize personal data collected and processed in connection with newsletter subscriptions if the recipient withdraws its consent, and where there is no other legal basis/ground for the processing.
- **Camera surveillance.** Video recordings will be deleted in accordance with the deletion requirements set forth in Section 6 of the Norwegian Regulation on camera surveillance in businesses (FOR-2021-06-28-2255).
- **Access control.** Personal data collected in connection with the use and administration of entrance cards, will be deleted within 6 months after an employee's resignation.

## **6 DATA PROTECTION RIGHTS**

The Data Protection Legislation provides certain rights for data subjects. A Data Subject have the following rights in connection with our processing of personal data:

- Access: Data Subjects may contact us if they want to obtain confirmation with respect to whether or not we are processing their personal data, as well as access to and further information regarding our processing of their personal data.
- Rectification: Data Subjects may request us to rectify and/or complete inaccurate or incomplete personal data.
- Erasure: Data Subjects may request that we erase their personal data. We will respect and comply with such requests unless we inter alia are prohibited from deleting the personal data under mandatory retention requirements, or the personal data is necessary for the establishment, exercise or defense of legal claims.
- Restriction of processing: Data Subjects may also request the restriction of our processing of your personal data in accordance with Data Protection Legislation. If the processing has been restricted, such personal data will, with the exception of storage, only be processed with the Data Subject's consent or for the

exercise or defense of legal claims or for the protection of the rights of another person or for reasons of important public interest.

- Right to object: Data Subjects are entitled to object to certain processing activities, including for example processing of their personal data for marketing purposes. Data Subjects are furthermore, on grounds relating to their particular situation (for example, a specific need for protection of their identity), entitled to object to the processing of personal data based on legitimate interests, which we will comply with, unless there exist compelling legitimate grounds for our processing which override interest of the Data Subject, or if our processing is necessary for the establishment, exercise or defense of legal claims.
- Data Portability: If we process Data Subjects' personal data based on consent or based on our performance of a contract, and the processing is carried out by automated means, Data Subjects may request us to transfer the personal data to them or to another controller, in a structured, commonly used and machine-readable format.

Certain limitations exist in the rights provided by the Data Protection Legislation and the rights available to the Data Subjects will depend on the particular circumstances of the processing.

In order to make a request, please contact us at the below-listed contact information. Please also note that we may request the provision of additional information, if such information is necessary to confirm Data Subjects' identity.

## **7 SECURITY**

As a controller, Promenaden is responsible for the security and confidentiality of the personal data we process. We are furthermore responsible for implementing appropriate technical and organizational measures to ensure an appropriate level of security of processing.

We are for security reasons not entitled to disclose detailed information on the security measures which we have implemented. However, all of our employees are bound by a duty of confidentiality with respect to the personal data which we process. Furthermore, we have implemented measures, policies and routines to ensure the security of our processing.

## **8 THE NORWEGIAN DATA PROTECTION AUTHORITY AND OTHER SUPERVISORY AUTHORITIES**

The Norwegian Data Protection Authority has inter alia been established to supervise Norwegian companies' processing of personal data. Data subjects may contact us at any time if they have any information or complaints regarding our processing of personal data. Data subjects may also file a complaint to the Norwegian Data Protection Authority, or a data protection authority in the EU/EEA Member State of their habitual residence, place of work, or the place of the alleged data protection infringement.

Contact details of the Norwegian Data Protection Authority can be obtained on the following website: [www.datatilsynet.no](http://www.datatilsynet.no). This website may also contain more information on rights under the Data Protection Legislation.

## **9 CHANGES**

We may, from time to time, revise this Privacy Notice for example due to changes in our processing activities, applicable Data Protection Legislation or other legislation which may affect our processing of personal data. An

updated version of this Privacy Notice will be published on the website of Promenaden Management AS if any revisions to the Privacy Notice are made. Furthermore, we will notify Data Subjects by e-mail if we make any material changes to this Privacy Notice.

## **10 CONTACT INFORMATION**

For questions regarding this Privacy Notice, including how we process personal data, or data protection rights requests, please contact Promenaden Management AS at [gdpr@promenadenmanagement.no](mailto:gdpr@promenadenmanagement.no).