

## Privacy Policy

We at Propstreet AB (“**Propstreet**”, “**we**” or “**us**”) are committed to protecting and respecting your privacy. This privacy policy describes your rights and how we collect and use personal data about our potential, current and former customers, suppliers and business partners.

We are responsible for the processing of your personal data as described herein, as a data controller. Please do not hesitate to reach out to us if you have any questions or comments regarding your personal data or this privacy policy. You can reach us by sending an email to [feedback@propstreet.com](mailto:feedback@propstreet.com) or contact us at Kungsgatan 8, 111 43 Stockholm, Sweden.

*In some cases, where we process data on behalf of you or your employer as a data processor, we will process personal data in accordance with the instructions we have received under the personal data processing agreement we have entered into with you or your employer. Such processing activities are not included in this privacy policy since this policy only describes the processing we do as a data controller.*

### 1 **PERSONAL DATA THAT WE PROCESS, HOW WE DO IT AND OUR LEGAL GROUNDS FOR PROCESSING IT**

We process your personal data for the following purposes and based on the following legal basis:

- **To communicate with you.** Your contact details (name, email address and phone number) as well as the information contained within your communications with us, such as the contents of emails will be processed by us. This processing is either necessary for the performance of our contract with you or your employer or for our legitimate interest in effective communication with our customers, suppliers and business partners.
- **To market our services.** Your contact details will be used to send newsletters, information about our services or events to you. This processing is based on our legitimate interest of being able to market our services, as you have shown an interest in our services. Feel free to follow the unsubscribe instructions contained in the email received from us or contact us directly if you no longer want direct marketing from us.
- **In order to identify you and the company you are working for.** If you are a sole trader, we will process your personal identification number as a part of the information we keep about your company and to identify you as the representative of such a company. Since your personal identification number is the same as your company registration number this is necessary for the identification process. If you are not a sole trader but contacts us in the role of representative of a company, we process your company name, job title, workplace and sometimes information regarding your right to represent your company. Such processing is done for our legitimate interest of being able to identify our customers, suppliers and business partners.

- **We are responsible for the processing of your personal data as described herein, as a data controller.** We are committed to fully complying with all applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR) and Swedish data protection regulations. Please do not hesitate to reach out to us if you have any questions or comments regarding your personal data or this privacy policy.
- **To protect our legitimate business interests and legal rights.** We will use information about you where we believe it is necessary to protect and enforce our legal rights, interests and the interests of others, for example in connection with legal claims, compliance, regulatory and audit functions. Examples of personal data processed for this purpose is your communication with us, as well as invoices and agreements.
- **In connection with a merger or acquisition.** In connection with, due to strategical or business-oriented reasons, a potential merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company, the personal data we retain about you may be processed, shared or transferred, to parties involved in the process. This processing is based on our legitimate interest of being able to develop our business.
- **To ensure the functionality of our website.** We will collect technical data from your computer (or mobile device) in connection with your use of our website. Examples of this information is your IP address, browser type and version, screen resolution, preferred language, geographic location, operating system and computer. Even though we do not normally use technical data to identify individuals, sometimes individuals can be recognized from it. Processing of technical data is necessary to ensure our legitimate interest in guaranteeing the functionality and security of our website.
- **With your consent.** Your personal data may be used for other purposes than stated above if you ask us to or you give us your consent. For example, if you are one of our customers, we might contact you asking for your consent to publish a customer review by you for the purpose of marketing our services or ask you to perform a survey.
- **Concerning sensitive data.** We will not ask you to provide us with sensitive personal data about you. If you chose to include such information in the communication with us, we will only process such information to the extent necessary and justified.
- **Only applicable to our customers:**
  - **To apply for a membership and create a user account.** To be able to use our service you need to apply for a membership and thereafter have a user account. For those purposes, we collect the following personal information about you; first and last name, company and role, phone number and email address. This is necessary for us to be able to enter into and fulfil the obligations of the

agreement with you or your employer. You also have the option to add a profile picture, for which the processing will be based on your consent. For Customers with CRM functionality, additional contact management features are available subject to separate terms and conditions.

- **To provide our services to you.** If you are customer to us, we will process your personal data to manage our customer relationship and to provide you with our services, e.g. to provide you with customer support and to send you information through email and text messages when you match with an owner or broker of commercial properties or an investor – depending on your role. This is necessary for upholding our obligations according to the contract we have entered into with you or your employer.
- **To administer our agreements.** If you are a customer to us, personal data will be processed when we enter into and during the agreements with you or your employer. This is necessary for us to be able to enter into and fulfil the obligations of the agreement with you or your employer and for our legitimate interest to administer the agreement, e.g. to be able to send invoices with you as reference or to have a contact person during the agreement.
- **To inform you about the service.** We will provide you with information by email with information about the service, e.g. planned downtime and updates or new features to the platform. This processing is based on our legitimate interests to provide you with information that we deem necessary for you to know in order to use the platform.
- **To develop and improve our service.** We use technical data, and other aggregated and non-personal information to develop and improve our platform, including troubleshooting, data analysis, research, statistical purposes and testing (such as beta testing and evaluation of new features, in line with the fundamental nature of our platform). For example, we may collect and evaluate technical data about your use of our platform for analytical purposes, to understand how people use the platform in order to make it more intuitive. This processing is partly necessary to provide our service to you but mainly to pursue legitimate interests of improving our service and platform and its features.
- **Use of AI-assisted features and automated processing.** Our platform incorporates AI-assisted features, including large language model (LLM) inference and vector-based search, to enhance service delivery such as matching, recommendations, and data enrichment. These features process aggregated and technical data, and in some cases personal data (such as contact details and communication content), to generate outputs that support your use of the platform. No decisions with legal or similarly significant effects are made solely

through automated processing. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (GDPR Art. 22). You may contact us at any time to request information about the logic involved in any automated processing, its significance, and the envisaged consequences for you.

## 2 HOW WE GATHER YOUR PERSONAL DATA

**Information you give to us.** Most of the information we process about you is received from you. You may directly or indirectly give us information about yourself in different ways, for example when you create an account on our platform or otherwise in your communication with us. You can always choose not to provide us with certain information. However, some personal data is necessary in order for us to provide you with our services. Not providing such personal data may prevent us from performing the services you expect from us.

**Information we collect about you.** We may also obtain personal data about you from your employer, the website of your employer or other external public sources.

When you visit our website, we will collect technical data regarding your device from cookies and similar technologies. For more information on cookies view the cookie policy on our website.

## 3 HOW WE SHARE YOUR PERSONAL DATA

Sometimes, we need to share your personal information with other trusted individuals and companies. Your personal information is shared with:

- **Our employees and consultants.** Your personal data will, when appropriate, be shared with some of our employees and consultants. However, we will restrict access to those of our employees and consultants who need it to perform their jobs, for example to provide you with customer support. Our employees and consultants are of course subject to strict confidentiality.
- **Our service providers.** We transfer to or share your personal data with our suppliers who help us to provide our service to you, which require them to process personal data, e.g. cloud-based servers.

We provide personal data to third parties solely for the purpose of delivering our services and to manage our daily operations including marketing of our services. Our suppliers and subcontractors are not authorized by us to use or disclose your personal data except as necessary to perform services on our behalf or to comply with legal requirements.

- **Users of our platform.** The purpose of our platform is to connect brokers of commercial properties with investors. To be able to do so we will share the information you choose to provide in your profile with other users to enable contact.

- **Authorities and other public actors.** Sometimes legal obligations may require us to share information about you, for example to respond to lawful requests from law enforcement agencies, regulatory agencies, and other public and government authorities. We may also disclose information if needed to detect and prevent fraud or in connection with a legal process, for example to enforce our agreements or to protect our rights, you or others.
- **Parties involved in mergers and acquisitions.** We may share or transfer your personal data in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business, to the counter party and advisors involved in the process.

#### 4 HOW WE PROTECT YOUR PERSONAL DATA

We implement robust multi-factor authentication and role-based access control to ensure that only authorized personnel can access personal data. Our access control measures include secure login credentials, periodic access reviews, and principle of least privilege to limit data access to only those who require it for specific business purposes.

We will collect technical data from your computer (or mobile device) in connection with your use of our website. We employ industry-standard encryption methods to protect data both at rest and in transit, ensuring the confidentiality and integrity of personal information through robust encryption protocols such as TLS for data in transit and AES-256 for data at rest.

To further protect personal data, we employ data anonymization and masking techniques where appropriate. This includes removing or encrypting personally identifiable information when full details are not necessary, ensuring minimal exposure of sensitive personal data during processing and storage.

To maintain high standards of data protection, we conduct regular internal security reviews and engage external security experts as needed to assess our security measures, identify potential vulnerabilities, and support ongoing compliance with data protection regulations.

In the event of a potential data breach or security incident, we have a comprehensive incident response plan that includes immediate detection, containment, and mitigation procedures. Our plan encompasses rapid notification to affected individuals within 72 hours, engagement of cybersecurity experts, preservation of evidence, and collaboration with relevant authorities to minimize potential damage and prevent future incidents.

#### 5 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, and stored at, a destination outside of 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.

We ensure such transfers are lawful and that your data remains protected through appropriate safeguards under GDPR Chapter V. These safeguards include:

**Adequacy Decisions:** Transferring data to countries recognised by the European Commission as providing an adequate level of data protection (pursuant to GDPR Art. 45).

**Standard Contractual Clauses (SCCs):** For transfers to third countries lacking an adequacy decision (such as the United States), we primarily rely on the Standard Contractual Clauses adopted by the European Commission (pursuant to GDPR Art. 46). When using SCCs, we also conduct a Transfer Impact Assessment (TIA) to evaluate the specific risks associated with the transfer and the laws of the recipient country. Based on the TIA, we implement supplementary technical, organizational, and contractual measures as necessary to ensure that your data receives a level of protection essentially equivalent to that afforded within the EU/EEA.

You can request further information regarding the specific safeguards applied to the transfer of your personal data outside the EU/EEA by contacting us.

## 6 HOW LONG WE KEEP YOUR PERSONAL DATA

We retain your personal data only for as long as necessary to fulfil the specific purposes for which it was collected and processed, as outlined in Section 1 of this policy. The criteria used to determine our retention periods include:

The duration required to provide our services to you and manage our relationship (e.g., active account status plus a reasonable period for administrative purposes or potential reactivation). Our legal and regulatory obligations (e.g., retaining accounting records for 7 years as required by the Swedish Accounting Act). The need to establish, exercise, or defend legal claims (e.g., retaining contract-related data for the duration of applicable statute of limitation periods). Whether the processing is based on consent (in which case data is typically retained until consent is withdrawn, plus a short administrative period). The nature and sensitivity of the personal data.

We regularly review our data processing activities and the necessity of retaining personal data according to these criteria. Data that is no longer necessary for its specified purpose will be securely deleted or anonymized. For example, technical website log data is typically retained for a period of 6 months unless required for security investigations, while data processed solely based on withdrawn consent is deleted promptly thereafter. Specific retention periods for different data categories can be provided upon request.

## 7 YOUR RIGHTS

- **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. You can always contact us for more information on the balance test that has been made.  
  
You may also object to your personal data being processed for direct marketing purposes.
- **Right to access your data.** You have the right to request a transcript of personal data processed by us, and additional information on how the data have been collected, processed, shared, etc. The first transcript may be requested free of charge, however if you make repeated and unreasonable requests, we might charge you with an administrative fee.
- **Right to transfer your data.** You have the right to transfer your personal data to another controller under certain conditions.
- **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 delete 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 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 *Integritetsskyddsmyndigheten (IMY)*, which also is our lead supervisory authority, and you can find more information at their website: <https://www.imy.se/>.

*Please note* that legal rights or obligations (such as confidentiality, accounting and tax legislation), investigations of security incidents, enforcement of our terms and conditions may prevent us from disclosing or transfer all or part of your information, or from immediately deleting your information. The same applies if you have requested to “unsubscribe” from further

messages from us, as we will keep information of the request to ensure that we will fulfil it.

## **8 CHANGES IN THIS PRIVACY POLICY**

This privacy policy may be updated periodically to reflect changes in our collection and use of your personal data, including but not limited to: changes in our data handling practices, introduction of new services, technological advancements, legal or regulatory requirements, or modifications to our business operations. Such updates ensure our policy remains current and transparent, and we will take reasonable steps to inform you of any material amendments.