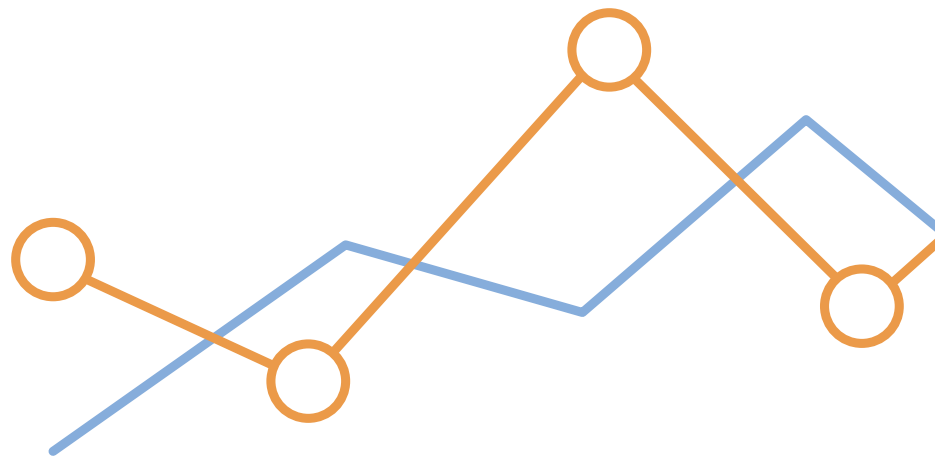


Privacy notice for processing of personal data

Sixth Swedish National Pension Fund



Privacy notice for processing of personal data

The Sixth Swedish National Pension Fund, CIN 855104-0721 (“AP6”, “us”, “we” and “our”) respects and safeguards your personal privacy when you visit our website, contact us, represent an organisation that is our supplier or partner, or participate in our events. We want you to feel secure when we process your personal data and, in this privacy notice we aim to inform you about how we process your personal data.

If you have any questions regarding our processing of your personal data or if you wish to exercise your rights as described below under the heading “What rights do you have when we process your personal data?” please contact us at dataskyddsbud@ap6.se.

Data controller

The Sixth Swedish National Pension Fund, with org. no. 855104-0721 (AP6) is the data controller for the processing of your personal data in connection with you visiting our website, contacting us, participating in our events or if you represent an organisation that is a potential, current or former supplier or partner to us.

For questions regarding the processing of your personal data – please contact: Sixth Swedish National Pension Fund

Köpmansgatan 32, SE-411 06 Gothenburg, Sweden

+46 31 - 741 10 00

E-mail to data protection officer: dataskyddsbud@ap6.se

For more information about personal data, permitted personal data handling or to file a complaint about the handling of personal data – please contact The Swedish Authority for Privacy Protection's (IMY).

The Swedish Authority for Privacy Protection's (IMY) Integritetsskyddsmyndigheten Box 8114, SE-104 20 Stockholm, Sweden

+46 (0)8 657 61 00

E-mail: imy@imy.se

Your rights

In summary, you have the following rights: the right to lodge a complaint with the Swedish Authority for Privacy Protection, the right to withdraw your consent, the right to object, the right of access, the right to rectification, the right to erasure, the right to restrict processing and the right to data portability. More information about your rights can be found at the end of this privacy notice.

If you have any questions about these rights or wish to exercise any of them, please feel free to contact us at dataskyddsbud@ap6.se

Who do we share your personal data with?

We share your personal data with our partners and suppliers as outlined below:

- our IT providers who process personal data on our behalf as data processors;
- external partners who assist us in managing our marketing and who process personal data on our behalf as data processors; and
- authorities and courts in cases where we have a legal obligation to do so or in cases where we have a legal claim against you.

If you would like more information about how we share your personal data, please contact us using the contact details provided above.

Processing of your personal data outside the EU/EEA

We do not transfer your personal data outside the EU/EEA.

Summary of AP6's processing of your personal data

Here you can read a summary of how we process your personal data. You will find more detailed information further down in this document. By clicking on the links below, you will be directed to the detailed information.

- We process various types of personal data about you, such as your name and contact details. Usually, we obtain this personal data directly from you or from the organisation you represent.
- We have compiled detailed information in tables below. There you will find a comprehensive description of our purposes, the personal data we process about you, our legal grounds and our storage periods.
- We process your personal data in order to carry out our business activities. In certain situations, we may need to share your personal data with other companies, such as our IT providers, authorities and third parties who assist us in improving our websites and in marketing.
- Processing of your personal data outside the EU/EEA. We do not transfer your personal data outside the EU/EEA.
- You have various rights in relation to our processing of your personal data, such as the right to lodge a complaint with the Swedish Authority for Privacy Protection and the right to obtain a record of the personal data we process.

Detailed information about the processing of your personal data

In the tables below you can read more about the personal data we process about you, why we process your personal data, how long we store your personal data for and the legal basis for our processing.

For our communication

Below you will find information on how we process your personal data when you contact us, visit our website or social media, or when we send marketing to you.

During communication with you		
Purpose of processing	Personal data processed	Legal basis
To communicate with you when you contact us via email, phone or our website.	<ul style="list-style-type: none">• Name• Email address• Phone number• Company or organisation, if applicable• Other information that you choose to give us	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to be able to communicate with you and answer your questions within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: AP6 is a Swedish authority and must therefore comply with the provisions on archiving set out in the Archives Act (1990:782). These provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely.

For personal data in documents that are not official documents, we store your data for three months after your question has been answered or our communication has ended.

Press releases

Purpose of processing	Personal data processed	Legal basis
To send press releases to you as a journalist.	<ul style="list-style-type: none">NameEmail addressPhone number	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to be able to provide information about events and news related to AP6 within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).
To manage subscribers who have registered to receive AP6 press releases.	<ul style="list-style-type: none">NameEmail addressCompany or organisation (optional)	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to be able to send press releases to individuals who have subscribed to our mailings within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: We will store your data until the press release is sent. If you have subscribed to our press room, we will store your personal data until you choose to unsubscribe.

Partners and suppliers

Below you will find information on how we process your personal data when you represent one of our suppliers or partners.

Contact with suppliers and partners

Purpose of processing	Personal data processed	Legal basis
To communicate with you as a representative of an organisation that is a potential, existing or former supplier or partner to us.	<ul style="list-style-type: none">NameEmail addressPhone number	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to be able to contact potential, existing or former suppliers and partners within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: We will delete your data if you no longer represent the organisation or if your contact details are no longer current. If we have entered into an agreement with your organisation we will store your contact details in accordance with what is stated under "Agreements with suppliers and partners" below.

Evaluation and selection of funds or investments

Purpose of processing	Personal data processed	Legal basis
To create investment documentation to assess whether the entity you represent will be able to manage assets in a desirable manner.	<ul style="list-style-type: none">NameEmail addressPhone numberProfessional experienceEducationInformation from interviews	The processing is necessary in the exercise of official authority – to manage pension assets in accordance with the statutory mission of the Sixth Swedish National Pension Fund pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: We will delete your data if you no longer represent the organisation or if your contact details are no longer current, unless otherwise specified by the provisions of the Archives Act (1990:782) that AP6 must adhere to. The archiving provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely.

If we have entered into an agreement with your organisation we will store your contact details in accordance with what is stated under "Agreements with suppliers and partners" below.

Agreements with suppliers and partners

Purpose of processing	Personal data processed	Legal basis
To negotiate, enter into and administer agreements with the organisation you represent.	<ul style="list-style-type: none">NameEmail addressPhone numberJob titleWorkplaceArea of responsibility	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is for the performance of a contract with the organisation you represent within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: We will store your data until the agreement with the organisation you represent has ended or if we become aware that you no longer represent the organisation in question. However, your information may be stored for longer for other purposes, such as accounting, as explained further below.

If personal data in the form of your signature is included in the agreement, the general rule is that it will be deleted 10 years from the date the agreement was entered into unless otherwise specified by the provisions of the Archives Act (1990:782) that AP6 must adhere to. The archiving provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely.

For invoicing purposes

Purpose of processing	Personal data processed	Legal basis
In order to be able to manage and administer invoicing.	<ul style="list-style-type: none">NameEmail addressPhone number	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is for the performance of a contract with your organisation within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: We will store your personal data until payment has been made, unless otherwise specified by the provisions on archiving set out in the Archives Act (1990:782) that AP6 must adhere to. The archiving provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely. The data may also be stored for a longer period for accounting purposes, as explained below.

To hold events

Below you will find information on how we process your personal data in connection with our events.

To hold events

Purpose of processing	Personal data processed	Legal basis
To invite you to our events.	<ul style="list-style-type: none">NameEmail addressPhone number	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is the ability to invite you to our events within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).
To organise our events.	<ul style="list-style-type: none">NameEmail addressPhone numberInformation concerning your dietary preferences, if you have provided this	<p>The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to enable us to organise events within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).</p> <p>If we process information concerning dietary preferences that could be related to health or religion, we obtain your consent (Article 6(1)(a) GDPR).</p> <p>You can withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of the processing carried out based on consent before its withdrawal.</p>

To share the list of participants with other participants.	<ul style="list-style-type: none"> Name Email address Phone number 	<p>The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is the ability to share</p> <p>the list of participants as a way of encouraging the participation of individuals who can contribute to the relevance of the event. This falls within the scope of our operations and of fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).</p>
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To photograph and make video recordings during events and activities in order to use these on the intranet, in marketing on the website and in the annual report.	<ul style="list-style-type: none"> Photographs and video recordings in which you appear 	<p>The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to be able to market AP6's activities and to provide information about this in the annual report. This falls within the scope of our operations and of fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).</p>
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Storage period: The photographs and video recordings are stored for as long as we need them for the purposes of marketing AP6's activities as a fund manager within the Swedish national pension system and to be able to provide information about this in the annual report. Since AP6 reports on gatherings, events, seminars etc. held to its stakeholders (owners, the general public etc.) over a lengthy period, we store photographs and video recordings of you for up to 10 years.

AP6 stores your other personal data until the event has been held.

This applies unless otherwise specified in the provisions on archiving set out in the Archives Act (1990:782) that AP6 must adhere to. The archiving provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely.

Legal obligation

Below you will find information on how we process your personal data when we must process it to fulfil our legal obligations under the Bookkeeping Act and the Marketing Act.

Bookkeeping		
Purpose of processing	Personal data processed	Legal basis
To comply with bookkeeping legislation.	<ul style="list-style-type: none"> Name Payment history, transactions and other material constituting bookkeeping records 	<p>The processing is necessary for compliance with a legal obligation</p> <p>(Art. 6(1)(c) GDPR) under the Bookkeeping Act (1999:1078).</p>

Storage period: We will store the information in bookkeeping records until the end of the seventh year after the end of the calendar year in which the financial year ended, unless otherwise specified by the provisions on archiving set out in the Archives Act (1990:782) that AP6 must adhere to. The archiving provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely.

If you have requested us to stop sending marketing communications

Purpose of processing	Personal data processed	Legal basis
If you have indicated that you do not wish to receive our marketing communications, we will store a note of this in an “unsubscribe register” to ensure that we do not market to you.	<ul style="list-style-type: none">Email address	The processing is necessary for compliance with a legal obligation (Art. 6(1)(c) GDPR) under the Marketing Act (2008:486) to ensure that you do not receive communications that you have requested not to receive.

Storage period: You will remain in our unsubscribe register until further notice.

Legal proceedings

Below you will find information on how we process your personal data when we or you have a legal claim or when we are otherwise in contact in legal proceedings.

Legal proceedings		
Purpose of processing	Personal data processed	Legal basis
To manage legal proceedings and claims.	<ul style="list-style-type: none">NameAddressInformation relevant to the case	The processing is necessary for the performance of a task carried out in the public interest (Art. 6(1)(e) GDPR), which is to enable us to defend ourselves against and assert our legal claims within the scope of our operations and fulfilling our task as a government authority pursuant to regulations such as the Government Agencies Ordinance (2007:515) and the Sixth Swedish National Pension Fund Act (2000:193).

Storage period: As a general rule, we will store your information until the case has been finally dealt with unless otherwise specified by the provisions on archiving set out in the Archives Act (1990:782) that AP6 must adhere to. The archiving provisions mean that personal data contained in official documents is archived and, in some cases, stored indefinitely.

Consent to processing

In certain situations we process your personal data after you have given your consent to the processing. These situations are described above, and you can withdraw your consent at any time. If you withdraw your consent entirely or in part, we will cease processing for that purpose. The withdrawal of your consent does not affect the lawfulness of the processing carried out based on consent before its withdrawal.

What rights do you have when we process your personal data?

The GDPR grants you various rights that you can choose to exercise in relation to our processing of your personal data. If you have any questions about these rights or wish to use any of them, please feel free to contact us. Read more about your rights below.

Right to lodge a complaint with the Swedish Authority for Privacy Protection (Article 77 GDPR)

You have the right to lodge a complaint with the competent supervisory authority if you believe that the processing of your personal data infringes the GDPR. In Sweden, the competent supervisory authority is the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten).

In detail: Your right to lodge a complaint applies if it does not prejudice any other administrative or judicial remedy. Such a complaint is preferably submitted to the authority in the member state where you have your habitual residence, where you work or where an infringement of applicable data protection laws and regulations is alleged to have occurred.

The supervisory authority is obliged to inform you about the progress of the complaint and the outcome, including informing you about the possibility of seeking a judicial remedy.

Right to withdraw consent (Article 7 GDPR)

You have the right to withdraw your consent at any time by contacting us.

In detail: The withdrawal of your consent will not affect the lawfulness of processing carried out based on consent before the consent is withdrawn.

Right of access (Article 15 GDPR)

You have the right to obtain confirmation as to whether or not your personal data is being processed by us. You can make a request by contacting us. If we process your personal data,

you also have the right to obtain a copy of the personal data we process and information about the processing.

In detail: The information about the processing that we provide you with access to in such cases to is:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to which the personal data has been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the intended period that the personal data will be stored for or, if this is not possible, the criteria used to determine that period;
- the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal data concerning you, or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- if we did not obtain the data from you, any available information as to where this data comes from;
- the existence of automated decision-making, including profiling, as referred to in Articles 22(1) and 22(4) GDPR, and, in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing; and
- if the personal data is transferred to a third country or to an international organisation, you also have the right to be informed of the appropriate safeguards provided pursuant to Article 46 GDPR in respect of the transfer.
- You have the right to receive a copy of the personal data processed by us. For any additional copies you request we may charge a reasonable fee based on our administrative costs. If you requested the information electronically, you will receive it in an electronic format that is commonly used unless you specify otherwise.
- Your right to request copies as described above shall not adversely affect the rights and freedoms of others.
- A request can be made by contacting us.

Right to object (Article 21 GDPR)

You have the right to object at any time to our processing of your personal data referring to grounds relating to your particular situation relating to processing of your personal data based on Article 6(1)(e) GDPR.

In detail: If you object, we may no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

Right to erasure (“right to be forgotten”) (Article 17 GDPR)

You have the right to have your personal data erased by us without undue delay and we have an obligation to erase personal data without undue delay if one of the following applies:

- the personal data is no longer necessary for the purposes for which it was collected or processed;
- you withdraw your consent on which the processing is based, and there is no other legal basis for the processing;
- you object to the processing pursuant to Article 21(1) GDPR, and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) GDPR;
- the personal data has been unlawfully processed; or
- the personal data must be erased to comply with a legal obligation in Union or Member State law to which we are subject.

We will notify each recipient to whom the personal data has been disclosed of any erasure carried out as described above, unless this proves impossible or involves disproportionate effort. If you would like information about these recipients please contact us.

Please note that our obligation to erase as described above does not apply to the extent that the processing is necessary for the following reasons:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing under Union or Member State law to which we are subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) GDPR in so far as your right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

Right to rectification (Article 16 GDPR)

You have the right to have inaccurate personal data concerning you rectified without undue delay.

In detail: Taking into account the purpose for which we process your personal data, you also have the right to have incomplete personal data completed, including by providing a supplementary statement.

We will notify each recipient to whom the personal data has been disclosed of any rectification carried out, unless this proves impossible or involves disproportionate effort. If you would like information about these recipients please contact us.

Right to restriction of processing (Article 18 GDPR)

You have the right to request that the processing of your personal data is restricted if:

- you contest the accuracy of the data (but only for a period that enables us to verify this);
- you have objected to the processing pursuant to Article 21(1) GDPR, pending the verification of whether our legitimate grounds override your legitimate interests;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead; or
- you require the personal data for the establishment, exercise or defence of legal claims even though we no longer need the personal data for the purpose of our processing.
- If processing has been restricted as described above, with the exception of storage such personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. We will notify you before the restriction of processing is lifted.
- We will notify each recipient to whom the personal data has been disclosed of any restriction of processing that has been implemented as described above, unless this proves impossible or involves disproportionate effort. If you would like information about these recipients please contact us.

Right to data portability (Article 20 GDPR)

You have the right to receive your personal data (which you have provided to us) from us in a structured, commonly used and machine-readable format and, where technically feasible, to have your data transmitted to another controller ("data portability"), where:

- the processing is based on consent; and
- the processing is carried out by automated means.
- Your right to data portability shall be without prejudice to your right in accordance with Article 17 GDPR (right to erasure). Your right to data portability does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

Your right to data portability shall not adversely affect the rights and freedoms of others.