

Integrity Notice

Fjärde AP-fonden (AP4)

Content

1. General.....	2
2. Application area	2
3. Personal data controller.....	2
4. Collection and processing of personal data	2
4.1 Collection of personal data	2
4.2 For what purposes does AP4 process personal data?.....	2
4.3 Categories of personal data that is processed	2
4.4 Legal basis for processing.....	3
4.5 How long does AP4 store your personal data?	3
4.6 Cookies.....	3
4.7 Recording of calls	4
5. We protect your personal data	4
6. Automated decision-making, profiling and direct marketing.....	4
7. Transfers of personal data to a third party	4
7.1 Transfers within the EU/EEA	4
7.2 Transfers to a third country	4
7.3 Category of recipient	4
8. Your rights as a data subject	5
8.1 Your right to access, rectification, erasure and restriction	5
8.2 Your right to object to our use of your personal data.....	6
8.3 Your right to data portability.....	6
8.4 Your right to lodge a complaint with the supervisory authority	6
9. Amendments to this integrity notice	6
10. Contact information.....	7
Compliance Officer at AP4	7
Data Protection Officer	7
Contact information for AP4	7

1. General

The Fourth Swedish National Pension Fund (“AP4”) works to safeguard your personal integrity and ensure that you feel secure when we process your personal data. It is incumbent upon us to make sure that all processing of your personal data is conducted in accordance with applicable laws on the protection of personal data.

This integrity notice has been prepared in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016). Interpretation and application of this integrity notice shall be made in accordance with the General Data Protection Regulation (GDPR).

2. Application area

This integrity notice applies for all use of personal data that is conducted within the framework of AP4’s operations in relation to you as a data subject who provide personal data to us.

3. Personal data controller

AP4 is the personal data controller for the processing of your personal data and is responsible for ensuring that processing is conducted in accordance with applicable laws. For questions concerning AP4’s processing of personal data, you are welcome to contact the fund’s Compliance Officer, who is also the direct link to AP4’s Data Protection Officer. For further contact information, see section 10.

4. Collection and processing of personal data

4.1 Collection of personal data

The data about you that AP4 processes about you is data that you yourself have provided to AP4 in connection with your interaction with us, either as a private person or as a representative for a contractual party to the fund. Data may also have been collected from a third party, such as a public register or your employer, in cases where AP4 has a business relationship with it.

4.2 For what purposes does AP4 process personal data?

AP4 collects and processes your personal data when:

- it is necessary to communicate with you, such as when you send a job application to AP4 or request information about the fund;
- it is necessary to conduct AP4’s operations, including managing the national pension system’s buffer capital, such as when entering into or fulfilling a contract;
- AP4 has a legal obligation that entails the processing of personal data; or
- it is necessary for AP4 to uphold its interests in a legal dispute.

4.3 Categories of personal data that is processed

The personal data that AP4 may process consists mainly of:

- your contact information, such as your name, phone number and email address;

- your job title, such as for entering into an agreement;
- your signature, such as for entering into an agreement;
- your legal form of identification, and information provided there, such as your personal identity number when entering into an agreement; and
- application documents and information in connection with such, such as your CV, school transcripts, age, etc., if you are applying for a job with AP4.

4.4 Legal basis for processing

AP4 is a government agency and conducts its business in accordance with The National Pension Insurance Funds (the AP Funds) Act (*Lag (2000:192) om allmänna pensionsfonder (AP-fonder)*). Processing of personal data that is necessary to conduct AP4's business, such as when entering into an agreement, is done on the legal basis that it is "necessary for the performance of a task carried out in the public interest".

AP4 may also process your personal data on the basis of "balancing of interest", such as if you send in a spontaneous job application to AP4, because the fund has a legitimate interest in being able to handle these spontaneous applications for HR purposes. The treatment is also not considered integrity-sensitive to the data subjects.

4.5 How long does AP4 store your personal data?

AP4 does not use your personal data for any other, incompatible purpose, and strive to not store information if it's not necessary.

However, as a Swedish government agency, AP4 must adhere to the archiving stipulations of the Archives Act (*Arkivlagen (1990:782)*). This entails that, in certain cases, personal data that exists in public records is archived and, in some cases, stored for an indefinite period. Disclosure of public documents only takes place in accordance with the National Archives Decline.

Personal data in non-public documents are stored for as long as they are required for the operation of the AP4. Certain data must also be stored by law, eg. Bookkeeping Act (1999: 1078). In such cases, your personal data will be stored as long as required by applicable law.

4.6 Cookies

To enhance our web services, AP4 uses cookies to save your browsing history on the website www.ap4.se. No personal information, such as the visitor's email address or name, is saved. If you do not want to permit the storage of cookies on your computer, you can turn off the function in your browser's settings. This will not affect your ability to read information on www.ap4.se.

AP4 adheres to the Swedish Post and Telecom Authority's (PTS's) recommendations on the use of cookies. For further information about cookies, please refer to the PTS website: <https://www.pts.se/sv/>.

AP4 uses Google Analytics as a tool to analyse how visitors use its website. The aim of this use is to improve the website's content and functionality. For further information about how Google Analytics uses cookies, please refer to their website: <https://www.google.com/intl/sv/cloud/security/gdpr/>.

4.7 Recording of calls

Considering AP4's asset management activities, calls to and from certain AP4 employees were tied. This means that data provided during such calls is recorded and stored. If you are unsure if conversations will be recorded, you are always welcome to ask the person you are talking to or contact the Fund's Compliance Officer.

5. We protect your personal data

You should always feel secure when you provide your personal data to us. Toward this end, AP4 has taken suitable security measures to protect your personal data from unauthorised access, alteration and erasure. In the event a security incident were to take place that could adversely affect you or your personal data, AP4 will contact you to inform you about what we are doing and what you can do to reduce the risk for negative consequences.

6. Automated decision-making, profiling and direct marketing

AP4 does not use your personal data for automated decision-making, profiling or direct marketing. Nor will AP4 sell your personal data to any other party.

7. Transfers of personal data to a third party

7.1 Transfers within the EU/EEA

AP4 will only transfer personal data to a third party if it is necessary to fulfil a legal obligation or when it is necessary to conduct AP4's operations.

Any transfer of personal data will be preceded by AP4 signing a personal data processor agreement with the receiving third party in order to protect your personal data.

7.2 Transfers to a third country

If it is necessary to transfer personal data to a recipient in a country outside of the EU/EEA, AP4 will ensure that your personal data continues to be protected and that the transfer is conducted in a lawful manner.

This will be done against the background of the European Commission's list of countries that meet an "adequate level of protection", and if necessary a check will be performed of the counterparty's processing of personal data, and a data protection agreement will be signed.

7.3 Category of recipient

The categories of recipients that AP4 may transfer your personal information to are:

- System vendors;
- Support providers (eg IT and HR suppliers);
- Service providers (eg backup service provider);
- Auditors and other external advisors (eg in connection with audit and legal expertise).

8. Your rights as a data subject

In connection with AP4's processing of your personal data, as the data subject you have a number of rights. If you would like to make a request to exercise your rights, please contact the Compliance Officer at dataskydd@ap4.se.

AP4 is required to respond to your request to exercise your rights within one month of receipt of such request. If your request is complicated or if a large number of requests have been made, we have the right to extend this period by a further two months.

All measures that we carry out in with respect to your rights are free of charge to you. If your request is manifestly unfounded or excessive, we have the right to charge an administrative fee to process your request.

AP4 has the right, under certain circumstances, to refuse your request. In such case you will receive a justification for the decision within one month from when AP4 received your request, at which time you will have the opportunity to lodge a complaint with the Swedish Data Protection Authority.

8.1 Your right to access, rectification, erasure and restriction

8.1.1 You have the right to request from AP4:

- a) Access to your personal data. This entails that you have the right to request a register extract of our use of your personal data. You also have the right to receive a copy of the personal data that we use, free of charge. For any additional copies we have the right to charge an administrative fee. If you make your request by electronic means, such as by email, we will provide the information to you in a commonly used electronic form. Please note that your request and access to the information must be preceded by your legitimacy.
- b) Rectification of your personal data. At your request or on our own initiative we will rectify, de-identify, erase or complement data that we discover is inaccurate, incomplete or misleading. You also have the right to complement with additional data if something of relevance is missing.
- c) Erasure of your personal data. You have (as from 25 May 2018) the right to request that we erase your personal data if there are no longer legitimate grounds for us to use it. Erasure shall therefore be done if:
 - (i) the personal data is no longer necessary in relation to the purpose for which we collected it;
 - (ii) you object to our use of your personal data after a consideration of interests and we do not demonstrate compelling legitimate grounds which override your interests and rights;
 - (iii) we have used your personal data in an unlawful manner; or
 - (iv) we have a legal obligation to erase your personal data.

However, there may be requirements in law or other compelling reasons why we cannot immediately erase your personal data. In such case we will stop using your personal data for other purposes than to comply with the law or that are not necessary for any other compelling reasons.

d) Restriction of use. This entails that we will temporarily restrict the use of your personal data. You have (as from 25 May 2018) the right to request a restriction when:

- (i) you believe your personal data is inaccurate and you have requested a rectification pursuant to point 8.1.1 b), during the time we verify the accuracy of the personal data;
- (ii) the use is unlawful and you oppose the erasure of the personal data;
- (iii) we as the personal data controller no longer need the personal data for our purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- (iv) you have objected to the use pursuant to point 8.2.1, pending verification of whether our legitimate grounds override yours.

8.1.2 At AP4 we will (as from 25 May 2018) take all reasonable actions we can to inform all recipients of personal data pursuant to section 7 above that we have rectified, erased or restricted access to your personal data after you have requested this. At your request we will inform you about whom we have provided your personal data to.

8.2 Your right to object to our use of your personal data

You have the right to object to such use of your personal data that we do for the performance of a task carried out in the public interest. If you object to such use, we will only continue to use your personal data if we have a legitimate interest to continue using your personal data that overrides your interests.

8.3 Your right to data portability

You have the right (as from 25 May 2018) to data portability. This entails that you have the right to receive some of your personal data in a structured, commonly used and machine-readable format as well as the right to transmit such data to another controller. You have the right to data portability only when the use of your personal data is automated and we base our use on a contract between you and us.

8.4 Your right to lodge a complaint with the supervisory authority

You have the right to lodge any complaints about our use of your personal data with the Swedish Data Protection Authority.

9. Amendments to this integrity notice

AP4 has the right at any time to amend this integrity notice. The most recent version of the integrity notice will always be posted here on AP4's website. For updates that are not solely of a language or editorial character,

you will receive clear information about the changes and what they entail for you before they take effect. This information will be published on www.ap4.se well in advance of when the updates take effect.

10. Contact information

If you have questions about this integrity notice, AP4's processing of personal data, or wish to exercise your rights as a data subject, you are welcome to contact the fund's Compliance Officer. The Compliance Officer is also a direct link to AP4's Data Protection Officer.

Compliance Officer at AP4

Jakobsbergsgatan 16, SE-111 43 Stockholm

Box 3069, SE-103 61 Stockholm

+46-(0)8-787 75 00

dataskydd@ap4.se

Data Protection Officer

Advokatfirman Carler KFB

AB Karl-Fredrik Björklund

Kungsgatan 30

111 35 Stockholm

+46-(0)8-522 532 00

Contact information for AP4

AP4, corporate identity number 802005-1952

Jakobsbergsgatan 16,

SE-111 43 Stockholm

Box 3069,

SE-103 61 Stockholm

+46-(0)8-787 75 00

info@ap4.se