

Integrity Notice

GDPR

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Fjärde AP-fonden



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1 General

The Fourth Swedish National Pension Fund ("AP4") values your personal privacy and aims to ensure that you feel secure when we process your personal data. It is AP4's responsibility to ensure that all handling of your information complies with applicable legislation regarding data protection.

This Integrity Notice has been prepared in accordance with the General Data Protection Regulation (GDPR), European Parliament and Council Regulation 2016/679 of April 27, 2016. Interpretation and application of this Integrity Notice should be done in accordance with GDPR.

2 Scope

This Integrity Notice applies to all processing of personal data carried out within the framework of AP4's activities in relation to individuals who provide personal data to us.

3 Personal Data controller

AP4 is the data controller for the processing of your information and is responsible for ensuring that the processing complies with applicable legislation. For questions regarding AP4's processing of your personal data, you are welcome to contact the fund's Compliance Officer, who also serves as a direct link to AP4's Data Protection Officer. Contact details can be found in section 10.

4 Collection and Processing of Personal Data

Below is general information about why we process your personal data, what personal data we process, the purpose of the processing, the legal basis for the processing, and how long personal data is stored. In the appendix of this document, "AP4's Processing of Personal Data," these details are specified in relation to different purposes.

4.1 Collection of Personal Data

The data that AP4 processes about you has been provided by you in connection with your interaction with us, either as an individual or as a representative of a contractual party to the fund. The data may also have been obtained from third parties, such as public registers or your employer when AP4 has a business relationship with them. If we obtain your personal data from a third party, we are obligated to inform you of this.

4.2 Purposes for Processing Personal Data

AP4 collects and processes your data when:

- It is necessary to conduct AP4's operations, including managing the general pension system's buffer capital. This includes fulfilling tasks of public interest or entering into and fulfilling agreements or other obligations.
- AP4 has a legal obligation that involves processing personal data.
- It is necessary to communicate with you, such as when you submit a job application to AP4 or request information about AP4. Alternatively, if you have a relative working at AP4 and we need to get in touch with you.
- It is necessary for AP4 to safeguard its interests in a legal dispute.

4.3 Categories of Processed Personal Data

The personal data that AP4 may process primarily includes contact information such as first and last names, phone numbers, and email addresses. It also encompasses positions (e.g., in the context of agreements), signatures (e.g., when entering into agreements), application documents, and related information if you are applying for employment at AP4 (e.g., CVs, grades, age, etc.).

4.4 What Does Processing of Your Personal Data Entail?

'Processing' refers to all actions related to personal data, whether performed automatically or manually. This includes activities such as collection, registration, organization, storage, processing, deletion, as well as transfer and archiving.

4.5 Legal Basis for Processing Your Personal Data

AP4 is a government agency and operates in accordance with Lagen (2000:192) om allmänna pensionsfonder ("APL"). Personal data processing necessary for AP4's operations is primarily based on the legal ground of "performance of a task carried out in the public interest," considering the fund's authority status. Other types of processing are based on the legal grounds of "contract with the data subject" and "legal obligation"¹

¹ Se GDPR art. 6.1.e, 6.1.b och 6.1.c

4.6 AP4's Data Retention Policy

As a Swedish government agency, AP4 adheres to the archival provisions of the Archives Act (1990:782). This means that personal data contained in public records is archived and, in some cases, stored indefinitely. Disposal of public records only occurs in accordance with decisions made by the National Archives (Riksarkivet). Other data may also be retained in accordance with other laws, such as the Accounting Act (1999:1078). In such cases, the data is stored for as long as applicable law requires.

All of this is documented and followed in accordance with AP4's established register of the fund's complete processing of personal data.

In general, AP4 strives to store your data only for the duration necessary for the specific, specified, and legitimate purpose for which the data was collected. The storage period varies depending on the type of information, the purpose of processing, and your relationship with us.

4.7 Recording of Calls at AP4

As capital managers in both the Swedish and international financial markets, AP4 has a responsibility to comply with external legal requirements and to live up to the trust placed in the fund by financial market stakeholders and society. As part of this, there are expectations that AP4 should have appropriate tools to account for the circumstances surrounding transactions made and to prevent, detect, and report in accordance with rules related to market abuse. One tool to meet these expectations is recording professional calls made on phones belonging to employees with trading authorization.

A requirement set forth in the General Data Protection Regulation (GDPR) for recording work-related calls is that both parties must be informed about the processing of personal data before it begins. AP4 fulfills this obligation by providing specific written information that has been communicated in advance to relevant individuals.

If you are unsure whether calls will be recorded, i.e., if AP4 processes your personal data in these situations, you are always welcome to ask the person you are speaking with or contact the fund's Compliance Officer. Contact details can be found in section 10.

4.8 Processing of Personal Data Related to Criminal Convictions and Offenses

AP4, in accordance with APL, manages fund assets in a manner that maximizes benefit for the income-based pension. As part of this mandate, AP4 has a responsibility to ensure that the companies in which it invests conduct sound business practices and that their representatives are reputable. Therefore, it is necessary for AP4 to carry out required background checks on representatives, which involves processing personal data. These checks are conducted within the framework of the so-called due diligence process for certain unlisted companies and operations in which AP4 invests. As part of this due diligence, AP4's procedures include

gathering necessary information about board members and executives in relevant companies, including details related to criminal convictions and offenses, which are collected and processed by AP4.

The legal basis for this processing is that AP4 performs tasks of public interest.

4.9 Handling of Personal Data in Shared Channels and Collaboration Rooms

4.9.1 Collaboration Rooms and Microsoft Teams

AP4 utilizes Microsoft Teams and external collaboration rooms, such as Storegate. These services are used by AP4 for purposes such as gathering information, communication, planning, document collaboration, and file storage. In cases where login is required to use these services, we need to process your personal data to grant you access. The necessary personal data for accessing these services includes your name, phone number, job title, and email address. We have a legitimate interest in this processing to ensure that login and collaboration function effectively.

Other programs within Microsoft 365 may be used by AP4 over time.

4.9.2 Sensitive Personal Data

Please avoid sharing sensitive personal data. Sensitive personal data may include health conditions, union membership, ethnic origin, and political opinions. To process sensitive personal data, an exception to the prohibition in Article 9 of the GDPR is required, and such data should only exceptionally be transferred outside the EU/EEA. Also, note that AP4 is a government agency, and information shared or made accessible in AP4's shared channels and collaboration rooms may be considered public records under the principle of public access to official documents. Therefore, a third party may request access to them.

5 We Protect Your Data

You should always feel secure when providing your personal data to AP4. Therefore, AP4 has implemented appropriate security measures to safeguard your personal data against unauthorized access, alteration, and deletion. In the event of a security incident that could negatively impact you or your personal data, AP4 will contact you to inform you of the situation and advise on steps you can take to mitigate any risks.

6 Automated Decision-Making, Profiling, and Direct Marketing

AP4 does not process your personal data for automated decision-making, profiling, or direct marketing purposes. Additionally, AP4 will not sell your personal data to any third party.

7 Data Transfer to Third Parties

7.1 Transfer within the EU/EEA

AP4 only transfers personal data to third parties when necessary to fulfill a legal obligation or to conduct AP4's operations. When such transfers are necessary for AP4's operations, AP4 enters into a data processing agreement with the receiving third party to protect your personal data and ensure that the recipient processes your data based on our instructions.

7.2 Transfer to Third Countries

If it is necessary to transfer personal data to recipients in a country outside the EU/EEA, AP4 will ensure that your data remains protected and that the transfer occurs legally. Currently, AP4 has business relationships with parties in the following countries outside the EU/EEA to which personal data may be transferred.

- USA
- United Kingdom
- India

Regarding data transfer to USA UK and India According to the EU Commission, both the United States and the United Kingdom are considered countries that ensure an adequate level of protection for personal data. This means that such transfers are permitted in accordance with Article 45.1 of the General Data Protection Regulation (GDPR). When a country is deemed to provide an adequate level of protection, it is considered to safeguard personal data in a manner equivalent to EU/EEA standards. More information about this can be found here: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

- Regarding India, appropriate safeguards have been implemented through the EU Commission's standard contractual clauses, and data transfers have been deemed permissible in accordance with Article 49.1(d) of the GDPR. Information about the standard contractual clauses can be found here:

EU Commission - Standard Contractual Clauses (SCC). https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

7.3 Categories of Recipients

AP4 may transfer your personal data to various categories of recipients, including:

- System Providers
- Support Providers (e.g., IT and HR service providers)
- Operational Providers (e.g., backup service providers)
- Auditors and Other External Advisors (eg., in connection with audits and legal expertise)

8 Your Rights as a Data Subject

When AP4 processes your personal data, as a registered individual, you have certain rights. Below is an explanation of these rights and what they entail. If you wish to exercise your rights, feel free to get in touch with us. You can find our contact details in section 10.

AP4 is obligated to respond to your request to exercise your rights within one month from the time you contacted us. If your request is complex or if there is a large volume of requests, we have the right to extend this period by two months.

All actions we take in response to your rights are free of charge for you. However, if your request is clearly unfounded or unreasonable, we reserve the right to charge an administrative fee to handle your request.

Under certain circumstances, AP4 has the right to reject your request. In such cases, you will receive an explanation for the decision within one month from the time AP4 received your request, and you will have the opportunity to file a complaint with the Integritetsskyddsmyndigheten (Swedish Data Protection Authority)².

8.1 Your Right to Access, Rectify, Erase and Restrict

According to the GDPR, you have the right to request the following actions from AP4.

1. Right to Access to Your Personal Data

You have the right to request a record of the personal data that AP4 processes about you. Additionally, you are entitled to receive a free copy of the personal data AP4 handles. For any additional copies, AP4 may charge an administrative fee. If you make a request in electronic format (e.g., via email), AP4 will provide the

² Since 2021-01-01 the swedish supervisory authority is called "Integritetsskyddsmyndigheten" and no longer "Datainspektionen."

information in a commonly used electronic format. Please note that your request and access to the data must be preceded by proper identification.

2. Rectification of Your Personal Data:

Upon your request or proactively, AP4 will correct, de-identify, delete, or supplement data that we discover to be inaccurate, incomplete, or misleading. You also have the right to add additional relevant information if something is missing.

3. Erasure of Your Personal Data:

You have the right to request that AP4 deletes your personal data if there is no longer a valid reason for AP4 to process it. Deletion should occur if:

- The personal data is no longer needed for the purpose AP4 collected it.
- AP4 has processed the personal data unlawfully.
- AP4 has a legal obligation to delete the personal data.

However, legal requirements or other compelling reasons may prevent AP4 from immediately deleting your personal data. In such cases, AP4 will cease processing your personal data for purposes other than compliance with the law or other strong justifications.

4. Restriction of Processing Your Personal Data:

This means that AP4 temporarily limits the processing of your data. You have the right to request restriction when:

- You believe that your data is inaccurate, and you have requested rectification under section 8.1.1(b), while AP4 investigates the correctness of the information.
- Processing is unlawful, and you do not want the data to be erased.
- AP4, as the data controller, no longer needs the personal data for our processing purposes, but you require them to establish, assert, or defend a legal claim.
- You have objected to processing under section 8.2, pending an assessment of whether our legitimate interests outweigh yours.

AP4 will take all reasonable measures to notify all recipients of personal data under section 7 above if we have corrected, deleted, or restricted access to your personal data after you requested us to do so. Upon your request, AP4 will inform you about the recipients to whom AP4 has disclosed personal data.

8.2 Your Right to Object to Processing of Your Personal Data

You have the right to object to the processing of your personal data by AP4 based on legitimate interests. If you object to such processing, AP4 will continue the processing only if we have compelling reasons that outweigh your interests.

8.3 Your Right to Data Portability

You have the right to data portability. This means you have the right to receive a portion of your personal data in a structured, commonly used, and machine-readable format and to transfer this data to another data controller. You are entitled to data portability only when the processing of your personal data is automated, and AP4 bases its processing on an agreement between you and AP4.

8.4 Your Right to Lodge a Complaint with the Supervisory Authority

You have the right to file any complaints regarding our processing of your personal data with the competent authority, in this case, the Integritetsskyddsmyndigheten (Swedish Data Protection Authority). For more information and instructions on submitting a complaint, visit their website:

<https://www.imy.se/privatperson/utfora-arenden/lamna-ett-klagomal/>

9 Changes to this Integrity Notice

AP4 reserves the right to modify this Integrity Notice at any time. The latest version of the Integrity Notice is always available on AP4's website. In cases where updates are not solely linguistic or editorial, you will receive clear information about the changes and their implications before they take effect. This information will be published on AP4's website well in advance of the updates becoming effective.

10 Contact Information

If you have any questions regarding this Integrity Notice, AP4's handling of personal data, or if you wish to exercise your rights as a registered individual, feel free to contact the fund's Compliance Officer. The Compliance Officer also serves as a direct link to AP4's Data Protection Officer.

Compliance Officer at AP4

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11 Appendix: AP4's Processing of Personal Data

In the table below, we outline the purposes for which AP4 processes personal data.

11.1 Personal Data Handling to Fulfill Our Mission of Managing Pension Capital

<p>Purpose:</p> <ul style="list-style-type: none">• To carry out our mission of managing the pension capital of the Swedish population.• To invest capital that generates high returns over time.• To contribute to the stable development of the state income pension system.• To establish and manage agreements on behalf of the fund.• To create and manage ongoing documentation, such as project plans, analyses, and presentations in collaboration with external managers.• To communicate with you.
<p>Personal Data:</p> <p>Name, job title, address, email, phone number, signature.</p>
<p>Legal Basis:</p> <p>The processing is necessary for AP3 to perform a task of public interest, specifically to fulfill our role as a government authority.</p>
<p>Retention Period:</p> <p>As a government authority, AP3 follows archival legislation, which mandates the preservation of public records. AP3 adheres to applicable retention rules and decisions, regularly discarding data of minor or temporary significance.</p>

Recipient

- Data processors and their sub-processors for the management of our systems.
- AP4 has an obligation, either continuously or upon request, to disclose personal data to entities such as the Swedish Tax Agency (Skatteverket), the National Audit Office (Riksrevisionen), and the government.

11.2 Suppliers and Other Collaborators' Contact Persons

Purpose:

- To establish and manage agreements on behalf of the fund.
- To communicate and handle necessary contacts in contractual or supplier relations.

Personal Data:

Name, job title, address, email, phone number, signature.

Legal Basis:

The processing is necessary for AP3 to perform a task of public interest, specifically to fulfill our role as a government authority.

Retention Period:

As a government authority, AP3 follows archival legislation, which mandates the preservation of public records. AP3 adheres to applicable retention rules and decisions, regularly discarding data of minor or temporary significance.

Recipients:

- Data processors and their sub-processors for the management of our systems.
- Authorities such as the Swedish Tax Agency (Skatteverket), the National Audit Office (Riksrevisionen), and the government, to whom AP3 has an obligation to disclose personal data either continuously or upon request.

11.3 Conducting Public Procurement

Purpose: To administer received bids and communicate with bidders.
Personal Data: Name, job title, email, phone number, signature, CV details.
Legal Basis: The processing is necessary for AP3 to perform a task of public interest, specifically to fulfill our role as a government authority.
Retention Period: Accepted bids are preserved according to archival legislation. Unaccepted bids are retained for four years.
Recipients: <ul style="list-style-type: none">• Data processors and their sub-processors for the management of our systems.• Authorities such as the Swedish Tax Agency (Skatteverket), the National Audit Office (Riksrevisionen), and the government, to whom AP3 has an obligation to disclose personal data either continuously or upon request.

11.4 Recording of Telephone Calls in Telephone Trading

Purpose: <ul style="list-style-type: none">• To verify that trades conducted exceptionally via telephone are recorded to ensure legal compliance.• For verification purposes related to accounting and reconciliation of business terms.
Personal Data: Audio recordings, telephone numbers.

Legal Basis:

The processing is necessary for AP3 to fulfill a legal obligation as a government authority.

Retention Period:

The data is stored in accordance with the Market Abuse Regulation for five years and for accounting purposes for seven years.

Recipient:

No recipient.