

# Privacy Guidelines

With these guidelines, White arkitekter AB, listed company 556140-1018 (“White”, “we”, “our”, “us”), wants to explain how it processes your personal data and how it makes sure that its processing of personal data is carried out responsibly and in accordance with applicable data protection legislation, in particular the General Data Protection Regulation (GDPR), which applies as of 25 May 2018.

## 1. General

- 1.1 White cares about your privacy. We have adopted these guidelines with the aim of protecting the personal data we process and to strive for a high level of security in all processing of personal data. We comply with appropriate and necessary technical and organisational measures to protect your personal data from unauthorised access, use, modification and erasure.

## 2. Definitioner

- 2.1 “Personal data” is any information that can be directly or indirectly linked to a living physical person. It includes names, personal ID numbers, addresses, images, e-mails and IP addresses. Information that cannot identify a person on its own can also be personal data if in combination with other data it can be linked to the person.
- 2.2 A “controller” is the natural or legal person, authority or other body that decides on the purposes and means for processing personal data, i.e. how and why personal data is processed.
- 2.3 “Processing of personal data” covers all operations related to the handling of personal data. These include collection, registration, storage, modification, adaptation, structuring and destruction.

## 3. How we process your personal data

- 3.1 White is the controller for the processing of personal data which it carries out or which is carried out on its behalf. This means that we decide whether, how and why your personal data is processed. If you have questions about how your personal data is processed, contact us using the contact details provided below.

### 3.2 What personal data do we collect and why?

White primarily receives personal data directly from you. We therefore strive to always have accurate information about you and to save only what is necessary. We mainly process only your contact details and your role in your organisation. If you (as a private individual) are our customer, we also collect further data, such as your personal ID number and the data that emerges from your credit information.

White registers, or may register, your personal data: if you sign up for a newsletter, seminar or event managed by White; if you contact White by e-mail, phone, its websites or social media; if you are a customer, supplier, business partner or stakeholder in one of White's assignments; or if you seek employment and/or work experience with White or visit White's websites. During visits to websites, we collect non-personal information that is used for the visit. Read more in paragraph 5, “About cookies and Google Analytics”.

### 3.3 Why do we collect personal data from you?

We mainly process personal data to

- facilitate a good business relationship by managing your inquiries, communicating on joint assignments or fulfilling agreements
- send you information by e-mail and other digital channels such as social media. We do this when you have an active business relationship with us

### 3.4 Legal basis and legitimate interests for processing your personal data

3.4.1 We always process your personal data in accordance with applicable legislation.

As a legal basis for processing, we refer to the fulfilment of agreements, legitimate interests or consent. If we use legitimate interest as the basis, we do so only for the purposes stated in point 3.3.

3.4.2 We will inform you if we use your personal data for any purposes other than those stated in point 3.3. Please note that you can withdraw your consent at any time by contacting us. Our contact details can be found in paragraph 7.

### 3.5 How long do we store your personal data?

We process your personal data in accordance with applicable legislation. This means that personal data is not stored for a period longer than necessary for the purpose of processing.

We do not use information that is older than five years for marketing purposes.

We keep some information longer if required by other laws, such as Sweden's Accounting Act.

All of our processing of personal data takes place under strict security and secrecy.

## 4. Disclosure of personal data

Sometimes we work with other parties in the processing of your personal data. In these situations, we always take full responsibility for ensuring that your data is made available in such a way that maintains respect for your privacy and complies with applicable legislation. Companies that process personal data on our behalf always enter into a data processor agreement with us so that we can ensure that your personal data is processed securely by our business partners. We take special protective measures for non-EU/EEA partners. For example, we sign agreements with standard clauses on data transfer that have been adopted by the European Commission.

We may also disclose your personal data to third parties if required by law, another statute or public authority decision, or when information has to be disclosed to insurance companies, banks or preferential partners. These recipients will not be data processors rather they are data controllers towards you as an individual.

We may also disclose personal data to third parties (such as the police, the tax agency or other authorities) in the case of a criminal investigation or if we are otherwise required to disclose such data as a result of legislation or public authority decision.

White shall not disclose your personal data to any other extent than described in this section.

## 5. About cookies and Google Analytics

When you use our websites, user statistics are collected via cookies. However, this is done only with consent.

We use Google Analytics to analyse and evaluate traffic on the website. We compile reports on visitors' behaviour on the website so that we can improve the content to better suit your needs. This is carried out in an anonymised way thanks to our IP masking, which uses only part of the IP address. It is not possible to track an identifiable person's pattern of activity on the Internet. Collected data is used only for statistical purposes in an anonymised way. Google will not use your abbreviated IP address with other Google data. Consent for web tracking and analysis can be withdrawn at any time. You can download and install an add-on to your browser from Google's website (<https://tools.google.com/dlpage/gaoptout>).

## 6. Your rights

- 6.1 Under applicable data protection legislation, you have the right to request access to personal data about you that we process at any time. You also have the right to have incorrect personal data about you rectified, to request erasure of your personal data or to restrict our processing of your personal data.
- 6.2 If processing is based on consent, you have the right to withdraw your consent to processing at any time.
- 6.3 If you wish to exercise any of your rights, please contact us using the contact details in paragraph 7.
- 6.4 You also have the right to lodge a complaint with the appropriate regulatory authority at any time if you believe that we are processing your personal data in violation of applicable data protection legislation.

## 7. Contact details

Please contact us if you have questions about how we process your personal data or if you would like information and contact details for the data protection officer at White.

Data Protection Officer  
Box 2502, SE-403 17 Gothenburg, Sweden  
[dataskyddsansvarig@white.se](mailto:dataskyddsansvarig@white.se)