

Privacy Notice

Citycon respects your privacy and protects your personal data. Personal data include all the information that can identify you as an individual (your name, address, etc.) This privacy notice (hereinafter “**Privacy Notice**”) describes what personal data Citycon collects and processes and how in connection with consumer marketing, and how Citycon ensures the privacy and security of information collected and processed by it.

It is important to us for you to trust the way we process your personal data (for example, we would never sell or transfer your personal data to another party in a way that is incompatible with our Privacy Policy). You are always welcome to contact us regarding any matter.

1 DATA CONTROLLER

Citycon Oyj (Finnish business ID 0699505-3)

Citycon Oyj and Citycon AB (business ID 556679–8160 serve as controllers for Kista Galleria and does not disclose information to the other shopping centres within the Citycon Group.

2 NAME OF THE REGISTER

Customer register for consumer marketing (hereinafter “**Customer Register**”).

3 COLLECTION OF PERSONAL DATA

Data that you disclose to us. The data that we collect is typically disclosed by you when you:

- subscribe to our newsletter;
- complete our customer surveys;
- participate in competitions or raffles that we organise;
- provide feedback to us, for example through the feedback function on our website; or
- visit our shopping centres or commercial facilities or contact us in any other way.

Data collected in other ways. Examples of data that we obtain from other sources and that we can link to your other personal data that we process are:

- information that we receive from the Swedish Transport Administration or other public registers;
- information from other customer or loyal customer systems, such as information obtained from the systems of shops operating in our shopping centres; and
- information that we obtain from the social media services you use, such as Facebook, Twitter, Google+, LinkedIn, Pinterest, Tumblr and Instagram.

For us to gain access to your information in the registers and systems of third parties, the third party in question must have the right to disclose such data concerning you. In addition, personal data may be collected and updated for purposes specified in our Privacy Policy based on information obtained from publicly available sources and the authorities or from other third parties as permitted by applicable legislation. Such updates to personal data are carried out manually or automatically.

When you use our services, we collect information about your device (computer or mobile device) with the help of cookies and other similar techniques, such as pixel tags, which store information in your web browser or your device in a way similar to cookies.

4 INFORMATION ABOUT COOKIES

Similar to many other companies, Citycon uses cookies or other technologies on its website to store information in order to improve the usability of the website and offer the best possible experience to users visiting the website, as well as to enable user profiling and effectively targeted marketing. This section describes cookies and how we use them and other similar technologies that store information.

Technically speaking, cookies are short text files that a web server uploads to the user's device. This enables the collection of information about how and when the Services are used and what other websites the user is interested in.

In addition to cookies, the range of technologies that Citycon uses and that enable the storage of information about Service usage include tracking pixels, such as pixel tags, Flash cookies (locally shared objects), HTML5 local storage, device identifiers, operating system identifiers, transparent GIF files and web beacons.

If you do not wish to receive cookies when browsing the Citycon website, you may change your cookie preferences from the website footer "Cookie Policy". The Cookie Policy also tells you what cookies are being used on the website. If you decide to decline cookies, some website functionalities or services may not work properly.

5 PERSONAL DATA PROCESSED BY US

The following information is examples of what kind of data that is being stored in the Customer Register:

- **Contact details**, including your name, email address, phone number and postal address.
- **Newsletter-related information**, such as specific areas of interest notified by you.
- **Device-related information**, such as IP address, language, web browser, and operating system.
- **Information from customer surveys**, meaning the data that is being provided when you voluntarily complete a customer survey.

6 HOW WE USE YOUR PERSONAL DATA, AND THE LEGAL BASIS FOR PROCESSING

To perform our contract. We process your personal data in our legitimate interest to fulfil our mutual contract, that is, to comply with our Terms and Conditions.

To provide you with personalised recommendations and service. We also process your personal data in order to customise our recommendations concerning special offers based on your preferences, behaviour and potential needs. This means creating a profile of you in order to be able to provide you Services and offer you a personalised user experience. However, our profiling does not have any legal effects, and the legal basis for profiling is performance of the contract that we have entered with you (Terms and Conditions of Use).

To communicate with you and others or to provide support. We process personal data that you have provided us, and if required, your device information, in order to communicate with you and other parties, for example in connection with support services. The processing we carry out is necessary to provide Services to you in the scope of our mutual contract and to ensure other legitimate interests, such as Citycon's interest of ensuring that our Services function faultlessly and of being able to effectively communicate with you and other parties.

To carry out customer surveys. Your contact information can be used to carry out customer surveys in order to, for example, hear your opinions about Citycon and our Services. Participation in our customer surveys is voluntary. The data collected in connection with the surveys are used as a basis for Citycon's legitimate interest in improving its Services.

To compile statistics. Your personal data are used to compile aggregate statistics, which means that you cannot be identified from the data. This processing is based on legitimate interests, such as our interest in being able to develop and improve our Services, products and future services.

To market Citycon and our Services. Supported by our legitimate interest of marketing Citycon, we use marketing technology in our Services and on other platforms (see below for a description of how we share your personal data).

To comply with legislation. Citycon must comply with Swedish law. This means that we process your personal data to the extent required by legislation or to comply with other legal obligations, such as reporting to the authorities.

To protect Citycon, you and others. Citycon may process your personal data, if required, to protect or exercise our, your and other parties' rights, business interests or other legitimate interests. This may be the case if, for example, you or someone else presents claims against us. Processing is necessary to protect you and others as well as to protect other legitimate interests, such as our interest to fulfil requirements.

In connection with a business transfer. Should Citycon, for strategic or business-related reasons, decide to sell or transfer its business, either fully or partly, your personal data may be shared with or transferred to the parties involved in the transaction. This processing is based on our legitimate interest of being able to develop our operations.

With your consent. Your personal data may also be used for specific purposes other than those described above, provided that you request us or give us consent to do so. For example, with your consent, Citycon may publish a reference submitted by you or include you in articles about the Service you use, in order to market Citycon's Services. You always have the right to withdraw your consent if that consent forms the legal basis for our processing of your personal data.

7 **TRANSFER OF PERSONAL DATA AND TRANSFER OF DATA OUTSIDE THE EU AND EEA**

For specific purposes, Citycon must share your personal data with other reliable persons and companies:

Persons who work in our company or for us. Your personal data will be shared with persons who work in or for Citycon. Sharing is restricted to persons who need access to the data in order to perform their duties.

Service providers. Your personal data will be shared with select companies that help us provide our Services. These services include servers, mail delivery, marketing and analytical tools. These companies can process your personal data in accordance with instructions supplied by us or to comply with their legal obligations. All Citycon suppliers are carefully vetted to ensure that your personal data are in safe hands.

Authorities and legal contexts. We may be obliged to share your personal data with the authorities, courts and other parties. This may be required, for example, by law, in connection with a legal process or to fulfil the request of a supervisory authority.

We do not transfer personal data outside of the EU or the EEA if not required by law. If personal data must be processed outside the EU or EEA, we ensure that our subcontractor has undertaken to comply with the standard contractual clauses approved by the EU Commission regarding the processing of personal data and when necessary, applies additional security measures.

Your personal data may be further transferred to third parties, without your consent, if the law or official regulations oblige such a transfer or if Citycon, after careful consideration, considers there to be justified grounds for transferring the data, for example, in special situations in which we deem it necessary for protecting your or another person's vital interest. Moreover, in connection with a business acquisition, we may transfer your personal data to the new owners of a shopping centre. We will inform you about this separately after the completion of the acquisition.

8 PROTECTION AND DURATION OF RETENTION OF YOUR DATA

Citycon complies with good administrative practices, the duty of care and the obligation to protect when processing your personal data and at all times strives to take every possible and reasonable measure to safeguard your privacy and prevent it from being violated at any stage of your personal data being processed. When processing your personal data, we always strive to ensure that processing is appropriate, warranted and necessary in view of the purposes described. We do not process personal data more than necessary with respect to the purposes and, where possible, we strive to anonymise data when they are no longer needed for identifying individual Members.

Citycon and any of Citycon's cooperation partners that process the personal data will adopt the necessary technical and organisational measures to protect personal data against unauthorised access, destruction, modification, distribution, transfer and other illegal processing of personal data.

Only authorised employees of Citycon or Citycon's cooperation partners who need to process personal data because of their work duties have access to your personal data. In addition, we have strict administrative measures in place regarding the access rights of employees at Citycon or Citycon's cooperation partners who have access to databases in which user data are retained or to servers used to manage our Services. The Customer Register, as well as the data stored in it, is protected, for example, through access restrictions and with passwords which are only granted to persons who pass our strict vetting process.

Citycon retains your personal data only for as long as you use the Services or is justified for the purpose of personal data processing, after which the data is deleted or anonymised. The duration of storage of personal data depends on the type of personal data involved. The same personal data may be stored for different purposes. For example, some personal data may be retained due to legal requirements, even though they have been deleted or anonymised for other purposes.

Citycon regularly reviews the need to retain your personal data, taking into account any applicable legal requirements. As a rule, your personal data are retained for the duration of our contractual relationship, and no longer than one (1) year after you were last active in the Service.

Personal data whose processing is legally based on your consent will be deleted if you withdraw your consent or when your data is anonymised, as described above. Your data will also be retained for a longer period if required by legislation, such as tax and accounting laws. In this case, your data will only be used for complying with the relevant obligations.

Additionally, we take appropriate reasonable action to ensure that no personal data that is incompatible, outdated or erroneous as regards its processing purpose is kept. We will correct or delete such data without undue delay.

9 YOUR RIGHTS AS A DATA SUBJECT

You have the right to review your personal data stored in the Customer Register as well as the right to request that any inaccurate, outdated, unnecessary or illegal data be rectified or deleted.

Where the processing of personal data is based on your consent, you also have the right to at any time withdraw your consent or modify it. Withdrawal of consent does not affect the legality of processing carried out before the withdrawal. Please contact us by sending an email to privacy@citycon.com if you wish to withdraw your consent.

As regards personal data that you have supplied to the Customer Register and that is processed automatically based on your consent or by a Service that you have used, you have the right to review such personal data as well as request that they be transferred to another controller.

You have the right to contact and lodge a complaint with the Data Protection Authority (Datainspektionen) if you suspect that we have processed your personal data inappropriately. Further information is available at www.datainspektionen.se. You can also contact the supervisory authority in your country of residence or employment.

You also have the right to object to the processing of your data on personal grounds if the processing of personal data is based on a legitimate interest. In your demand, you are required to specify the particular personal situation on the basis of which you object to the processing of your data. We can deny your request only based on grounds specified in law.

10 CONTACT INFORMATION

If you have any questions about the processing of your personal data or if you wish to exercise your rights described above, please contact us by email at privacy@citycon.com.