

## LSON PARTNERS REAL ESTATE PRIVACY POLICY

If you wish to obtain more information on how LSON PARTNERS REAL ESTATE handles personal information for a specific category of clients, you may click on the following link or scroll to the bottom of the page.

### 1. GENERAL

1.1 This privacy policy describes how LSON PARTNERS REAL ESTATE, S.L., with CIF B-66188723, gathers and uses personal information (from here on referred to as “LSON PARTNERS”).

1.2 Your privacy is important to LSON PARTNERS and we want you to feel secure whenever you send us your personal information. We therefore provide you with this privacy policy, to explain what personal information we collect about you and how we use and protect it. This privacy policy also describes your rights and how to contact us if you have any questions about how we use your personal information.

### 2. RESPONSIBILITY FOR PERSONAL INFORMATION

2.1 LSON PARTNERS is involved with brokerage activities in Spain and abroad through a large number of local brokerage firms. So that you, as a current or potential client, can always enjoy the best possible experience with LSON PARTNERS, regardless of the local brokerage firm you choose, LSON PARTNERS takes complete responsibility for handling your personal information. All companies involved in brokerage activities under the umbrella of the LSON PARTNERS brand share a common database of clients and take shared responsibility for making sure the personal information in the client database is used in accordance with data protection laws.

2.2 If you have any questions about or comments on the use of your personal information by LSON PARTNERS, you may contact LSON PARTNERS REAL ESTATE, S.L. at any time (contact information is listed in section 7 below). Of course, you may also contact another local LSON PARTNERS office, if you prefer. Information on our offices in Spain and abroad can be found at [-].

### 3. HOW WE COLLECT AND HANDLE YOUR PERSONAL INFORMATION

#### 3.1 General

The term “personal information” refers to all the information related to an identified or identifiable physical person, and to any data which can identify a person directly or indirectly (“personal data”).

In this section, we describe what types of personal data we gather about you and why, what juridical basis we have for that process, and how long we keep your personal data for. To make our privacy policy as accessible as possible, we have divided this section into different categories of people. To read about how LSON PARTNERS uses your personal data, click on the appropriate title or titles for your case.

#### 3.2 If you visit LSON PARTNERS website

##### 3.2.1 *What type of personal information do we handle?*

When you visit our website, LSON PARTNERS collects and handles the following personal information:

- (i) information about how you use our website; and
- (ii) technical data like your IP address or other unique data that can identify the device you are using, as well as the operating system, the browser type, and general location information.

##### 3.2.2 *Why do we use your personal information?*

LSON PARTNERS uses your personal information for the following reasons:

- (i) to guarantee technical operation of our website; and
- (ii) to analyse how you use our website, so that we can improve and develop it.

##### 3.2.3 *Juridical basis for using your personal information*

The juridical basis for using your personal information, such as technical data and your IP address when you visit our website, is that this is necessary for LSON PARTNERS’ legitimate

interest in assuring the technical operation of the website, as well as in developing and improving it.

#### **3.2.4 For how long will we store your personal information?**

Your IP address will only be saved temporarily, as long as you are visiting our website. As for cookies, read below.

#### **3.2.5 Cookies, etc.**

LSON PARTNERS uses cookies and similar techniques on our website [-]. By using cookies and similar techniques, we can improve the website, promote our service, and provide you with a better, more personalized service while you are using our website. For more information on the use of cookies and similar techniques, read our cookies policy [-]. For more information on the use of cookies and similar techniques, read our cookies policy: [-]

### **3.3 If you have subscribed to the mailing list on living spaces**

#### **3.3.1 What type of personal information do we use?**

LSON PARTNERS collects and uses the following personal information when you sign up to receive messages about living spaces:

- (i) first and last name;
- (ii) e-mail address;
- (iii) telephone number;
- (iv) password; and
- (v) if you choose, information about your current residence, civil status, familial relations, hobbies, occupation, and language.

When you authorise LSON PARTNERS to update you on properties in certain areas, to save searches to send you alerts, or to save housing as favourites in your name, LSON PARTNERS also processes information about these saved updates, searches, and favourites.

#### **3.3.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to be able to provide you with information on matching housing in accordance with our terms of use for the message in question;
- (ii) to show searches that are relevant to you;
- (iii) to allow you to complete alert notifications for certain areas, save searches, and save housing, and
- (iv) to send you suggestions by e-mail about new housing that matches your alerts and searches, or about events we think may interest you.

#### **3.3.3 Juridical basis for using your personal information**

So that LSON PARTNERS can verify the e-mail address you provide, it is necessary for us to use your personal information. When you search for housing/real estate and activate alerts in relation to certain areas, LSON PARTNERS will use your personal information to send you e-mails with suggestions about new housing that coincides with your alerts and searches. LSON PARTNERS can also send you e-mails with suggestions about events, LSON PARTNERS' services, and other information about LSON PARTNERS that we believe could be of interest to you. Such use comes about because it is necessary for LSON PARTNERS to be able to commercialise its services and the housing it manages in your legitimate interest.

#### **3.3.4 For how long will we store your personal information?**

The personal information you provide for all related correspondence will be saved as long as you are registered at LSON PARTNERS Global. If you decide to cancel your account, LSON PARTNERS will delete your alerts and then handle your account according to our elimination procedures, that is, your personal information will be deleted or saved according to other sections of this policy.

If you no longer wish to receive the related e-mail, or if you do not wish to receive e-mails from us, you can contact LSON PARTNERS at any time (consult our contact information in section 7 below). You can also unsubscribe at any time by clicking on the link "cancel subscription" at the bottom of our e-mail messages.

### **3.4 If you visit LSON PARTNERS or start a client relationship with one of LSON PARTNERS' offices**

#### **3.4.1 What type of personal information do we handle?**

LSON PARTNERS collects and uses the following personal information when you register for a visit on the LSON PARTNERS website or contact LSON PARTNERS:

- (i) first and last name;
- (ii) e-mail address;
- (iii) telephone number;

- (iv) address (if you choose to enter your address); and
- (v) details about the visit you have registered for.

If, during or after the visit, you express direct interest in participating in a bid, LSON PARTNERS may ask you to provide additional information in order to manage offers, for example, to specify if you have received a provisional loan approval from your bank or not.

#### **3.4.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to manage visits;
- (ii) to contact you after the visit and to respond to any questions you may have had during it;
- (iii) if you have expressed interest in receiving information about later offers, to be able to manage these;
- (iv) if you have expressed interest in a particular type of housing/real estate, to be able to respond to any questions and to help you find housing/real estate that may be of interest to you;
- (v) to promote LSON PARTNER, our services, events, and housing/real estate.

#### **3.4.3 Juridical basis for using your personal information**

Any use that conforms to the previous descriptions is based on our legitimate interest in (as appropriate):

- (i) managing visits;
- (ii) contacting you to answer any questions you may have asked about the visit;
- (iii) managing any later offer;
- (iv) when you request it, responding to any questions, and, furthermore, helping you find housing/real estate that may interest you;
- (v) promoting our business, our services, events, etc.

#### **3.4.4 For how long will we store your personal information?**

We will store your personal information for commercial promotional ends for two (2) years after the date of registration for a visit or for any other active display of interest in LSON PARTNERS' services. If you decide to unsubscribe from our e-mail list, LSON PARTNERS will stop sending you information for purposes of commercial promotion, and your account will then be handled according to our data elimination procedures, that is, your personal information will be deleted, or it will be saved in accordance with other sections in this policy.

### **3.5 If you make an offer on housing or a property offered by LSON PARTNERS**

#### **3.5.1 What type of personal information do we handle?**

LSON PARTNERS collects and uses the following personal information when an offer is sent for any housing/real estate that LSON PARTNERS offers:

- (i) first and last name;
- (ii) contact details;
- (iii) details about the housing/real estate you have bid on;
- (iv) time of the bid; and
- (v) details about the offer you have made, as well as the amount and, if you proceed, the terms of the offer.

#### **3.5.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to manage offers and inform the seller and relevant bidders about them;
- (ii) to comply with the legal requirements; and
- (iii) to document the sales processes and to defend ourselves against any legal complaints.

#### **3.5.3 Juridical basis for using your personal information**

The data usage carried out according to the previous statements is necessary for LSON PARTNERS to comply with its legal obligations under Constitutional Law 3/2018, from December 5, on the Protection of Personal Information and on the guarantee of digital rights and the obligatory regulation that the law describes.

#### **3.5.4 For how long will we store your personal information?**

Your personal information will be stored for ten (10) years after the offer is finalised, so that LSON PARTNERS can document the sales process and protect us against any legal complaint made in the future.

### **3.6 If you contact LSON PARTNERS because you are interested in selling your housing or if you value your property through LSON PARTNERS**

#### **3.6.1 What type of personal information do we handle?**

If you choose to fill out our contact form on the LSON PARTNERS website, we will collect the following personal information about you:

- (i) first and last name;
- (ii) e-mail address;
- (iii) region; and
- (iv) telephone number;

LSON PARTNERS will contact you and, according to the personal information you provide, LSON PARTNERS will also collect the following personal information:

- (v) address;
- (vi) information about your current residence;
- (vii) your national identification number; and
- (viii) your passport number.

If you decide to hire LSON PARTNERS to value your property, we will also collect the details on the valuation done of your property.

#### **3.6.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to contact you according to your instructions;
- (ii) to provide you with information you have requested;
- (iii) to be able to reserve a valuation of your property; and
- (iv) to promote LSON PARTNER, our services, events, and housing/real estate.

#### **3.6.3 Juridical basis for using your personal information**

The usage is necessary for LSON PARTNERS to be able to take measures and provide information you have requested before coming to any agreement with LSON PARTNERS for mediation of your property.

The usage of your personal information for commercial purposes is based on our legitimate interest in commercializing our business, our services, events, and more.

#### **3.6.4 For how long will we store your personal information?**

We will store your personal information for commercial promotion purposes for two (2) years from when you last expressed interest in selling your property, or from when you may have expressed interest in LSON PARTNERS' services in some other way. If you decide to unsubscribe from our e-mail list, LSON PARTNERS will stop sending you information for purposes of commercial promotion and your account will then be handled according to our data elimination procedures, that is, your personal information will be deleted, or it will be saved in accordance with other sections in this policy.

### **3.7 If you buy or sell housing through LSON PARTNERS**

#### **3.7.1 What type of personal information do we handle?**

LSON PARTNERS collects and uses the following personal information when you buy or sell housing/real estate through LSON PARTNERS:

- (i) first and last name;
- (ii) address;
- (iii) telephone number;
- (iv) e-mail address;
- (v) your passport number.
- (vi) Swedish personal identification number or equivalent foreign identification number;
- (vii) details about the housing/real estate you have bid on;
- (viii) the buying price and any other term under the transference agreement; and
- (ix) date of purchase or sale.
- (x) information we request in relation to the law on money laundering, such as information on annual statements, employer, political activity.

#### **3.7.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to offer the relevant housing/real estate according to the brokerage contract;
- (ii) to comply with the legal requirements; and
- (iii) to defend lawsuits.

#### **3.7.3 Juridical basis for using your personal information**

Any usage according to the previous statements is based on the following juridical bases:

- (i) Usage is necessary to comply with the brokerage contract with the seller;
- (ii) Usage is necessary to comply with the requirements of LSON PARTNERS under the law; and
- (iii) Usage is necessary for LSON PARTNERS' legitimate interest in defending against legal complaints in the future.

#### **3.7.4 For how long will we store your personal information?**

Your personal information will be stored for ten (10) years after the offer is finalised so that LSON PARTNERS can document the sales process and protect itself against any legal complaint made in the future.

### **3.8 If you attend any of LSON PARTNERS' events**

#### **3.8.1 What type of personal information do we handle?**

If you decide to register to participate in any of LSON PARTNERS' events, we will collect the following personal information about you:

- (i) name;
- (ii) e-mail address;
- (iii) telephone number;
- (iv) event information; and
- (v) indication of any special diet.

If you attend a LSON PARTNERS event, we may also take photos of you for the purpose of publishing those photos on social media.

#### **3.8.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to send you information or notifications related to the event for which you registered;
- (ii) if you have expressed particular dietary preferences, in order to provide that particular diet during the event in question;
- (iii) to publish images of events on social media and, through them, provide information about our business;
- (iv) to send you an e-mail inviting you to other events we organize and that we think may interest you.
- (v) to promote LSON PARTNER, our services, events, and housing/real estate.

#### **3.8.3 Juridical basis for using your personal information**

Any usage according to the previous statements is based on our legitimate interest in providing information about LSON PARTNERS and promoting LSON PARTNERS and our business, services, events, etc.

#### **3.8.4 For how long will we store your personal information?**

We will save your personal information for the purposes of commercial promotion for one (1) year from the date of registering for an event or actively expressing your interest in some other way in LSON PARTNERS' services. If you decide to unsubscribe from our e-mail list, LSON PARTNERS will stop sending you information for purposes of commercial promotion and your account will then be handled according to our data elimination procedures, that is, your personal information will be deleted, or it will be saved in accordance with other sections in this policy.

### **3.9 If you are the contact person for one of LSON PARTNERS' providers or associates**

#### **3.9.1 What type of personal information do we handle?**

If you are the contact person for one of our providers or associates, LSON PARTNERS collects and uses the following personal information about you:

- (i) contact details, such as your name, e-mail address, and telephone number; and
- (ii) employment information, like your employer, position, and the address of your place of work.

#### **3.9.2 Why do we use your personal information?**

LSON PARTNERS uses your personal information for the following reasons:

- (i) to send you notifications or messages related to an agreement between your company and LSON PARTNERS;
- (ii) to be able to execute, maintain, and comply with our obligations according to an agreement with your company;
- (iii) to dispute any future contractual relationship between your company and LSON PARTNERS; and
- (iv) to provide information about LSON PARTNERS' products and services, or to invite you to activities or events.

#### **3.9.3 Juridical basis for using your personal information**

Any use that conforms to the previous descriptions is based on our legitimate interest in (as appropriate):

- (i) sustaining, maintaining, and managing a contractual relationship we have with your company;
- (ii) maintaining collaboration/association with your company and negotiating any future contractual relationship with your company; and
- (iii) advertising, promoting, and informing clients about our business, products, solutions, services, events, etc.

#### **3.9.4 For how long will we store your personal information?**

If your company has a contractual relationship with us, we will save your personal information

until the contractual relationship with your company has ended. However, we will continue to use your personal information (if this is indicated in the text of the agreement) as part of the text of the agreement, as long as the agreement is kept for the purposes of guaranteeing the legal interests of LSON PARTNERS.

### **3.10 If you send an e-mail to LSON PARTNERS**

#### **3.10.1 *What type of personal information do we handle?***

LSON PARTNERS uses the following personal information if you contact us by e-mail:

- (i) name;
- (ii) e-mail address;
- (iii) any other personal information you provide in the e-mail sent to us.

#### **3.10.2 *Why do we use your personal information?***

We use your personal information for purposes of responding to your *e-mail*.

#### **3.10.3 *Juridical basis for using your personal information***

Usage in accordance with previous statements is based on LSON PARTNERS' legitimate interest in responding to your e-mail and continuing to communicate with you if you wish.

#### **3.10.4 *For how long will we store your personal information?***

Personal information in e-mail form will be erased automatically after one (1) year as part of LSON PARTNERS' internal proceedings. If you have supplied personal information in the e-mail that we have not requested or that we do not need, we reserve the right to delete the entire e-mail immediately. If our correspondence leads you to be subject to some other category in this policy, we will use and save your personal information according to the relevant category.

## **4. TO WHOM DO WE RELEASE YOUR PERSONAL INFORMATION?**

4.1 LSON PARTNERS will not sell or loan your personal information to third parties. However, LSON PARTNERS may share your personal information with those associates, with whom they have agreements for purposes of being able to provide our services according to our commitment. Those associates may have access to your personal information when they provide services for us, in order to comply with the intent of using your personal information as set forth previously in section 3, but they will never be able to use your personal information for any other purpose.

4.2 LSON PARTNERS will not provide your personal information to any country outside of the EU/EEA.

4.3 LSON PARTNERS may share personal information as required by law or governmental requirements or, if it is necessary, to protect our legal interests or to detect or prevent fraud or other security issues.

## **5. HOW WE PROTECT YOUR PERSONAL INFORMATION**

5.1 You should always feel safe when you send us your personal information. Therefore, LSON PARTNERS has taken the necessary safety measures to protect your personal information against unauthorized access, modifications, and deletion.

5.2 To guarantee that personal information is handled safely and confidentially, LSON PARTNERS uses data networks that are protected from intruders by a firewall and passwords that meet industry standards. In order to guarantee the integrity of the personal information sent online, LSON PARTNERS may use enciphering technology when said personal information is transmitted to its servers online. LSON PARTNERS' security protocols are updated constantly, in line with technical developments.

## **6. YOUR RIGHTS**

### ***Access, modifications, and additions***

6.1 You always have the right to know what personal information of yours we are using and to have access to it. That means that you may request what is called a registry extract about how we use your personal information. You also have the right to receive a copy of the personal information that is used. Moreover, you may always request that we modify or update your personal information.

### ***Limitation, deletion, and portability of information***

6.2 In particular circumstances (according to what is established in applicable information protection legislation), you have the right to request that LSON PARTNERS limits the use of your personal information or deletes your personal information. You also have the right to the portability of information. That involves the right, under certain conditions, to extract and

transfer your personal information in a format that is structured, in common use, and machine readable to another party in charge of handling it.

*Objection*

6.3 You have the right to object to the use of personal information that takes place after a consideration of interests. If you object to this use, we will only continue it if there are legitimate reasons for this use that prevail over your interests.

*Inquiries and complaints*

6.4 Do not hesitate to contact LSON PARTNERS if you have any questions about this privacy policy, the use of your personal information, or in order to exercise any of your rights as previously explained (see contact information in section 7).

6.5 If you are not satisfied with our use of your personal information, do not hesitate to contact us, and we will do everything possible to respond to your remarks. Your privacy is very important to us, and we always strive to handle your personal information in the best and safest way possible. If you think that we are not meeting that goal, you have the right to present any complaints related to the usage of your personal information by LSON PARTNERS to the Information Protection Agency. You will find contact information for the Information Protection Agency at <https://www.aepd.es>

**7. CONTACT**

You may contact us by sending a letter to: LSON PARTNERS REAL ESTATE, S.L. Paseo de Gracia, 74, 3-2B, Barcelona, Spain, calling us at + 34 932 20 14 44, or sending us an e-mail to [info@larssonestate.com](mailto:info@larssonestate.com).