

Introduction

This privacy notice applies for a number of companies within the business area Bonnier News (see list below). In this privacy notice we describe how we process our customers and users personal data, e.g. data that you provide us with when you register for a subscription, apply to participate at any of our events and conferences, purchase a product online, participate in any of our competitions, or when you contact our customer service. This privacy notice also describes how we compile and process personal data via our digital platforms. We care about your privacy and it is important that you read the information on how we process your personal data.

To make it easier for those that use the services of more than one company within Bonnier News, we have gathered the information on how we process data in one privacy notice. It is the company whose services you use that is the controller with respect to the use of your personal data. Contact details to us are available under "CONTACT US" and "DATA PROTECTION QUERIES".

This privacy notice comprises the following companies which primarily provide products and services to consumers:

- **AB Dagens Nyheter** (reg no: 556246-8172) ("DN")
- **AB Kvällstidningen Expressen** (reg no: 556025-4525) ("Expressen"). Expressen includes brands such as Allt om Bilar and Hälsoliv. Expressen provides the evening newspapers Expressen, Kvällsposten and GT and also several magazines, such as Mitt Kök and Korsord. Read more about Expressen here: <https://www.expressen.se/om-expressen/>
- **Bonnier Magazines & Brands AB** (reg. no. 556012-7713) ("BMB"). BMB includes a number of brands, including Amelia, Allt om mat, Mama and Teknikens Värld; a complete list is available at <https://bonniermag.se/varumarken/>.
- **Sydsvenska Dagbladets Aktiebolag** (reg no: 556002-7608). Sydsvenska Dagbladets Aktiebolag is data controller for customers and end users of Sydsvenskan, Helsingborgs Dagblad and Lokaltidningen.
- **Bonnier News Local AB (formerly Mittmedia AB)** (reg. no. 556004-1815) ("BNLO"). BNLO includes a number of brands, including Sundsvalls Tidning, Nerikes Allehanda and Gefle Dagblad; a complete list is available at <https://kundservice.bonniernewslocal.se>.
- **Hall Media AB** (reg. no. 556100-7518) ("Hall Media"). Hall Media includes a number of brands: Falköpings Tidning, Jönköpings-Posten, Värnamo Nyheter, Vetlanda-Posten, Smålands Dagblad, Smålands-Tidningen, Tranås Tidning, Smålänningen, Västgöta-Bladet and Skaraborgs Läns Tidning, Jnytt and Skövde Nyheter.
- **Happy Green AB** (reg. no. 559070-1669) ("Happy Green")

The privacy notice comprises the following companies which primarily provide products and services to companies or individuals in their capacity as traders or otherwise in respect of their profession. The companies are jointly referred to as "Di-gruppen".

- **Dagens Industri Aktiebolag** (reg no: 556221-8494) ("Di").
- **Bonnier Business Media Sweden AB** (reg no: 556468-8892) ("BBM"). BBM includes a number of brands: Aktuell Hållbarhet, Apoteksmarknaden, Dagens Medicin, Digital Hälsa, Energimarknaden, Fond & Bank, Kommunal Hälsa, Läkemedelsmarknaden, Pensioner & Förmåner, Resumé och Risk & Försäkring.
- **Tidningen Byggindustrin AB** (reg no: 556096-1319) ("Byggindustrin").
- **Dagens Media Sverige AB** (reg no: 556558-6301) ("Dagens Media").
- **Fastighetsnytt Förlags AB** (reg no: 556326-8837) ("Fastighetsnytt"). Fastighetsnytt includes the brand Business Arena.
- **Dagens Samhälle AB** (org.nr 556176-4613) ("Dagens Samhälle").

- **Hakon Media AB** (org,nr 556923-9519) ("Hakon Media"). Hakon Media includes the brands Dagligvarunytt and Market.

Some (not all) of the companies within the Bonnier company group co-operate to maintain a joint customer database with good data quality. Through the co-operation we are able to achieve an efficient and integrity friendly processing of customer data since we can share resources and competence. The co-operation is managed by Bonnier News AB, which is therefore a joint controller for the data processing together with the Bonnier company where you are a customer or which services you are using. The joint data processing is described in the joint privacy notice which you can find at gdpr.bonniernews.se/kdb. Please find more information on which Bonnier companies that participate in the co-operation and how we share data within the group, with suppliers and partners under the section "REASONS WHY WE SHARE YOUR PERSONAL DATA".

When you surf on our websites we use cookies; please read more in our Cookie Policy. You can also find more information on use of data in advertising in our FAQ.

Please note that editorial content such as our articles, pictures and TV programs falls outside the scope of this privacy notice. If you have questions regarding editorial material, please contact editor in chief.

Please read more about how we use personal data and how we protect your rights by clicking on the links to the various sections below. Supplemental terms and privacy notices may apply with respect to some of the services that we offer.

The personal data we compile

Which personal data do we compile?

The data we compile may vary and depends on which services you use. It may also depend on which privacy settings you have made on your computer or phone, and the functions you use in the services. The data we compile may include the following:

- **Name and contact details.** We process our customers' first name and surname, email address, postal address, telephone number, delivery address and other similar contact details.
- **Data related to your user account.** If you register an account with us we process authentication details such as user names, passwords, and information that you add to your account.
- **Age, gender and statistics (demographic data).** If you are a customer with us we may process information about your age and gender as well as statistics about the area where you live, e.g. information on whether the area is populated by many families with children or retired persons, or if residents generally rent or own their house or apartment.
- **Payment information.** We compile information which is necessary to process your payment in conjunction with any purchase, which may include means of payment number (for example, credit card number) and associated security code or bank account number.
- **Purchase history.** We compile information about your purchases, subscriptions, amounts, time of purchase and offers which you take up.
- **Unit and use data.** We compile data about your unit, e.g. information whether you surf on a phone or computer and which browser you use. We also compile data on how you use our digital services, e.g. information about the functions and software configurations you use. This may include information about IP addresses and settings (e.g. language settings).
- **Interests and favourites.** We compile data about your interests and favourites, for example which shares you monitor through a financial app, and your favourites among

the news articles you store on your profile on your user account. In addition to the information which you expressly provide, your interests and favourites can also be derived or linked from other information which we compile, for example based on purchase and reader history.

- **Personal identification number (Sw: “personnummer”).** We may process your personal identification number if necessary for verifying your identity, age or if you log in to a service via Bank-ID, and for verifying whether you have registered with NIX.
- **Miscellaneous.** We also compile information which you write in messages which you send to us, such as feedback and reviews you write, or questions and information you submit in customer service matters. When you contact us, e.g. for customer support by telephone or chat sessions with our representatives, the conversations may be monitored and recorded for our mutual security, to continuously evaluate our customer service encounter and, if necessary, to use as evidence that an agreement has been reached.

How do we compile personal data?

- **Data that you provide.** Some of the data is provided by you directly, for example when you order a subscription or when you create and use an account in an app or on our websites, when you apply to attend an event, register for a newsletter, buy a product from an online store or contact us for support.
- **Use of services.** We obtain some of the data by registering how you interact with our services and products, for example through use of technology such as cookies on our websites and through information to which we obtain access via the unit (such as mobile telephone, computer or tablet) you use when you obtain our Services, such as IP address, language settings and push settings. In some cases, we may collect and use your data cross-devices for the purpose of achieving relevant content and advertisements on our websites.
- **Information from external sources.** We can also obtain data from external companies or authorities, referred to as third-party sources. Such third-party sources may vary over time but have previously included:
 - We use Bisnode to verify and add contact details and demographic data such as statistics for a certain residential area.
 - In conjunction with the use of a service which requires payment, we compile the name, personal ID number, address details and means of payment from payment service providers such as Klarna in order to confirm your identity and address details.
 - Social networks where you afford a service access to your data in one or more networks, for example if you have chosen to identify yourself via Facebook or LinkedIn we compile data from your public Facebook or LinkedIn profile.
 - Suppliers that help us determine geographical locations based on IP address.
 - Partners with whom we collaborate in order to offer services or to participate in joint marketing activities; we can, for example, obtain data from our event partners (such as a co-organiser) if you apply to participate at any of our events through our event partner.
 - Publicly available sources, for example open public authority databases or other data sources which is available to the general public, such as SPAR (The State's Personal Address Register).

If you do not provide data which is necessary to gain access to the services or a particular function, there is a risk that you will be unable to use the specific service or function.

How we use personal data

In this chapter we have summarized the purposes for which we process personal data and which legal basis we use. We primarily process your personal data on the legal basis that our processing is necessary for the performance of a contract to which you are a party (“**Performance of a Contract**”), or that the processing is necessary for the purposes of the legitimate interests pursued by us or a third party (“**Legitimate Interest**”). In some cases our processing is based on your consent (“**Consent**”) or that the processing is necessary for compliance with a legal obligation (“**Legal Obligation**”).

We have made the assessment that we have a Legitimate Interest to process personal data in those cases where the processing is necessary to meet our users’ and customers’ wishes and requests, to evaluate, develop and improve our content and the services and to be relevant in our offerings and advertising. Finally, we have a legitimate interest to protect our business operations.

- **Providing products, services and customer support.** We use information in order to carry out your purchases from us and to provide you with our services and products such as subscriptions, private advertisements, premiers, events and courses, including providing contact in conjunction with events and courses, and to provide customer support. We may verify your age, payment details and/or your account when registering as a subscriber or user of our applications via the email you stated when registering. Legal basis: Performance of Contract or Legitimate Interest. Processing which is necessary for us to fulfil our contractual obligations to you is for example collection and storing of your address in order for us to be able to distribute a newspaper that you subscribe to or an invoice for payment of your subscription. Processing that is based on our Legitimate Interest is for example that we process your contact details in connection to your participation in a competition or voting. If you represent a company that has ordered our products or services, we may process information about you and the company you represent based on our Legitimate Interest in order to provide our services or deliver our products to the company. We also process your personal data to be able to accommodate your interest to receive customer support.
- **Personalised services.** Some of our services entail that you obtain access to a more personalised experience which is based on your activities on our websites, interests and favourites, your location, customer profile and the choices you have made, for example if you have chosen to follow a specific writer or topic. Legal basis: Performance of Contract (if personalised content is part of the service) or Legitimate Interest.
- **Product improvement.** We use data to improve our existing services and products, among other things by updating functions and obtaining an increased understanding as to how we can improve your user experience. For example, we use error reports in order to improve security functions, user behaviour, search questions and clicks on our websites to improve the relevance of search results, to determine which new functions should be prioritised, the content on websites and placement of relevant content for you on our websites. Legal basis: Legitimate Interest.
- **To better understand our business (so called “Business Intelligence”).** We process personal data in order to develop statistic and analyses regarding our business. We use this information to make well informed decisions and to plan for future strategies for our business operations. Legal basis: Legitimate Interest.
- **Security and regulatory compliance.** We use information in order to protect our products, services and customers’ security by discovering and preventing fraud, for example double take up of offers, to resolve disputes and perform our agreements. We use information in order to comply with applicable legislation such as the Swedish Accounting Act (Sw: bokföringslagen). Note that we may delete content which you have published via, for example, a comment function, if it violates our user terms for a specific

Service. Legal basis: Legitimate Interest or, where applicable, that the processing is necessary for compliance with a Legal Obligation.

- **Communication.** We may contact you by email, telephone, push-function or otherwise to inform you when a subscription is about to expire or when we update our terms and conditions; to notify you when security updates are available; to remind you that you still have products in your shopping cart; to get back to you in a customer service matter; to inform you that you need to take a measure to keep your account active; or to deliver a newsletter which is included in your subscription or in which you have expressed interest. Legal basis: Performance of Contract (if the processing is necessary to carry out our contractual obligations to you) or Legitimate Interest.
- **User accounts.** When you create a personal user account upon registration or by making a purchase from us, we ask for certain personal data. We will allocate you a unique customer ID for identifying your account and associated information. Your login information can, in certain cases, be used to log into user accounts provided by other companies within Bonnier News. If you have already provided your information for a user account with one Bonnier News company, you do not need to personally create a new account; instead, we will obtain relevant account details from our joint customer register. When you log into your user account, we create a registration of the login, including date and time, information about the product you logged into, IP address and any error messages. Legal basis: Legitimate Interest.
- **Marketing and advertising.** We use different channels for marketing and advertising, e.g. postal, telephone, email, SMS and our websites and other digital channels. The marketing and advertisements may, depending on channel, include our own products and services as well as other companies' products and services. Our marketing and the advertisements you see on our websites may be based on how you have used our services, such as reading and purchase history, as well as demographic data such as age, gender, residential area and geographic location. If you for example has shown an interest in travel, you may be shown travel related advertisements. We can also choose to direct certain marketing to a certain target audience, for example "women in Stockholm aged "30-35".

You always have the right to object to our direct marketing, i.e. marketing from us via post, email, SMS and telephone marketing, read more under the chapter "HOW TO ACCESS AND CONTROL YOUR DATA".

When you visit our websites, some of the cookies we place on your computer will be advertising cookies, which are specifically intended to remember how you navigate on the Internet and which websites you visit; this is in order to make the advertising more relevant and effective. For more information on how we use cookies, please read the chapter "COOKIES AND LOCAL STORAGE OF DATA" below and our Cookie Policy. None of the technicians we use with respect to interest-based advertising on our websites compile information about your name, address, email or telephone number.

Legal basis: Legitimate Interest

- **Recordings of phone calls.** If we contact you by telephone to market our products or services to the company you represent, parts of the conversation may be recorded to use as evidence that an agreement has been reached. Legal basis: Legitimate Interest.
- **Distribution blocked list.** Note that if you request that we do not contact you by email, post or telephone, we will retain a copy of the relevant contact information in our distribution blocked list to ensure that you do not receive undesired direct marketing in the future.

- **The Facebook pixel.** Some websites use a tool called the Facebook pixel. This tool is only used if you have provided your consent. When using this tool we share certain data with Facebook in order to be able to market our services and products on Facebook's platform. Read more under "SPECIFICALLY REGARDING SOME OF OUR SERVICES". Legal basis: Consent.
- **Behaviour-based retargeting of our advertisers' products and services.** This is another form of interest-based advertising which allows us and several of our advertisers to display advertising for our advertisers' products and services. The advertisement is based on your reader and click patterns on a website which is not controlled by Bonnier News. For example, if you visit an online clothing store, you may see advertisements for the clothing store's products on our websites. This allows companies to direct advertising to you if you leave their website without making a purchase. You can thereby be reminded, for example through an advertisement on DN.se, about the product or service you chose not to buy. Legal basis: It is the responsibility of the advertiser to ensure that it has a legal basis to process your data for retargeting ads on our websites. We only provide advertisement space on our website.
- **Other purposes.** If we plan to use personal data for a new purpose, other than as described in this policy, you will be informed of such use before, or in connection with, compilation of the personal data. If legally required we will request your permission.

Cookies and local storage of data

Cookies and local storage of data is used in order for us to improve functionality on our sites, to direct relevant content, offerings and advertisements to you and to ensure that the services are working correctly. We use both first-party cookies and third-party cookies (e.g. for advertisement). In our Cookie Policy you will find more information on cookies. On our FAQ site you will find more information on how we work with advertising. Below is a summary of how we use cookies and local storage of data.

- **Log in and settings.** Some cookies are used to remember your settings when you return to our website. Local storage of data is used so that you do not have to log in every time you visit our websites, and to save settings that you have made (such as text size).
- **Personalized consent and advertisements.** We use local storage of data to personalize your experience on our sites and apps, for example based on your reading history on our sites. In this way we can personalize our services for you.
- **Analyses, statistics and development.** Through various measuring techniques we can compile statistics about how our apps and sites are used. This helps us develop and improve the experience for our users. Different tools are used for different purposes. We use real time tools to determine which news articles shall be published at what time. Other tools, such as Google Analytics, are used to follow and analyse reading over time. We also use local storage of data to perform so called A/B tests when we, for example, test new functions on a smaller group of users before we release it to all users. Some of our sites use the tool Hotjar to identify how visitors click and scroll on the site and to conduct surveys where we ask questions to our visitors. This helps us optimise our sites and the experience for our users.
- **Advertisement cookies.** Advertisers, media agencies and other third parties use cookies on our websites to deliver ads on our sites, to measure how many users have seen an ad and to determine which ad should be displayed to you. You can read more about which third parties we allow and how we use data in advertisement in our FAQ.

Reasons why we share your personal data

It may sometimes be necessary for us to share your personal data with other companies in our group or with companies who perform services on our behalf.

Suppliers that are data processors

We engage suppliers that provide services on our behalf, for example customer service support, marketing and traffic measurement and for assistance in protecting and securing our systems and services. These suppliers may require access to personal data, and may have to process data, in order to provide such services. These suppliers are bound by so called data processing agreements and are not allowed to process the data for its own purposes.

Intra group co-operations

Within the Bonnier company group. Some of the companies within the Bonnier company group co-operate to maintain a joint customer database with good data quality. Through the co-operation we are able to achieve an efficient and integrity friendly processing of customer data since we can share resources and competence. The co-operation is managed by Bonnier News AB, which is therefore a joint controller for the data processing together with the Bonnier company where you are a customer or which services you are using. The joint data processing is described in the joint privacy notice which you can find at gdpr.bonniernews.se/kdb.

Within Bonnier News. Companies within the business area Bonnier News co-operate from time to time regarding various offerings and campaigns relating to its products and services; either for managing a combined offering or for reducing the companies' marketing activities. In connection to such co-operations it may be necessary to share certain limited data. If, for example, DN offers its customers the possibility to add a subscription to Di to its existing DN subscription, it may be necessary for DN to share certain data with Di in order for Di to be able to activate the subscription. Another example may be that Expressen wants to display a website campaign for Di. In order not to bother existing Di subscribers with the campaign, Expressen can choose to display the campaign to visitors that are not already Di subscribers.

Within Di-gruppen. If you are a representative of a company that is an existing or potential customer to a company within Di-gruppen, or have applied to participate at a conference or other event in your capacity as a trader or otherwise in respect of your profession, we may share your contact details to other companies within Di-gruppen in order for them to be able to market their services to you which may be of interest in your professional capacity. For example, if you have applied to participate at an event arranged by BBM, your contact details may be used by Di for its direct marketing purposes if Di assesses that the marketing message may be of interest in your professional capacity. We share your personal data based on the group companies' Legitimate Interest to market their products and services towards traders and professionals. The company within Di-gruppen that contacts you for its direct marketing is controller for the processing of personal data in relation to the direct marketing. You always have the right to object to our direct marketing, read more under the chapter "HOW TO ACCESS AND CONTROL YOUR DATA".

Payment service providers

The payment information which you provide to carry out a purchase is shared by us with banks and other institutions that process payment transactions or deliver other financial services, and to prevent fraud and reduce credit card risks. Examples of such providers include Klarna and Dibs. Such payment service providers are controllers for the processing of personal data in relation to the payment transaction.

Invoice in the Kivra app

Some companies within Bonnier News is connected to Kivra. If you have a digital mailbox in Kivra you may receive your invoice in the Kivra app when purchasing some of our products and services. We share your personal identification number and content in your invoice with Kivra in order to provide your invoice in the Kivra app. We share this information on the legal basis Performance of Contract. Kivra Sverige AB is independent controller of the personal data it processes from when your invoice has been made available in your digital mailbox.

Distribution partners

We share personal data with our distribution partners, e.g. Postnord (Tidningstjänst AB) or [Nim Distribution I Skåne AB](#). Each distribution company is an independent controller of the personal data that they process in relation to deliveries.

Advertising

Advertisers and other partners process certain data in connection to ads on our websites through cookies which are used to deliver, measure and adapt ads on our website. Such partners process data as independent controllers. For more information on advertising and cookies, please read our Cookie Policy. None of the technicians we use with respect to interest-based advertising on our websites compile information about your name, address, email or telephone number.

Event partners

When participating at a conference in your capacity as a trader or otherwise in respect of your profession, your personal data may be shared with our partners who participate at the conference (co-organisers, sponsors and exhibitors) in order for them to be able to market their services to you which may be of interest in your professional capacity. The event partners process personal data as independent controllers. We share your personal data based on our Legitimate Interest to, among other things, increase the opportunities for networking within the business community as between participants and our event partners. You have the right to object to our sharing of your personal data to event partners by contacting the company within Di-gruppen arranging the conference, see the chapter "CONTACT US".

Social media / plug-ins

When you use our services you can choose to share articles via social media via a social plug-in (for example, a share button). When you share information via a social plug-in, your browser will transfer data to the social medium, such as date and time of the sharing, the type of unit you use, your operating system and IP address, URL for the visit, as well as information regarding the article you share. For more information about how relevant social media process the information you provide via social plug-ins, we encourage you to read the respective social medium's terms and personal data policies.

Facebook pixel

Some of the companies within Bonnier News share data with Facebook (through a tool called the Facebook pixel). This tool is only used if you have provided your consent. You can find more information under the section "SPECIFICALLY REGARDING SOME OF OUR SERVICES" below.

Miscellaneous

We may disclose personal data as part of a joint transaction, for example a merger or sale of assets. Finally, we may need to disclose or store your data when we believe that doing so is necessary to:

1. comply with laws or legal processes and to disclose information to the police and other competent authorities;
2. protect our customers, for example to prevent junk mail or attempted fraud;
3. manage and maintain the security of our products, including preventing or stopping an attack on our systems or networks;
4. protect rights or property belonging to us, including performance of the terms which determine your use of the services. When necessary, we refer the matter to the police for further action.

Note that some of our websites contain links to external companies, for example to offers regarding products and services, whose personal data policies differ from ours. If you provide personal data in any of these products, your personal data is processed in accordance with their respective personal data policy; we recommend that you read such policy before disclosing data to an external company. We are not responsible for the use of your personal data by such external companies.

How to access and check your personal data

The way in which you access or check your personal data depends on which services you use. Through your browser settings or push settings on your telephone, you can monitor for example cookie history and location information.

Customer service. You are always welcome to contact us via our customer service with any questions concerning the processing of your personal data. Read more about how to proceed under "YOUR INDIVIDUAL RIGHTS" and "CONTACT US".

User account. You can control certain data through your user account.

Unsubscribe from direct marketing. If you receive advertising messages from us by email or text message and wish to unsubscribe from them, you can do so by following the instructions in the message. Note that such subscription cancellation does not apply to other communication which is required to enable us to provide the Services, such as communication regarding changes or updates to user terms.

Your advertising settings. Please visit youronlinechoices.com or networkadvertising.org (if you visit our US websites) if you wish to receive more information about interest-based marketing and how you can decline to receive it. Please note that even if you choose not to receive personalised/interest-based ads, you will still see advertisements on our websites, however the advertisement displayed will not be adapted to you and may therefore be perceived as less relevant. To the extent the data used for personalised/interest-based ads is also used for other legitimate purposes (such as for providing our services, analyses and fraud detection) such use will not cease because you choose not to receive personalised/interest ads.

Cookie controls. Relevant browser-based cookie controls are described in our Cookie Policy.

Tracking protection via your browser. Certain browsers have a function called Tracking Protection which blocks content from third parties, including cookies, from all websites which you place in the tracking protection list. By limiting calls to these websites, the browser limits the information which such third-party sites can compile about you.

Your individual rights

Contact information about whom to contact to protect any of your rights is available under "CONTACT US".

You have the following rights:

- **Consent.** If processing of personal data is based on your consent, you are entitled at any time whatsoever to withdraw your consent to future processing of your personal data.
- **Register extract, rectification and deletion.** You are entitled, free of charge, to request access to a copy of your personal data (referred to as a register extract), request rectification of incorrect information and, under certain circumstances, request that your personal data be deleted.
- **Limitation.** You are entitled to demand that we limit the processing of your personal data during the period we are required to investigate any objections from you or if we lack any legal ground to continue processing but you do not wish the information to be deleted, or if we no longer need the information but you require it in order to assert your rights.
- **Data portability.** In certain cases you are entitled to data portability, i.e. to receive personal data which has been provided by you, in a structured, generally usable and mechanically readable format and to be able to transfer such to another controller of personal data in those cases where our entitlement to process your personal data is based either on your consent or on performance of an agreement with you.
- **Objection against direct marketing, i.e. marketing via post, email, SMS and telephone.** You are entitled, at any time whatsoever, to object to direct marketing (including profiling for direct marketing purposes), with the consequence that we may no longer continue to use the data for this purpose.
- **Objection.** You are entitled, in certain cases, to object to the use of your personal data with the consequence that we must possibly cease the processing unless we can show compelling justifiable reasons which outweigh the interest in not processing the personal data.
- **The Swedish Data Protection Authority.** You are entitled complain to a data protection authority. The Swedish Data Protection Authority (Sw: Datainspektionen) is the authority in Sweden which exercises supervision over the manner in which we, as a company, comply with legislation.

It costs nothing to exercise your rights. We answer requests about your rights and enquiries about access to or deletion of your personal data within, as a starting point, 30 days. The measures are taken within a reasonable time which, depending on the circumstances, may be up to 3 months. We reserve the right to charge a reasonable fee or decline to take any measure in the event of an unreasonable or manifestly unfounded objection or request.

Information regarding editorial content. Editorial content such as our articles, pictures and TV programs are not subject to the provisions of the GDPR. This means that you cannot request removal of an article based on the provisions of the GDPR. If you discover any errors in published material please contact editor-in-chief.

Security for your personal data

We employ a number of security technicians and security methods to protect your personal data from unwanted access, use and disclosure. For example, personal data which you state on a computer system to which there is restricted access is stored in protected premises. In conjunction with the transfer of extremely sensitive data (for example, credit card numbers and passwords) via the Internet, we provide protection of such data through encryption. In those cases where our providers use subcontractors, we conduct regular audits of such subcontractors to ensure that processing takes place in accordance with this policy and our security routines. We store the information we compile when a user is not logged in (authenticated) separately from customer-specific account information which identifies you, such as your name, email address or

telephone number. When analysing customer views, product development, personalisation, trends, statistics and for similar purposes, we primarily use anonymous data which does not consist of personal data; alternatively, we use pseudonymised data which cannot be linked to a specific individual without supplementary information being used.

Where we store and process personal data

We process data primarily within the EU/EEA, however in certain cases we use providers who are established outside the EU/EEA, such as for distributing newsletters and for development and maintenance of our systems, which allows the provider access to personal data. In those cases where processing of personal data takes place outside the EU/EEA, we have ensured that there is a legal basis for such processing. For example by entering into standardised model clauses with the recipient of the personal data, that are approved by the EU Commission and are accessible on the Swedish Data Protection Authority's website.

How long we store your personal data

We store personal data for the time necessary for the reasons for which they are used, e.g. for such time as required to enable us to provide the services; to maintain and improve the performance of existing services; to distribute necessary communication and market communication; to engage in development of our services; and to perform our statutory obligations. Since needs can vary as regards different types of data and with respect to different types of services, products and contexts, the period in which we store the information may vary.

Criteria that determine storage time. The criteria that primarily determine how long personal data will be stored are:

- the reason we use the data, i.e. if we use the data to meet statutory requirements, it is stored for a longer time than, for example, contact information for direct marketing;
- the type of data involved, i.e. sensitive data such as a food allergy is stored for a shorter period of time than, for example, contact information;
- the way in which the data is stored, i.e. data which is not pseudonymised is stored for a shorter period of time than information which is pseudonymised;
- our relationship with you, i.e. whether you are an existing, former or potential user/customer or whether you are visiting us without being logged in.

Contact details for direct marketing. We use your contact details for direct marketing during such time as we have a user or customer relationship and for a certain period of time after our user or customer relationship has ended, provided you have not objected thereto; read more under "YOUR INDIVIDUAL RIGHTS". We store your details for up to **24 months** following conclusion of the service (e.g. a subscription) or after your final purchase.

Company contact details. If your contact details are connected to a company that you represent, for example in conjunction with an event, your contact details may be stored to direct marketing to you for up to **36 months** after the concluded event.

Prospects. We may contact potential customers by telephone in order to market our services and products. If you choose not to enter into a customer relationship with us, we store the contact details for up to **3 months** from the date of contact. Companies within Di-gruppen may contact representatives of companies that are potential customers in order to market its services and products. In these cases, your contact details may be stored for up to **12 months** from the date the contact details were collected by us.

User account data. If you have registered a user account, we use your data regarding, for example, interests and favourites, reader and purchase history, until such time as you close your account and for up to **24 months** thereafter, if you do not request that we delete certain data. We store data in order to process complaints and to analyse user and customer behaviour with the aim of improving our services and for interest-based marketing.

Miscellaneous

Your personal data is deleted or anonymized when it is no longer relevant for the purposes for which it has been compiled. In conjunction with analyses of customer views, trends, etc. we use anonymous data which does not comprise personal data, alternatively pseudonymised data which cannot be attributed to a particular individual without additional data which requires specific measures.

Your personal data may be stored for longer than stated above in those cases where we are obliged to do so pursuant to any law, ordinance or public authority decision or to retain data which must be retained in order to resolve a dispute or if you have consented thereto.

Contact us

Below you will find contact details to us. Please contact us if you want a register extract, or if you want to request deletion, object to our direct marketing or if you want to exercise any of your rights (please read under "YOUR INDIVIDUAL RIGHTS").

Dagens Nyheter

Dagens Nyheter AB (reg no: 556246-8172)
105 15 Stockholm
Website: <https://kund.dn.se/kontakta-oss/>
Email: kundservice@dn.se
Telephone: 08-738 26 00

Expressen

AB Kvällstidningen Expressen (reg no: 556025-4525)
105 16 Stockholm
Email (not magazine subscribers): kundservice@expressen.se
Customer service contact for our magazine subscribers:
<https://expressenmagasin.prenservice.se/Kundtjanst>
Telephone: 0770-457 195

Sydsvenskan, Helsingborgs Dagblad and Lokaltidningen

Sydsvenska Dagbladets AB (reg no: 556002-7608)
205 05 Malmö or Helsingborgs Dagblad 251 83 Helsingborg
Website: <https://www.sydsvenskan.se/kundservice/#!/kontakt/>
or <https://www.hd.se/kundservice/#!/kontakt>
Email: kundservice@sydsvenskan.se or kundservice@hd.se
Telephone: 040-93 41 00 eller 042-489 90 89

Sydsvenska Dagbladets AB is the controller for Sydsvenskan's, Helsingborgs Dagblad's and Lokaltidningen's customer and end user data.

Bonnier Magazines & Brands

Bonnier Magazines & Brands AB (reg no: 556012-7713)
105 44 Stockholm, Telephone 08 736 53 00

You can read more and exercise your rights at <https://bonniermaq.se>

Bonnier News Local AB (formerly Mittmedia AB)

Bonnier News Local AB (reg no: 556004-1815)
Telephone: 010-7097900.

Website: <https://kundservice.bonniernewslocal.se>

If you want to exercise your rights via your user account we need to verify your identity. Please visit Mitt Konto, Kontoinställningar and choose Min Information. If you do not have an account with BNLO please send a letter with your request and a copy of your ID card to the following address: Bonnier News Local AB, Kundcenter, 701 92 Örebro.

Hall Media AB

Hall Media AB (reg no: 556100-7518)
Telephone: 0356-30 40 40

Website: <https://kundservice.bonniernewslocal.se/hm>

If you want to exercise your rights via your user account we need to verify your identity. Please visit Mitt Konto, Kontoinställningar and choose Min Information. If you do not have an account with Hall Media please send a letter with your request and a copy of your ID card to the following address: Hall Media AB, Kundcenter, Skolgatan 24, 556 16 Jönköping.

Happy Green

Happy Green AB (reg. no. 559070-1669)
Website: <https://www.happygreen.se>
E-mail: kundservice@happygreen.se
Telephone: 08-4506060

Companies within Di-gruppen

Dagens Industri

Dagens Industri AB (reg no: 556221-8494)
105 15 Stockholm
Website: <https://pren.di.se/pren/min-sida/>
Email: kundservice@di.se
Telephone: 08-573 651 00

Bonnier Business Media

Bonnier Business Media Sweden AB (reg no: 556468-8892)
Torsgatan 21, 113 21 Stockholm
Website: <http://bbm.bonnier.se/kontakt/>
Email: kundservice@bbm.bonnier.se
Telephone: 08-409 320 10

Fastighetsnytt

Bonnier Business Media Sweden AB (reg no: 556326-8837)
Website: <https://www.fastighetsnytt.se>
Email: kundservice@fastighetsnytt.se
Telephone: 08-409 320 02

Dagens Media

Dagens Media Sverige AB (reg no: 556558-6301).
Website: www.dagensmedia.se
Email: kundservice@dagensmedia.se
Telephone: 08-409 320 05

Byggindustrin

Tidningen Byggindustrin AB (reg no: 556096-1319)
Website: www.byggindustrin.se
Email: kundservice@byggindustrin.se
Telephone: 08-409 320 12

Dagens Samhälle

Dagens Samhälle AB (reg no: 556176-4613).
Website: www.dagenssamhalle.se
E-post: kundservice@dagenssamhalle.se
Telephone: 09-409 320 10

Hakon Media

Hakon Media AB (reg no: 556923-9519).
Website: <https://hakonmedia.se/kontakta-oss/>
Email: kundtjanst@hakonmedia.se
Telephone: 08-409 320 10

Data processing queries

If you have questions about our data processing or a complaint you are welcome to contact us by the contact details below. Here you can also get in contact with the Data Protection Officer of each company.

Dagens Nyheter: dataskydd.dn@bonniernews.se

Expressen: dataskydd.expressen@bonniernews.se

Sydsvenskan, Helsingborgs Dagblad och Lokaltidningen: dataskydd.hdsyd@bonniernews.se

Bonnier Magazines & Brands: dataskydd.bmb@bonniernews.se

Bonnier News Local AB (formerly Mittmedia AB): dataskydd.bnlo@bonniernews.se

Hall Media AB: dataskydd.hm@bonniernews.se

Happy Green: dataskydd.hg@bonniernews.se

Companies within Di-gruppen

Dagens Industri: dataskydd.di@bonniernews.se

Bonnier Business Media Sweden: dataskydd.bbm@bonniernews.se

Fastighetsnytt: dataskydd.fastighetsnytt@bonniernews.se

Dagens Media: dataskydd.dm@bonniernews.se

Byggindustrin: dataskydd.byggindustrin@bonniernews.se

Dagens Samhälle: dataskydd.ds@bonniernews.se

Hakon Media: dataskydd.hakon@bonniernews.se

Specifically regarding some of our Services

Presented below is specific information about some of our services to which we would particularly like to draw your attention. To find out in greater detail which personal data we compile, why and the way in which we use the data, reference is made to the information in the sections above.

Specifically regarding services within Di-gruppen

Work-related services. In respect of our services focused on traders and/or individuals in their professional life, we collect contact details from our business partners, such as Bisnode, and official sources, e.g. websites and social media such as LinkedIn. This information may be used to contact potential customers to market our products and services. We may also compile data about titles and any specialisation, workplace and job sector. This information is collected from you or official sources and used by us in order to adapt relevant offers to you in your professional life and to be able to deliver products to your workplace.

Conferences and events. Some companies within Di-gruppen arrange conferences, educational services and other events with the aim of creating a meeting place for, among other things, networking within the business community. We use your personal data to provide the event you have applied to attend to, to provide customer support and to provide our event app before and during the event. In some cases, we may use images or recorded material from the event in which you appear in order to inform about upcoming events. When applying for a conference or an event you may be required to provide us or our co-organisers with particularly sensitive information, such as information about special food or allergies, for booking and provision of the event. If you attend at a conference in your capacity as a trader or otherwise in respect of your profession, we may share your contact details with our event partners, read more under the chapter "REASONS WHY WE SHARE YOUR PERSONAL DATA". Legal basis: Performance of Contract, Legitimate Interest or Consent. Processing which is necessary for us to fulfil our contractual obligations is for example collection and storing of your contact details to administrate your participation at the event and to distribute an invoice for payment. Processing that is based on our Legitimate Interest is for example processing of your personal data to provide name-plate, our event app, to be able to accommodate your interest to receive customer support and to use and publish images or recorded material from the event in which you might appear. We may, based on your Consent, process information about special food and allergies or publish a list of participants (name, company and title) in our channels before the event.

Our networks. If you are a member of any of our networks, e.g. one of our CEO networks, information about you and the company that you represent may be visible for other members of the network through the network platform. The information that may be visible is your name, company, industry, turnover, telephone, email address and link to your LinkedIn profile. You can

also update your profile with more information about yourself that you want to share with other members. You can also choose to make your information non-visible to other members.

Specifically regarding offers and benefits

We provide offers and benefits for users and customers on specific platforms, such as upptack.dn.se, stjarnklubb.sydsvenskan.se, hdpasset.hd.se and lasarshoppen.se. Through newsletters, we may invite you to take advantage of the offers and benefits on the website. In order to take advantage of the offers, you are linked to external websites belonging to the companies who provide the offers. Note that we are not responsible for such companies' use of your personal data, and you should always read their personal data policies and terms.

Specifically regarding Mitt Kök

Mitt Kök is a recipe platform provided by Expressen. If you choose to create a user account on Mitt Kök, you are afforded the opportunity to upload a profile picture, describe yourself and provide information on how other users can contact you via your social media such as Twitter, Facebook and Instagram. Mitt Kök uses data to provide recipe platforms and to communicate with you via newsletters. You close your account by contacting us (mittkok@expressen.se) or personally inactivating your account; read more about how to store your data under the section "How we store your data".

Specifically regarding some of Bonnier Magazines & Brand's services

Bonshop.se. Bonshop.se provides subscribers with a wide range of advantageous offerings relating to popular lifestyle brands and courses developed specifically to meet our subscribers' interests. If you sign up for a course that we arrange together with one of our partners your personal data may be processed by our partner in accordance with their specific terms.

Bontravel. Bontravel provides BMB subscribers with a wide range of experience offerings, exclusively developed for this group. We co-operate with experts and experienced partners within different areas also outside the Bonnier group, that offers travels, courses and events such as fitness trips, writing courses, fashion trips, trend nights and ski weekends. If you sign up for an experience that BMB arranges together with one of our partners your personal data may be processed by our partner in accordance with their specific terms.

Please note that when you book an experience you may have to provide certain sensitive information such as allergies and special food requests for flights/hotels to us and our partners. We will process such data based on consent that we collect separately when you book your trip.

Specifically regarding the Facebook Pixel

Some of our websites use a tool called the Facebook pixel. This tool is only used if you have provided your consent on the website where the pixel is used. The Facebook pixel makes it possible for us to display better ads for you on Facebook based on your behaviour on our website. You can withdraw your consent at any time by clicking on "Cookie settings" on the website where you provided your consent. You can also adjust your settings on your personal account Facebook. Go to Settings on your account. Click on Ads in the menu, thereafter Ad Settings. Change the setting from "Allow" to "Not allow" for "Ads based on data from partners" and "Ads based on your activity on Facebook Company Products that you see elsewhere". Direct link to your account settings:

https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen

The Facebook pixel shares data regarding your behaviour on our website (which url's that you visit), IP-adress and certain technical information. We as advertisers on Facebook, and other

advertisers on Facebook, may build customer target groups for our respective ads which is partly based on pixel data. In addition to pixel data other Facebook behavioural data may be used. Please read Facebook's data policy for users here:
<https://www.facebook.com/about/privacy/update>

Changes in this Privacy Notice

We will update our privacy notice as needed to reflect customer feedback and changes to our services. When the notice is updated, the date of the latest update is changed at the bottom of the notice. In the event of major changes to the notice or in the way we use your personal data, where so required by law you will be notified via an announcement on the website or by email before the changes enter into force. Please read this personal data policy from time to time to stay updated as to how we at Bonnier News protect your personal data and your privacy.

This privacy notice was updated on: 4 november, 2020