

## Privacy policy – CCTV, parking, etc.

*This policy was last revised on September 1, 2025*

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This policy sets out how the data controllers (hereinafter referred to as the "**Data Controller**" (as defined below), "**we**", "**us**" or "**our**") collect and process personal data of employees and visitors to our shopping centre for security, protection and access management purposes. Security purposes refer to the prevention and detection of alleged or actual criminal activity. Protection purposes refer to the processing of personal data about accidents and incidents within the shopping centre.

This policy covers the following:

1/ Contact details of the Data Controller and the Data Protection Officer

2/ How we collect your personal data

3/ What does this policy cover?

4/ Information about the processing of your personal data

5/ How we share your personal data

6/ How we keep your personal data safe

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8/ Your rights in relation to your personal data

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### 1/ Contact details of the Data Controller and the Data Protection Officer

#### Local Data Controllers:

- Rodamco Sverige AB (556201-8654) (the parent company)
- Rodamco Handel AB (556782-9311) (property owner, Westfield Mall of Scandinavia)
- Rodamco Täby Centrum KB (902002-9717) (property owner, Westfield Täby Centrum)
- Rodamco Forum Nacka KB (916403-9720) (property owner, Nacka Forum)

all with address Box 7846, 103 98 Stockholm.

The local data controllers consist of Rodamco Sverige AB, the parent company of the Nordic organization and its subsidiaries above. Rodamco Sverige AB is strategically and operationally responsible for the processing of personal data carried out in the Nordic region and employs the majority of its employees. Its subsidiaries (owners of the respective shopping centres) may process personal data specifically relating to their respective shopping centres. Such personal data may include names and contact details in connection with entering into an agreement with the affiliate as a contracting party

and camera surveillance images to a certain extent. Rodamco Sverige AB and its subsidiaries are wholly owned subsidiaries and part of the Unibail-Rodamco-Westfield Group.

The Local Data Controllers will process your personal data in the context described below.

**Group Data Controller:**  
Unibail Management

A simplified limited liability company with a capital of EUR 20,000,000 with its registered office at 7 place du Chancelier Adenauer 75016 Paris, registered in the French Commercial Register under number 414 878 389. The Group Data Controller will process your personal data in order to assist the Local Data Controllers and to ensure equal governance at group level.

The Local Data Controllers and the Group Data Controller act as joint Controllers and are collectively referred to below as the "**Data Controllers**".

Contact details to the **Data Protection Officer**: [dp.nordics@urw.com](mailto:dp.nordics@urw.com)

## 2/ How we collect your personal data

We collect personal data about you in the following ways:

- through systems used for security, protection and access management (in particular camera surveillance, parking systems, access rights systems)
- directly from you (or from your relatives) in the event of personal injury or property damage;
- directly from you in connection with handling an enquiry about how we process your personal data
- through applications that may be available to those working in the shopping centre.

## 3/ What does this policy cover?

This policy covers personal data that we process within the framework of the management of safety and security in and around our shopping centres through:

- Camera surveillance system (image recording only)
- Bodycams (image and sound recording)
- Documentation of injuries and accidents
- Documentation of incidents and/or criminal activity
- Access rights management system
- Parking subscription agreement
- Documentation of requests according to GDPR

If you are a member of our loyalty program, the processing of your personal data will also take place in accordance with the separate Privacy Policy for the Loyalty Program that you can find on the shopping centers' websites.

## 4/ Information about the processing of your personal data

In the table below you can see all the information related to:

- Why we process your personal data ("Specific Purpose")
- Which personal data is affected ("Personal data that is processed")
- The legal basis on which we process your personal data ("Legal Basis")
- How long we store your personal data ("Retention Period")

Specific purpose	Personal data processed	Legal basis	Storage period*
<p>Handling of accidents and damages that occur in the shopping centre, including handling any legal claims.</p>	<p>Personal data, including contact details, date of birth, information about the injury and/or accident.</p> <p>Special categories of personal data may be processed, including data regarding health and medical information.</p> <p>Please note that personal data may appear in camera surveillance images and recorded image and sound material from bodycams (see below).</p>	<p>The processing of personal data is necessary for our legitimate interest in dealing with accidents/damages that occur in the shopping centre (GDPR Article 6(1)(f)). Please note that the data subject has the right to object to the processing (GDPR Article 21(4)).</p> <p>The processing of special categories of personal data is necessary for the establishment, exercise or defence of a legal claim (Article 6(1)(f) and Article 9(2)(f) of the GDPR). Please note that the data subject has the right to object to the processing (GDPR Article 21(4)).</p>	<p>The personal data is stored for a maximum of 5 years, counted from the date of the event/accident.</p> <p>The storage period for personal data within the framework of camera surveillance is 28 days from the date of recording.</p>
<p>Management of access to the shopping centre in order to:</p> <ul style="list-style-type: none"> <li>- prevent unauthorised access and</li> <li>- prevent criminal or alleged criminal activity.</li> </ul>	<p>Personal data, including contact details, access cards, car registration numbers.</p> <p>Personal data about criminal or alleged criminal activity may be processed.</p> <p>Please note that personal data may appear in camera surveillance images.</p>	<p>The processing of personal data is necessary for our legitimate interest in ensuring a high level of security and preventing and detecting criminal activity (GDPR Article 6(1)(f)). Please note that the data subject has the right to object to the processing (GDPR Article 21(4)).</p> <p>The processing of personal data relating to criminal or alleged criminal activity is necessary for our legitimate interest in preventing and detecting criminal activity (GDPR Article 10). The processing of personal data relating to criminal or alleged criminal activity is necessary for the establishment, exercise or defence of a</p>	<p>The personal data is stored for a maximum of 2 years, counted from the date of the last entry or exit from the centre/car park.</p> <p>The storage period for personal data within the framework of camera surveillance is 28 days from the date of recording.</p>

		legal claim (GDPR Article 10).	
<p>Maintain the safety of our shopping centre and keep visitors safe and in particular:</p> <ul style="list-style-type: none"> <li>- comply with health and safety obligations (incl. fire protection and prevention of foreseeable natural and technological risks).</li> <li>- preventing and detecting criminal or alleged criminal activity (including prevention of damage to property, shoplifting, prevention of terrorist attacks and drug trafficking).</li> <li>- detect abnormal events, such as crowds, fights, alarms and dangerous situations in connection with, for example, an evacuation where panic and crowding may occur.</li> </ul>	<p>Personal data, including contact details and car registration number.</p> <p>Personal data about criminal or alleged criminal activity may be processed.</p> <p>Please note that personal data may appear in camera surveillance images (image and in some cases voice).</p> <p>Specifically for everyone who works in the mall: Name, phone number and email address (personal and professional).</p>	<p>The processing of personal data is necessary for our legitimate interest in complying with health and safety obligations and ensuring a high level of security and preventing and detecting criminal activities (GDPR, Article 6(1)(f)). Please note that the data subject has the right to object to the processing (GDPR Article 21(4)).</p> <p>The processing of personal data relating to criminal or alleged criminal activity is necessary for our legitimate interest in preventing and detecting criminal activity (GDPR Article 10). The processing of personal data relating to criminal or alleged criminal activity is also necessary for the establishment, exercise or defence of a legal claim (GDPR Article 10).</p>	<p>The personal data is stored for a maximum of 3 years, counted from the date of collection.</p> <p>The storage period for personal data within the framework of camera surveillance is 28 days from the date of recording.</p> <p>Specifically for everyone who works in the shopping centre: The storage period is 1 year, calculated from the last digital contact.</p>
<p>The use of bodycameras by security personnel with image and sound recording in situations that are or may become threatening or violent for the purpose of preventing and documenting such situations.</p>	<p>Personal data that appears in recorded image and sound material.</p>	<p>The processing of personal data is necessary for our and our visitors' legitimate interest in preventing and documenting threats and violence (GDPR, Article 6(1)(f)). Please note that the data subject has the right to object to the processing (GDPR Article 21(4)).</p>	<p>28 days from the date of recording.</p>

Managing parking subscription agreements	Personal data, including contact details, address and car registration number.	The processing of personal data is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into such a contract (GDPR Article 6(1)(b)).  The consequence of not providing personal data is that such a parking agreement cannot be concluded.	The personal data is stored during the contract period and 2 years thereafter.
Handling GDPR requests from data subjects exercising their rights, including any legal claims.	Personal data, including contact details, information about alleged or actual incidents, information displayed from camera surveillance images and parking systems.  Copy of ID card, if applicable.	The processing of personal data is necessary for the fulfilment of a legal obligation of the Data Controller (Chapter III GDPR, cf. GDPR Article 6(1)(c)).	The personal data is stored during the processing of the request and for 3 years thereafter.  If ID card is requested, it will be deleted immediately after verifying the data subject's identity.

\* We may need to retain your personal data beyond these specified retention periods, e.g. when a law enforcement or regulatory body is investigating a crime or incident, or to prepare or defend legal claims.

## 5/ How we share your personal data

We may share your personal information with:

- other companies within the Unibail-Rodamco-Westfield group as part of the management of a security, insurance or legal matter, based on our legitimate interest in handling those matters efficiently and with the support of the relevant departments of such companies.
- service providers where we use service providers to process personal data on our behalf. Recipient categories: security companies, IT suppliers, maintenance and operating companies and insurance brokers.
- for all employees working in the Shopping Centre: your personal data may be processed in any application (such as URWConnect) that is available to you in accordance with the privacy policy applicable to that specific application.
- law enforcement authorities to prevent and detect crime.
- the emergency services in the event of an accident or illness.
- our lawyers and courts when we make claims and/or defend our position.
- Our insurance companies for claims related to accident/injury or damage to personal property.

## 6/ How we keep your personal data safe

We take the security of all personal data we process very seriously and we are committed to protecting your personal data. The images from camera surveillance systems are stored in a secure and password-protected manner and are only reviewed when necessary (e.g. to investigate a crime or accident) and in that case only by authorized persons.

## 7/ Transfers of personal data to third countries or international organizations

As a general rule, your personal data is not transferred outside the EU/EEA.

If your personal data is to be transferred to countries outside the EU/EEA, we will ensure that you are informed in advance and that personal data is transferred to countries that either provide an adequate level of protection or where the transfer is subject to appropriate safeguards to protect your personal data, including through the signing of the European Commission's Standard Contractual Clauses. More information about such clauses can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)

## 8/ Your rights in relation to your personal data

You have the right to access, rectification, erasure and/or restriction of the processing of your personal data, to data portability and to object to the processing as described below:

- **Right of access:** You have the right to request confirmation that we are processing your personal data and, if so, to receive a copy of it.
- **Right to rectification:** If the personal data we process is inaccurate, you have the right to request rectification.
- **Right to erasure:** You have the right to request the erasure of all or part of your personal data;
- **Right to object to processing:** You have the right to object to the processing of your personal data. This means that you can ask us not to process your personal data until we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.
- **Right to restriction of processing:** You have the right to request the restriction of the processing of your personal data, in particular if you contest the accuracy of the data, the lawfulness of the processing or our need to process your personal data. In this case and if applicable, we will then process the personal data only for the establishment, exercise or defence of legal claims or, if necessary, for the protection of the rights of another natural or legal person, or for other reasons as provided for by applicable laws.
- **Right to data portability:** You have the right to receive a copy of the personal data you have provided to us, in an interoperable format or, where appropriate and technically feasible, you may also request the transmission of such data directly to another data controller.

### Exercising your rights:

If you wish to exercise these rights, please contact us at the following email address: [dp.nordics@urw.com](mailto:dp.nordics@urw.com). We will respond to your request within one month.

In order to ensure the effective exercise of your rights, please note that you may send your request to the above e-mail address for questions and requirements related to the processing to any Data Controller (Local Data Controller and Group Data Controller). You can also exercise these rights directly at the reception of your shopping centre.

To avoid infringement of third party rights, we reserve the right, in case of reasonable doubt, to request identification documents to verify your identity.

#### Complaint:

We ask you to first give us an opportunity to deal with any questions or complaints you have about how we process your personal data. However, you have the right to lodge a complaint with the Swedish Data Protection Authority: Integritetsskyddsmyndigheten (IMY), Box 8114, SE-104 20 Stockholm, Sweden. Telephone number: 08-657 61 00. For further information, please visit to the authority's website: [www.imy.se](http://www.imy.se).

#### **9/ Automated decision-making/profiling**

There is currently no automated decision-making process or profiling regarding your personal data.

#### **10/ Updating of this policy**

We may change or update this policy from time to time. Any changes to this policy will be effective upon posting on this website. If such a change requires notice or consent under applicable law, you will be notified or given the opportunity to provide your consent.