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Data privacy policy

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1 Introduction

1.1 Background and purpose

In the constantly expanding digitalized world individuals disclose more data and leave more traces in the digital landscape, and consequently, exposing significant risks to the protection of the integrity and the management of personal data. Therefore, the EU has established the General Data Protection Regulation (GDPR) to ensure a consistent and high level of protection of personal data across Europe.

ICA Gruppen AB and its subsidiaries' ("ICAs") culture is based on responsibility, trust and a high level of professional conduct, and thus the Board of Directors of ICA Gruppen AB and ICA are committed to following the GDPR including other applicable data privacy legislation relevant for ICA ("applicable data privacy laws").

The over-arching goal for ICA on the data privacy field is to embed ongoing privacy management activities throughout the ICA organization resulting in the ability to demonstrate accountability and compliance with evidence. ICAs data privacy vision sets the ambition level for its privacy management activities and the direction of the strategic work.

ICA's data privacy vision is:

ICA always puts the individual's personal integrity at heart to build trust

The data privacy vision is further supported and explained in the following guiding principles:

- **Be honest** - actively provide the data subject with the information needed at the right time.
- **Be mutual** - show the data subject how sharing personal data gives advantages and explain the security measures.
- **Be reliable** - set goals that can be maintain and promise no more than that. Be consistent and advertise changes.
- **Be human** - humanize what we do. Always give the data subject the opportunity to object. Make sure to provide direct contact and give faces to what we do.
- **Be innovative yet respectful** - have innovation on the agenda but find the balance between innovation and the respect for personal integrity.

1.2 Scope

This Data privacy policy is applicable for all companies within ICA for which the GDPR is applicable.

1.3 Communication and implementation

The Head of Privacy Office publishes this policy on the group intranet once annually approved by the Board of Directors.

Each ICA company CEO is responsible for the implementation of and compliance with this policy. Compliance towards applicable data privacy laws resides with the organization with the highest

management body ultimately responsible, irrespective if a data protection officer has been appointed or not.

2 Data privacy policy

2.1 Data protection regulation, laws and guidelines

In its operations, ICA shall comply with applicable data privacy laws and further strive to follow EU guidelines, industry practices and any general best practices.

2.2 Processing of personal data

ICA stands for a respectful processing of personal data, considering the personal integrity as well as efficiency in its business operation. ICA believes that to reach a sustainable data privacy management it is important to find a balance between business needs and data privacy compliance efforts. ICA aims to meet business needs and maintain good ethical standard when processing personal data. ICA shall be, and be perceived to be, responsible and transparent in how ICA processes personal data and communicate with data subjects.

This policy is an expression of ICAs long-term ambition and fundamental approach to comply with applicable data privacy laws where the GDPR data protection principles shall serve as a guide for processing of personal data at ICA. Out of respect of personal integrity and to achieve a sustainable data privacy management ICA aspires to:

- have a systematic data protection management (way of working) with an adequate data protection organization to support as well as monitor ICA's data protection management with documented evidence;
- ensure that each processing of personal data complies with the data protection principles;
- ensure that each processing of personal data has a purpose and a legal ground that is clearly communicated to the data subjects;
- communicate information on personal data processing in relevant information channels and adapted to the data subject;
- be as transparent as possible towards data subjects;
- make data subjects aware of their individual rights and to provide an effective way for ICA as well as data subjects to act on their individual rights;
- have a clearly assigned responsible person to each processing activity;
- establish and implement adequate roles and functions with assigned responsibility into the business operations;
- develop and adapt applications and other system support in a way that guides employees to be compliant towards applicable data privacy laws as well as ensures effectiveness in responding to data subject right requests, taking into account privacy by design and privacy by default;
- develop an understanding for the data privacy ecosystem and thus implementing business processes and system support to adapt to any changes affecting the processing activities;
- ensure that any transfers of personal data are clearly documented and performed in a legal and transparent way towards data subjects;
- train employees to have the data privacy knowledge they need for their daily work and for reporting data breaches; and
- have a functional and effective handling of data breaches.

This policy and the approach it express is complemented and concretized in the following guidelines:

- Data privacy guideline,
 - Guideline on data privacy governance structure,
 - Guideline on transfer or personal data to other parties,
- and in other more specific steering documentation.

3 Roles and responsibilities

Each member of ICA Gruppen's Management Team ("IMT") is responsible for ensuring, within his or her areas of responsibility, that their business is conducted in accordance with this policy. This policy is supplemented by a guideline on data privacy governance structure, where roles and responsibilities are further described.

4 Exemption management

Exemptions to this policy shall be approved by ICA Gruppen AB's Board of Directors.

5 Compliance

Each ICA Company CEO is responsible for the legal compliance of its company.

Each Data protection officer within ICA shall, in collaboration with and guidance from the Privacy Office, monitor the compliance with applicable data privacy laws, including internal policies and guidelines in the area. The Head of Privacy Office shall report any breaches of this policy to the Board of Directors and/or IMT, where relevant.

6 Annual review

This policy shall be annually reviewed by the Head of Privacy Office and submitted to the Board of Directors for approval.