



POLICY



Data Protection Policy



1 Introduction

In today's digitalized world, we all share more information online and as a result exposing our integrity. Recognizing this, the European Union 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 ("ICA") are fully committed to processing personal data in a responsible manner in accordance with law and stakeholders' expectations. Our culture values responsibility, trust and professionalism. We want everyone who trusts us with their personal data and to do so with confidence. We are transparent with why and how ICA processes personal data, ensuring that data subjects understand why we process it and how it benefits them.

We strive to embed data protection governance and management activities throughout the ICA organization so that we can demonstrate accountability and compliance.

This policy is applicable for all companies within ICA for which the GDPR is applicable. The policy applies to the board of directors, employees and consultants ("ICA Personnel").

2 Data Privacy Vision and Guiding Principles

The vision for ICA's data protection work is straight-forward.

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

We then build on the vision with five supporting guiding principles.

- **Be honest** - actively provide the data subject with the information needed at the right time.
- **Be mutual** - show the data subject the benefits of sharing data and explain how we protect it.
- **Be reliable** - set realistic commitments, keep promises and advertise changes .
- **Be human** – provide direct contact for the data subject and give faces to what we do, listen to the data subject, and give the data subject the possibility to object.
- **Be innovative yet respectful** – strive to innovate with respect for personal integrity.

3 Data Protection Processing Principles

ICA stands for a respectful processing of personal data, considering personal integrity as well as efficiency in its business operation. ICA believes that achieving sustainable data protection management requires striking a balance between business needs and efforts to ensure data protection compliance. ICA aims to maintain good ethical standards when processing personal data. ICA shall be, and be perceived to be, responsible and transparent in how ICA processes personal data and communicates with data subjects.

This policy is an expression of ICAs long-term ambition and fundamental approach to comply with applicable data protection legislation where the GDPR data protection principles shall serve as a basis for processing of personal data at ICA.

In its operations, ICA shall comply with applicable data protection laws and further strive to follow EU guidelines, industry practices, standardization, and any leading practices. As part of our commitment to data protection, we adhere to the following principles when processing personal data:

1. We process personal data lawfully, fairly and in a transparent manner (principle on lawful, fair and transparent processing)
2. We only process personal data for specified and lawful purposes and only process personal data for the purposes for which it was collected (principle on purpose limitation)
3. We only collect personal data that is adequate, relevant, and limited to what is necessary (principle on data minimization)
4. We ensure that personal data is correct and up to date (principle on accuracy)
5. We only keep personal data for as long as necessary for the purposes for which the personal data is processed (principle on storage limitation)
6. We protect personal data in terms of confidentiality and integrity (principle on integrity and confidentiality)
7. We must be able to demonstrate data protection accountability (principle on accountability)

4 Governance and Organisation

ICA has established a data protection governance and organization structure as well as a systematic data protection management to enable compliance with our data privacy principles as well as delivering on data subjects rights.

- **Processing responsible** has an overall responsibility to ensure that a purpose of processing is carried out in accordance with the data protection principles.
- **Privacy Office** is a group-wide data protection expert function led by the Chief Privacy Officer.
- **Data Protection Officers (DPO)** have an independent role to monitor and advise on personal data processing.
- **Data Protection Committee** is responsible for ICAs long term data protection strategy, following up on compliance and risk status from a Group perspective, advising on data protection risk management and high-level issues elevated from the Chief Privacy Officer or any of our DPOs.

In addition to the roles mentioned here, we also have specialist roles further described in ICA data protection steering documentation, such as Data Protection Managers and Data Protection Guardians.

5 Implementation and Compliance

Each member of the ICA Gruppen Management Team (“IMT”), in their role as such and normally also OpCo CEOs, is responsible for ensuring, within their area of responsibility, that work within ICA Gruppen is conducted in accordance with this steering document.

Compliance with applicable data protection laws resides with the highest management body within the organization, irrespective of whether a data protection officer has been appointed or not.

Each DPO shall, in collaboration with and guidance from the Privacy Office, monitor compliance with applicable data protection laws, including internal steering documentation.

Managers are responsible for communicating and implementing steering documents in their target groups. Enforcement is part of every manager’s responsibility.

ICA Personnel are responsible for familiarizing themselves with the content of this policy, and for acting in accordance therewith. According to the GDPR, there are several corrective measures that can be taken in case of violations of the GDPR. Some of those measures include warnings, reprimands, limitation of processing (including ban of processing) and administrative fines.

6 Guidance and Reporting

If you have any questions regarding this steering document, please consult the Chief Privacy Officer.

The DPO shall report any breaches of this policy to the ICA company’s highest management level and Chief Privacy Officer. The Chief Privacy Officer shall report any breaches of this policy to the ICA Gruppen Board of Directors and/or IMT, where relevant. ICA’s Personnel shall report any breaches of this policy to the relevant DPO, with a copy to the Chief Privacy Officer.

7 Updates and Reviews

This document shall be reviewed and updated annually or as needed by the Chief Privacy Officer, in consultation with Group General Counsel.