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Data privacy policy

Approved by ICA Gruppen AB's Board of Directors 22nd of May 2018

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1 Introduction

1.1 Background and purpose

In the constantly expanding digitalized world consumers disclose more data and leave more traces in the digital landscape, and consequently, exposing significant risks to the protection of the integrity and personal data of natural persons, in particular regarding the safety of personal data and keeping the integrity of natural persons. Therefore, and to ensure a consistent and high level of protection of personal data across Europe, the EU has imposed the General Data Protection Regulation (GDPR).

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 ("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 for its privacy management activities and the direction of the strategic work conducted.

ICA's privacy vision is:

ICA is transparent and process personal data with respect so that we create trust, security and relevance for our customers and employees.

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. A Data Protection Officer is a strategic role and any Data Protection Function has a tactical function which provides advice, direction and follow up on data privacy compliance; as such they have a functional responsibility. However, the legal compliance towards applicable data privacy laws remains with the organization.

2 Data privacy policy

2.1 Data privacy regulations, laws and guidelines

In its operations, ICA shall comply with applicable data privacy laws in its privacy management operations and further ICA strives to follow EU guidelines, industry practices and any generally accepted practices.

2.2 Data processing management activities

ICA stands for a respectful processing of personal data, considering the integrity of natural persons 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 aim to operate both with profit and good ethics where processing personal data, and shall be, and perceived to be, responsible and transparent in how we process

personal data and communicate with data subject, while considering flexibility and manageability of the processing activities defined by ICA.

This policy is an expression of ICAs long-term aspiration and fundamental approach to comply with the data protection principles and values, which shall serve as a guide for all processing of personal data at ICA. Out of respect of the integrity of natural persons and to achieve a sustainable data privacy management ICA aspires to

- ensure that each processing of personal data complies with the data protection principles, has a purpose and a legal ground that is clearly communicated to the data subjects together with other required information;
- 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 to achieve data privacy sustainability with documented evidence;
- develop and adapt applications and other system support in a way that guides employees to be compliant as well as ensures effectiveness in responding to data subject right requests;
- develop an understanding for the data privacy ecosystem and thus implementing business processes and system support to adapt to business changes;
- ensure that any transfers of personal data are clearly documented and performed in a legal and transparent way towards data subjects;
- consider data privacy for any changes related to personal data processing;
- 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 its aspirations shall be complemented and concretized in guidelines and other internal 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 within ICA 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. 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.