

# GDPR - Privacy Policy Statement

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With this Privacy Policy, Reguity Group AB (publ) ("Reguity Group", "we", "our", "us") will explain how we treat your Personal Data and how we ensure that the data processing is done responsibly and in accordance with applicable legislation. As of May 25, 2018, the General Data Protection Regulation ("GDPR") applies within the EU/EEA – *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)*.

Reguity Group respects the integrity of our customers and others. We have adopted this policy as a step towards providing strong protection of the Personal Data we process and for which we are the Personal Data Controller. Regarding that part of the registry relating to the company's share books, we have a relation to these companies as a Personal Data Processor. Our obligations regarding these Personal Data are governed by separate Personal Data Processor Agreement.

For the above reasons, the Reguity Group has taken the necessary and appropriate technical and organizational measures to protect your Personal Data against unauthorized access, unauthorized use, alteration and deletion.

## Definitions

**"Data Protection Rules"** means any applicable law or regulation applicable to the Processing of Personal Data, which includes but is not limited to the Personal Information Act (1998: 204) and from 25 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council ( "Data Protection Ordinance") which supersedes the Personal Data Act (1998: 204); as well as the regulatory authority's binding decisions and regulations as well as additional local adaptation and regulation regarding data protection.

**"Personal Data"** is all information related to an identified or identifiable natural person. Such data may, for example, be name, image, social security number, email address and home address, shareholding, IP address, information about skills or previous experience. Although a single task may not suffice to identify you as an individual, an assignment may constitute Personal Data if it, combined with other information, can be linked to you.

**"Personal Data Controller"** is the natural or legal person, public authority, institution or other body that determines the purpose and method of processing personal data, that is to say why and how Personal Data is processed.

**"Personal Data Processor"** is the natural or legal person, public authority, institution or other body that processes Personal Data on behalf of Personal Data Controller.

**"Personal Data Sub-processor"** is a third party assistant assigned to the Data Processor that processes Personal Data in accordance with this Privacy Policy.

**"Processing"** of Personal Data means, in essence, an action or combination of actions relating to Personal Data, such as collection, registration, organization, structure, storage, processing or modification, production, reading, use, transfer by transmission, dissemination or provision of other means , adjustment or assembly, restriction, erasure or destruction.

## Purpose

The purpose of our registration of personal data is to provide you with a wide range of digital online/offline tools and services within the 'regtech', corporate finance and knowledge-sharing space via the Internet as described on of Reguity Group's web pages, including but not limited to Nordiska Värdepappersregistret ("NVR") and Värdepapperszonen ("VPZ").

The purpose of the Processing is that we will be able to perform the services described on our web pages.

The largest amount of information we collect and process comes from our one of our share book portals run by our company NVR or VPZ. Since all private or unlisted companies according to Chapter 5, The Swedish Companies Act is subject to a penal sanction (Chapter 30 of the Swedish Companies Act) and for liability (Chapter 29 of the Swedish Companies Act) required to hold a share register, we provide this digital service to facilitate these companies, so that the management of their share books will be more efficient. As mentioned above, with regard to the part of the records relating to the company's share books, we have a relation to these companies as a Personal Data Processor.

At the same time, from these unlisted companies perspective, the custody account service, which the Reguity Group runs through VPZ, is a technical and organizational tool for all companies using NVR's services. With the help of VPZ, they can fulfill their obligations to respond to requests from registered shareholders in the share register and their exercise of their rights under Data Protection Rules, which may include the right to obtain information (registry extracts) and to correct, block or delete Personal Data at the registrar's request. This also constitutes an objective for both registration and processing of personal data within the limits mentioned in Chapter 5 of the Swedish Companies Act.

## What personal data is collected and why

In addition to shareholder information, which is covered by our Terms and Conditions and Personal Data Processor Agreement, we collect information when you use our services, register for our courses and seminars, subscribe to our newsletter, participate in surveys, or contact us for different types of questions.

We also collect Personal Information that is necessary to manage your customer relationship with us and to provide services in accordance with our mutual agreement. This usually includes information such as your name and phone number, your address, phone number and email address, but may also contain other information, such as IP address. We may collect Personal Information about you from various sources, including:

### (a) Details you provide to us directly

We can receive information directly from you when you provide us with Personal Data, which is not covered by our role as Personal Data Processor. The information we may collect from you includes:

Name, social security number, email address, login details, address, phone number, photo, ID card, signature, e-signature, credit card details, bank account information, billing information, insurance data, securities settlement, VP account information, KYC form, real principal, basis for risk assessment, information about financing needs, divestment acquisitions and mergers, tax relationship for calculating capital income forms, buy / sell quotas/orders, your email correspondence with us as well as other material (images, figures, symbols).

### (b) Data retrieved automatically when you visit our site(s)

We (and third party service providers acting on our behalf) may use cookies and other tools (such as web analytics and pixel tags) to automatically collect information about you when using our site, subject to the terms of this Privacy Policy and applicable laws and regulations. The types of data collected automatically can contain:

information about the type of browser you use, user interaction and interaction data for our webpage, your IP address, clock, language of your browser, your geographical location (city and country), your network operator.

**(c) Information retrieved from other sources**

We may receive Personal Information about you from other legitimate sources, including from NVR/VPZ, commercially available sources such as public databases and data aggregators, as well as third party information. The types of Personal Data that we can retrieve from such sources include:

- Shareholders' phone number, e-mail address, bank account information, shareholder / VP account.
- Subscription (shares, derivatives and debt securities).
- Information on purchase and selling prices.
- Listed financial holdings.
- Insurance.
- Risk and preference assessments, agreements and other material.

## For what purpose is Personal Data Processed

We strive to comply with applicable laws and regulations, such as: privacy control and data protection. When necessary, we adapt our processing of your Personal Data as described in this Policy to ensure legal compliance.

The Personal Information we collect about you could be used for:

- To comply with legal requirements or legal authority requests
- Administrative and internal business purposes
- Provide you with products and services and inform you of new products, services and events from the Reguity Group and our partners
- To evaluate and improve both our offer and communication with our customers
- Development of our business and services
- Data processing for advertising purposes
- Statistics

## Legal basis for the Processing of Personal Data

We will always Process your Personal Data in accordance with applicable law.

**(a) Consent to Processing of Personal Data**

Personal data can be processed by consent of the data subject. Prior to the consent, the registrant shall be informed in accordance with this Privacy Policy. The declaration of consent must be obtained in writing or electronically for documentation. Under certain circumstances, such as phone calls, consent may be given orally. The granting of consent must be documented.

**(b) Processing of Personal Data Due to Legal Obligation**

Processing of Personal Data is also permitted if national law requests, requires or allows this, such as, for example, Companies Act. The type and extent of the treatment must be necessary for the legally approved data processing operations and must comply with applicable law.

**(c) Processing of Personal Data due to legitimate interests**

Personal Data may also be processed if necessary for a legitimate interest in the Reguity Group. Eligible interests are generally legal (eg collection of outstanding claims) or commercial nature (eg

avoiding breach of contract). Personal data may not be processed for legitimate interest if there is evidence in individual cases that the interests of the data subject are protected and that this takes precedence. Before Personal Data is processed, it is necessary to determine if there are interests to be protected. For example, Reguity Group may have considered that we have a legitimate interest in meeting our obligations towards you and managing your client account.

**(d) User data and the Internet**

If Personal Data is collected, processed and used on websites or in apps, the registrants must be informed of this in a Privacy Statement and, if applicable, informed about cookies. Integrity statements and any cookies information must be integrated so that they are easy to identify, directly and consistently available to the data subjects. If usage profiles (tracking) are created to evaluate the use of websites and apps, they must always be informed in the privacy statement. Personal tracking may only be performed if permitted by national law or after the consent of the data subject. If the tracking uses a pseudonym, the registrant will have the chance to opt out of tracking in the confidentiality statement. If websites or apps may access Personal Data within an area restricted to registered users, the identification and approval of the registrant must provide sufficient protection upon access.

In addition to the above-mentioned purposes, your Personal Data is processed for the overall purpose of administering, managing and fulfilling our obligations to you under our mutual agreement(s). If we process your Personal Data for any purpose other than those mentioned above, we will inform you.

## **Disclosure of personal data**

We have the right to hire the Data Processors to process personal data on your behalf. We undertake to inform you of our possible plans to hire and/or replace a Data Processor, which allows you to object to such changes. If we hire a Data Processor to handle Personal Data on your behalf, we are fully liable to you for such Data Processor(s).

Companies that process Personal Data on our behalf will always enter into a Personal Data Processor Agreement with us to ensure that a high level of protection of your Personal Data is maintained by our partners. In the case of non-EU/EEA partners, special safeguards are taken, such as the signing of agreements containing standardized data transfer clauses adopted by the EU Commission.

Your personal information may also be disclosed to third parties when (i) required by law, other statutory or state decisions, or (ii) information is provided to insurance companies, banks or beneficiaries; or (iii) if we provide products and services in cooperation with partners to Reguity Group.

We may also disclose Personal Data to third parties, such as the police, the Financial Supervisory Authority, or any other authority, in a criminal investigation, or if we are otherwise required to provide such information based on law or authority decision

Reguity Group will not disclose your Personal Information in any context other than described in this section.

## **Your rights in accordance with applicable data protection laws**

You are entitled, in accordance with applicable data protection laws, to request access to the Personal Data processed on you at any time. You also have the right to have incorrect personal information about you corrected, request that we delete your personal data, limit our processing of your personal data, exercise your right to data portability, and oppose the processing of your personal data.

When Data Processing is based on your consent, you are entitled to revoke your consent to that treatment at any time. Furthermore, if you would like to exercise any of your rights, please contact us through contact details below. In conclusion, you also have the right to file complaints with the supervisory authority at any time if you believe that your Personal Data is treated in violation of applicable data protection laws.

## Cookies

We use cookies on our websites. A cookie is a small amount of data sent from a webpage and stored in a user's browser, mobile phone, tablet, or other device while browsing the web page. A cookie can help us recognize a device the next time a user visits the webpage, give this access to some features on the web page and / or register its browsing pattern. There are other technologies like pixel tags, web bugs, web storage and other similar files and technologies that may have the same features as cookies. We use the term "cookies" for cookies and all similar technologies.

We can use both "persistent cookies" and "session cookies". While persistent cookies remain on the visitor's computer for a long time, session cookies are automatically deleted when the browser window is closed.

We may use the following types of cookies for the purposes listed below:

### (a) Functional cookies

We can use functional cookies to control certain features of the web page and to optimize the use of their webpage, which means that when you continue to use or return to the webpage, the site will be provided as you previously requested, such as remember your customization and web page settings.

### (b) Analytical/performance cookies

These cookies allow us to recognize and count the number of visitors to our website and see how visitors move when they use it. This helps us improve how our websites work, for example, by ensuring that users find what they're looking for easily. We can also use the information for statistical and marketing purposes.

### (c) Third-party cookies

We may allow our partners to use cookies on the web page for the same purposes as identified above. We may also use service providers acting on our behalf to use cookies for the above purposes. Currently, we use a web hosting service and tools provided by a third party that collects data such as your IP address.

Most browsers allow administrators to manage their cookie preferences. A visitor to our site can set up their browser to refuse cookies or delete certain cookies. In general, the visitor should also be able to handle similar technologies by using the browser settings. Please note that if you choose to block cookies, our webpage may not work properly.

## How long is Personal Data stored?

The information we collect about you will be saved in our business relationship with you. However, we will remove your personal information three (3) years from when the business relationship has been terminated.

Note that some data must be stored for a long time, even after a business relationship has been completed, when required by national law. Such requirements may, for example, be found in tax legislation, accounting laws, Companies Act or other legislation. Also note that some domain name registry also requires that some data be stored for a long time. However, no information about you will be saved longer than is necessary or in a manner contrary to the law.

## Contact details

The Personal Data Controller responsible for managing your information is Reguity Group AB (publ). If you have questions about how we treat your Personal Information or want information and contact information for the designated person responsible for Personal Data, please contact us via the following contact information:

[info@reguity.com](mailto:info@reguity.com)