

# Privacy policy regarding the processing of personal data of shareholders and other securities holders

Last updated in May 2019

## General

This privacy policy applies to the processing of personal data for shareholders and other securities holders in Serkland AB (publ) (“**Serkland**” or “**us**”), including in relation to the keeping of shareholders’ register and general meetings of shareholders. In addition, the privacy policy is directed towards all individuals whose personal data may be processed in connection with a general meeting and therefore affect our shareholders as well as other persons visiting or in any other way may have any relation to the general meeting (“**you**”).

The privacy policy explains how we collect, use, share and store personal data. The privacy policy is applicable on requests sent through e-mail or enquiry templates on our website as well as when notice of participation is given for a general meeting through an electronic form on our website or when notice of participation to the general meeting is sent by mail. It also describes individuals’ rights in relation to their submitted personal data.

## The controller

Serkland AB (publ), Reg. No. 559093-4476, is the controller for the processing of personal data in relation to general meetings, regardless whether the personal data is processed by us or by a service provider. Contact information to us can be found at the bottom of this policy document.

## Data Protection Officer

The Serkland Group’s data protection officer can be contacted through e-mail, [omid.gholamifar@serklandinvest.com](mailto:omid.gholamifar@serklandinvest.com).

## Personal data and the processing of such data

### What personal data do we process and why?

In connection with acquisition of shares or other securities in Serkland, and in connection with, during the preparations of as well as the work conducted following a general meeting, we process the following personal data:

- (i) contact details (e.g. name, title, address, telephone number and email address);
- (ii) identification details (e.g. date of birth, personal identification number or company registration number if it can be linked to you);
- (iii) financial information (e.g. voting rights, information regarding shareholdings and rights associated with the holdings);
- (iv) photographs, video- and tape recordings, insofar the general meeting has resolved to do so;
- (v) if a proxy is appointed, information on whom you are representing or are represented by;
- (vi) If applicable, information regarding legal guardianship, pledges and pledgees, and notes in the share register;
- (vii) information on how participants have voted may be processed, e.g. if voting devices are used or vote counting is carried out and to the extent your voting can be connected to

- you based on the number of votes (e.g. if the number of votes corresponds to the number of shares you own);
- (viii) notes in the minutes from the general meeting (e.g. notification of dissenting opinion or when exercising shareholders' rights such as proposing, expressing or asking questions during the general meeting); and
  - (ix) any other information that has been provided to us by you or by the organisation you represent.

Our purpose for collecting and processing personal data is to administer and perform agreements, to carry out a general meeting and to provide services in connection therewith, as well as to comply with legal obligations in accordance with applicable law and regulations.

### **What is the legal basis for processing personal data?**

We process personal data when:

- (i) it is necessary to conclude, perform, or secure the performance of agreement we have with you;
- (ii) it is necessary in order for us to comply with our legal obligations; or
- (iii) it is in our legitimate interest to do so, e.g. to maintain adequate security or order during an ongoing general meeting, and such interest is not overridden by your legitimate interest or fundamental right to the protection of your personal data.

### **For how long is personal data kept?**

Personal data is only kept for as long as it is necessary given the fulfilment of the purposes for which the personal data was collected in accordance with this privacy policy.

Personal data which is only processed to carry out a general meeting will, under normal circumstances, be erased shortly after the closing of the general meeting. Personal data related to attendance, shareholding, voting etc. which is processed to carry out and document the general meeting in accordance with applicable law will be stored as required or permitted by applicable laws or regulations.

Personal data which is processed due to your holding of shares or other securities in Serkland, will be stored as long as you hold shares or other securities in Serkland or as required or permitted by applicable laws or regulations.

### **Where does the personal data come from?**

We collect personal data from the following sources:

- Personal data submitted to us

We collect personal data directly from individuals, e.g. when personal data is submitted through forms, e-forms, e-mails, via phone or during an ongoing general meeting.

- personal data we receive from other sources

We may collect personal data through (i) information in public records and sources; (ii) information from a service provider in connection with a general meeting (e.g. legal advisors); or (iii) the shareholder you represent or your proxy.

### **With whom may the personal data be shared?**

#### **Transfer within the group or to third-parties**

- (i) The personal data may be transferred to other affiliated entities or business partners to the extent necessary for us to conclude, perform, or secure the performance of agreements, to fulfill legal requirements or in connection with general meetings. We take precautions by only allowing access to staff members or others whom have a legitimate interest to get access to these and through contractual prohibitions of using the personal data for any other purpose.
- (ii) We may transfer personal data to competent law enforcement bodies, administrative agencies, courts or other third parties such as the Police, the Swedish Financial Supervisory Authority or the Swedish Tax Agency, where we assess that disclosure of personal data is necessary to (i) fulfil legal obligations in accordance with applicable law or regulation, or (ii) exercise, establish or defend our legal rights.
- (iii) We may disclose personal data to our third party vendors and partners who provide services to us (e.g. third party consultants working with the general meeting, law firms/advisors or security personnel), which are or will be involved in providing services to the general meeting or who otherwise needs to process personal data for purposes described in this privacy policy or as notified to you when we collect your personal data.
- (iv) We may disclose personal data to our auditors, advisors or legal representatives and similar agents if it is necessary in connection with the advisory services they provide to us and under contractual prohibitions of using the personal data for any other purpose.

### **International transfers of personal data**

Where countries outside the European Economic Area (EEA) do not have data protection laws equivalent to ours, we will ensure that there are appropriate safeguards in place for the transfer of personal data to such countries. You can contact us through our contact information in the below for more information on the safeguards put in place.

### **How do we protect your personal data?**

We are concerned about the security of your information. To prevent unauthorized access, disclosure, loss, alteration, misuse, destruction to your data, to maintain data accuracy, and to ensure the appropriate use of information, we have put in place reasonable physical, electronic, administrative and managerial safeguards to secure the information we collect. We use security protocols and encryption technology when collecting or transferring data such as logins or passwords to prevent any data privacy breaches.

### **Your rights**

We are responsible for the processing of your personal data in accordance with applicable law. We will, on your request or on our own initiative rectify, anonymise, erase or complete information which is discovered to be inaccurate, incomplete or misleading.

You have the right to:

- (i) request information regarding our processing of your personal data. We strive to be transparent through, among other things, the publication of this privacy policy.
- (ii) request access to your personal data. You have the right to access your personal data. You have a right to receive a copy of your personal data processed by us.
- (iii) request rectification to your personal data. We will, on your request, as soon as possible rectify the inaccurate or incomplete personal data we process of you. If such personal data has been disclosed to a third party in accordance with this privacy policy, we will also contact such third-party and request rectification or an update of your personal data.

- (iv) request erasure of your personal data. You have the right to request that we erase your personal data if the personal data are no longer necessary in relation to the purposes for which they were collected. However, there may be legal requirements in, for example, accounting- or tax legislation, that states that we cannot immediately erase your personal data.
- (v) request restriction of processing. In some cases, you have the right to request that we restrict the processing of your personal data. This means we are permitted to store the data but not to process it further unless you give your consent thereto.
- (vi) request data portability. In some cases, you are allowed to obtain your personal data kept by us in a structured, commonly used and machine-readable format and to transmit those personal data to another controller without restriction.
- (vii) to object. You have the right to object to certain processing of your personal data.

If you consider our processing of your personal data to be contrary to applicable data protection law, you have the right to complain to the Swedish Authority for Privacy Protection.

### **What if you choose not to give us your personal data?**

If you choose not to give us your personal data and the personal data is necessary in order to (i) conclude, perform, or secure the performance of agreements, (ii) to fulfill legal requirements, (iii) admit you as an attendee to a general meeting, or (iv) provide you with further information regarding our services, then we may in some cases be prevented from stating you as a holder of securities in Serkland, allowing you to attend the general meeting or provide you with the requested services or information.

### **Amendment of the privacy policy**

This privacy policy may be updated to comply with changing legal or technical requirements or business developments. It is possible to see when the policy was last updated by checking the date of this policy document. When updates are essential for the processing of personal data or when updates are not essential for the processing of personal data but when they may be essential for you whose personal data is stored, the information will be published on [www.serklandinvest.com](http://www.serklandinvest.com) before the update becomes applicable. Please consider the version available on our website as the latest version.

### **Contact information**

Should any questions or concerns arise regarding this privacy policy or the processing of your personal data, you are welcome to contact our data protection officer, [omid.gholamifar@serklandinvest.com](mailto:omid.gholamifar@serklandinvest.com), or use our contact information below.

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