

## **POLICY FOR PROCESSING OF PERSONAL DATA**

SAMINVEST AB ("**Saminvest**")

### **1. BACKGROUND**

It is of the utmost importance for Saminvest that business is conducted in a correct and open manner and always with ethical considerations. The natural person whose Personal Data Saminvest Processes must feel secure that Saminvest always keeps a high standard when it comes to Processing Personal Data.

The purpose of this Policy for Processing of Personal Data ("**the Policy**") describes how Saminvest ensures and maintains the fundamental rights and freedoms for the protection of Personal Data and how Saminvest otherwise ensures that it complies with Applicable Data Protection Legislation.

### **2. DEFINITIONS**

In this Policy, the following definitions shall have the meanings as set forth below.

<b>"Personal Data"</b>	Any information relating to an identified or identifiable natural person.
<b>"Registered"</b>	An identifiable natural person who can be directly or indirectly identified specifically by reference to an identifier such as a name, identification number, location information, or online identifiers, or one or more factors specific to the natural person's physical, physiological, genetic, mental, economic, cultural, or social identity.
<b>"Processing"</b>	An action or combination of actions concerning Personal Data or sets of Personal Data, whether or not they are performed automatically, such as collection, registration, organisation, structuring, storage, adaption, or modification, development, reading, use, disclosure by transmission, dissemination or sharing in any other way, adjustment or amalgamation, restriction, deletion or destruction.
<b>"Personal Data Manager"</b>	A natural or legal person who determines the purposes and means of the Processing of Personal Data.
<b>"Personal Data Assistant"</b>	A natural or legal person, public authority, institution, or other body that processes Personal Data on behalf of the Personal Data Manager.
<b>"Sensitive Personal Data"</b>	Personal Data revealing racial or ethnic origin; political opinions, religious or philosophical beliefs, or trade union membership; as well as genetic data, biometric data to uniquely identify a natural person,

health data or data on a natural person's sexual activity or sexual orientation.

**"Saminvest"**

Saminvest AB, corporate identity number 559066-7605.

**"Applicable Data Protection Legislation"**

Signifying, from time to time, applicable legislation and regulations (including regulations issued by the relevant supervisory authorities) concerning the protection of the fundamental rights and freedoms of natural persons and, in particular, the right to the protection of their Personal Data in the Processing of Personal Data applicable to Saminvest, including legislation, ordinances, and regulations implementing Directive 95/46/EC and, from 25 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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).

### **3. SCOPE OF THE POLICY**

This Policy applies to all Processing of Personal Data that takes place within the framework of Saminvest's operations.

The intention is not for this Policy to repeat what is stipulated in the Applicable Data Protection Legislation, and the Processing of Personal Data in accordance with this Policy does not automatically mean that the Processing takes place in accordance with the Applicable Data Protection Legislation. This Policy is instead intended to supplement the Applicable Data Protection Legislation. If there is a discrepancy between this Policy and Applicable Data Protection Legislation, the Applicable Data Protection Legislation shall prevail over what is stated in this Policy. Should, on the other hand, this Policy offer stronger protection of Personal Data and the Registered's rights and freedoms compared with the Applicable Data Protection Legislation, the provisions of the Policy shall apply, provided that nothing else is ordered by Applicable Data Protection Legislation.

### **4. BASIC PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA**

#### **4.1 Legality**

Saminvest must always Process Personal Data in a legal, correct, and transparent manner, in accordance with the Applicable Data Protection Legislation and any guidelines from relevant supervisory authorities.

#### **4.2 Purpose limitation**

Saminvest must always explicitly state the purposes for which Personal Data is Processed and only Process Personal Data in accordance with those documented purposes. Personal Data shall not be Processed for purposes that are incompatible with the Processing's original purposes, in addition to what is permitted under the Applicable Data Protection Legislation.

#### **4.3 Data minimisation**

Saminvest shall Process Personal Data in accordance with the principle of data minimisation, which means that Saminvest shall only Process Personal Data that is necessary to fulfil the purposes for which the Personal Data was originally collected.

To ensure compliance with the principle of data minimisation, it is important to only Process Personal Data that is *needed*, rather than to Process Personal Data that is *good to have*. Which Personal Data is actually *needed* must be assessed before any Processing begins.

#### **4.4 Personal data must be updated and correct.**

Saminvest shall take measures to ensure that the Personal Data Processed is correct, complete, and up to date. In the event that Saminvest Processes incorrect or incomplete Personal Data, Saminvest shall take measures to ensure that the Personal Data is corrected or deleted without undue delay.

#### **4.5 Security**

Saminvest shall, through appropriate technical and organisational measures, ensure that Personal Data is protected and otherwise processed in a secure manner. No Personal Data may appear in systems that cannot guarantee adequate security regarding Processing.

Secure Processing means that Personal Data shall be kept confidential and protected against destruction, loss, or alterations by accidental or unlawful actions, as well as unauthorised disclosure or access.

#### **4.6 Transparency**

All Processing of Personal Data performed by Saminvest shall be transparent in relation to the Registered. This is ensured, among other things, through understandable and unambiguous text to the Registered, openness regarding Processing, and measures intended to make it easier for the Registered to exercise their rights in relation to the Processing of their Personal Data (e.g. the right to request their Personal Data).

#### **4.7 Liability**

As the Personal Data Manager, Saminvest must always be able to show that it complies with the Applicable Data Protection Legislation. This means, e.g., that Saminvest must be able to demonstrate compliance with the basic principles for Processing of Personal Data, that there is a legal basis for the Processing, and that appropriate technical and organisational measures have been taken to ensure that Personal Data is protected.

In order to meet the requirements of the applicable rules and the basic principles for the Processing of Personal Data, it is necessary to continuously update documentation describing the measures taken and to keep a record of Saminvest's Processing of Personal Data.

### **5. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

#### **5.1 Consent**

Saminvest may Process Personal Data if the Registered has consented to the Processing of Personal Data. The Processing of Personal Data shall, however, only take place on the basis of consent to the extent that no other legal basis is applicable to the Processing.

Consent is valid if it is unambiguous and has been provided voluntarily by the Registered, with requirements for clear and unambiguous information that ensures that the Registered has understood the scope of the consent. If consent is given for several specific purposes, the Registered must be able to choose which purposes are to be covered by their consent. This means that a single consent may not cover several purposes.

Furthermore, the Registered shall always have the right to revoke consent without negative consequences, and it shall be as easy to revoke consent as to give consent.

Consent may not be used as a legal basis for the Processing of Personal Data in relation to employees or other Registered if there is a clear imbalance between the Registered and Saminvest, unless the Applicable Data Protection explicitly states otherwise.

## **5.2 Fulfilment or implementation of an agreement**

Saminvest may Process Personal Data if it is necessary to fulfil or implement an agreement with the Registered or take action at the request of the Registered before such an agreement is entered into. It should be added that this legal basis only applies to agreements with the Registered and not to fulfil or implement agreements in general.

## **5.3 Compliance with a legal obligation**

Saminvest may Process Personal Data if the Processing is necessary to comply with a legal obligation incumbent on Saminvest.

## **5.4 Balancing of interests**

Saminvest may Process Personal Data if it has a legitimate interest that outweighs the Registered's interest in protecting their privacy in relation to the Processing. Saminvest shall, in accordance with the right to information under section 7.1 below, inform the Registered if the legitimate interest of Saminvest is deemed to outweigh the Registered's privacy interest. The assessment regarding the outcome of the balance of interests must also be documented in writing internally at Saminvest.

If the Registered, in accordance with their rights, opposes Saminvest's Processing, Saminvest must show a compelling legitimate interest in order to continue to have the right to Process the Registered's Personal Data on the basis of a balance of interests. If a compelling legitimate interest cannot be shown, the Processing must cease unless Saminvest can support the Processing on another legal basis.

## **5.5 Processing of Sensitive Personal Data**

Sensitive Personal Data may only be Processed if the Registered has given their consent or if the Processing is expressly permitted in accordance with Applicable Data Protection Legislation. With regard to employees of Saminvest, Sensitive Personal Data may be Processed without consent to the extent necessary for Saminvest to be able to fulfil its obligations within employment law, e.g., to calculate salary due to sick leave.

## **5.6 Personal data concerning violations of the law**

Unless Applicable Data Protection Legislation expressly allows it, Saminvest shall not process Personal Data concerning violations of the law.

## **6. SAFETY AND INCIDENT MANAGEMENT**

### **6.1 Technical and organisational measures**

Saminvest shall take technical and organisational measures to protect Personal Data from illegal or unintentional loss or alteration, as well as from unauthorised or illegal access. The security measures taken must be appropriate in regard to the special risks associated with a particular Processing of Personal Data, as well as the level of sensitivity associated with the Personal Data. For example, the Processing of Sensitive Personal Data requires that Saminvest implements security and control measures to a greater extent than in the Processing of Personal Data in general.

### **6.2 Built-in data protection**

All systems that Process Personal Data must be designed in a way that enables the Registered to exercise their rights in accordance with the Applicable Data Protection Legislation and to ensure that Personal Data is processed in a secure and legal manner. For example, direct identifiers (e.g., personal identity numbers), which are not absolutely necessary to achieve the purposes of Processing, should be pseudonymised. Furthermore, systems that Process Personal Data must be designed to, in the standard case, comply with the basic principles for Processing Personal Data. Such a design can, for example, consist of functions within the systems that ensure the principle of data minimisation is observed and that free text fields are only made available if it is strictly a necessity.

### **6.3 Incident management**

In the event that an incident leads to unintentional or illegal destruction, loss, or alteration, or to unauthorised disclosure of or access to Personal Data, Saminvest shall, as soon as it becomes aware of the incident, investigate the incident and the possible consequences. Unless it is unlikely that the incident entails a risk to the Registered's freedoms and rights, Saminvest shall notify the proper authorities within 72 hours of the incident being discovered. If the incident is likely to involve a significant risk to the privacy of the Registered, the Registered must also be notified of the incident.

Information security is important to Saminvest, and in the event of an incident, Saminvest shall take measures to investigate the circumstances behind the incident, as well as take measures to remedy any negative effects that the incident entails and to ensure that a similar incident does not occur in the future. The investigation will normally be handled by Saminvest and, if necessary, with the help of external experts, e.g., IT security and Personal Data Assistants.

## **7. RIGHTS OF THE REGISTERED**

An important part of Saminvest's work to ensure a high standard of protection in the Processing of Personal Data, and comply with the Applicable Data Protection Legislation, is to always observe the various rights of the Registered. Saminvest must therefore take measures to be able to respond to the Registered's wishes regarding the following rights, including both technical and organisational measures to ensure that there are routines in place for handling requests from the Registrants.

## **7.1 Right to information**

Saminvest shall take appropriate measures to provide the Registered information regarding the Processing of the Registered's Personal Data. The information must always be comprehensible, and it must be provided in clear and unambiguous language. In all circumstances, Saminvest must comply with the information requirements of the Applicable Data Protection Legislation.

Providing the Registered with information regarding Processing is a significant part of ensuring transparency in the Processing of Personal Data. A vital aspect is that the Registered receive correct information about the Processing and that the information describes all Processing concerning the Registered.

## **7.2 Right to extract of Personal Data**

The Registered have the right, upon request, to access information about their Personal Data that Saminvest Processes. Upon request, Saminvest shall, subject to the Applicable Data Protection Legislation, provide the Registered with an extract of the electronic record of the Personal Data that Saminvest processes. Such an electronic copy shall be provided in a format that is widely used.

If the Registered requests more than one copy of the extract of the Personal Data, Saminvest has the right, to the extent permitted by the Applicable Data Protection Legislation, to charge a reasonable fee to cover administrative costs for providing the electronic copy.

## **7.3 Right to rectification**

The Registered shall have the right, during Saminvest's Processing, to request any correction if their Personal Data is incorrect or incomplete. Saminvest must have routines that enable such corrections. However, Saminvest is obliged to correct incorrect Personal Information on its own, which is why it is important that Saminvest always works to ensure that Personal Data is current, correct, and, when required, updated.

## **7.4 Right to erasure**

The Registered has the right to request deletion of their Personal Data in the following situations:

- (i) The Personal Data is no longer necessary to fulfil the purpose for which the Personal Data was originally collected;
- (ii) the Registered has revoked their consent, and Saminvest has no other legal basis for continuing to Process the Personal Data;
- (iii) the Registered opposes Processing based on a balance of interests, and Saminvest cannot show a compelling legitimate interest that outweighs the Registered Party's privacy interest;
- (iv) Personal Data has been processed illegally;
- (v) Personal Data must be deleted in accordance with a legal obligation, or
- (vi) the Registered is otherwise entitled to deletion in accordance with Applicable Data Protection Legislation.

When a request for deletion has been received, Saminvest shall, without undue delay, investigate whether any of the above-mentioned circumstances are applicable and, if so, delete the Personal Data. If Saminvest deems that the right to deletion is not applicable, the Registered shall be notified of this as soon as possible.

#### **7.5 Right to limit Processing**

The Registered shall, in certain circumstances, have the right to request a restriction on the Processing of their Personal Data. This means that Saminvest must have technical possibilities to mark or flag the Personal Data that is limited in order to ensure that the Personal Data is not subject to further Processing (other than that the Personal Data is stored in Saminvest's system) unless the Registered agrees to further Processing.

Saminvest must always inform the Registered of any negative effects as a result of the exercise of the right to limit Processing.

#### **7.6 Right to data portability**

In the event that the Personal Data is processed automatically (electronically) and the Registered has provided the Personal Data to Saminvest, and if the Processing is based on either (i) the Registered's consent, or (ii) that the Processing is necessary to fulfil or enter into an agreement with the Registered, the Registered shall have the right to receive such Personal Data in a common and machine-readable format.

Furthermore, the Registered shall have the right to transfer such Personal Data to another Personal Data Manager. If it is technically possible, Saminvest shall, at the Registered's request, transfer the Personal Data directly to another Personal Data Manager.

#### **7.7 The right to oppose Processing**

The Registered shall have the right to oppose the Processing of their Personal Data if the Processing is based on a balance of interests or if the Processing takes place for direct marketing purposes.

In the event that the Registered opposes Processing based on a balancing of interests for reasons attributable to the Registered's specific situation, Saminvest shall demonstrate to the Registered that Saminvest has a compelling or convincing legitimate interest in Processing their Personal Data even though the Registered has opposed Processing. If Saminvest is unable to demonstrate such a legitimate interest and if the Processing cannot take place on the basis of any other legal basis, the Processing must cease.

### **8. TRANSFER OF PERSONAL DATA**

#### **8.1 Transferring within the company group**

Personal Data may be transferred from Saminvest to another company within the group. It is important that the registered also receive information about these intra-group transfers.

Saminvest must always ensure that such transfers within the company group take place in accordance with the Applicable Data Protection Legislation. Saminvest shall, in order to ensure transfers in accordance with the Applicable Data Protection Legislation, take adequate security measures in the form of, e.g., an intra-group data transfer agreement.

## **8.2 Transferring to other Personal Data Managers**

Before Saminvest transfers Personal Data to other Personal Data Managers outside its operations, Saminvest shall examine whether the receiving Personal Data Manager complies with the Applicable Data Protection Legislation in the country in which the receiving Personal Data Manager is established. Transfer of Personal Data may only take place if the receiving Personal Data Manager complies with Applicable Data Protection Legislation. The receiving Personal Data Manager shall, in cases when possible, enter into an agreement with Saminvest, which ensures that the Personal Data Manager complies with the Applicable Data Protection Legislation to protect Personal Data.

## **8.3 Transferring to Personal Data Assistant**

Saminvest engages external service providers in most cases, who may directly or indirectly process Personal Data on behalf of Saminvest (Personal Data Assistants). Saminvest shall only hire Personal Data Assistants who can provide sufficient guarantees that they comply with the requirements set in Applicable Data Protection Legislation.

To ensure that the use of Personal Data Assistants complies with Applicable Data Protection Legislation, Saminvest must always enter into a Personal Data Assistant agreement with the Personal Data Assistant. Saminvest shall, as far as possible, use its own template for Personal Data Assistant agreements, as the template has been reviewed to meet the conditions in Applicable Data Protection Legislation. Saminvest's procedure for periodic reviews of Personal Data Assistants must be followed during that time the Personal Data Assistant Processes Personal Data on behalf of Saminvest.

## **8.4 Transfers outside the EU/EEA**

If Saminvest transfers Personal Data to a recipient outside the EU/EEA, Saminvest shall ensure that all requirements set in Applicable Data Protection Legislation are complied with. This includes ensuring an adequate level of protection by, e.g., entering the standard contractual clauses adopted by the European Commission (or the equivalent from time to time with other applicable frameworks) with the receiving party.

## **9. COMPLIANCE AND GOVERNANCE**

The CEO is responsible for developing guidelines and internal routines to ensure that this Policy and Applicable Data Protection Legislation are complied with.

The CEO shall appoint a person responsible for monitoring Saminvest's compliance with Applicable Data Protection Legislation.

The CEO must ensure that all employees are aware of the importance of protecting Personal Data and must, therefore, among other things, arrange training sessions where employees are trained in issues related to Personal Data. Training of new employees shall be part of Saminvest's introductory program. All training opportunities are documented by Saminvest so that Saminvest can follow up on which employees have completed each training.

Saminvest's employees must also keep up to date with regard to all policies and guidelines regarding the Processing of Personal Data, which may be subject to change.

*This is a translation. The Swedish version of the policy is the original and shall prevail in case of any discrepancy*



**10. REVIEW**

This Policy shall be subject to annual review or more frequently as necessary.