

# SWEDFUND'S PRIVACY NOTICE FOR INVESTMENT PROCESSES

*Last changed: 2024-09-01*

Swedfund International AB, reg.no. 556436-2084 ("**Swedfund**", "**we**", "**our**" or "**us**") respects and protects your privacy. This privacy notice ("**Privacy Notice**") aims to describe how Swedfund as a data controller processes your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and other applicable privacy legislation. It also describes what rights you have under the GDPR and how you can enforce them.

## 1 TO WHOM DOES THIS PRIVACY NOTICE APPLY?

### 1.1 Portfolio company contacts

This Privacy Notice applies when Swedfund, as a data controller, processes personal data pertaining to you who is a contact person of one of Swedfund's portfolio companies.

### 1.2 Representatives of portfolio companies

This Privacy Notice applies when Swedfund, as a data controller, processes personal data pertaining to you who is a signatory, officer, director or principal of one of Swedfund's portfolio companies.

### 1.3 Individuals in investment prospects

This Privacy Notice also applies when Swedfund, as a data controller, processes personal data pertaining to you who appears in the due diligence dataset for an investment prospect.

### 1.4 Investment prospect contacts

This Privacy Notice applies when Swedfund, as a data controller, processes personal data pertaining to you who is a contact person of an investment prospect.

### 1.5 Shareholders

This Privacy Notice applies when Swedfund, as a data controller, processes personal data pertaining to you who is a shareholder in an investment prospect.

### 1.6 Stakeholder contacts

This Privacy Notice applies when Swedfund, as a data controller, processes personal data pertaining to you who is a contact person of an investment partner.

## 2 CONTACT DETAILS TO DATA CONTROLLER

Swedfund is the data controller for the processing of your personal data as described in this Privacy Notice. As the data controller, we are responsible for ensuring that our processing of your personal data takes place in accordance with the GDPR and other applicable data protection legislation.

If you have any questions about this Privacy Notice, our processing of your personal data or if you wish to exercise any of your rights, please contact us at [GDPR@swedfund.se](mailto:GDPR@swedfund.se) or through the contact details below.

Swedfund International AB, reg.no: 556436-2084

Postal address: P.O. Box 3286, 103 65 Stockholm, Sweden

Visiting address: Drottninggatan 92-94, Stockholm, Sweden

E-mail: [GDPR@swedfund.se](mailto:GDPR@swedfund.se)

Telephone number: +46 8 725 94 00

### 3 HOW DO WE COLLECT YOUR PERSONAL DATA?

We process personal data provided by you when you contact us through, for example, e-mail or our corporate social media accounts.

We may also collect personal data regarding you from your employer, public domain or consultants engaged by Swedfund for due diligence. In some cases, we may also perform an integrity check in which case we also collect personal data regarding your general reputation etc. In such an event, you will be separately informed.

### 4 OUR PROCESSING OF PERSONAL DATA

In the tables below, you will find a summary with information about why we process your personal data, the categories of personal data processed for the stated purpose, how long we process your personal data and the legal basis on which we base the processing. If we base the processing on a legitimate interest as a legal basis, we have also stated what the legitimate interest is.

4.1 To cultivate as well as maintain contact and business relations		
<p><b>Purpose of processing:</b></p> <p>We process your personal data as part of carrying out our daily work of managing projects, developing activities and to be able to maintain contact and business relations with you and your employer.</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Contact details</u>, such as name, business telephone number and email address.</li> <li>• <u>Additional personal data</u> provided by you in your correspondence with us.</li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p> <ul style="list-style-type: none"> <li>• Representatives of portfolio companies</li> <li>• Portfolio company contacts</li> <li>• Stakeholder contacts</li> <li>• Shareholders</li> <li>• Investment prospect contacts</li> <li>• Individuals in investment prospects</li> </ul>
<p><b>Legal basis:</b> <u>Legitimate interest</u>. The processing is necessary for our legitimate interest in cultivating as well as maintaining contact and business relations. We have assessed that our interest outweighs your right not to have your personal data processed for this purpose.</p>		
<p><b>Retention period:</b> We retain your personal data for the duration of the project and up to twelve (12) months after its completion. In case of non-investment, the personal data is kept for up to twelve (12) months from collection.</p>		

4.2 To fulfil our legal obligations by collecting annual sustainability, governance, tax, and impact information from our portfolio companies		
<p><b>Purpose of processing:</b></p> <p>We process your personal data to be able to collect certain information (such as sustainability, governance,</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Contact details</u>, such as name, business telephone number and email address.</li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p>

<p>tax, and impact information) from our portfolio companies in order to be able to, among other things, monitor our legal requirements and to report on the development effects of our investments and fulfilling the requirements of transparency from our owners and stakeholders. For example, we may send out questionnaires in order to monitor the ESG status of our portfolio companies.</p>	<ul style="list-style-type: none"> <li>• <u>Employer/company name and job title</u>, as well as professional accomplishments.</li> <li>• <u>Personal identity number</u> (only sole traders and representatives of portfolio companies).</li> <li>• Identity card</li> </ul>	<ul style="list-style-type: none"> <li>• Portfolio company contacts</li> <li>• Representatives of portfolio companies</li> <li>• Shareholders</li> </ul>
<p><b>Legal basis:</b> <u>Legitimate interests</u>. We assess that our interest to be able to monitor our legal requirements and report on development effects and fulfilling the requirements of transparency from our owner's and stakeholders overrides your interest of protection of your privacy.</p>		
<p><b>Retention period:</b> We retain your personal data for the duration of the contractual relationship and up to ten (10) years after the termination of the contract.</p>		

4.3 To communicate and market our activities in our external communication channels		
<p><b>Purpose of processing:</b></p> <p>We process your personal data to communicate regarding and market our investments and activities. As such, we may post photos and videos of you in external communication channels in order to illustrate the good dialog between us and the portfolio company that you represent.</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Videos and photos</u>.</li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p> <ul style="list-style-type: none"> <li>• Representatives of portfolio companies</li> <li>• Individuals in investment prospects</li> </ul>
<p><b>Legal basis:</b> <u>Legitimate interest</u>. We process your personal data based on our legitimate interest in marketing our activities, which we consider outweighs your right not to have your personal data processed for this purpose.</p>		
<p><b>Retention period:</b> The personal data will be retained for the duration of the project and up to twelve (12) months after its completion. In case of non-investment, the personal data will be retained for up to twelve (12) months from when it was collected.</p>		

4.4 To send you Swedfund's newsletter		
<p><b>Purpose of processing:</b></p> <p>If you are a stakeholder contact that have requested to receive our newsletter, we process your personal data to send you said newsletter that includes information about our investments and activities.</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Contact details</u>, such as name, business telephone number and email address.</li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p> <ul style="list-style-type: none"> <li>• Stakeholder contacts</li> </ul>

**Legal basis:** Legitimate interest. We process your personal data based on our legitimate interest in sending you Swedfund's newsletter, which we consider outweighs your right not to have your personal data processed for this purpose.

**Retention period:** The personal data will be retained for a period of twelve (12) months from the date we received your contact details.

#### 4.5 Assessing the viability of potential investments, administration and fulfilment of obligations and safeguarding our legal rights and conducting exit evaluations.

**Purpose of processing:**

We process your personal data within our investment organisation in different stages of the investment process, such as when assessing the viability of potential investments and exits, as part of our administration of our investments, to be able to fulfil our obligations and to safeguard our legal rights as well as to monitor our legal requirements and to report on the development effects of our investments and fulfilling the requirements of transparency from our owners and stakeholders. For example, your personal data may be included in the due diligence dataset for an investment prospect.

**Categories of personal data:**

- Contact details, such as name, business telephone number and email address.
- Employer/company name and job title, as well as professional accomplishments.
- Identity card.
- Personal identity number.
- Income data.
- Demographic information, such as gender, nationality, date of birth and age.

**This processing concerns data subjects who represent:**

- Portfolio company contacts
- Representatives of portfolio companies
- Individuals in investment prospects
- Investment prospect contacts
- Stakeholder contacts
- Shareholders

**Legal basis:** Legitimate interest. We process your personal data based on our legitimate interest of assessing potential investments and exits as well as to monitor our legal requirements and to report on the development effects of our investments and fulfilling the requirements of transparency from our owners and stakeholders, which we consider outweighs your interest of protection of your privacy.

**Retention period:** In the case of a business acquisition, restructuring or the granting of loans, the personal data will be retained for the duration of the project's contractual relationship and up to ten (10) years from the termination of the contract. In the case of a *project*, the personal data is retained for the duration of the project and up to ten (10) years after its completion.

If we use contact details and initiate an investment process, we retain the personal data for ten (10) years after the decision to not proceed with the investment. If we proceed with the investment, we may retain the personal data for the duration of the project and for ten (10) years after the exit/completion of the project.

#### 4.6 To enable a well-informed decision regarding which investments to make

**Purpose of processing:**

We use your personal data in order to determine whether we, based on such information, can proceed with an investment or not.

**Categories of personal data:**

- Contact details, such as name, business telephone number and email address.

**This processing concerns data subjects who represent:**

- Portfolio company contacts

<p>Prior to making an investment, we may perform integrity checks both externally and internally on owners, board members and/or key or executive persons within our potential portfolio companies to rule out that we are not financing terrorist activities or money laundering.</p>	<ul style="list-style-type: none"> <li>• <u>Employer/company name and job title</u>, as well as professional accomplishments.</li> <li>• <u>Demographic information</u>, such as gender, nationality, date of birth and age.</li> <li>• <u>Personal information</u>, such as behaviour, reputation and personal history (including allegations of bad conduct or criminal activity).</li> </ul>	<ul style="list-style-type: none"> <li>• Representatives of portfolio companies</li> <li>• Shareholders</li> <li>• Investment prospect contacts</li> <li>• Individuals in investment prospects</li> </ul>
<p><b>Legal basis:</b> <u>Legitimate interest</u>. We process your personal data based on our legitimate interest of being able to take a well-informed decision regarding which investments to make, which we consider outweighs your interest of protection of your privacy.</p>		
<p><b>Retention period:</b> In case the report includes any allegations of criminal activity, the report will only be reviewed and thereafter deleted.</p> <p>In case the report includes any sensitive information such as bad reputation or behaviour, we will keep the report until we have made a final investment decision and up to one (1) month thereafter (for administrative purposes).</p> <p>In case the report is “clean” or only reports on minor irregularities, the report will be saved during the lifetime of the investment and up to ten (10) years thereafter.</p>		

#### 4.7 To verify the existence of companies in which we are contemplating investing and to identify board members, signatories and owners of our potential portfolio companies

<p><b>Purpose of processing:</b></p> <p>We collect personal data from board members, signatories and owners of our potential portfolio companies for verification and identification purposes and keep it for fulfilling the requirements of transparency from our owners and stakeholders.</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Contact details</u>, such as name, business telephone number and email address.</li> <li>• <u>Employer/company name and job title</u>.</li> <li>• <u>Identity card</u>.</li> <li>• <u>Personal identity number</u>.</li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p> <ul style="list-style-type: none"> <li>• Representatives of portfolio companies</li> <li>• Shareholders</li> </ul>
<p><b>Legal basis:</b> <u>Legitimate interest</u>. We process your personal data based on our legitimate interest of being able to verify the existence of companies in which we are investing and to identify board members, signatories and owners of our portfolio companies, as well as to fulfilling the requirements of transparency from our owners and stakeholders, which we consider outweighs your interest of protection of your privacy.</p>		
<p><b>Retention period:</b> We retain your personal data during the lifetime of the investment and up to ten (10) years thereafter. Personal data which we have received when assessing a potential investment which we have decided not to pursue will be stored up to ten (10) years after such decision.</p>		

#### 4.8 To become aware of irregularities being conducted within Swedfund or in any of our portfolio companies

<p><b>Purpose of processing:</b></p> <p>We use your personal data in order to investigate a reported irregularity within Swedfund or in one of Swedfund's portfolio companies.</p> <p>If the report is made through our whistleblowing system, see section <b>Fel! Hittar inte referenskölla.</b> below.</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Contact details</u>, such as name, business telephone number and email address.</li> <li>• <u>Employer/company name and job title</u>, as well as professional accomplishments.</li> <li>• <u>Demographic information</u>, such as gender, nationality, date of birth and age.</li> <li>• <u>Personal identity number</u> (sole traders only).</li> <li>• <u>Information relating to serious irregularities.</u></li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p> <ul style="list-style-type: none"> <li>• Representatives of portfolio companies</li> <li>• Portfolio company contacts</li> <li>• Shareholders</li> <li>• Investment prospect contacts</li> <li>• Individuals in investment prospects</li> <li>• Stakeholder contacts</li> </ul>
<p><b>Legal basis:</b> <u>Legitimate interest</u>. We process your personal data passed on our legitimate interest in investigating a reported irregularity, which we consider outweighs your right not to have your personal data processed for this purpose.</p>		
<p><b>Retention period:</b> We retain your personal data during the process of investigating and acting upon the reported irregularity.</p>		

#### 4.9 [To provide a whistleblowing system]

<p><b>Purpose of processing:</b></p> <p>We process your personal data to report and follow up on whistleblowing matters.</p>	<p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>• <u>Contact details</u>, such as name, business telephone number and email address.</li> <li>• <u>Information relating to serious irregularities.</u></li> </ul>	<p><b>This processing concerns data subjects who represent:</b></p> <ul style="list-style-type: none"> <li>• Representatives of portfolio companies</li> <li>• Portfolio company contacts</li> <li>• Shareholders</li> <li>• Investment prospect contacts</li> <li>• Individuals in investment prospects</li> <li>• Stakeholder contacts</li> </ul>
<p><b>Legal basis:</b> <u>Legal obligation</u>. The processing of your personal data is necessary for the fulfillment of Swedfund's obligations under the Whistleblower Act (2021:890) (Sw. lag (2021:890) om skydd för personer som rapporterar om missförhållanden).</p>		
<p><u>Legitimate interest</u>. For personal data included in reporting of misconduct that does not fall under the Whistleblower Act, the processing is necessary for our legitimate interest in providing a whistleblowing</p>		

system. We have assessed that our interest outweighs your right not to have your personal data processed for this purpose.

**Retention period:** We retain your personal data for up to two (2) years after the end of each investigation following the receipt of a report through the whistleblowing system, unless there is an ongoing criminal procedure or similar.

#### 4.10 To enable the restructuring, sale or liquidation of Swedfund or our assets

**Purpose of processing:**

If Swedfund is to be restructured (e.g., split into several different businesses) or if a third party wishes to acquire Swedfund, Swedfund may disclose your personal data to the acquiring company. This may also occur in the event of a merger or if Swedfund is liquidated or goes bankrupt. In such cases, the acquiring company will continue to process your personal data for the same purposes as stated in this Privacy Notice, unless you receive other information in connection with the transfer.

In order to enable a restructuring, sale or liquidation, personal data may also be shared with other companies as part of the process. In such cases, the companies have undertaken to observe confidentiality.

**Categories of personal data:**

- Contact details, such as name, business telephone number and email address.
- Employer/company name and job title, as well as professional accomplishments.
- Demographic information, such as gender, nationality, date of birth and age.
- Personal identity number (sole traders only).
- Income data.

**This processing concerns data subjects who represent:**

- Representatives of portfolio companies
- Portfolio company contacts
- Shareholders
- Investment prospect contacts
- Individuals in investment prospects
- Stakeholder contacts

**Legal basis:** Legitimate interest. We process your personal data based on our legitimate interest to enable the restructuring, sale or liquidation of Swedfund or our assets, which we consider outweighs your right not to have your personal data processed for this purpose. However, this presupposes that the acquiring company carries on similar activities as Swedfund.

**Retention period:** If Swedfund ceases to exist, e.g., through a merger, division, liquidation or bankruptcy, we will delete your personal data as long as the retention of such personal data is not required by law.

#### 4.11 To defend our interests in the event of a dispute

**Purpose of processing:**

We may need to process your personal data in order to defend our interests in the event of a dispute, such as to establish, exercise or defend legal claims, e.g., in the event of a payment dispute or a dispute towards one of our portfolio companies.

**Categories of personal data:**

- Contact details, such as name, business telephone number and email address.
- Employer/company name and job title, as well as professional accomplishments.
- Demographic information, such as gender, nationality, date of birth and age.
- Personal identity number.
- Income data.

**This processing concerns data subjects who represent:**

- Portfolio company contact
- Private individuals (investment targets)
- Prospects
- Representatives of portfolio companies
- Shareholders
- Stakeholder contacts

	<ul style="list-style-type: none"> <li>• <u>Identity card.</u></li> <li>• [Personal information, such as behaviour, reputation and personal history (including allegations of bad conduct or criminal activity).]</li> </ul>	
<p><b>Legal basis:</b> <u>Legitimate interest.</u> We process your personal data based on our legitimate interest in being able to establish, exercise or defend legal claims, which we consider outweighs your right not to have your personal data processed for this purpose.</p>		
<p><b>Retention period:</b> Your personal data is retained for as long as it is needed to establish, exercise, and defend our interests in the event of a dispute. For example, during the time that the dispute is ongoing, before it is finally settled.</p>		

## 5 LEGITIMATE INTEREST

When Swedfund has stated "legitimate interest" as the legal basis in the section above, it means that we have assessed that we or a third party have a legitimate interest in the processing being carried out (you will also find information about what the identified legitimate interest is in the section above). In addition to identifying the legitimate interest, we have also weighed this interest against your interests or fundamental rights and freedoms that require the protection of personal data. We can only base the processing of your personal data on a legitimate interest as a legal basis if we have carried out a balancing of interest and concluded that our or a third party's interests outweigh your interests or fundamental rights and freedoms.

If we process your personal data on the basis of a legitimate interest, you can contact us through the contact details provided in section 2 to obtain further information about the performed balancing of interest, through a so-called legitimate interest assessment. Please note that the assessments are general (e.g., based on an average individual in the relevant category) and that no individual assessment has been made.

## 6 AUTOMATED DECISION-MAKING

We do not use automated processes to make decisions that significantly affect you.

## 7 HOW LONG WE RETAIN YOUR PERSONAL DATA

We will only retain your personal data for as long as it is needed for the purposes for which we collected the personal data and as described in this Privacy Notice. When we no longer need your personal data, we will remove it from our systems, databases, and backups unless we have a legal obligation to save your personal data for a longer period. More specific retention periods are provided in the tables above under section 4.

## 8 WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Swedfund may disclose your personal data to the categories of recipients listed below. For a detailed list of the recipients to which we have disclosed your personal data, please contact us through the contact details provided in section 2.

### 8.1 Data processors

Swedfund may engage other companies to process your personal data on our behalf as data processors. Such companies may only process your personal data in accordance with our instructions. We enter into data processing agreements with these companies and ensure a high



level of protection to safeguard your personal data. We use the following types of data processors:

- **IT and system suppliers** – Swedfund may share your personal data with IT and system suppliers to manage necessary operation, technical support and maintenance of our IT services.
- **Marketing and communications agencies** – Swedfund may share your personal data with marketing and communications agencies engaged to assist Swedfund with marketing communications to stakeholder contacts.
- **Business/market intelligence agencies** – Swedfund may share your personal data with business intelligence agencies engaged to assist Swedfund with business intelligence, e.g., by conducting various due diligence and background controls.
- **Accounting firm** – Swedfund may share personal data contained in invoices and accounting information with our accounting firm, which has been engaged to enable Swedfund to fulfill its obligations under the Accounting Act.
- **Provider of whistle blowing system** – Swedfund may share your personal data within suppliers of Swedfund's internal reporting channel.

## 8.2 Independent data controller

Swedfund may share personal data with parties who are independent data controllers, which means that the party independently determines the purposes for which the personal data will be processed and how the processing will be carried out (i.e., the means for the data processing). When sharing personal data with these parties, they have an obligation to inform you about their processing of your personal data. Hence, their respective privacy notice applies to their processing.

- **Authorities and the judiciary** – in some cases, we may need to disclose your personal data to courts and law enforcement authorities (e.g., the police authority) in accordance with law or in the context of court proceedings. Additionally, we may also need to disclose personal data to other parties in court proceedings or similar. Such disclosure is based on a legitimate interest as a legal basis or to fulfill a legal obligation under law.
- **External advisors** – we may share your personal data with external advisors, such as audit firms or law firms, in accordance with law or to obtain advice. These advisors usually act as independent data controllers, and a disclosure is usually based on a legitimate interest as a legal basis.
- **Acquiring company** – if Swedfund is to be restructured (e.g., split into several different businesses), or if a third party wishes to acquire Swedfund or our customer database, Swedfund will disclose your personal data to the acquiring company. This may also occur in the event of a merger or if Swedfund is liquidated or goes bankrupt. In such cases, the acquiring company will continue to use your personal data for the same purposes as stated in this Privacy Notice, unless you receive other information in connection with the transfer. However, this presupposes that the acquiring company carries out similar activities as Swedfund. In order to enable a restructuring, sale or liquidation, personal data may also be shared with other companies as part of the process. In such cases, the companies have undertaken to observe confidentiality. This is described in more detail in sections 4.10.

## 9 WHERE DO WE PROCESS YOUR PERSONAL DATA?

Swedfund processes your personal data primarily within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA. If personal data is transferred to any such country, we will ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.

When carrying out any transfer to a country that lacks an adequacy decision by the European Commission, we will use the standard contractual clauses issued by the European Commission as legal basis for the transfer.

Please contact us through the contact details provided under section 2 for more information on a specific transfer or to obtain a copy of the relevant documentation regarding the safeguards taken. You can also read more at the Swedish Authority for Privacy Protection website, available here, regarding what applies under the GDPR for transfers to Third Countries and appropriate safeguards.

## 10 YOUR RIGHTS

### 10.1 Our responsibility for your rights

Swedfund is responsible, in its capacity as data controller, for ensuring that your personal data is processed in accordance with applicable data protection legislation and that you can effectively exercise your rights under the GDPR. You can find more information about your rights in the sections below and at the Swedish Authority for Privacy Protection (IMY's) website, available here. In order to exercise your rights, you may contact us at any time through the contact details provided under section 2 in this Privacy Notice. Please do not forget to specify the right to which the request relates.

#### *Time limits*

Swedfund is obliged to respond to your request to exercise your rights within one month of receiving your request and to inform you of the action taken. In the event that a request is complex or if we have received a large number of requests, we are entitled to extend the time limit by two additional months (i.e., in total no later than three months from receipt of the request). We will notify you of such an extension including the reason for the extension within one month. If we do not take any action in response to your request, we are obliged to notify you within one month of receipt of your request: (i) that the action has not been taken; (ii) the reason for this; and (iii) inform you of your right to lodge a complaint with the supervisory authority and seek judicial redress.

#### *As a general rule, it is free of charge*

All information, communication and actions we carry out are free of charge for you. If requests related to your rights are manifestly unfounded or unreasonable, we have the right to either charge a reasonable administrative fee for providing the information or carrying out the requested action. We may also refuse to comply with your request.

#### *We may need to identify you*

If we have reasonable grounds to doubt the identity of the applicant, we may request additional information necessary to confirm your identity. We will not collect more personal data than necessary.

### 10.2 Your rights of access, rectification, erasure and restriction

According to the GDPR, you have certain rights in relation to the data we process about you, which are described below. Some of these rights apply under certain conditions, which you can read more about below. You have the right to request the following rights.

- a) **Access to your personal data.** In order for you to check whether processing of your personal data is taking place and whether the processing is lawful, you have the right to request access to your personal data. This means that you have the right to receive confirmation of whether we process your personal data and, if so, receive a copy of the personal data we are processing about you, free of charge. If you are only interested in a

certain category of personal data or data processed for a specific purpose (for example, direct marketing), please indicate this in your request. In connection with the access request, you will also receive information about the processing, such as the reason why we process your personal data (i.e., the purpose of the processing), the envisaged period for which the personal data will be stored (if possible), to whom the personal data have been or will be disclosed, etc. For any additional copies you request, we are entitled to charge a reasonable administration fee to cover our administrative costs. If you make a request in electronic format, such as by e-mail, we will provide you with the information in a commonly used electronic format, unless you request otherwise.

- b) **Rectification or completion of your personal data.** If we process personal data that is inaccurate, you have the right to request rectification. We will also, on our own initiative, rectify or erase information that we discover to be inaccurate. You also have the right to complete any incomplete personal data by providing a supplementary statement.
- c) **Erasure of your personal data.** In some cases, you have the right to have your personal data deleted. This applies in the event that:
- i. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - ii. we process your personal data on the basis of your consent and you withdraw the consent, provided that there is no other legal basis for the processing of the personal data;
  - iii. we process your data for direct marketing purposes and you object to this processing;
  - iv. you object to our processing of your personal data that takes place based on the legal basis legitimate interest or a public interest, and we have no compelling legitimate grounds for the processing which override your interests, rights and freedoms;
  - v. we have processed the personal data unlawfully; or
  - vi. we have a legal obligation to delete the personal data.

***There are exceptions to the right to erasure.*** For example, there may be requirements in law or other compelling reasons that prevent us from deleting your personal data. A strong reason may be, for example, to establish, exercise or defend Swedfund against legal claims. We may also be prevented from deleting your personal data due to archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes.

- d) **Restriction of processing.** This means that we temporarily restrict the processing of your personal data so that they are only processed for certain limited purposes. We will inform you before the restriction of processing ends. You have the right to request restriction when:
- i. you consider your data to be inaccurate and you have requested rectification as defined in section 10.2 b), while we establish the accuracy of the personal data;
  - ii. the processing is unlawful, and you do not want the personal data to be erased;
  - iii. we, as the data controller, no longer need to process your personal data for the purposes of the processing, but you need them to be able to establish, exercise or defend a legal claim; or
  - iv. you have objected to the processing as set out in section 10.3, while pending verification of whether our legitimate grounds override yours.

We will take all reasonable measures possible to notify all recipients of your personal data as set out in section 8 above if we have rectified, erased or restricted access to your personal data after you have requested us to do so, provided that it is not impossible or if it would involve a disproportionate effort. At your request, we will inform you about who we have disclosed personal data to.

### **10.3 Your right to object to our processing of your personal data**

You have the right to object to our processing of your personal data if we base the processing on a legitimate interest or public interest as a legal basis (see section 4 above). When you object, you must provide reasons for your objection that are related to your specific situation. If you object to a processing, we will only continue the processing if we have compelling legitimate grounds to continue the processing which override your specific reasons, interests, rights and freedoms or if the processing is necessary to establish, exercise or defend legal claims.

### **10.4 Your right to object to direct marketing including profiling**

If you do not want us to process your personal data for direct marketing purposes, which include profiling, you always have the right to object to such processing (including profiling) by contacting us. Once we have received your objection, we will cease to process your personal data for this purpose. If you receive marketing communications from us by e-mail or text message, you can also click on our unsubscribe link at the bottom of each e-mail and text message.

### **10.5 Your right to withdraw your consent**

If we process your personal data based on your consent as a legal basis (see section 4 above), you have the right to withdraw your consent at any time by contacting us. We are then not entitled to continue the processing of your personal data if there is no other legal basis for the processing. You will find our contact details in section 2 of this Privacy Notice.

If you wish to withdraw a consent that you have given to us in order to receive our direct marketing by email or SMS, you can choose between contacting us to withdraw your consent or clicking on our unsubscribe link which you will find at the bottom of each email.

### **10.6 Your right to data portability**

You have the right to data portability when we process your personal data by, for example, automated means and when the legal basis for the processing is your consent or performance of a contract. Your right to data portability means that you have the right to receive the personal data that you have provided to us in a structured, commonly used, and machine-readable format and to transfer this personal data to another data controller. You may also request that we transfer the personal data directly to another data controller, provided that such direct transfer is technically possible.

### **10.7 Your right to lodge a complaint with the relevant supervisory authority**

You always have the right to lodge a complaint with the relevant supervisory authority if you believe that our processing of your personal data violates the GDPR. This is particularly the case in the member state where you have your habitual residence, place of work or where the infringement was committed. The supervisory authority in Sweden is the Swedish Authority for Privacy Protection (IMY). You can contact IMY through the e-mail address [imy@imy.se](mailto:imy@imy.se) or through the contact details provided on IMY's website, available [here](#).

## **11 WE PROTECT YOUR PERSONAL DATA**

Our mission is that you feel comfortable when we process your personal data. We have therefore implemented both technical and organizational security measures, including access restrictions and regular internal controls, to protect your personal data against, for example, unauthorized

access, alteration, or loss. In the event of a personal data breach that could significantly affect you or your personal data, such as the risk of fraud or identity theft, we will contact you to explain what has happened and advise you on how to reduce the risk of potentially harmful effects.

## 12 CHANGES TO THIS PRIVACY NOTICE

Swedfund may change this Privacy Notice. In the event of a change, you will receive clear information about the change and what it means for you within a reasonable time before the amended version becomes effective. This applies provided that the change is not merely linguistic or editorial but involves a fundamental change in the processing itself, or if the change is not a fundamental change but we consider it to be relevant and to affect you. If a change in the processing of your personal data requires that your consent is obtained, you will be notified of this and given the opportunity to provide your consent.

You can always find the latest version of the Privacy Notice on our website and we will always indicate the date of the last update at the top of the Privacy Notice.