

# Privacy Policy

Vaekstkapital gives you, as a registered AIFM at the Swedish Financial Supervisory Authority, access to attractive investment opportunities. We are exploring new paths and uncovering investment opportunities that others have yet to discover.

We have established this Privacy Policy to inform you about how we collect, process, and store your personal data when you contact us or use our services, whether through our website, by telephone, or in a customer relationship. We respect your privacy and your rights to protect your personal data. Therefore, we ensure legal, fair and transparent processing of your information, regardless of where and why we have received your data. Personal data is all types of information about a person that can be attributed to them. This is usually first and last name, address, e-mail address, telephone number and other contact information.

## **Data Controller**

We are the data controller and therefore responsible for processing personal data that takes place as part of our role as a registered AIFM, the administration of Alternative Investment Funds (AIFs), or the promotion of other companies. Furthermore, we are responsible for ensuring that the processing is carried out in accordance with the principles outlined in this Privacy Policy.

You will find our contact details below:

Vaekstkapital Alternative Investment Fund Manager AB  
c/o ECOVIS RevisorCompaniet AB  
Norrtullsgatan 6  
113 29 Stockholm  
org-nr.: 559516-1547

We are not obliged to appoint a Data Protection Officer (DPO), as we do not process sensitive information on a large scale, and our activities do not include regular and systematic monitoring of the registered. If you have any question about the processing of your personal data, you can contact us via [investering@vaekstkapital.com](mailto:investering@vaekstkapital.com).

## **Collection of personal data**

We only collect basic personal data about you that is necessary for our relationship with you, and essential for optimizing our services and offerings:

- When you use our website, including ordering material and subscribing to our investment opportunities (newsletter), we collect your contact information, including name, address, phone number and email address. By ordering material, subscribing or otherwise contacting us via our website, you also accept our Declarations of Consent (these also appear on our website) which allow us to collect and store this information.

If you do not engage in further interactions with us, your information will generally be stored for 5 years from the last contact or after you have withdrawn your consent to receive updates from us.

- When you enter a customer relationship with us and use our investment opportunities or purchase our services, we may require additional information. You will receive further information about our personal data processing in these situations. By using our services, you also accept our consent declarations (which are also available on our website) which allow us to collect and store this information.

If you do not enter into another relationship with us thereafter, your information will generally be stored up to 5 years plus the current year from the end of the customer relationship.

- When you contact us directly in other situations, your contact information is processed in our telephone and/or IT systems. By contacting us directly in other situations, you also accept our consent declarations (which are also available on our website), allowing us to collect and store this information. This information is stored for up to 5 years plus the current year.

If, in exceptional cases, we need to collect particularly sensitive information, it will not occur without your consent.

You may request access to the information we process about you at any time by contacting us.

### **Withdrawal of Consent**

If our processing of your personal data is based on your consent, you have the right to withdraw it at any time. Please note that withdrawing your consent may affect our ability to manage your customer relationship and investment activities, as consent is required for certain data processing activities.

### **Disclosure of data**

Upon registering as a customer with Vaekstkapital, you simultaneously grant us permission to disclose relevant information about you to the AIFs or other companies you invest in, as well to companies that assist us with tasks related to anti-money laundering regulations and the subscription and listing of shares in the underlying AIFs.

Furthermore, in certain cases, we may share your data with other partners. This will only occur with full control of your data retained by us, as such a partner can only access and process your data after a data processing agreement has been established between Vaekstkapital and the relevant partner. The company may transfer personal data to one or more of the following categories of third parties:

- Marketing and communication systems, as well as other administrative systems.
- Lawyers and other consultants who provide advisory assistance.
- Operations operators, such as server providers.
- The Financial Supervisory Authority and other regulatory authorities as required by law.

This list is not exhaustive.

The purpose of disclosing your data may, for example, be to establish, maintain, or terminate your customer relationship. Additionally, data may be disclosed to facilitate the provision of our services.

We will only disclose your personal data for marketing purposes with your consent or if we are pursuing a legitimate interest. You may, at any time, request to be excluded from marketing communications from us or our partners by contacting us.

### **Non-EU/EEA countries (Third countries)**

As a general rule, your personal data will not be disclosed to third countries; however, should this become relevant, you will be informed accordingly.

### **Cookies**

We use cookies on our website to improve the user experience on our website. Cookies are short text files that are stored on the user's terminal device by a web server. After saving, the browser sends the data back to the server as part of the request. This allows the service site to recognize and track web browsers.

Cookies tell us how users use our website. We use cookies to develop our services and website and to analyse the use of the website, as well as to target and optimise marketing.

When accessing the Website, the Website user can either give their consent to the use of cookies or refuse the use of cookies. The website user can change the settings later in the cookie settings section and revoke any consent they have given. You can find more detailed

cookie-specific information in the cookie settings.

## The basis for processing your personal data

Our basis for processing your personal data includes the following conditions:

- You have entered into, or are considering entering into, an agreement with us, pursuant to Article 6(1)(b) of the General Data Protection Regulation (GDPR).
- We are legally required to process your data under Article 6(1)(c) of the GDPR, or as mandated by law, such as in accordance with regulations like the Anti-Money Laundering Act (sw. *Lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism*), the Bookkeeping Act (sw. *Bokföringslag (1999:1078)*), or the Data Protection Act (sw. *Lag (2018:218) med kompletterande bestämmelser till EU:s dataskyddsförordning*).
- Processing is necessary for us or our partners to pursue a legitimate interest, pursuant to Article 6(1)(f) of the GDPR. Legitimate interests we pursue include, among others, preventing and investigating criminal activity, marketing purposes, targeting materials we distribute, and optimizing our internal processes, products, and services.  
You have the right to object to this processing of your personal data at any time. For further information on how we balance our legitimate interest, you are welcome to contact us.
- You have provided us with consent to process your personal data, pursuant to Article 6(1)(a) of the GDPR.

We safeguard your personal data through both technical and organizational measures, protecting your information from accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access.

We may update this privacy policy periodically and reserve the right to do so to ensure compliance with the requirements for the proper processing of your personal data. The current version of the policy will be available on our website.

## Your Rights

Under the General Data Protection Regulation (GDPR), you have several rights regarding our processing of your personal data. If you wish to exercise your rights, please contact us.

- *Right of Access (sw. rätt till tillgång)*  
You have the right to access the information we process about you, as well as additional relevant details.

- *Right to Rectification (sw. rätt till rättelse).*  
You have the right to have incorrect information about yourself corrected.
- *Right to Erasure (sw. rätt till radaring)*  
In certain circumstances, you have the right to have your information deleted before it would typically be erased as part of our standard data retention practices.
- *Right to Restriction of Processing (sw. rätt till begränsning av behandling)*  
In specific cases, you have the right to request that the processing of your personal data be restricted. If processing is restricted, we may only process the data – apart from storing it – with your consent, for the establishment, exercise, or defense of legal claims, to protect a person, or for important public interest.
- *Right to Object (sw. rätt att göra invändningar)*  
In certain cases, you have the right to object to our otherwise lawful processing of your personal data. You may also object to the processing of your data for direct marketing purposes.
- *Right to Data Portability (sw. rätt till dataportabilitet)*  
In certain circumstances, you have right to receive your personal data in a structured, commonly used, and machine-readable format, as well as to have this data transferred directly from one data controller to another, where technically feasible.

[You](#) can find more information about your rights in the Swedish Authority for Privacy Protection's guidance on data subject's rights, available at [www.imy.se](http://www.imy.se).

## **Complaint**

You have the option to file a complaint with the Swedish Authority for Privacy Protection if you are dissatisfied with the way we process your personal data. You can find the contact details for the Swedish Authority for Privacy Protection at [www.imy.se](http://www.imy.se).