

PRIVACY STATEMENT

Nordic VPS Group takes your privacy seriously. We are responsible for processing and are responsible for ensuring that the information we have about you is used in accordance with privacy legislation.

In this privacy statement, we provide you with information about how we use and protect your personal information and what rights you have. Personal information is all information that can be linked to you as an individual.

What information do we have about you?

Information is provided by other data controllers and processed by us as a data processor.

When a company registers in our solutions, you as a shareholder or participant will typically be registered with the following information:

Identification and contact information, such as birth or D-number, name, residential address, tax country, email address, telephone number.

Payment information, such as bank account number.

Securities Holdings and Issue Information, such as the number of shares, participations, or holdings of shareholder loans in addition to history related to the ownership you as a shareholder or participant have in the company in question.

Information provided by you. When you use our services, such as by logging in to investor web or contacting us for questions about your investments, you typically provide us with the following information:

Contact information, such as birth or D-number, name, residential address, tax country, email address, telephone number.

Payment information, such as bank account number.

Communication, such as when you contact support or have a dialogue with us.

Information collected about you. By using our services, we typically collect the following information:

Technical information, such as type of PC / mobile, internet connection, operating system, browser, and IP address.

Location information, ie information about where you are.

Login history, ie information about which logins you have made with us. We collect this information by registering the logins you make with us.

How we use the information

Here are the main purposes for which we use the information:

1. **To verify your identity.** For this purpose, we use *contact information*.
2. **For reporting purposes.** For this, we use *Identification* and *contact information*, as well as *Inventory information securities*.
3. **To improve your user experience on our platforms.** For this purpose, we use *technical information* and *usage information*.
4. **To improve our goods and services.** For this purpose, we use usage information and technical information.

The legal basis for purposes **1, 2** is that it is necessary to fulfill our agreement with you and the company we are the data processor for and to fulfill our legal obligations (such as the Money Laundering Act and the Accounting Act).

The legal basis for purposes **3 & 4** is our legitimate interest in conducting product development and improvements.

You can withdraw your consent at any time.

Who do we share the information with

We share the information with our suppliers to the extent necessary to provide service to you.

In some cases, we will share information about you with partners and government agencies. As a provider of “owner register services”, the information registered directly with us can be shared with the companies you as an investor have securities holding with, and data will also be shared with the tax authorities in connection with the annual reporting of taxable securities.

We do not transfer information out of the EEA area.

How long do we store the information?

We only store the information for as long as necessary. This typically means that we delete:

- *Contact information* within 10 years after the last realization in securities registered with us.
- *Payment information* no later than 3 years after the last realization in securities registered with us.
- *Inquiries* no later than 3 years after the inquiry has been resolved. This is to be able to assist you as an investor in connection with any correction of your own tax documents within the deadline for correction of the tax return.
- *Technical information* no later than one year after data has been collected
- *Location information* no later than one year after data is collected

We will in any case store information as long as we are required by law, and where a special need arises, e.g. in the event of complaints or claims made against us or by us.

Your privacy rights

You have a number of privacy rights. You can use these by contacting us. Your rights include

Information. Further information on how we process information about you.

Insight. Copy of information we have about you.

Correction. Correct and supplement information about you.

Deletion. Request deletion of information that we no longer have a basis for storing.

Restriction. Request that we limit the use of your information.

Data portability. Request that your information be transferred to you or to another business in a structured, commonly used, and machine-readable format.

Objection. Ask to oppose our use of your information for direct marketing, including profiling. You can also object to being subject to individual decisions of a legal nature that are exclusively automated.

Please note that these rights are subject to legal restrictions.

We will respond to your inquiry as soon as possible, usually within one month.

If you believe that we process personal data unlawfully, you have the right to complain to the Norwegian Data Protection Authority. We hope that you will contact us first so that we can assess your objections and resolve any misunderstandings.

Changes to the privacy statement

We may update the privacy statement from time to time. You will always find the latest version of our privacy statement on our website.

Contact information

Feel free to contact us if you have questions, comments, or want to make use of your rights. You can use the following contact information:

Telephone number: [0047/+47] - 66 77 37 30

E-mail address: personvern@nordicvps.com

Address: Billingstadsletta 13, 1396 Billingstad, Viken, Norway