

Danske Invest Management A/S Privacy Notice

Danske Invest Management A/S is a management company of undertakings for collective investment and an alternative investment fund manager (“AIFM”) of alternative investment funds. Danske Invest Management A/S is acting from its main office in Denmark and/or from its Luxembourg branch.

References to “we”, “us”, or “ours” include Danske Invest Management A/S and/or its affiliates that process your personal data.

References to “you” or “your” include all individuals whose personal data we collect, hold and process in the course of carrying out the business of a management Company and/or AIFM, as a business partner or as an employer.

In the course of our business, we register and use information about you (personal data), when you interact with us as an individual who is connected with a business, corporate customer or counterparty (hereinafter collectively referred to as *customer*) of ours. You could be an authorised signatory, a beneficial owner, a director, an employee or a third party connected to our customer or activity.

We may process your personal data for any of the following purposes, depending on the capacity in which you interact with us:

- meeting our contractual obligations and providing services and products to our customers
- complying with applicable law and regulation, including anti-money laundering legislation
- for administrative purposes, including in order to secure and maintain our internal systems, platforms and other digital applications
- upholding an adequate level of security when you visit our premises
- carrying out controls to prevent fraud and/or financial crime
- managing the customer relationship, including marketing of services and products
- where you have applied for a position with us, to review and process your application and considering whether to enter into an employment, consultancy or engagement contract with you

We will only process your personal data if we have a legal basis to do so.

This means that we process personal data when:

- you have made or you are considering making an agreement with us, cf. GDPR art. 6.1(b)
- you have granted us consent to use your personal data for a specific purpose, cf. General Data Protection Regulation (GDPR) art. 6.1(a)
- we have to comply with certain obligations in accordance with law and regulation applicable to our activity
- we or the customer that you have a connection with pursue a legitimate interest. This could be when we or the customer have a business or commercial reason to process your personal data, such as in order to administrate the services and products that the customer has requested and provide you the necessary access to digital services, to prevent abuse and loss, to strengthen IT security or to use it for marketing purposes in line with applicable law and regulation. We will only do so if our interest clearly outweighs your interest in not having your personal data processed by us, cf. GDPR art. 6.1(f).

What personal data do we register and use?

We typically process the following types of personal data:

- Basic personal information, for instance your name, address, occupation, contact information, country of residence, nationality, social security number, tax status information and date of birth
- Identification documentation, for example a photocopy of your passport, driving licence, or other documentation required by law or regulation
- Information provided by you about preferences for various types of marketing events
- Information about your education, professional and employment information, knowledge and experience
- Financial information and information about your investment targets
- Digital information related to your use of our websites, platforms and digital applications, including, traffic data, location data and other communication data
- Information related to the devices you use to access our websites as well as technical information, including the type of device and operating system
- Information about your visits to our premises

Sensitive data

We may also register sensitive data about you if required by law or if you participate in customer events arranged by us. We will seek your explicit consent to register sensitive personal data unless the law permits us to register such data without your consent. The sensitive personal data we may process includes:

- information about your health, for instance allergies
- bio-metric data, such as facial image

How long do we store your personal data?

Your personal data will be retained for as long as required:

- for the purposes for which the personal information was collected;
- in order to establish or defend legal rights or obligations or to satisfy any reporting obligations; and/or
- as required by data protection laws and any other applicable laws or regulatory requirements.

Third parties and personal data

Personal data from third parties

We process personal data from third parties, for instance:

- asset managers and other intermediaries;
- publicly accessible sources and registers;
- entities of Danske Bank Group in accordance with anti-money laundering legislation;
- entities of Danske Bank Group and business partners (including intermediaries and other banks) if we have your consent or if it is allowed by law.

Which third parties do we share your personal data with?

In some cases, we may share personal data with third parties inside or outside Danske Bank Group:

- We disclose personal data to public authorities as required by law and regulation, including to the State Prosecutor in accordance with the applicable law and regulation for statistical and other purposes.
- With your consent or if we are allowed by law and regulation we may disclose data internally within Danske Bank Group and to external business partners (including correspondent banks and other banks).
- In connection with IT development, hosting and support, we transfer personal data to data processors, including data processors in third countries outside the EU and the EEA such as Danske Bank in India. We ensure that your rights are safeguarded and protected in such data transfers by using, for example, standard contracts approved by the European Commission or local regulation. You can get a copy of the standard contract by contacting us.

Your rights

Insight into your personal data

You can get insight into the personal data we have processed about you, how we use it and where it comes from. You can obtain information about how long we store your data and who receives data to the extent that we disclose data. Your right of access may be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of insight.

Right to object

In certain circumstances, you have the right to object to our processing of your personal information including when we rely on our legitimate interest to process your personal information.

You also have the right to object to our use of your personal information for marketing purposes, including profiling that is related to such purpose.

Correction or erasure of Danske Invest's data

If the data we have registered about you is incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased subject to restrictions in existing legislation and our rights to process data. These rights of correction and erasure are known as the "right to rectification", "right to erasure" and "right to be forgotten".

Restriction of use

If you believe that the data we have registered about you is incorrect or if you have objected to the use of the data, you may demand that we restrict the use of the data to storage until the correctness of the data can be verified or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have your data erased, you may instead request us to restrict the use of the data to storage. If we need to use the data solely to assert a legal claim, you may also demand that any other use of this data be restricted to storage. We may, however, be entitled to other use of the data to assert a legal claim or if you have given your consent to this.

Withdrawal of consent

You can withdraw a consent at any given time. Please note that if you withdraw a consent, we may not be able to offer you specific services or products. Note also that we will continue to use your personal data, for example if we are required to do so by law.

Data portability

If we use data based on your consent or because of an agreement and the data processing is automated, you have the right to receive a copy of the data you have provided in an electronic machine-readable format.

Contact details and how you can complain

You are always welcome to contact us if you have any questions about your privacy rights and how we register and use personal data.

You can contact us via e-mail: danskeinvest@danskeinvest.com or our Data Protection Officer via e-mail dpofunction@danskebank.com

If you are dissatisfied with how we register and use your personal data and your dialogue with the Data Protection Officer has not led to a satisfactory outcome, you can contact our complaints handling unit: danskeinvest@danskeinvest.com. You can also lodge a complaint with the Luxembourg National Data Protection Commission (CNPD): 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette , Tél. : (+352) 26 10 60 -1, Fax. : (+352) 26 10 60 29, E-mail: info@cnpd.lu.