

PRIVACY POLICY

(Data protection policy for persons in Investo Capital's network)

This Privacy Policy explains how we use the personal information that Investo Capital collects or generates both in relation to this website and our products and services.

1. BACKGROUND AND LEGAL BASIS

- 1.1. Investo Capital Management A/S with its registered office at Niels Jernes Vej 10, DK-9220 Aalborg and other companies in the Investo Capital group collect and use certain Personal Data. Investo Capital is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.
- 1.2. At Investo Capital we respect the privacy of our clients and we are committed to keeping all your Personal Data secure. This Privacy Policy governs the handling of Personal Data by Investo Capital in the course of carrying on commercial activities.
- 1.3. The legal basis of Investo Capital's processing of all client data is based on voluntary consent, and the receipt of application form, including pitch-material. This consent can be withdrawn at any time (see section 9).
- 1.4. We use the following definitions in this Privacy Policy:

"Investo Capital", **"we"** or **"us"** means Investo Capital Management A/S and other companies in the Investo Capital group.

"Personal Data" means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Investo Capital (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Investo Capital or any other person in respect of an individual.

2. THE INVESTMENT ACTIVITIES AND SERVICES WE PROVIDE

This Privacy Policy concerns the following categories of information that we collect about you when providing the following products and services:

- Information we receive through our websites ("**Investo Capital Websites**") e.g. applications and pitch material; and
- other information which we might receive through or in connection with the provision of our investment activities and services ("**Services**").

3. THE TYPES OF PERSONAL DATA WE COLLECT

- 3.1. Many of the services offered by Investo Capital require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. In relation to each of the

services described at paragraph 2.1 above, we will collect and process the following Personal Data about you:

- **Information that you provide to Investo Capital.** This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):
 - Basic Personal Data (such as first name; family name; position in the company; company name; company email address; business phone number; business address; city; postcode; country);
 - Any information that you choose to share with us (whether through our websites or otherwise) which may be considered Personal Data, including your business idea;
- **Information that we collect or generate about you.** This includes (by way of a non-exhaustive list):
 - Information about the background for the engagement between you and Investo Capital, for example a proposal to Investo Capital to invest in your company or engage you in a current portfolio company, and our interactions with you;
 - When you visit Investo Capital Websites, cookies are used to collect technical information about the services that you use, and how you use them. For more information on the cookies used by Investo Capital please see our Cookie notice.
- **Information we obtain from other sources.**
 - We may be supplied with CV of prospective candidates for roles at both Investo Capital and our portfolio companies.
 - We may from time to time use 3rd party public and private data sources to find out more information about an individual's employment history.
- **Anonymized data.**
 - In addition to the categories of Personal Data described above, Investo Capital will also process further anonymized information and data that is not processed by reference to a specific individual.

4. HOW WE USE YOUR INFORMATION

- 4.1.** Your Personal Data may be stored and processed by us in the following ways and for the following purposes:
- For ongoing review and improvement of the information provided on or operation and security of Investo Capital Websites;
 - To assess your application for our Services, where applicable;
 - To set you up as a client or investment opportunity;
 - To provide you with our Services;
 - To understand feedback on our Services and to help provide more information on the use of those products and services quickly and easily;
 - To communicate with you in order to provide you with services or information about Investo Capital and our products and services;
 - To understand your needs and interests;
 - For the management and administration of our business;
 - In order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures;
 - For the administration and maintenance of databases storing Personal Data;

- We may process business communications traffic data sent and received by us for the purposes of evaluating our existing or prospective business relationship.

4.1 However, we use Personal Data and we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include where:

- We need to do so in order to perform our contractual obligations with our customers;
- We have legal and regulatory obligations that we have to discharge;
- We may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- The use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - Allowing us to effectively and efficiently manage and administer the operation of our business;
 - Conducting market research or business analysis;
 - Maintaining compliance with internal policies and procedures; and
 - Promoting our business or Investo Capital Services.

4.3 We will take steps to ensure that the Personal Data is accessed only by employees of Investo Capital that have a need to do so for the purposes described in this Privacy Policy.

5. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

5.1 We may share your Personal Data within the Investo Capital group of companies for the purposes described above in section 4.

5.2 We may also share your Personal Data outside of the Investo Capital group for the following purposes:

- With our business partners. For example, this could include intermediaries that introduced you to us or through whom you have required our Services. Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;
- With third party agents and contractors for the purposes of providing services to us (for example, Investo Capital' accountants, professional advisors, IT and communications providers and debt collectors). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
- To the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend our legal rights;
- If we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- If we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

6. HOW WE SAFEGUARD YOUR INFORMATION

6.1. The information that we handle is protected with safeguards appropriate to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer

systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

- 6.2.** As a condition of employment, Investo Capital employees are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those employees who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by an Investo Capital employee is prohibited and may result in disciplinary measures.

7. HOW LONG WE KEEP YOUR PERSONAL DATA

- 7.1.** How long we will hold your Personal Data for will vary and will be determined by the following criteria:
- The purpose for which we are using it – Investo Capital will, unless otherwise agreed keep the data for a period of 5 (five) years; and
 - Legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

8. YOUR RIGHTS

- 8.1.** In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:
- The right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
 - The right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
 - In some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to Investo Capital;
 - The right to request that we rectify your Personal Data if it is inaccurate or incomplete;
 - The right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data, but we are legally entitled to retain it;
 - The right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict our processing of your Personal Data but we are legally entitled to refuse that request; and
 - The right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.
 - You can exercise your rights by contacting us using the details listed in paragraph 10 below.
- 8.2.** You can exercise your rights by contacting us using the details listed in paragraph 10 below.

9. DESIGNATED REPRESENTATIVE

- 9.1.** Investo Capital Management A/S's registered office may be contacted using the following contact information:

Investo Capital Management A/S, Niels Jernes Vej 10, DK-9220 Aalborg or mail
dataprotection@investo.dk

10. QUESTIONS AND CONCERNS

- 10.1.** If you have any questions or concerns about Investo Capital's handling of your Personal Data, or about this Policy, please contact us, using the following contact information:
Investo Capital Management A/S, Niels Jernes Vej 10, DK-9220 Aalborg or mail
dataprotection@investo.dk

- 10.2.** We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, you may also file a complaint regarding Investo Capital's processing of your personal data to the Danish Data Protection Agency:

The Danish Data Protection Agency (Datatilsynet)
Borgergade 28, 5
DK-1300, Copenhagen K
Telephone number: +45 33 19 32 00
Email address: dt@datatilsynet.dk
Website: www.datatilsynet.dk

11. CHANGES TO THE PRIVACY POLICY

- 11.1.** This Privacy Policy will be updated on a regular basis and when necessary due to changes in applicable law. The Privacy Policy will always include information on the effective date of the most recent version. To the extent, the changes of the Privacy Policy are regarded as material and significant, you will be expressly informed hereof. In certain cases, you may receive a request from Investo Capital to accept the changes prior to their entry into force.

12. EFFECTIVE DATE OF THE RECENT UPDATE OF THIS PRIVACY POLICY

11th April 2019