



Data Protection Policy

Protecting your data

AIFM Group AB (“AIFM”) strives to protect your privacy and the personal data that you provide to us during any contact or visit to our website. In order for you to understand how AIFM may collect and use your personal data, we provide this Data Protection Policy and act in accordance with its provisions when processing personal data. By visiting our website or contacting us, you accept that we process your personal data in the manner stated here.

Contact information can be found at the bottom of the policy.

Personal information we receive or collect from you

When you use one or some of our services such as visit our website, request information or material about us or our funds, invest in our funds, or apply for employment, you may provide personal information to us and/or we may collect personal information from you.

Such personal information provided and/or collected may be, but is not limited to:

— **Personal and contact information**

Name, date of birth, social security number, invoice and delivery address, e-mail address, mobile phone number, employment, title, CV, etc.

— **Information for measures against money laundering and terrorist financing**

Shares or other significant influences, information if you or close relatives are a politically exposed person, the source of your capital, etc.

— **Information about services**

Details regarding the services you have purchased.

— **Financial information**

Your income, any credits, and negative payment history.

— **Historical information**

Your purchases or sales of units, payment, and credit history.

— **Information about how you interact with our services**

How you use our services, including response time for pages, download errors, how you reached and left services, as well delivery notices when we contact you. We use this type of information to improve our web services, navigation, and general user experience, and to provide you with relevant information.

— **Device information**

For example, IP address, language settings, browser settings, time zone, operating system, platform, and screen resolution.

— **Geographical information**

Your geographical location.

The information you provide to us, as well as information about the services and your financial information, is generally necessary to enter into a contractual relationship with us, while the other information we collect is generally necessary for other purposes - see below.

What we do with your personal information

All data is used to provide, perform, and improve our services and to be able to maintain agreements, as well as comply with applicable legislation or other legitimate interests.

We will not sell, share, or otherwise make your information available to outside parties, except that we may need to share information with third parties who perform services for us under agreements and on our behalf. These third parties may only process personal data to the extent that we receive do so and are limited in the same way we are.

Communication with you

We may use your personal information to communicate relevant information about services and products, customer events and training, or to perform customer satisfaction surveys regarding our services. This can be done, for example, via electronic communication channels



and by telephone. If you do not want to receive such communication, you are welcome to contact info@aifmgroup.com.

Who we may share your personal information with

We may share your information with selected third parties for the purpose of obtaining their assistance in providing services and products to you, or to manage our website. We take all reasonable legal, technical, and organizational measures to ensure that your data is handled securely and with an appropriate level of protection when transferring to or sharing with such selected third parties. The following third parties may be:

— **Suppliers, subcontractors, and advisers - such as companies within our group**

We may share your personal information with suppliers, subcontractors, and/or advisers for the performance of our contractual obligations to you, or for other purposes set forth in this Data Protection Policy. These third parties may be fund managers, expert advisers, valuation experts, distributors, IT technicians, external auditors, internal auditors, etc.

— **Police, tax, or supervisory authorities**

We may provide necessary information to authorities such as the police, tax, or other authorities if we are required to do so by law or if you have agreed that we do so. An example of a legal obligation to provide information is for measures against money laundering and terrorist financing.

— **Divestment**

We may share your information with third parties: A) In the event that we sell or buy business or assets, we may leave your personal information to a potential seller or buyer, or, B) If a significant portion of our assets is acquired by a third party, personal information about our customers will be shared.

Countries where we process your personal data

We always strive to process your data within the EU/EEA, however, data may in some situations be transferred to and processed in a country outside the EU/EEA by another

supplier or subcontractor. As we are determined to always protect your data, we will take all reasonable steps legal, technical, and organizational measures to ensure that your data is handled securely and with one adequate level of protection comparable to and at the same level as the protection offered within the EU/EEA.

If you want to know more about these levels of protection, you are welcome to contact us at info@aifmgroup.com. It is important to understand that this website can be viewed worldwide, including in countries where data protection is not as high as in the EU/EEA. By going into, and possibly sending personal information via our website, you voluntarily consent to the processing of personal data about you through these countries and channels.

How long we store your personal information

We only store your data for as long as is necessary to carry out our contractual obligations, or as long as required by legal storage times, for example:

- Should the information be saved due to the customer knowledge requirement in the regulations for measures against money laundering or terrorist financing, they are saved for at least five years. If there is an investigation, which we are prevented by law from notifying you of, the information should be saved for ten years.
- The requirement to save information relating to our fund operations may mean that we are prevented from clearing information about you before five years have elapsed from receipt. The data is to be cleared the following year.
- General contact information should be cleared if necessary if it does not have to be saved due to any of the aforementioned reasons. A general clearing of information takes place every two years.
- Information on the basis of accounting and bookkeeping is saved in accordance with Bokföringslagen (SFS 1999: 1078) (*Eng: "Accounting Act"*) for at least seven years.

- Information pertaining to investigation of incidents, violations of rules, and possible suspicion of crime for recovery and substantiation of legal claims, may be saved for two years unless there is a dispute as requires longer processing. Crime reports may only be saved for such time as we have opportunity to act. After these time periods, the data must be cleared.

Your rights of access, correction, and deletion

As an object for the processing of your personal data, you have a number of legal rights, for example:

- **Right to access your data**

You have the right to know if the processing of your personal data takes place with us. You can request a copy of the information you would like to know and verify the information we have about you. The copy is to be provided free of charge.

- **Right to correct your data**

You have the right to correct incorrect or incomplete information about yourself.

- **Right to be forgotten**

You have the right to request deletion of your personal data in cases where data is no longer necessary for the purpose for which it was collected. However, there may be legal obligations or other legitimate reasons which prevents us from immediately deleting all or part of your data. These obligations and rights can be, but are not limited to:

- Freedom of expression
- Legal obligations, such as accounting and tax legislation, banking and money laundering legislation, or consumer law.
- Important public interest in the field of public health.
- Defense of legal claims.

In such cases, we block the data we are obliged to save from being used for purposes other than to fulfill such legal obligations.

— **Right to limitation of treatment**

You have the right to restrict how we may process your personal data in certain circumstances. If you want to exercise this right, contact us at info@aifmgroup.com and we can explain the circumstances should it be possible.

You also have the right to protest at any time against any profiling (i.e. through cookies) or automated individual management decision that may concern you and your information. Please contact us at info@aifmgroup.com in such case. You always have the right to file a complaint against us with the Swedish supervisory authority Datainspektionen.

Our data security

AIFM has implemented the technical, organizational, and operational security processes needed to protect personal data against loss, misuse, alteration, or deletion. Only employees and contractors with relevant authorization have access to the data you have provided to us and the access is adapted to needs. Every employee or contractor with access to personal data is bound by confidentiality. Although we take the measures that, according to industry standards are appropriate and sufficient to protect your personal information, we cannot guarantee that it can never be accessed by an unauthorized person. We can therefore not be held responsible for intrusion or other unauthorized disposal if the personal data has submitted to us via the internet or other public network.

Cookies and tracking techniques

— **Cookie policy**

When you visit a website, a small text file called a cookie is saved on to your device. There are two types of cookies. The first cookie type saves a file for a longer period on your device. It uses features that communicate what has changed since the user last visited the current site. The second cookie type is session cookies. When you visit a page, a session cookie is temporarily stored in your computer's memory. Session cookies are removed when you close your browser. If you do not want to accept cookies, you can apply settings on your device's control panel to block them. This automatically denies websites from storing cookies onto your device or informs you each time a site requests to store a cookie. You can also delete previously stored cookies, through your web browser setting. More information about cookies and electronic communications can be found on the Swedish Post and Telecom Authority (PTS) website.

— **To avoid cookies**

You can change the setting on your computer if you do not want to accept cookies. This then automatically denies the website from storing cookies on your computer or device, or automatically notifies you every time one website requests to store a cookie with you. You can also delete previously accepted or stored cookies through your browser setting.

Go to the help pages of your browser for more information. More information about cookies and electronic information can be found on the website of Svenska Post and The National Telecom Agency. To find more information about Google Analytics data protection policy and how to refrain from their cookies please go to <https://tools.google.com/dlpage/gaoptout>

— **Google Analytics**

We use Google Analytics to see how our visitors use the site. The following cookies are set:

`_ga` – Used to distinguish users – expires after two years

`_gid` – Used to distinguish users – expires after 24 hours

`_gat` – Used to control the amount of requests, i.e. restrict data collection on high-traffic websites – ceases after one minute.

The information created by these cookies, by your use of the site (including your IP address), is forwarded to and stored by Google on servers in the United States. The purpose of these cookies is to evaluate how the site is used to improve content, navigation, and structure. Google may also transfer this information to third parties if required by law, or in cases where a third party analyzes the information on behalf of Google.



Contact us

This Data Protection Policy applies to AIFM Group AB in its capacity as personal data controller.

Our data protection representative can inform in more detail about how we work with personal data and privacy protection. You can reach us by e-mail: info@aifmgroup.com

**The data protection policy was last updated on 2020-01-07*