



PRIVACY POLICY

Updated, August 2024

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Introduction

At Equuro Holding AS ("Equuro"), we prioritize your privacy. We act as a data controller and ensure that your personal data is processed in accordance with data protection legislation.

In this privacy policy, we provide you with information about how we collect, use and protect your personal data, as well as what rights you have. Personal data is any information that can identify you as an individual.

For customers where Equuro Issuer Services AS is the Account Operator on behalf of the issuer, or for the investor in Euronext Securities Oslo ("ES-OSL"), the Account Operator and ES-OSL are jointly the data controllers of the customer's personal data. ES-OSL's privacy notice "Privacy Notice" can be found on their websites.

The ES-OSL collects and processes personal data when someone use their services, therefore all ES-OSL customers should familiarise themselves with the ES-OSL Privacy Policy.

Equuro's own services mean the products and services that are developed and owned by Equuro.

What information we have about you

Information that is provided by other data controllers and that is 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 national identity number or D number, name, residential address, tax country, relevant tax rate for withholding tax, email address, and telephone number.

Payment information, such as bank account number.

Holding and transaction information, such as the number of shares, shareholder loans, as well as history related to the ownership you as a shareholder or participant have in the company in question. History means, among other things, the date of the transaction and the transaction cost. In addition to the ES-OSL account number and type of account.



Information provided by you.

By using our services, you typically provide us with the following information:

Contact information, such as national identity number or D number, name, residential address, tax country, relevant tax rate for withholding tax, email address, and telephone number.

Payment information, such as bank account number.

Holding and transaction information, which includes, among other things, transactions made in connection with the customer relationship, such as date, number of shares and amounts, as well as any ES-OSL account number.

The information is provided by you by, for example, logging in to investorweb or contacting us for questions about your investments.

Information automatically collected about you.

By using our services, we collect, among other things, the following information:

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

Location information based on IP address.

Usage data, i.e. information about how you use our systems. Examples of information are which logins you have made with us, how often and when you use our services, as well as error reports, and other information necessary to ensure access and availability of the services.

Purpose of data collection

Equuro processes personal data for several purposes. Below you can read more about this:

1. **Identity verification.** For this purpose, we use *Contact Information* to verify your identity. We do this, among other things, to ensure that the services we offer are available to the right owners, and in this way avoid unauthorized use of your personal information and associated services. This is also done to prevent illegal activity such as fraud and money laundering.
2. **Reporting Purposes.** We use *Identification* and *Contact information*, as well as *Technical information* and *Usage data*, to fulfil our reporting obligations. These reporting obligations include, among other things, the submission of Shareholder register statement, tax reporting, or any reporting of suspicious transactions that may indicate money laundering or terrorist financing.
3. **User experience improvement.** *Technical information* and *Usage data* are used to improve your user experience on our platforms. This information helps us understand how you interact with our systems and helps us improve and customize the services to your needs.
4. **System and service improvement.** For this purpose, we use *Technical information* and *Usage data* to improve our systems and services. This includes monitoring the performance of our systems, identifying and correcting technical errors, improving security, and developing new features. For example, your login history and user data can help us understand which parts of our services are most useful, which parts can be improved, and identify any issues that hinder an optimal user experience. This leads to continuous improvement and development of our services.
5. **Recruitment.** We process personal data about candidates who are in a recruitment process with us. In addition to information the candidate shares with us, information will be processed in interview minutes and conversations with reference persons. In connection with the recruitment process, the processing is justified by the fact that it is necessary to enter a potential employment contract.
6. **Personalisation of website content** (cookies). We use personal data in order to provide you with a better user experience and to ensure that the content displayed is relevant to you. We personalise this content based on your interests and behaviour, whether you are logged in or not, often using cookies. The legal basis for adapting content on websites is consent. You can customize your consent in the cookie settings. Select "Change cookie settings" in the bottom left corner of the page.



The legal basis for the processing

The legal basis for purposes **1** and **2** is that this processing of personal data is necessary for the performance of our agreement with you, us and the company for which we are the data processor. In addition, it is necessary to fulfil our legal obligations under the Anti-Money Laundering Act and the Bookkeeping Act, among others.

The legal basis for purposes **3**, **4**, **5** and **6** is our legitimate interest in conducting product development, product improvement and recruitment.

Who we share the information with

We share the information with our suppliers when it is necessary to provide our services to you, or when it is required by applicable law. This information is protected through data processing agreements and other relevant measures to ensure privacy.

In some cases, we will share information about you with partners and public authorities. As a provider of shareholder register services, information registered directly with us may be shared with the companies which you as an investor are holding securities, and data will also be shared with the tax authorities in connection with the tax process, annual reporting of tax documents. We are responsible for the privacy and security of our customers and impose the same requirements on our subcontractors as when we process personal data ourselves.

We do not transfer data out of the EEA.

Storage of personal data

Your personal data is processed for as long as necessary for the purpose they were collected and as long as we have a legal obligation to retain them. This means that once the purpose is fulfilled, your information will be deleted, even if you haven't requested it. The storage period and deletion timing may therefore vary from processing activity to processing activity.



Examples of the duration for which we store personal data follows:

Technical information and *Location information* are deleted within one year after the data has been collected.

We handle both companies registered in our own system and companies registered in ES-OSL, as well as some companies that are on both platforms. This makes it impractical to differentiate the storage duration for individual customers. According to the Securities Trading Act, financial institutions must retain documentation on investment services and investment activities for at least five years. This includes inquiries made through phone calls and digital communication. The Central Securities Depository Act requires that deleted information in ES-OSL be stored for at least ten years. The law also requires ES-OSL account operators to retain documentation on the basis of the registrations in ES-OSL for at least ten years. This documentation includes *Contact information* and *Payment information*. We delete accounting information and information relevant to the customer relationship after ten years have passed.

Inquiries are stored for as long as necessary to handle and resolve the questions or issues presented.

Equuro deletes information at its own initiative if the processing is based on consent and you withdraw your consent for us to process your information.

Security measures/ How we protect your personal data

It is necessary for us to process personal data in order to safeguard both your and Equuro's security and interests. This is achieved, for example, through access management to systems, logging onto servers and systems, operation of technical infrastructure, firewalls and access control, and camera surveillance.

Please note that the security measures mentioned above apply to systems under the control of Equuro. Equuro cannot guarantee the security or confidentiality of information during transmission via channels/media that are not under its control, particularly the internet.

If Equuro becomes aware of a security breach that results in unauthorized access to your personal data, Equuro will inform you of this.



Your rights and remedies

You can contact Equuro if you have any questions about whether we process your personal data. If Equuro processes your personal data, you have the right to access the data about you. You may also have the right to have it amended, deleted and request restriction of processing in certain cases. Your rights can be summarized as follows:

Access. You have the right to obtain a copy of the personal data we hold about you.

Correction. You have the right to correct and supplement information about you.

Deletion. You have the right to request the deletion of information that we no longer have a basis for storing.

Restriction. You have the right to request that we restrict the use of your personal data.

Data portability. You have the right to request that your data be transferred to you or to another company in a structured, commonly used and machine-readable format.

Reservation/Objection. You have the right to object to our use of your personal data for direct marketing purposes, including profiling. You may also object to being subject to automated individual decisions of a judicial nature.

Withdraw consent. If the processing of your personal data is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of how we used your personal information before it was withdrawn.

Please note that these rights may be subject to limitations imposed by law. We will respond to your inquiry as soon as possible, and typically within one month at the latest.

If you believe that we are processing personal data unlawfully, you have the right to complain to the Norwegian Data Protection Authority (Datatilsynet). We hope that you will contact us first so that we can consider your objections and clear up any misunderstandings.



Changes to the Privacy Policy

We reserve the right to update and amend this Privacy Policy periodically to reflect any new legal requirements, or changes in how we handle personal data. When important changes are made, we will make sure to inform you in an appropriate manner, for example by email, our newsletter or a prominent notice on our website.

You are advised to review the Privacy Policy regularly to stay informed of any changes. The current version of the Privacy Policy is always available on our website, www.equro.com. By continuing to use our services after changes have been made, you agree to be bound by the revised Privacy Policy.

Contact

Please feel free to contact us if you have any questions, comments or wish to exercise your rights. You can use the following contact information:

Phone Number: +47 66 77 37 30

E-mail address: compliance@equro.com

Address: Billingstadsletta 13, 1396 Billingstad