



A·P·MØLLER

Privacy policy

APMH Invest IV A/S

This Privacy Policy explains how APMH Invest IV A/S ("we" or "us") processes personal data.

Data controller

The entity responsible for the processing of your personal information is:

APMH Invest IV A/S
Esplanaden 50
DK-1263 Copenhagen K
CVR no. 39 18 30 56

Contact

Feel free to direct any questions regarding our Privacy Policy to us on email:
privacy@apmoller.com

Description of our processing

In APMH Invest IV A/S, we treat Personal Data for different purposes. Below, we describe the nature of the Personal Data and how we process it in more detail for each of these purposes:

1. Communicate with you

In order to communicate with you, we process the following ordinary personal data: your name, email address, telephone number and other contact information. The data is collected either a) directly from you or b) from third parties and processed based on Article 6.1.f (necessary for the pursuit of legitimate interests, e.g. APMH Invest IV A/S' legitimate interest in being able to effectively communicate with business partners, third parties and other persons). We share the data with a) suppliers and vendors that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions) and b) other Group-entities. We will store personal data as long as it is necessary to fulfil the purposes mentioned. In general, personal data will be deleted no later than 12 months after we consider that our dialogue with you has ended.

2. Third party arrangements

To enter into contracts, deals and other agreements, business partnerships, consultancy agreements etc. and fulfilling such agreements, including subsequent invoicing, we process ordinary personal data such as your name, contact information and national identification number. The data is collected either a) directly from you, b) from the business we enter into an agreement with (normally your employer) or c) from other Group-entities or subsidiaries, and processed based on Article 6.1.b (necessary for the performance of the contract between you and APMH Invest IV A/S), Article 6.1.c (necessary for us to comply with a legal obligation, e.g. relevant bookkeeping and tax laws), Article 6.1.f (necessary for the pursuit of legitimate interests, e.g. APMH Invest IV A/S' legitimate interest in being able to communicate with people outside the company, and enter into contracts with other businesses) and/or Article 87, cf. section 11 of the Danish Data Protection Act. We share the data with a) suppliers and vendors that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other Group-entities and c) public

authorities. We will only store personal data as long as it is necessary to fulfil the purposes mentioned. In general, contact information will be kept as part of the contractual documentation and be deleted in accordance with the Danish Bookkeeping Act, unless the contractual documentation has been kept for historical and/or documentation purposes.

3. *Compliance*

In order to comply with legal and other requirements related to bookkeeping, tax, reporting etc. and to meet requests from government or other public/regulatory authorities, we process three categories of ordinary personal data: a) payment/money transfer data (bank account and credit card number, payment of invoices, transfer of money), b) personal details and contact information (e.g. name and surname, gender, date of birth, e-mail and telephone details, home address etc.) and c) KYC-information (e.g. driver license number, passport number, information on who the owners of the company are, etc.). The data is collected either a) directly from you, b) from the business we enter into an agreement with (normally your employer) or c) from other Group-entities or subsidiaries. It is processed based on article Article 6.1.b (necessary for APMH Invest IV A/S to comply with a legal obligation, including the EU Regulation on Market Abuse, and the Danish Payroll Tax Act), Article 6.1.c (necessary for APMH Invest IV A/S to comply with a legal obligation, including the EU Regulation on Market Abuse, and the Danish Payroll Tax Act), Article 6.1.f (necessary for the pursuit of legitimate interests of APMH Invest IV A/S, e.g. APMH Invest IV A/S' legitimate interest in ensuring compliance with applicable laws) and/or Article 87, cf. Section 11 of The Danish Data Protection Act. We share the data with a) suppliers and vendors that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other Group-entities and c) public authorities such as the Danish Financial Supervisory Authority and the Danish tax authorities (SKAT). We will store personal data as long as it is necessary to fulfil the purposes mentioned and to fulfil any legal requirements. Bookkeeping records will be kept for 5 years + running financial year as required under the Danish Bookkeeping Act. KYC-information will be kept in accordance with relevant laws and regulations on anti-money laundering, e.g. the Danish Money Laundering Act.

4. *Monitoring*

In order to monitor compliance with internal policies or applicable laws, we process two categories of ordinary personal data: a) payment/money transfer data (bank account and credit card number, payment of invoices, transfer of money) and b) personal details and contact information (e.g. name and surname, gender, date of birth, e-mail and telephone details, home address etc.). The data is collected either a) directly from you or b) from other Group-entities or subsidiaries, and processed based on Article 6.1.b (necessary for the performance of the contract between you and APMH Invest IV A/S), Article 6.1.c (necessary for APMH Invest IV A/S to comply with a legal obligation), Article 6.1.f (necessary for the pursuit of legitimate interests of APMH Invest IV A/S, e.g. APMH Invest IV A/S' legitimate interest in monitoring compliance with internal policies and laws) and/or Article 87, cf. Section 11 of The Danish Data Protection Act. We share the data with a) suppliers and vendors that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other Group-entities and c) public authorities. We will store personal data as long as it is necessary to fulfil the purposes mentioned and fulfil any legal requirements. Bookkeeping records will be kept for 5 years + running financial year as required under the Danish Bookkeeping Act. KYC-information will be kept in accordance with relevant laws and regulations on anti-money laundering, e.g. the Danish Money Laundering Act.

5. *Whistleblower scheme*

As part of our whistle-blower scheme, which allows for reporting violations of various laws and regulations, we process the following ordinary personal data: your name, position, boss of

employee, contact information, photos, description of conduct. We also process information about criminal convictions and offences such as violations of laws subject to criminal liability. The data is collected either a) directly from you, b) from other Group-entities or subsidiaries or c) from others reporting through the whistle-blower scheme, and processed based on Article 6.1.f (necessary for the pursuit of legitimate interests of APMH Invest IV A/S, e.g. APMH Invest IV A/S' legitimate interest in ensuring that all activities involving the firm comply with the applicable law) and/or Article 10, cf. section 8 of The Danish Data Protection Act. We share the data with a) suppliers and vendors that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other Group-entities and c) public authorities. We will store personal data as long as it is necessary to fulfil the purposes mentioned. The time period - for which the information is stored - depends on how long the specific case is active and/or pending. Information related to specific cases are deleted as soon as the case has been concluded. In most cases this will be within a fairly short time span, e.g. 1 year. However, it is possible that a specific case may result in the termination of an employee's employment, in which case the reasons for the termination will be deleted after 5 years from the termination of the employment, unless there are special reasons for a longer retention period. This retention period is based on guidelines from the Danish Data Protection Agency.

We will also process your personal data when you apply for a job at APMH Invest IV A/S.

For your information we have outsourced a number of services to our parent company, A.P. Møller Holding A/S, which entails that A.P. Møller Holding A/S performs and manages our activities related to Compliance, cf. clause 3, Monitoring, cf. clause 4 and the Whistle-blower Scheme, cf. clause 5. As such, processing of personal data in respect of these activities are performed by A.P. Møller Holding A/S on our behalf.

Transfers to countries outside the EU/EEA

We will generally not transfer your personal data to countries outside the EU/EEA. We will inform you when such transfer takes place and ensure that such transfers will only take place for the specific purposes mentioned above and we will always ensure that appropriate safeguards are in place, using e.g. "Model Contracts for the Transfer of Personal Data to Third Countries", published by the Commission of the European Union, or any other contractual agreement approved by the competent authorities.

Your rights

In relation to our processing of your personal data, you have the right to:

- Request access to and rectification or erasure of your personal data.
- **Object to the processing of your personal data and have the processing of your personal data restricted.**
- **Object to the processing of your personal data for direct marketing purposes.**
- Withdraw your consent at any time, if our processing of your personal information is based on your consent. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent by sending a request to Susanne.Poulsen@apmoller.com.
- Receive your personal information in a structured, commonly used and machine-readable format (data portability).

You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency (Datatilsynet).

You can take steps to exercise your rights by: by sending an email to email: privacy@apmoller.com

There may be conditions or limitations on these rights. It is therefore not certain, for example, that you have the right of data portability in the specific case. This depends on the specific circumstances of the processing activity.

Last updated: 05.02.2020