

PRIVACY NOTICE

1. Background

Saminvest AB ("**Saminvest**", "**we**" or "**us**") collects and stores information that you provide within the scope of your investment proposal. Thus, we will collect your Personal data as part of considering your investment proposal but also during the period for which we invest in the fund (in case we choose to accept the investment proposal). This privacy notice sets out the categories of Personal data that we process as well as the purposes of the processing.

Throughout this notice, we will use the term "processing", which includes any measure taken involving personal data, including without limitation collection, handling, storage, transfer, sharing, access, use and erasure of Personal data.

"Personal data" means every set of information that directly or indirectly may be attributable to an identified or identifiable natural person.

2. From where do we collect your Personal data

We collect Personal data from (i) you during the investment process, (ii) the fund team submitting the investment proposal, and/or (iii) the references that have been submitted as part of the investment proposal.

3. Purposes of the processing

3.1. *Handle investment proposal*

As part of receiving a proposal for investment and during the subsequent contacts with members of the relevant fund team, we will process your Personal data in order to handle the investment proposal. The Personal data we process for this purpose are:

Categories of Personal data
<u>Fund team members</u> <ul style="list-style-type: none">• Name• Contact details• Qualifications
<u>Fund experts and advisors</u> <ul style="list-style-type: none">• Name• Contact details• Other information of relevance relating to you in the provided material
<u>Potential co-investors</u> <ul style="list-style-type: none">• Name• Contact details• Other information of relevance relating to you in the provided material

The processing is carried out in order for us to be able to manage and review the investment proposal that we have received. The legal ground for the processing is that the processing is necessary in order for us to fulfil our legitimate interest to (potentially) invest in the proposed

fund. In case we choose to not accept the investment proposal we will retain your Personal data for a period of five (5) years after we have made our decision in order to ensure and show that the decision-making process has been carried out properly and in accordance with our normal routines.

3.2. *Make a decision about the investment, including negotiations in connection with such decision*

If the investment proposal is qualified for the next step in the investment process, we will process your Personal data in order to make a decision about the investment and potentially invest in the fund subject to the proposal. This includes handling and reviewing decision support documents such as letter of intent, contracts, risk analyses and other documentation relating to the investment. We may also, as part of the decision-making process, collect information from individuals that you have named as references. The Personal data we process for this purpose are:

Categories of Personal data
<u>Fund team members</u> <ul style="list-style-type: none"> • Name • Contact details • Nationality • Information from the reference check • Other information of relevance relating to you in the provided material
<u>Potential co-investors</u> <ul style="list-style-type: none"> • Name • Contact details • Fund investment (if you are a natural person) • Personal identity number (if you are a natural person)
<u>Reference</u> <ul style="list-style-type: none"> • Name • Contact details

The legal ground for the processing is that the processing is necessary in order for us to fulfil our legitimate interest to review the proposal and (potentially) invest in the proposed fund. Your Personal data will be processed during our investment in the fund to fulfil our legitimate interests to be able to conduct internal audits and investigations in connection with e.g. incidents or other events that may affect our investment. In case we choose to not accept the investment proposal we will retain your Personal data for a period of five (5) years after we have made our decision in order to ensure and show that the decision-making process has been carried out properly and in accordance with our normal routines.

3.3. *Follow up and manage the investment*

In case we choose to invest in the fund subject to the investment proposal, we will process your Personal data as part of our follow up routines and management related to the investment. Such management includes e.g. to administer contracts for call offs from the fund management company (e.g. call off regarding investment costs (such as external advisors and law firms), management fees and investments in portfolio companies) and follow ups on investments (e.g. participating in annual general meetings, analysis of quarterly report and receiving relevant information for the investment (e.g. regarding recruitments or if senior officials/key individuals

quits their employment/position which affects and/or relates to the investment)). The Personal data we process for this purpose are:

Categories of Personal data
<u>Fund team members</u> <ul style="list-style-type: none">• Name• Contact details• Other information relating to you due to follow ups which is of relevance for our business/investment
<u>Other co-investors</u> <ul style="list-style-type: none">• Name• Contact details• Information on ownership and amount (if you are a natural person)• Other information relating to you due to follow ups which is of relevance for our business/investment

The processing is carried out in order to manage and follow up on our investment. We will process your Personal data to fulfil our legitimate interest in managing our invested capital and to fulfil our commitments due to our investment. Your Personal data will for such purposes be processed during the period for which we invest in the relevant fund.

3.4. *Fulfil legal obligations*

Provided that we have chosen to invest in the fund subject to the investment proposal we will process your Personal data to fulfil our legal obligations (*inter alia* taxation and accounting obligations). The Personal data we process for this purpose are:

Categories of Personal data
<ul style="list-style-type: none">• Name• Contact details• Information on ownership and amount (if you are a natural person co-investor)• Other information relating to you included in accounting information or in call off documents and reports

We will process your Personal data to fulfil our legal obligation relating to e.g. book-keeping and accounting. Your Personal data is retained for this purpose for a period of at least seven (7) years from the end of the calendar year in which the relevant fiscal year ended.

3.5. *Establish, exercise and defend legal claims*

Notwithstanding if we have chosen to invest in the relevant fund or not we will process your Personal data to establish, exercise or defend legal claims in the unlikely event a dispute arises between the company you have a connection to and Saminvest. The Personal data we process for this purpose are:

Categories of Personal data
<ul style="list-style-type: none">• Name• Contact details

- Other information as necessary for the purpose

We will process your Personal data to fulfil our legitimate interest in establishing, exercising, and defending legal claims. Your Personal data will for such purposes be processed during the period which is necessary in order for us to defend against and/or exercise our claims due to a potential dispute with the company you have connection to.

4. Transfer of Personal data

4.1. Data processors

We may share your Personal data with Microsoft Corporation which provides us with our e-mail and document management systems and with AdminControl AS which provides us with our board portal. We may also share your Personal data with eFront Financial Solutions that provides us with Saminvest's ERP system and with Oderland Webbhotell AB which is the hosting supplier for Saminvest's webpage. Furthermore, we will share your Personal data with Saminvest's fully owned subsidiary Inlandsinnovation AB that will store Personal data for the purposes of enabling Saminvest to fulfil its accounting obligations. The now mentioned recipients will only process Personal data on our behalf and in accordance with our instructions.

Saminvest has entered into contacts with the above mentioned suppliers to ensure that your Personal data is processed in accordance with applicable legislation and that appropriate safety measures have been taken to ensure the protection for your Personal data that is being transferred to a country outside the EU/EEA (e.g. by ensuring that recipients are EU/US Privacy Shield certified and/or that the standard contractual clauses adopted by the European Commission have been entered into between the relevant parties). According to applicable legislation, you have the right to receive a copy of the safety measures that have been taken in case your Personal data is transferred outside the EU/EEA. If you would like to know more about the safety measures being taken, please see our contact details below in section 6.

4.2. Other data controllers

Recipient	Purpose of the transfer	Legal basis
<i>Öhrlings PricewaterhouseCoopers AB, reg. no. 556029- 6740</i>	Conducting background checks.	Legitimate interest to receive background checks before deciding whether an investment shall be made.
<i>External advisors</i>	Transfer to external advisors such as law firms, accounting firms or similar advisors, in order to enter into an agreement.	Legitimate interest to receive advice from external advisor prior to entering into an agreement.
<i>Courts and legal representatives</i>	To establish, exercise and defend against legal claims.	Legitimate interest that disputes are handled by competent courts.
<i>Authorities</i>	Comply with legal obligations (e.g. taxation and accounting obligations).	To comply with legal obligations.

5. Your rights

(i) *Right to rectification and an electronic copy*

Saminvest will take measures in accordance with applicable legislation to keep your Personal Data correct, complete and up-to-date. You have a right to rectification of incomplete or incorrect Personal Data.

Moreover, you have a right to request an electronic copy of your Personal Data that we process.

(ii) *Right to erasure*

Under certain circumstances, you have a right to request erasure of your Personal Data.

(iii) *Right to restrict processing*

You have, under certain circumstances, a right to restrict the processing of your Personal Data to only include storage of your Personal Data, e.g. during the period we investigate whether you have a right to erasure under paragraph (ii) above.

(iv) *Right of access*

You have a right to receive a confirmation from Saminvest that your Personal Data is processed by us and, if so, have access to the Personal Data and the following information:

- the purpose of the processing;
- the categories of Personal Data concerned;
- the recipients of Personal Data (in particular recipients located outside the EU/EEA);
- the period for which the Personal Data will be processed;
- information on the rights reproduced herein;
- information on the source from which Personal Data has been collected; and
- if there is any automated decision-making, including profiling.

In addition to this you also have a right to obtain a copy of your Personal Data on a commonly used electronic format. Please note that we have a right to charge a fee if you request more than one (1) copy of your Personal Data.

(v) *Right to object*

Where processing is based on a balancing of interest or if the processing includes direct marketing, you are entitled to object to the processing. In such case, Saminvest must demonstrate a compelling legitimate interest in order to continue such processing.

(vi) *Right to data portability*

When the processing of your Personal Data is made since processing is necessary to fulfil or conclude an agreement with you, and provided that the Personal Data has been collected directly from you, you have a right to obtain a copy of your Personal Data on a commonly used machine-readable format.

(vii) *Rights in relation to automated decision-making, including profiling*

You have a right to not be subject to a decision based solely on automated processing, including profiling, if such decision has legal effects or similarly significantly affects you.

(viii) *Complaints to supervisory authority*

You are welcome to contact us with any questions or complaints regarding the processing of your Personal Data. However, you also always have the right to lodge complaints regarding the processing of your Personal Data to the Swedish Data Protection Authority.

6. Contact us

If you have any questions or concerns regarding the processing of your Personal data, please contact us in accordance with the contact details below.

Saminvest AB

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