

Privacy Guidelines for Whistleblowing

Information regarding the manner in which we process your personal data when you use Swedfund's internal whistleblowing channel

1. Introduction

These privacy guidelines ("**Privacy Guidelines**") describe the manner in which Swedfund International AB, company registration no. 556436–2084, with its address at Box 3286, 103 65 Stockholm, processes personal data about you when you use or appear in a communication such as a report within the context of our internal whistleblowing channel. We are responsible as the personal data controller for the personal data processing described in these Privacy Guidelines.

We want you to feel secure about how we process your personal data, and we accordingly ask that you to read through the Privacy Guidelines which will be updated by us from time to time. Information about when we last updated the Privacy Guidelines may be found at the top of the page.

All references in these Privacy Guidelines to "**Swedfund**", "**we**", "**us**" and "**our**" constitute a reference to Swedfund International AB. If you wish to know more about our processing of your personal data, you are always welcome to contact us at the address above or by means of the contact information provided at the end of these Privacy Guidelines.

We process personal data which you provide to us or which has been received from someone else in our internal whistleblowing channel.

These Privacy Guidelines contain, among other things, information regarding the purposes for which we process personal data, with whom we share your information, and the rights you have in relation to your personal data.

2. How we process your personal data

We process only your personal data if the processing is permissible in accordance with applicable data protection legislation. This entails, among other things, that the processing must have a so-called *legal basis*. A legal basis may consist, for example, of the following:

Fulfilment of legal obligations and exercise of rights – the processing is necessary in order to fulfil legal obligations, e.g. to the extent we are covered by obligations pursuant to labour and employment law, according to law, other statute or collective bargaining agreements or where we have been subjected to an obligation in accordance with a decision by a court of law or government authority which requires that we process information about you. The processing of your personal data may also take place where, in a comparable way, it is necessary in order to exercise rights pursuant to labour and employment law related to your employment.

Performance of a contract – the processing is necessary in order to perform a contract in which you are a contracting party (e.g., if you are employed by us).



Legitimate interest assessment – the processing is necessary for purposes concerning the legitimate interests of Swedfund or a third party provided, however, that your interests or fundamental rights or freedoms are not overriding (in such case, processing may not take place).

In the table below, we provide greater detail regarding the categories of personal data processed by us, the purposes for which we process such data, and more detail regarding the legal basis on which our processing of your personal data is established, including the length of time the data regarding you is saved by us and with whom we share your personal data.

Purpose	Processing carried out	Categories of personal data
<p>To administer information in reports and follow up on irregularities necessary for a follow-up matter.</p>	<ul style="list-style-type: none"> • Receiving whistleblowing reports; • Administration and communication with the person(s) who are the subject of the reports; • Handling, follow-up and documentation of the content of the reports and issues raised, including examination of the accuracy of the allegations presented. 	<ul style="list-style-type: none"> • Contact information such as name, telephone number and e-mail address; • Report history and report number; • Employment information (such as title, employment identification designation and responsibilities); • Pictures and sound recordings; • Personal data related to convictions in criminal cases, suspicions of and/or actual offences and other irregularities in our operations.
<p>Legal basis: The performance of legal obligations on our part as employer in administering reporting and follow-up within the framework of our internal reporting channels in accordance with the Swedish Protection of Persons Reporting Irregularities Act (Swedish Code of Statutes 2021:890).</p>		
<p>Storage period: We process your personal data during the storage period necessary according to law or otherwise for the period of time necessary for the establishment, exercise or defence of legal claims. We normally do not store your personal data for more than two years following conclusion of the follow-up matter (unless otherwise required for the establishment, exercise or defence of legal claims, in which case your data is normally not stored in excess of 10 years following the date the data was registered).</p>		



Sharing of personal data: We will share your personal data, where appropriate, with the police and/or other government authorities, employee organisations, specially appointed external recipients of reports (currently, Setterwalls Advokatbyrå AB), other external advisors and our systems provider of the whistleblower service (currently, WhistleB Whistleblowing Centre AB).

3. Security measures

We employ security measures to ensure that our handling of your personal data is carried out in a secure manner. For example, the systems in which the personal data is stored are accessible only by our employees and service providers who require the information in order to perform their duties and who are authorised to handle it. They have also been informed of the importance of security and confidentiality in relation to the personal data we process. We take suitable security measures and implement security norms in order to protect your personal data against unauthorised access, unauthorised disclosure and misuse. We also monitor our systems in order to detect vulnerabilities.

4. With whom do we share your personal data?

Access to your personal data is limited to persons who require such access for the purposes described in section 2 above. Your personal data will accordingly be shared with the following recipients:

- a) Government authorities: We will provide your personal data to government authorities (such as the Swedish Tax Agency or the Swedish Police) where necessary according to law, statute or decision by a court of law or government authority for the purpose of fulfilling legal obligations set forth therein.
- b) Our providers of the whistleblowing application: WhistleB Whistleblowing Centre AB (with its address at World Trade Center, Klarabergsviadukten 70, SE-107 24 Stockholm). Whistle B Whistleblowing Centre AB is responsible for the whistleblowing application, including processing of encrypted data such as, for example, whistleblower messages. We have entered into a personal data processing agreement with them and taken other suitable measures in order to ensure that your personal data is processed in a manner which is in compliance with this Privacy Guidelines. For example, neither WhistleB Whistleblowing Centre AB nor any of their sub-contractors can decrypt or read the communications (which entails that neither WhistleB Whistleblowing Centre AB nor any of their sub-processors have access to readable content).
- c) External advisors and other companies with whom we cooperate: We will disclose your personal data to external advisors and other similar companies with whom we cooperate for the purpose of performing legal obligations or in order to be able to establish, assert or defend legal claims. Setterwalls Advokatbyrå AB has in this regard been appointed as an external party to



receive reports and take contact with reporting persons in Swedfund's internal whistleblowing channel.

- d) Collective bargaining agreement parties: We will also disclose your personal data to relevant collective bargaining agreement parties in order to fulfil our legal obligations.
- e) Sale or transfer: We will transfer your personal data to a buyer/investor or potential buyer/investor in conjunction with a sale or other transfer of all or some of our shares, assets or our business. In conjunction with such transfer, we will take steps to ensure that the recipient party processes your data in a manner which complies with these Privacy Guidelines. The purpose of such processing is to allow a (potential) buyer/investor to carry out a review of our business and, where applicable, take steps and prepare for a subsequent purchase or investment in which the transfer takes place by reference to the legitimate interest of such a possibility to review, take steps and prepare.

5. Will we transmit your personal data outside the EU/EEA?

It is our goal to process your personal data within the European Union ("EU")/European Economic Area ("EEA") at all times. However, in light of the fact that we operate internationally, it may be necessary that personal data is transmitted to companies outside the EU/EEA. In the event the whistleblowing relates to activities occurring outside the EU/EEA, personal data may, for example, be transmitted to such third country. In these cases, we have an obligation to see to it that the transmission takes place in accordance with applicable data protection legislation before the data is transmitted, e.g. by ensuring that the country to which the data is transmitted meets the requirements of adequate levels of protection in accordance with decisions taken by the EU Commission or by ensuring that the transmission is covered by suitable protective measures in the form of, for example, standard contract clauses decided by the EU Commission which ensure that suitable measures are taken in order to protect your rights and freedoms.

Through the following link, you will find information regarding the countries outside the EU/EEA which the EU Commission has deemed to rise to an adequate level of protection for permissible transmission of personal data:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_sv

Through the following link, you will find the standard contract clauses which the EU Commission has decided can ensure that suitable protective measures are taken by the parties who receive personal data following transmission from the EU/EEA:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_sv

You may contact us at any time in the event you wish to know more about whether we transmit your personal data to a country outside the EU/EEA, the countries to which we transmit your personal data, and the security measures which have been taken in respect



of the transmission. Contact with us is most easily made by sending a written request to the contact information found at the end of these Privacy Guidelines.

6. What rights do you have?

Set forth below is a summary of the rights you have in relation to us in accordance with applicable data protection legislation. It costs you nothing to exercise these rights and you may exercise them by contacting us (see the contact information found at the end of these Privacy Guidelines). Do not hesitate to contact us if you have any questions regarding your rights.

We ask that you note that your rights apply to the extent provided by applicable data protection legislation and, where applicable, there may be exceptions to your rights. We also request that you keep in mind that we may need additional information from you for the purpose of, among other things, confirming your identity before we move forward with your request to exercise your rights.

In addition to the rights set forth below, you are always entitled to submit a complaint to the Swedish Authority for Privacy Protection which is the government authority in Sweden responsible for monitoring the application of applicable data protection legislation. If you are of the opinion that we process your personal data incorrectly, we encourage you to first contact us so that we have the possibility to examine your position. However, you can always submit your complaints to the Swedish Authority for Privacy Protection.

- (a) **Right of access.** You are entitled to obtain a confirmation as to whether we process your personal data. If such is the case, you are also entitled to have access to such personal data by means of a so-called register extract and additional information regarding our processing of your personal data as well as the purposes for which the processing takes place, relevant categories of personal data and to whom the personal data has been disclosed.
- (b) **Right to rectification.** You are entitled, without undue delay, to obtain rectification and/or supplementation of inaccurate and/or incomplete personal data.
- (c) **Right to erasure.** You also have a right to request that we erase your personal data without delay in the following situations.
 - the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
 - our personal data processing takes place on the basis of your consent, and you withdraw your consent to the processing in question and there is no other legal basis for the processing;
 - you object to the processing of your personal data carried out by us pursuant to a legitimate interest assessment and your objection overrides our or a third-party's legitimate interest in the processing;
 - the personal data has been processed unlawfully; or
 - the personal data must be erased for compliance with a legal obligation.



(d) **Right to restriction of processing.** You have a right to request restriction of the processing of your personal data in the following situations:

- you contest the accuracy of the personal data for a period enabling us to verify whether the data is correct or not;
- the processing is unlawful or is no longer needed for the purposes of the processing, but you oppose erasure of personal data and instead request restriction of the processing;
- we no longer need to process the personal data for the purposes for which it was acquired but need it for the establishment, exercise or defence of legal claims; or
- you have objected to the processing of your personal data carried out by us pursuant to a legitimate interest assessment and such objection is subject to investigation of whether it overrides our legitimate interest in continuing with the processing.

(e) **Right to data portability.** You have a right to receive the personal data concerning you which you have provided to us in electronic format where the processing of the personal data is based on your consent or the performance of a contract. You have a right to have the personal data transmitted from us directly to another personal data controller where technically feasible. We ask you to keep in mind that this right to so-called *data portability* does not cover such information as is manually processed by us.

(f) **Right to object.** You have a right at any time to object to such processing of your personal data as is based on our or a third party's legitimate interests. If you object, we must, in order to continue the processing, be able to demonstrate compelling legitimate grounds for such processing which override your interests or that we require the personal data for the establishment, exercise or defence of legal claims.

(g) **Right to withdraw your consent.** Where our processing of your personal data is based on your consent, you have the right at any time to withdraw your consent. A withdrawal of your consent does not affect the lawfulness of the processing based on consent before it was withdrawn.

How can you contact us?

You can contact us in the following ways:

E-mail: gdpr@swedfund.se

Or by post:

Swedfund International AB

P.O. Box 3286

SE-103 65 Stockholm, SWE

