

**SWEDPARTNERSHIP'S PRIVACY POLICY FOR PERSONS WHOSE PERSONAL DATA  
WE PROCESS WITHIN OUR INVESTMENT PROCESS, SUCH AS DIRECTORS,  
MANAGEMENT AND EMPLOYEES OF ANY OF SWEDPARTNERSHIP'S  
PROJECT COMPANIES.**

## SUMMARY

### General

Swedpartnership (“**Swedpartnership**”) is a part of Swedfund International AB (“**Swedfund**”). Swedpartnership contributes with grants to Swedish small and medium sized companies that transfer knowledge and equipment to companies in the emerging markets.

Your privacy is very important for us at Swedpartnership. We respect your right to privacy when we process your personal data. In our capacity as a data controller we, therefore, ensure that applicable law regarding data privacy is complied with when we process your personal data.

### Material scope

This Privacy Policy applies to Swedpartnership’s processing of personal data in relation to you, being a member of the board, management or an employee of any of Swedpartnership’s project companies, whose personal information we obtain within our investment process.

### Collected personal data

The information we collect about you is mainly personal data of a professional nature received directly from you, your employer, or via consultants Swedpartnership has engaged. Sometimes we also collect information from other sources, such as public records or business partners.

Personal data is all information which directly or indirectly can be referred to you as a natural person. Information regarding you which we may process is for example contact details, job title/position(s), and your professional history. In some cases we may also perform an integrity check in which case we also collect personal data regarding your general reputation etc. In such case you will be separately informed.

The processing of personal data includes all sorts of actions. Each action conducted with respect to the personal data constitute processing, regardless of whether it is automatic or not. Examples of common ways of processing is to collect, register, organise, structure, store, adapt, transfer and delete personal data.

We use cookies. Swedpartnership only collect data through cookies in order to be able to analyse the usage statistic on our website. We do not store any personal data via cookies and no data can be directly connected to you. You can read more about how we use cookies in our [policy](#) regarding the use of cookies.

## **Our use and sharing of your personal data**

At Swedpartnership, we use your personal data to be able to conduct our business in the best and most appropriate way. We use your personal data for purposes such as:

- assessing the viability of potential investments (including performing due diligences of various sort);
- maintaining contact and business relations with you and your employer for ongoing communication;
- collecting annual sustainability, governance, tax, and impact information from our project companies;
- conducting exit evaluations; and
- administration and fulfilment of obligations as well as to safeguard our legal rights.

We do not use your personal data for any other incompatible purpose and we only keep your personal data for as long as necessary.

In some cases we may share your personal data with our IT services provider and other companies with which we cooperate to conduct our business. We will not sell your personal data to any third party.

## **Your rights**

You have the right to receive information regarding which personal data we process about you and what we do with that data. You also have the right to a certain degree of control over your personal data. Therefore, in certain cases you have the right to receive the personal data that we have collected about you (data portability), to have inaccurate data rectified or erased and request restriction of our processing. Furthermore, under certain conditions you have the right to object to the processing of your personal data. If you consider that we process your personal data in an unlawful manner, you are always entitled to lodge a complaint with the supervisory authority. If you want to read more about your rights, please read the full version of our Privacy Policy.

**Contact details**

If you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights, you can contact us in any of the following ways:

Postal address: Swedfund International AB, P.O. Box 3286, 103 65 Stockholm, Sweden

Visiting address: Drottninggatan 92-94, Stockholm, Sweden

Email: [GDPR@swedfund.se](mailto:GDPR@swedfund.se)

Telephone: +46 8 725 94 00

Webpage: [www.swedfund.se](http://www.swedfund.se)

<p style="text-align: center;"><b>AN OVERVIEW</b></p>	<p style="text-align: center;"><b>PRIVACY POLICY</b></p>
<p><b>1. GENERAL</b></p> <p>We respect and care about your privacy. By way of this Privacy Policy, we want to inform you about how we ensure that your personal data is processed in accordance with applicable law.</p> <p>This Privacy Policy applies to you being a member of the board, management or an employee of any of Swedpartnership’s project companies, investment partners or counterparties, whose personal information we obtain within our investment process.</p>	<p><b>1. GENERAL</b></p> <p>1.1.1 Swedpartnership respects and cares about your privacy. We want you to feel safe when we process your personal data. By way of this privacy policy (“<b>Privacy Policy</b>”), we want to inform you about how we ensure that your personal data is processed in the right way and in accordance with applicable law.</p> <p>1.1.2 To be able to conduct our business in the best and most appropriate way we must process and store personal data about you to a certain extent. This Privacy Policy applies to you being a member of the board, management or an employee of any of Swedpartnership’s project companies, investment partners or counterparties, whose personal information we obtain within our investment process.</p>
<p><b>2. DATA CONTROLLER</b></p> <p>Swedpartnership is the data controller for the processing of your personal data.</p>	<p><b>2. DATA CONTROLLER</b></p> <p>2.1.1 Swedpartnership is the data controller for the processing of your personal data and is responsible for ensuring that the processing is in compliance with applicable law. You will find our contact details at the last page of this Privacy Policy.</p>

**3. OUR PROCESSING OF YOUR PERSONAL DATA**

At Swedpartnership, we process your personal data to conduct our business in the best and most appropriate way.

**3. OUR PROCESSING OF YOUR PERSONAL DATA**

3.1.1 At Swedpartnership, we process your personal data to conduct our business in the best and most appropriate way. We use your personal data for:

- assessing the viability of potential investments;
- maintaining contact and business relations with you and your employer for ongoing communication;
- collecting annual sustainability, governance, tax, and impact information from our project companies;
- conducting exit evaluations; and
- administration and fulfilment of obligations as well as to safeguard our legal rights.

3.1.2 In the tables below, you are provided with more information about e.g. why we process your personal data, which personal data we keep to achieve the purposes of the processing and for how long we keep your personal data.

Maintain contact and/or business relations with you and your employer for ongoing communication and collecting annual sustainability, governance, tax, and impact information from our project companies.

**Purpose:** Maintain contact and/or business relations with you and your employer for ongoing communication and collecting annual sustainability, governance, tax, and impact information from our project companies.

**Personal data:**

Contact information such as name, address, telephone number, and email address.

Other information such as job title/positions and professional accomplishments

**What we do:**

We process your personal data to be able to maintain contact and business relations with you and your employer. We also process your personal data to be able to collect certain information (such as sustainability, governance, tax, and impact information) from our project companies in order to be able to, inter alia, monitor our legal requirements and to report on the development effects of our investments.

**Legal basis:**

Legitimate interest; as we assess that our interest of being able to maintain contact and business relations with you as well as to be able to monitor our legal requirements and report on development effects overrides your interest of protection of your privacy.

**Retention period:**

Personal data forming part of a document being a public document (Sw. allmän handling) will, in accordance with Swedish law, be archived and preserved without limitation in time as a part of the national heritage, in order to satisfy;

(i) the common right to take part of public documents;

(ii) the need of information for the administration of justice and the public administration; and

(iii) scientific purposes.

Personal data not forming part of a document considered a public document (Sw. allmän handling) may be kept until the relevant project is closed (normally within 36 months) and up to 1 year thereafter.

**Your rights:** You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis. Please see section 8 below if you want to read more about your rights.

We market our business.

**Purpose:** Marketing

**Personal data:**

Contact information such as name, telephone number and email address.

Other information such as job title/positions.

Demographic data such as jurisdiction and business category.

**What we do:**

We process your personal data within the scope of our marketing and market segmentation. With market segmentation, we mean that we categorize our customer base based on business category and jurisdiction.

**Legal basis:**

Legitimate interest: as we assess that our interest of marketing overrides your interest of protection of your privacy

**Retention period:**

We may keep your personal data in order to send you marketing within 12 months from the later of the point in time when we received your contact details and when we were last in contact. This is preconditioned upon you not having opposed direct marketing.

Consent.

**Your rights:** You always have right to request that we stop using your personal data for direct marketing purposes. You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis. When we need your consent in order to process your personal data, you also always have the right to withdraw such consent at any time. If you withdraw your consent, you will no longer receive information and offers that are tailored for you. Please see section 8 if you want to read more about your rights.



Assessing the viability of potential investments, administration and fulfilment of obligations and safeguarding our legal rights, and conducting exit evaluations.

**Purpose:** Assessing the viability of potential investments, administration and fulfilment of obligations and safeguarding our legal rights, and conducting exit evaluations.

**Personal data:**

Contact information such as name, telephone number, address and email address.

Professional information such as job title/positions, professional history and CV.

Demographic data such as jurisdiction and business category.

Personal information such as date of birth and nationality

**What we do:**

We process your personal data within our investment organisation in different stages of the investment process such as when assessing the viability of potential investments and exits, as part of our administration of our investments, to be able to fulfil our obligations and to safeguard our legal rights as well as to monitor our legal requirements and to report on the development effects of our investments.

**Legal basis:**

Legitimate interest; as we assess that our interest of assessing potential investments and exits as well as to monitor our legal requirements and to report on the development effects of our investments overrides your interest of protection of your privacy.

**Retention period:**

Personal data forming part of a document being a public document (Sw. allmän handling) will, in accordance with Swedish law, be archived and preserved without limitation in time as a part of the national heritage, in order to satisfy;

(i) the common right to take part of public documents;

(ii) the need of information for the administration of justice and the public administration; and

(iii) scientific purposes.

Personal data not forming part of a document considered a public document (Sw. allmän handling) may be kept until the relevant project is closed (normally within 36 months) and up to 1 year thereafter.

**Your rights:** You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis. Please see section 8 below if you want to read more about your rights.

Prior to making an investment we may perform integrity checks on owners, board members and/or key or executive persons within our potential project companies.

**Purpose:** To enable a well-informed decision regarding which investments to make.

**Personal data:**

Contact information such as name, telephone number, address and email address.

Professional information such as job title/positions, professional history and CV.

Personal information such as date of birth, nationality, behaviour, reputation and personal history (including allegations of bad conduct or criminal activity)

**What we do:**

We use your personal data in order to determine whether we, based on such information, can proceed with an investment or not.

**Legal basis:**

Legitimate interest; as we assess that our interest of being able to take a well-informed decision regarding which investments to make overrides your interest of protection of your privacy.

**Retention period:**

In case the report includes any allegations of criminal activity the report will only be reviewed and thereafter deleted alternatively the part(s) specifying the criminal activity will be anonymised.

In case the report includes any sensitive information such as bad reputation or behaviour we will keep the report until we have made a final investment decision and up to 1 month thereafter (for administrative purposes).

In case the report is “clean” or only reports on minor irregularities the report will be saved during the lifetime of the investment and up to 1 year thereafter.

**Your rights:** You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate ground for the processing that override your interest, rights and freedoms. Please see section 8 if you want to read more about your rights.

Via our whistleblowing system or via other channels we may receive reports on irregularities regarding persons within Swedpartnership and Swedpartnership's project companies. You can read more about our whistleblowing system [here](#).

**Purpose:** To become aware of irregularities being conducted within Swedpartnership or in any of our project companies.

**Personal data:**

Contact information such as name, telephone number, address and email address.

Professional information such as job title/positions, professional history and CV.

Personal information such as date of birth, nationality, behaviour, reputation and personal history (including allegations of bad conduct or (with respect to persons in key or executive positions within Swedpartnership or one of Swedpartnership's project companies) criminal activities)

**What we do:**

We use your personal data in order to investigate a reported irregularity within Swedpartnership or in one of Swedpartnership's project companies.

**Legal basis:**

Legitimate interest; as we assess that our interest of investigating a reported irregularity overrides your interest of protection of your privacy.

**Retention period:**

Personal Data may be kept during the process of investigating and acting upon the reported irregularity.

**Your rights:** You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate ground for the processing that override your interest, rights and freedoms. Please see section 8 if you want to read more about your rights.

You can read more about our whistleblowing system [here](#).

We collect Know Your Client documentation prior to making an investment.

**Purpose:** To verify the existence of companies in which we are contemplating investing and to identify board members, signatories and owners of our potential project companies.

**Personal data:**

Contact information such as name, telephone number, address and email address.

Professional information such as job title/positions.

Personal information such as all information included in a passport (including picture).

**What we do:**

We collect personal data specified above for board members, signatories and owners of our potential project companies for verification and identification purposes.

**Legal basis:**

Legitimate interest; as we assess that our interest of being able to verify the existence of companies in which we are investing and to identify board members, signatories and owners of our project companies overrides your interest of protection of your privacy.

**Retention period:**

Personal data forming part of a document being a public document (Sw. allmän handling) will, in accordance with Swedish law, be archived and preserved without limitation in time as a part of the national heritage, in order to satisfy;

- (i) the common right to take part of public documents;
- (ii) the need of information for the administration of justice and the public administration; and
- (iii) scientific purposes.

Personal data not forming part of a document considered a public document (Sw. allmän handling) may be kept until the relevant project is closed (normally within 36 months) and up to 1 year thereafter.

Personal data which we have received when assessing a potential investment which we have decided not to pursue will only be stored up to 1 year after such decision.

**Your rights:** You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis. If you object to such processing, we will continue with the processing only if there is a compelling legitimate ground for the processing that override your interest, rights and freedoms. Please see section 8 if you want to read more about your rights.

<p><b>4. WHERE WE COLLECT YOUR PERSONAL DATA FROM</b></p> <p>The personal data we process about you is the information you have provided us with or that we have obtained from different sources such as from your employer or consultants Swedpartnership has engaged for due diligence.</p>	<p><b>4. WHERE WE COLLECT YOUR PERSONAL DATA FROM</b></p> <p>4.1.1 The personal data we process about you is the information you have provided us with or that we have obtained from different sources such as from your employer or consultants Swedpartnership has engaged for due diligence.</p> <p>4.1.2 We may also collect personal data regarding you from your employer, public domain or consultants engaged by Swedpartnership for due diligence (e.g. Control Risks Group Limited, Risk Advisory Group PLC, Thomson Reuters and S&amp;P).</p>
<p><b>5. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?</b></p> <p>We only keep your personal data for as long as it is necessary for the purposes described, and thereafter we remove the data from our systems.</p> <p>In certain cases, we may have to keep your personal data for a longer period of time.</p>	<p><b>5. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?</b></p> <p>5.1.1 We only keep your personal data for as long as it is necessary to achieve the purposes for which they were collected in accordance with this Privacy Policy. When we no longer need your personal data, we remove the data from our systems, databases and backups. In the tables above under section 3, you will find more information about how long we keep your personal data for different purposes.</p> <p>5.1.2 We may be required to keep your personal data for other reasons, such as to comply with legal obligations or to safeguard our legal interest, or for any other important public interest.</p>

<p><b>6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?</b></p> <p>We may share your personal data with, among others, our IT services provider and with other companies which we cooperate with to conduct our business.</p> <p>We will not sell your personal data to any third party.</p>	<p><b>6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA WITH?</b></p> <p>6.1.1 Swedpartnership may share your personal data with third parties such as our IT services provider and companies with which we cooperate to conduct our business. We will therefore share your personal data with among others Idenet AB, Control Risks Group Limited, Risk Advisory Group PLC and Worldfavor AB. In certain cases, we may also be required to share your personal data with public authorities or other third parties in connection with audits, court proceedings or similar reasons.</p> <p>6.1.2 We will not sell your personal data to any third party.</p>
<p><b>7. WHERE DO WE PROCESS YOUR PERSONAL DATA?</b></p> <p>Swedpartnership processes your personal data primarily within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA. If personal data is transferred to any such country, we will ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.</p>	<p><b>7. WHERE DO WE PROCESS YOUR PERSONAL DATA?</b></p> <p>7.1.1 Swedpartnership processes your personal data primarily within the EU/EEA. In some cases, we may transfer your personal data to a country outside of the EU/EEA. If personal data is transferred to any such country, we will ensure that your personal data is protected and that the transfer is carried out in accordance with applicable law.</p> <p>7.2 When carrying out any transfer to a country that lacks an adequacy decision by the European Commission, we will use the standard contractual clauses issued by the European Commission as legal basis for the transfer. You find these here: <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en</a></p>

## 8. YOUR RIGHTS

You may at any time contact us to exercise your rights.

You have the right to request access, rectification and erasure of your personal data. You also have the right to request that we restrict the processing of your personal data.

## 8. YOUR RIGHTS

### Our responsibility for your rights

8.1.1 In our capacity as data controller, Swedpartnership is responsible for ensuring that you can exercise your rights and that your personal data is processed in accordance with applicable law. You may at any time contact us to exercise your rights. You will find our contact details at the last page of this Privacy Policy.

8.1.2 Swedpartnership is responsible for responding to your request to exercise your rights within one month from our receipt of your request. We are entitled to extend this period by two months when necessary, taking into account the complexity of your request or if we have received a large number of requests. We will inform you of any such extension within one month of receipt of your request, together with the reasons for the delay and information about your right to lodge a complaint with a supervisory authority.

8.1.3 All information and communication, and all actions we carry out, is at no cost to you. If the action you request is manifestly unfounded or excessive, we are entitled to charge you an administrative fee to provide you with the requested information or carry out the requested action, or refuse to meet your request.

### Your right to access, rectification, erasure and restriction of processing

8.1.4 You have the right to request:

- a) Access to your personal data. This means that you have the right to request information on our use of your personal data. You also have the right to request a copy of the personal data being processed by us, at no cost. However, we may charge you a reasonable administrative fee to provide you with additional copies of such information. If you make your access request by electronic means such as email, we will provide you with the information in a commonly used electronic format.

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|  | <p>b) <u>Rectification of your personal data.</u> We will at your request, or at our own initiative, rectify, anonymise, erase or complement personal data that you or we discover is inaccurate, incomplete or misleading. You also have the right to complete the personal data with additional data if relevant information is missing.</p> <p>c) <u>Erasure of your personal data.</u> You have the right to request that we erase your personal data if we do no longer have an acceptable reason for processing the data. Given this, erasure shall be made by us if:</p> <ul style="list-style-type: none"><li>(i) the personal data is no longer necessary for the purposes for which it was collected,</li><li>(ii) we use your personal data with your consent and you withdraw your consent,</li><li>(iii) you object to the processing of your personal data based on our legitimate interest and there is no overriding legitimate ground for the processing,</li><li>(iv) the personal data has not been lawfully processed, or</li><li>(v) we are required to erase the personal data due to a legal obligation.</li></ul> <p>However, there might be requirements under applicable law, or other compelling reasons, that prevents us from immediately erasing your personal data. In such case, we will stop using your personal data for any other reasons than to comply with the applicable law, or the relevant compelling reason.</p> <p>d) <u>Right to restrict processing:</u> This means that we temporarily restrict the processing of your personal data. You have the right to request restriction of the processing when:</p> |
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You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis.

- (i) you have requested rectification of your personal data in accordance with section 8.2.1 b) above, during the period of time we are verifying the accuracy of the data,
- (ii) the processing is unlawful and you do not want the personal data to be erased,
- (iii) Swedpartnership, in its capacity as data controller, does no longer need the personal data for the purposes for which it was collected, but you require us to retain the information for the establishment, exercise or defence of a legal claim, or
- (iv) you have objected to our legitimate interest for the processing in accordance with section 8.1.6 below, during the time we determine whether our legitimate interest overrides your privacy rights.

8.1.5 At Swedpartnership, we will take all reasonable and possible actions to notify any recipients of your personal data as set out in section 6 above regarding any rectification, erasure or restrictions carried out by us. At your request, we will also inform you of which third parties we have shared your personal data with.

#### **Your right to object to the processing**

8.1.6 You have the right to object to the processing of your personal data when such processing is made with a legitimate interest as the legal basis (please see section 3 above). If you object to such processing, we will only continue with the processing if we have a compelling legitimate reason for the processing that outweighs your interests, rights or freedoms, or if continued processing is necessary for the establishment, exercise or defence of a legal claim.

When we need your consent in order to process your personal data, you always have the right to withdraw such consent at any time by contacting us.

Your right to lodge a complaint with the supervisory authority

**Your right to withdraw your consent.**

8.1.7 When we need your consent in order to process your personal data (see section 3 above), you always have the right to withdraw such consent at any time by contacting us. You will find our contact details at the end of this Privacy Policy.

**Your right to lodge a complaint with the supervisory authority**

8.1.8 You have the right to lodge a complaint regarding our processing of your personal data with the supervisory authority.

<p><b>9. WE PROTECT YOUR PERSONAL DATA</b></p> <p>We protect your personal data against unauthorised access, alteration and erasure.</p>	<p><b>9. WE PROTECT YOUR PERSONAL DATA</b></p> <p>You shall always feel safe when providing us with your personal data. Therefore, Swedpartnership has implemented appropriate security measures to protect your personal data against unauthorised access, alteration and erasure. In the case of a security breach that may significantly affect you or your personal data, e.g. when there is a risk of fraud or identity theft, we will contact you and inform you of what you can do to reduce this risk.</p>
<p><b>10. COOKIES</b></p> <p>Swedpartnership use cookies. Swedpartnership only collects data through cookies in order to be able to analyse the usage statistic on our website. We do not store any personal information that we receive via cookies.</p>	<p><b>10. COOKIES</b></p> <p>Swedpartnership use cookies. Swedpartnership only collects data through cookies in order to be able to analyse the usage statistic on our website. We do not store any personal information that we receive via cookies. In our cookies policy, we provide you with more detailed information on how we use cookies and which choices you may make regarding our cookies. Here you will find the <a href="#">policy</a>.</p>
<p><b>11. AMENDMENTS TO THIS PRIVACY POLICY</b></p> <p>Swedpartnership has the right to amend this Privacy Policy the most updated version will always be available on our website (<a href="http://www.swedfund.se">www.swedfund.se</a>).</p>	<p><b>11. AMENDMENTS TO THIS PRIVACY POLICY</b></p> <p>Swedpartnership has the right to amend this Privacy Policy at any time. The most updated version will always be available on our website (<a href="http://www.swedfund.se">www.swedfund.se</a>)</p>

**12. CONTACT INFORMATION**

Do not hesitate to contact us at Swedpartnership if you have any questions.

**12. CONTACT INFORMATION**

Do not hesitate to contact us at Swedpartnership if you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights.

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