

Privacy Policy

PRIVACY POLICY

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1 BACKGROUND AND PURPOSE

CataCap Management A/S (“**CCM**”) is an alternative investment fund manager based in Copenhagen. CCM manages private equity funds which invest (directly or indirectly) in equity or securities giving access to equity in small and medium-sized companies located in Denmark and adjacent markets.

This privacy policy (the “**Policy**”) applies to CCM and has been enacted with the purpose of establishing the framework for CCM’s compliance with the rules on the processing of personal data and rules relating to the free movement of personal data as set out in the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”).

This Policy sets out the principles by which CCM as a Data Controller must act in accordance with when processing personal data. Personal data shall for the purpose of this Policy mean any information relating to an identified or identifiable natural person (Data Subject). CCM is responsible in terms of the handling and processing of personal data in accordance with the legislation at all times.

Contact details

If you wish to contact CCM regarding CCM’s processing of your personal data, you can do so at:

CataCap Management
CVR: 33589913
Øster Allé 48, 8.
DK-2100 Copenhagen Ø
info@catacap.dk or +45 71 99 19 00

2 DEFINITIONS

Unless the context requires otherwise, the following definitions shall have the meanings ascribed thereto:

“Board of Directors”	means the board of directors of CCM as registered with the Danish Business Authority from time-to-time;
“Board of Management”	means the board of management of CCM as registered with the Danish Business Authority from time-to-time;
“CCM”	means CataCap Management A/S, CVR no. 33589913;
“Compliance Officer”	means the compliance officer appointed by the Board of Directors pursuant to the compliance policy adapted by CCM from time to time;
“Data Controller”	means the legal person (here: CCM), which determines the purposes and means of the processing of personal data;
“DDPA”	means the Danish Data Protection Agency (in Danish: Datatilsy-

net);

“Data Processor”	means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
“Data Subject”	means an identified or identifiable natural person;
“GDPR”	means the General Data Protection Regulation; and
“Sub-data Processor”	means an organisation which the Data Processor uses to assist in its processing of personal data for a controller.

3 PROCESSING OF PERSONAL DATA

Personal data is any type of information that to some extent or another can be attributed to you. If you do not want CCM to process this data, it may be problematic to maintain and comply with any established agreements and legal obligations.

3.1 Categories of personal data

In general, all the personal data is processed lawfully in accordance with the GDPR article 6. However, if CCM processes special categories of personal data as set forth in the GDPR article 9(1), such processing activities will be based on (i) explicit consent given by the Data Subject, or (ii) in case processing is necessary for the purposes of carrying out obligations or exercise specific rights in the field of employment, social security and social protection law in accordance with article 9(2) in the GDPR.

3.2 Employees of potential portfolio companies

When CCM considers employees of potential portfolio companies, it is necessary for CCM to collect the following personal data about such persons:

- Name, CV data, any personal profile and copy of passport and health insurance

CCM collects personal data about potential customers for the following purposes:

- Possible future cooperation
- Administration of the relationship with us

CCM collects this information on the following legal basis:

- Balancing of interests
- Legal obligation in relation to anti-money laundering legislation

CCM retains the data for the statutory period, and CCM erases the data when it is no longer required. The period depends on the nature of the data and the reason that it is retained. Information concerning employees of potential portfolio companies will typically be erased if the cooperation is not relevant or when the cooperation ends.

3.3 Stakeholders

If you are one of CCM's stakeholders, it is necessary that CCM collects the following personal data about you:

- Name, company, email and title

CCM collects personal data about stakeholders for the following purposes:

- Administration of your relationship with us

CCM collects this data on the following legal basis:

- Balancing of interests, since it is in the interest of the Data Subject to receive information about CCM's company

CCM retains the data for the statutory period, and CCM erases the data when it is no longer required. The period depends on the nature of the data and the reason that it is retained. Information concerning stakeholders will typically be erased after you have not interacted with CCM for one year, or if you choose not to receive the information in the future.

3.4 Investors

To become a customer/investor in a fund managed and/or advised by us, it is necessary that CCM collects the following personal data about you:

- Name, signature, KYC information and copy of passport and health insurance, if applicable.

CCM collects personal data about investors for the following purposes:

- Administration of our relationship
- Compliance with relevant anti-money laundering legislation

CCM collects this data on the following legal basis:

- Fulfilment of our agreement
- Legal obligation in relation to anti-money laundering legislation

CCM retains the data for the statutory period, and CCM erases the data when it is no longer required. The period depends on the nature of the data and the reason that it is retained. Information concerning investors will typically be erased no later than five years after the end of our relationship.

3.5 Suppliers and partners

To be CCM's supplier and business partner, it is necessary that CCM collects the following personal data about you:

- Name, telephone number, email address, title and any details of experience

CCM collects personal data about suppliers and business partners for the following purposes:

- Processing of our commercial interaction
- Administration of your relationship with us

CCM collects this data on the following legal basis:

- Processing is based on the fulfilment of our agreements

CCM retains the data for the statutory period and erases the data when it is no longer required. The period depends on the nature of the data and the reason that it is retained. Information concerning suppliers and business partners will typically be erased after the termination of the agreement.

- The data will be erased no later than five years after the last contact.

3.6 Applicants

When CCM receives your application, it will be read and processed in accordance with the following instructions.

The application with annexes will be shared internally with relevant staff in the recruitment process.

Personal data resulting from the recruitment process will be processed on the following processing basis: Balancing of interests, since it is in the interests of the Data Subject that the data is processed.

CCM retains your application with annexes until CCM finds the right candidate and the recruitment process is completed. Your application with annexes will then be erased. Concerning unsolicited applications, CCM retains your application with annexes for six months, after which it will be erased. If CCM wants to retain your application with annexes for more than six months, CCM will contact you to obtain your consent.

Your consent is voluntary and can be withdrawn at any time by contacting CCM using the aforementioned contact details.

3.7 Sources

The abovementioned categories of personal data are collected from the Data Subjects themselves, contracts from the investors or potential investors and third-party service providers. The personal data can also be publicly available information extracted from company registers, business authorities or financial supervisory authorities.

4 FURTHER INFORMATION CONCERNING PROCESSING

4.1 Security

CCM has taken appropriate technical and organisational measures to prevent your data from being accidentally or illegally erased, disclosed, lost, impaired or accessed by unauthorised parties, misused or otherwise processed in conflict with legislation. The Data Controller ensures that the processing can only take place when all data protection principles have been fulfilled in accordance with article 5 of the GDPR.

4.2 Data minimisation

CCM only collects, process and store the personal data necessary to fulfil CCM's established purpose. In addition, it may be determined by statutory provision which type of information is necessary to collect and store for CCM's business operations. The type and scope of the data CCM processes may also be determined by the need to fulfil a contract or other statutory obligation.

4.3 Updated data

As CCM's service is dependent on your data being correct and updated, CCM kindly requests you to inform CCM of any relevant changes in your personal data. You can use the aforementioned contact details to notify CCM of the relevant changes, after which CCM will update your personal data accordingly. If CCM becomes aware that any personal data is incorrect, CCM will update the information and notify you thereof.

4.4 Disclosure of personal data

CCM uses a number of third parties to store and process the personal data, including suppliers of IT solutions and CCM's business partners. They process data solely on CCM's behalf and may not use the data for their own purposes.

Personal data is only stored on servers located within the EU. With regards to Dropbox Business and Google Workspace, data will only be stored on servers which are physically located within the EU. This to avoid personal data from being transferred to unsafe third countries.

5 PROCEDURES ON AUDIT OF DATA PROCESSORS

As a Data Controller, CCM is under an obligation to make sure that CCM's Data Processors comply with applicable rules and to be able to document such compliance towards the Danish Data Protection Agency.

To ensure this, CCM solely uses reliable and serious Data Processors of which CCM performs risk-based audits, when necessary. Persondataportalen handles such audits on behalf of CCM. The frequency of an audit depends on the risk assessments regarding the specific Data Processor.

In the case of an audit, the Data Processor confirms compliance with all obligations set out in the data processing agreement. In case of suspicious actions or alike, the Compliance Officer at CCM will initiate an audit of the Data Processor in question.

6 YOUR RIGHTS AS A DATA SUBJECT

- You have the right to be informed at any time of which data CCM processes about you, where it originates from and what CCM uses it for. You can also be informed of for how long CCM retains your personal data, and who receives data concerning you, to the extent that CCM discloses data in Denmark and abroad.

- If you request this, CCM will inform you of the data CCM processes about you. Access may be limited, however, in order to protect the privacy of other persons, and to protect business secrets and intellectual property rights.
- If you believe that the personal data CCM processes about you is inaccurate, you have the right to rectification. You must contact CCM and inform CCM of the nature of the inaccuracies and how they can be rectified. Please be precise about your rectification, otherwise it will complicate CCM's work and, in some cases, may entail that CCM is unable to comply with your rectification.
- In some cases, CCM will have an obligation to erase your personal data. This will apply, for example, if you withdraw any consent that you have given. If you believe that your data is no longer necessary in relation to the purpose for which it was collected, you can request that the data be erased. You can also contact CCM if you believe that your personal data is being processed in conflict with legislation or other legal obligations.
- You have the right to submit a complaint to the Danish Data Protection Agency.
- You have the right to object to CCM's processing of your personal data. You may also object to CCM's disclosure of your data for marketing purposes. If your objection is justified, CCM will stop the processing of your personal data.
- You can use data portability if you want your data to be moved to another Data Controller or Data Processor.
- CCM erases your personal data at CCM's own initiative when it is no longer necessary for the purpose for which it was collected, or when CCM no longer has a legal basis for retaining the data.

When you contact CCM with a request for rectification or erasure of your personal data, CCM will investigate whether the conditions have been met and, in such case, implement changes or erasure as soon as possible.

You can exercise your rights by contacting us. CCM's contact details can be found above.

7 DATA BREACH NOTIFICATION PROCEDURES

Personal data breaches are defined in the GDPR as (1) a breach of security, (2) leading to the "accidental", "unlawful", or "unauthorized", (3) "destruction", "loss", "alteration", "disclosure of", or "access to", and (4) "personal data transmitted stored or otherwise processed".

If CCM becomes aware of a personal data breach, CCM shall without undue delay, and not later than 72 hours after having become aware of it, notify the DDPA and the Data Subject of the data breach, unless the breach is unlikely to result in a risk to the rights and freedom of the affected Data Subject. In case notification to the DDPA is not made within 72 hours, the notification shall be accompanied by reasons for the delay, cf. article 33(1) in the GDPR.

Notification must be set forth in a data breach record, detailing the facts surrounding the breach, the categories and number of Data Subjects involved, the consequences of the breach and actions taken into remedy to rectify the breach. In case of a

personal data breach, the Compliance Officer must notify the DDPA by filling out the data breach record, which may be found on www.virk.dk.

8 CONTROL AND MONITORING

When CCM handles personal data, CCM ensures that such handling and processing is done in accordance with this Policy, including internal guidelines, procedures and data protection principles.

8.1 Training and education of employees

All employees shall regularly receive training on how to ensure sufficient data protection and shall be made aware of any changes to internal procedures, including this Policy on the processing of personal data. The training shall as a minimum cover the internal procedures at all times.

8.2 Key roles and responsibilities

The distribution of responsibilities for compliance with this Policy is as follows:

The Board of Directors is ultimately responsible for ensuring compliance with this Policy and the legal obligations as set out in the GDPR.

The Compliance Officer and Compliance shall monitor and control compliance with the requirements as set out above and is responsible for (i) briefing the Board of Directors on data protection responsibilities, (ii) updating the data protection framework including updating the records of processing activities, (iii) advising staff on potential data protection issues, (iv) notifying the DDPA, e.g., in case of a data breach and (v) approving contracts with Sub-data Processors.

Where the Compliance Officer and/or Compliance deem(s) that there has been a material instance of non-compliance with this Policy or relevant regulation, it shall inform the Board of Directors together with a report on the subject matter and proposal for a solution. The Board of Directors shall then decide on the matter, which the Board of Management shall effectuate.

9 REVIEW AND APPROVAL

This Policy shall be reviewed on a regular basis, and at least annually, by the Compliance Officer. This Policy shall be reviewed and approved by the Board of Directors on an annual basis.

This Policy was approved by the Board of Directors on 30 August 2023. Please note that CCM also had a privacy policy prior to this date, however this was in an old format.

Approval history:

Version:	Effective from:	Changes:	Edited by:	Approved by:
1	30 August 2023	New format and implementation of recommendations from Compliance	Compliance Officer	Board of Directors