

## PRIVACY NOTICE

Nordic Fund Administration Partners  
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## PROCESSING OF PERSONAL DATA

The purpose of this Privacy Notice is to provide information about how Nordic Fund Administration Partners (hereinafter referred to as "NFAP") as an independent data controller processes personal data.

This Privacy Notice is issued under the GDPR article 13 and 14 and includes mandatory information on how the NFAP (hereinafter referred to as "NFAP", "we" or "us") in our capacity as a data controller, processes personal data of our clients including representatives and employees of investment managers, business partners and suppliers and/or their contacts or representative and if anyone contacts us in general (hereinafter referred to as "you").

NFAP will for processing activities related to investor shareholders, personal investors and investor board members act as a data processor for our client, the Investment Managers. If NFAP process your personal data in our capacity of data processor you will be informed about this from the Investment Manager due to their capacity as a data controller.

The Privacy Notices provides information about det following:

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For a more detailed information about how we process your personal data, follow this [link](#).

**1. WHO IS THE DATA CONTROLLER AND HOW DO YOU CONTACT US?**

Nordic Fund Administration Partners  
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1256 København K  
CVR-no. 44504804  
Phone: +45 20 95 33 80  
E-mail: [info@nfap.dk](mailto:info@nfap.dk)

is the data controller for the processing of personal data as stated in this privacy policy.

If you have any questions about our processing of your personal data, please contact us at [info@nfap.dk](mailto:info@nfap.dk).

**2. CATEGORIES OF PERSONAL DATA**

We only collect and process the following general personal data about you in our capacity of data controller:

**2.1 General Personal Data**

- Name
- Title
- Company name
- Company address
- Email address
- Telephone number

Whether we process all the above personal data about the you depend on your affiliation with NFAP. In addition to the above personal data, we may process any other personal data you provide in connection with an inquiry or correspondence with us.

**3. PROCESSING OF PERSONAL DATA IF YOU ARE AN INVESTMENT MANAGER OR THEIR REPRESENTATIVES**

We collect and process personal data about you if you are an employee or a representative of an Investment Manager and NFAP administrates a fund on behalf of you. We may also collect and process personal data and if you are an employee or contact person at the Investment Manager's Legal Advisors and Auditor.

**3.1 Collecting personal data**

If you are an employee or a contact person at the Investment Manager, we collect your personal data from you directly, for example when you contact us or enters a contract with us regarding administration of your fund.

If you are an employee or contact person of the Investment Manager's legal advisors or auditors, we either collect your personal from you directly when you contact us or from the Investment Manager.

In some cases, we collect your personal data from the service provider, e.g. service providers engaged to verify personal data or company information.

### **3.2 Purposes and legal basis for collecting and processing**

We process the above personal data about you on a legal basis for processing. The basis for processing will depend on the category of data and the purpose of the specific processing of personal data.

#### **3.2.1 Manager contact purposes - Performance of contract**

We process your personal data such as name, title, company name, email address, telephone number and postal address in order to get in contact with you as a manager including in order to report necessary information and organize meetings, assisting in ongoing accounting and reconciliation, as well as handle day-to-day questions from you.

The legal basis for our processing of your personal is performing of your contract in accordance with GDPR article 6(1)(b) when NFAP assist in administration of a fund.

#### **3.2.2 Advisor contact purposes – Legitimate interest**

We process your personal data including contact details such as name, email address, title and company name when you contact us or if we need to get in contact with you, for example with clarification questions or distribution of information regarding the Fund.

The legal basis for our processing your personal data as a data controller is our legitimate interest in accordance with GDPR article 6(1)(f), due to a balancing of our interest in processing your general personal data for the purpose of clarification and sharing of information related to the Fund and your interest in not having your personal data processed.

#### **3.2.3 Specific purposes - Consent**

We may ask for your consent to process your personal data for specific purposes. In these cases, we will reach out to you and ask you for your voluntary, informed, explicit and specific consent. We will in such case inform you specific about which personal data we will process, how we will process the data and for

what specific purposes. We will also inform you about your right to withdraw your consent and the effects hereof.

The legal basis for processing your personal data based on your consent is GDPR article 6(1)(a) and article 9(2)(a).

#### **4. PROCESSING OF PERSONAL DATA IF YOU ARE A BUSINESS PARTNER OR SUPPLIER**

##### **4.1 Collecting personal data**

If you are a contact person or a representative of one of our business partners or suppliers, we will process personal data about you such as name, email address, telephone number and company information. We collect the personal data directly from you or from the company of which you are the contact person or representative.

##### **4.2 Purposes and legal basis for collecting and processing**

We process personal data about in order to manage our relationship with and contact, and to receive services from you. The legal basis for processing is performance of a contract in accordance with GDPR article 6(1)(b) when we cooperate with you as a business partner or when you deliver a service.

#### **5. PROCESSING OF PERSONAL DATA IF YOU CONTACT NFAP**

##### **5.1 Collecting personal data**

If you contact us, we will process your personal data such as name, email address, telephone number and what your inquiry concern. We collect the personal data directly from you and will in some cases collect further personal data from third parties if it is necessary in order to return on your inquiry.

##### **5.2 Purposes and legal basis for collecting and processing**

We process the above personal data about you on a legal basis for processing. We process your personal data in order to reply on your inquiries. The legal basis for processing is our legitimate interests in responding on an inquiry in accordance with GDPR article 6(1)(f).

#### **6. PROCESSING OF PERSONAL DATA IF YOU VISIT OUR WEBSITE**

We do not collect or process any personal data about you when you visit our website including any cookies.

**7. DISCLOSURE OF PERSONAL DATA**

We only disclose personal data to third parties when this is necessary to fulfill our obligations to the managers of the managed funds or our legal obligations.

We will disclose your personal data with our IT suppliers such as Microsoft and Allvue with the sole purpose of ensuring the use of our IT systems including hosting, backup, storage and other IT related support. In these cases, we have entered a Data Processing Agreement regarding our suppliers processing of your personal data. Our IT suppliers acts as a data processor and shall process the personal data in accordance with NFAP's instructions.

When your personal data is disclosed to a third party located within the EU/EEA, your personal data will be protected under the GDPR and the applicable national regulation.

**8. TRANSFER OF PERSONAL DATA**

NFAP will transfer personal data to IT systems providers located in the US for the sole purpose of enabling NFAP to use IT-systems applied in the Fund Administration.

Some of the US system providers have signed up and self-certified under the voluntary EU-US Data Privacy Framework and are, thereby, operating under the adequacy decision issued by the European Commission. Other IT system providers are committed under agreements with NFAP to provide data subjects with rights equivalent to the GDPR when receiving personal data from the EU/EEA, as they have submitted to appropriate safeguards such as the Standard Contractual Clauses issued by the EU Commission.

**9. SECURITY MEASURES FOR PROTECTION PERSONAL DATA**

In accordance with the data protection principles of lawful and transparent processing, NFAP strives for data minimization and storage limitation and maintains the integrity and accountability required for the fairness of the processing.

NFAP stores your personal data in our IT system, which include both local servers in EU and servers in the US. We have appropriate technical and organizational measures in place to protect against unauthorized access to, loss or destruction of the personal information and other data under our control. We continuously develop our security policies and procedures to ensure that our systems are secure and protected. Only persons who have a purpose for processing personal data for the purposes mentioned have access to the personal data.

## 10. **STORAGE AND RETENTION OF PERSONAL DATA**

We retain personal data for as long as necessary. This is determined based on a concrete assessment of the importance of the information for the fulfillment of our obligations. As a general rule, we store personal data for the entire lifetime of the fund and five years thereafter in accordance with our legal obligation under the Danish Bookkeeping Act.

In some cases, we will also retain personal data needed to protect our legitimate interest, including in case of any disputes and or protection of NFAP's legal rights. In such case NFAP has made a balancing of our interests in protection our legal rights against your interests in deletion of your personal data in accordance with GDPR article 6(1)(f).

## 11. **THE RIGHTS OF THE DATA SUBJECT AND COMPLAINTS**

According to the GDPR, you have several rights when your personal data are being processed by NFAP, including:

### Right to access

You have right to gain access to the personal data we process about you and some additional information about the processing.

### Right to rectification

You have the right to have incorrect data corrected.

### Right to erasure

In special cases, you have the right to have data deleted before our general deletion takes place.

### Right to restrictions for processing

You have, in some cases, the right to limit the processing of your personal data. If you have the right to limit the processing, the processing – except for storage – may only take place in the future subject to consent or for the purpose of establishing, exercising or defending a legal claim or to protect a person or important public interests.

### Right to object

In special cases, you have the right to object to our processing of your personal data or our legal basis for processing of your personal data. You have the right as well to object to our processing of your personal data to direct marketing.

### Right to data portability

You have the right to receive the registered personal data in a structured, commonly used and machine-readable format and to have the data transferred from one controller to another without hindrance.

Right to withdraw your consent

When your consent is the legal basis for processing your personal data, you have the right to withdraw your consent at any time. If you choose to withdraw your consent, it does not affect the lawfulness of our processing based on your previously given consent and up to the time of withdrawal.

In connection with the data subject's exercise of the above-mentioned rights, we may demand relevant identification.

For more information on your rights, see the Danish Data Protection Agency's guidelines describing the data subject's rights on [www.datatilsynet.dk](http://www.datatilsynet.dk).

You may file a complaint with the Danish Data Protection Agency if you are dissatisfied with our processing of your personal data. You can find the contact details of the Danish Data Protection Agency on [www.datatilsynet.dk](http://www.datatilsynet.dk).

This information has been updated 2.7.2024 and will be updated according to the current rules and practice and in line with any adjustments to our procedures.