

Privacy Statement

SQN Private Equity ApS respects your privacy and is committed to protecting your personal data. This privacy statement will inform you about how we collect, process, and share your personal data when you use or purchase our products and services, visit our website, and communicate and interact with us, including on social media, and will tell you about your data protection rights under the EU General Data Protection Regulation (GDPR).

Created 23 April 2024.

1. Data Controller

The data controller for the processing described in this privacy statement is:

SQN Private Equity ApS (CVR number: 44605260), Bredgade 17, 4., 1260 København K

2. Data Protection Contact

If you have questions regarding this privacy statement, please contact:

contact@sqn.dk

3. Data we collect and how we collect it

In the following, we will tell you which types of personal data we may collect about you and how we collect it. In section 4, you will find a table which explains the purposes for which we process your personal data and the lawful basis we rely on.

We may collect; use; store and transfer different kinds of personal data about you which we have grouped together as follows:

- (A) **Identity Data** includes name, title, company/organization.
- (B) **Contact Data** includes email, telephone number, address.
- (C) **Technical Data** includes IP address, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and other technology on the devices you use to access this website.
- (D) **Usage Data** includes information about how you use and interact with our website and social media platforms.
- (E) **Transaction Data** includes services you have purchased from us and details of agreements we have entered into and about payments from you.
- (F) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our partners as well as your communication preferences.

In most situations the information is collected directly from you via internet forms, email, telephone, social media platforms, contracts, meetings, and other instances where you provide this information. Data regarding companies and their employees, as well as other registered parties, can also be collected from public sources such as websites, directory services and other companies.

As you interact with our website or services, we may automatically collect Technical Data and Usage Data about your equipment and browsing actions and patterns. We collect this information by using cookies and similar technologies. We may also receive Technical Data about you if you visit other websites or social media employing our cookies. We will only apply cookies – other than strictly necessary technical cookies – if you have provided your consent.

4. The purposes and the lawful basis

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (i) Where we need to perform a contract which we are about to enter into or have entered into with you cf. Article 6(1)(b) GDPR.
- (ii) Where we need to comply with a legal or regulatory obligation cf. Article 6(1)(e) GDPR.
- (iii) Where you have provided your consent cf. Article 6(1)(a) GDPR.
- (iv) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests cf. Article 6(1)(f) GDPR.
- (v) We may process information on your personal identity number when required by law or when we have the lawful basis identified in (i), (iii) and (iv). We may disclose your personal identity number when it is of decisive importance for unique identification or when the disclosure is demanded by a public authority cf. Section 29 of the Data Protection Act.

In the table below we describe all the purposes for which we will use your personal data, and the legal basis on which we process your personal data. Where appropriate, we have also identified what our legitimate interests are.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage and perform the contract with you including: <ul style="list-style-type: none"> • To register you as new customer • To allow you to use and purchase our services • To deliver our services to you • To manage and collect payments for services • Generally, to comply with our obligations and exercise our rights under agreements entered into with you 	(A) Identity (B) Contact (E) Transaction	Processing is necessary for the performance of a contract with you or to take steps at the request of you prior to entering a contract. Processing is necessary to comply with a legal obligation (bookkeeping, accounting and tax laws).
To analyse and improve our business procedures and practices.	(A) Identity (B) Contact	Processing is necessary for our legitimate interest to analyse and improve our business,
	(D) Usage (E) Transaction	including our products and services.

To enable you to access and interact with our website.	(C) Technical	Processing is necessary for our legitimate interest to provide you access to our website.
To enable you to communicate with us on the website, by email, via social media or otherwise.	(A) Identity (B) Contact (D) Usage (F) Marketing	Processing is necessary for our legitimate interest to communicate with you.
To administer and protect our business and website (including troubleshooting, data analysis, testing and system maintenance).	(A) Identity (B) Contact (C) Technical (D) Usage	Processing is necessary for our legitimate interests for running our business, provision of administration and IT services, network security and to prevent fraud.
To send you newsletters or other marketing.	(A) Identity (B) Contact (F) Marketing	Processing is necessary for our legitimate interests to send you relevant marketing. We will only send you marketing by email or other means of electronic communication if you have given us your consent, or if we are otherwise allowed to under the Act on Electronic Communications Services.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(C) Technical (D) Usage	Processing is necessary for our legitimate interests to define types of customers for our services, to keep our website updated and relevant, to develop our business and to improve our marketing strategy.

To the extent that we have referred to our legitimate interest as the legal basis for the processing of personal data specified above, we have conducted a balancing test for those interests to ensure that our interest is not overridden by your interests or fundamental rights and freedoms. Please contact us by email at contact@sqn.dk if you wish to receive more information on the balancing test.

5. Sharing of data collected

As a tied agent to Wictor Family Office AB (Org.nr: 556984-3567) we may disclose your personal data to Wictor Family Office AB where required for the above specified purposes. We base this processing on our legitimate interest to transmit personal data for administrative purposes of using their IT systems and the legal obligation to, for instance, conduct KYC and AML checks. In addition, we may disclose your personal data to other companies within Wictor Family Office's supervision for the purpose of selling and providing investment services.

We may disclose personal data to third parties:

- When it is necessary for the purposes listed in section 4.
- To public authorities such as health authorities, tax authorities, and law enforcement authorities when required by law.
- To any person or entity that acquires all or substantially all of our business, stock or assets, or with whom we merge.
- When we in good faith believe that disclosure is necessary to establish or exercise our legal rights or defend against legal claims, protect your safety or the safety of others, investigate fraud, or respond to a government request.

We share data, including personal data, with our trusted third-party service providers that process your data on our behalf and under our instruction. Such services include, e.g., hosting of data and maintenance of IT systems, communication, planning and displaying of marketing, administration of our interests in social media, customer support and service, payment processing, analytics and other services. These third-party service providers may have access to or process your personal data for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal data that we share with them for any other purpose than in connection with the services they provide to us. We have entered into data processing agreements with our data processors.

6. Transfers of data outside the EU or the EEA

We will not transfer your personal data to recipients outside the EU or EEA unless we have ensured compliance with Chapter V of the GDPR.

Some of our third-party service providers are established outside the EEA, so their processing of your personal data will involve transferring data outside the EEA. However, to ensure that your personal data receive an adequate level of protection, we have ascertained that sufficient safety measures have been implemented to allow for the transfer, including where the European Commission have deemed the country to provide an adequate level of protection for personal data, or by use of specific contracts approved by the European Commission (Standard Contractual Clauses) which give personal data essentially equivalent protection as it has in the EEA.

If you require further information about our data processors established outside the EEA and the safety measures in place to allow for the transfer of personal data, you can request it from us by sending your request to us by email at contact@sqn.dk.

7. Data Retention

We retain the personal data we collect where we have an ongoing legitimate need or obligation to do so. When we have no ongoing legitimate need to process your personal data, we will either delete or anonymise them.

Identity, Contact and Transaction Data is saved to demonstrate the agreement we have/have had and for bookkeeping and tax purposes for 6 full fiscal years after the expiry of the year in which the transaction relates.

Data may be retained for longer period if we are legally obliged to do so or if retention is necessary to establish, exercise or defend legal claims.

8. Principles of data security

We exercise care and prudence in the processing of registry data and the data is properly protected. The data is in principle stored in information systems managed by us. If data is stored on internet servers, the physical and digital security of their hardware will be properly ensured as required by the individual situation. The data stored by us in our operations as well as the access rights to the data and servers, will be treated confidentially and only by employees whose job description includes described data usage and handling. Employees process information with care and prudence and only to the extent required by their job description and scope.

9. How to exercise your data protection rights

You have certain choices available to you when it comes to your personal information. Below is a summary of those choices, how to exercise them and any limitations.

Under certain circumstances, you have the following rights:

- **Right to request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are processing data lawfully.
- **Right to request rectification of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected. Please note that the law may prohibit that we delete entries in certain cases, for example medical records.
- **Right to request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it.
- **Right to object to processing of your personal data** where we are relying on our legitimate interest (or that of a third party) as a legal basis for processing and there is something about your particular situation which makes you want to object to processing. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Right to request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish accuracy of the data or the reason for processing the data.
- **Right to request that we transmit your personal data to another party** (also known as data portability).

Where our processing is solely based on your specific consent, the **right to with-draw your consent** at any time. Such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of the data protection rights that are available to you, please send your request to us by email at contact@sqn.dk and we will action your request in accordance with applicable data protection laws.

You have the right to complain to your local data protection authority if you are unhappy with our data protection practices. In Denmark you can lodge a complaint with the Danish Data Protection Agency at <https://www.datatilsynet.dk/borger/klage/saadan-klager-du>.

10. Changing of the terms of the Registry and Privacy Statement

We have the right to change the data protection statement from time to time due to, among other things, the development of services and changes in legislation. If significant changes are made to the Privacy Statement, these changes will be notified to registered customers when the terms are updated.