



# Privacy notice for general meetings of shareholders

What we do with your data

Last update: July 2018

Applicable to shareholders of a company holding a general meeting of shareholders, as well as any other individual visiting or otherwise connected to such meeting.

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# 1 About this privacy notice

## 1.1 To whom is this notice for?

This notice applies to shareholders of a company holding a general meeting of shareholders (“GM” and the company holding a GM “the Company”), as well as any other individual visiting or otherwise connected to such GM (“you” or “your”).

This notice explains what types of personal data are gathered about you, how the personal data is used, and with whom the personal data is shared. It also describes your rights in relation to personal data.

## 1.2 Who controls your personal data?

We take our data protection obligations seriously. We, Euroclear Sweden AB, with registered office at Klarabergsviadukten 63, Po Box 191, SE - 101 23 Stockholm (Sweden) and registered under corporate registration number 556112-8074 (“Euroclear”, “we”, “us” or “our”), are the controller of the processing of your personal data performed by us or our service providers in connection with the GM.

# 2 Personal data and processing of such data

## 2.1 What personal data do we process and why?

In connection with a GM, including the preparation of a GM as well as work conducted following a GM, we process personal data regarding you which may include:

- contact details (e.g. name, title, address, telephone number and email address);
- identification details (e.g. date of birth and ID number);
- financial information (e.g. voting rights, information regarding holdings and entitlements connected to the holdings);
- if a proxy is appointed, information on who you are representing or are represented by (as relevant); and
- information on how you have voted may be processed, e.g. if voting devices are used or vote counting is carried out and to the extent your voting is possible to connect to you based on your holdings (e.g. in some cases a certain number of votes may be connected to a certain number of shares held by you).

Our purpose for collecting and processing your personal data is to carry out a GM and providing services in connection therewith as well as to comply with applicable law and regulations.

## 2.2 What are the legal bases for our processing of your personal data?

We process your personal data when:

- it is necessary to comply with our legal obligations; or
- it is in our legitimate interests to do so, e.g. to maintain adequate security or order at the GM, and such interest is not overridden by your legitimate interests or fundamental rights and freedoms which require the protection of personal data.

## 2.3 How long do we keep the personal data?

Personal data related to the GM is kept as long as necessary given the purpose of the processing, unless otherwise required or permitted by applicable laws or regulations.

Personal data regarding attendance, holdings, voting etc. which is processed to carry out and document the GM according to law, is normally kept for one year following the GM, unless storage during a longer period is justified based on the resolutions adopted at the GM or otherwise.

## 2.4 Where does your personal data come from?

The personal data we collect about you comes from the following sources:

### a) Personal data you give us

We collect personal data we directly receive from you, e.g. when you:

- send us personal data on forms, e-forms and e-mails;
- provide us personal data via the phone; or
- provide us personal data at the GM.

### b) Personal data we receive from other sources

We may receive your personal data through:

- information received from the Company;
- information received from public records;
- information received from third party service providers in connection with the GM (such as legal advisors); or
- the shareholder you represent or your proxy (if relevant).

## 2.5 With whom may we share your personal data?

### a) Transfer within the Group or to third parties

- We may transfer personal data to other affiliated entities or business partners to the extent necessary in connection with the GM. We take precautions to allow access to personal data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the personal data for any other purpose.
- We may provide personal data to any competent law enforcement body, regulatory, government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities and the tax agency, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.
- We may disclose personal data to our third party vendors, service providers and partners who provide services to us or to the Company (e.g. third party consultants working with the GM, law firms/advisors or security agents), which are or will be involved in providing services in connection with the GM or who otherwise process personal data for purposes that are described in this privacy notice or as notified to you when we collect your personal data.
- We may disclose personal data to our auditors, advisors, legal representatives and similar agents as may be necessary in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the personal data for any other purpose.

## b) International personal data transfers

Our group companies and third party contractors and consultants operate around the world. This means that we may process personal data outside the European Economic Area (EEA) in jurisdictions which may not have an adequate level of protection. However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this notice. These measures include, where applicable, implementing EU standard contractual clauses with our third party contractors (such contractual clauses are available at [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)), as well as binding corporate rules for transfers of personal data within our group.

## 2.6 What are your rights in respect to your personal data?

The right to be informed	We are publishing this privacy notice to keep you informed as to what we do with your personal data. We strive to be transparent about how we use your personal data.
The right to access	You have the right to access your personal data. You have a right to receive a copy of your personal data processed by us.
The right to rectification	If your personal data kept by us is inaccurate, not complete or up to date, you have the right to ask us to rectify or update the data. If such personal data has been disclosed to a third party in accordance with this privacy notice, we will also ask them to rectify or update your personal data (if relevant).
The right to erasure (the right to be forgotten)	You have the right to request that we erase your personal data and if we do not have a legal reason to continue to process and hold it, we will erase the data.
The right to object	You have the right to object to certain processing of your personal data.
The right to restrict processing	In some cases, you have the right to request that we restrict the processing of your personal data. This means we are permitted to store the data but not to process it further unless with your consent or with respect to legal claims.
The right to data portability	In some cases, you are allowed to obtain your personal data kept by us in a structured, commonly used and machine-readable format and to transmit those personal data to another controller.
The right to complain to a Supervisory Authority	You have the right to complain to the Swedish Data Protection Authority (Sw. <i>Datinspektionen</i> ) about our processing of your personal data if you are dissatisfied with our processing of your personal data. Contact details for the Swedish Data Protection Authority can be found here: <a href="http://www.datinspektionen.se">www.datinspektionen.se</a> .

Please contact us if you wish to exercise any of your rights described above, using the contact details stated in the notice to convene the GM.

## 2.7 What about data security and quality?

To keep your personal data secure we have implemented a number of security measures, such as the following.

- **Secure operating environments** - We store your data in secure operating environments and only accessible to our employees, agents and contractors on a need-to-know basis. We also follow generally accepted industry standards in this respect.
- **Encryption** - We use industry-standard encryption to provide protection for information that is transmitted to us.
- **Prior authentication for IT access and access to premises** - We require our staff and contractors to verify their identity (e.g. through login ID, password, pin codes and badges) before they can access IT bases and business premises. This is aimed to prevent unauthorized accesses of personal data.

## 2.8 What if you choose not to give us your personal data?

If you do not want to give us your personal data and the personal data is necessary in order to (i) admit you as an attendee to a GM, or (ii) provide you further information on our services, then we may not be able to allow you to attend the GM or provide the requested services or information.

## 3 Updates of this privacy notice

This notice may be updated from time to time to comply with changing legal or technical requirements as well as business developments. You can see when it was last updated by checking the “last updated” date displayed at the top of this notice. Please consider the version available online, [www.euroclear.com/Sweden-GDPR](http://www.euroclear.com/Sweden-GDPR), as the latest version.

## 4 Questions or concerns? Contact us!

If you want to request information about this notice, you can contact our Data Protection Officer by e-mailing us at [es.dpo@euroclear.eu](mailto:es.dpo@euroclear.eu) or writing to our Data Protection Officer by writing to Euroclear Sweden AB, Data protection officer. Klarabergsviadukten 63 - PO Box 191 - SE-101 23 Stockholm, Sweden.