

PRIVACY NOTICE –

VIND

Last changed: 8 January 2024

1 INTRODUCTION

This Privacy Notice ("**Privacy Notice**") has been prepared by Vind AS ("**Vind**", "**we**", or "**us**") to ensure that you receive the information we are required to provide to you- and which is necessary for you to exercise your rights under the General Data Protection Regulation (the "**GDPR**") and Norwegian data protection legislation (together "**data protection legislation**").

This Privacy Notice describes how we process personal data about you, the purpose of our processing activities, and the legal basis for our processing activities. This Privacy Notice also describes your rights in connection with our processing of your personal data under applicable data protection legislation.

2 GENERALLY ABOUT PERSONAL DATA

Personal data means any information relating to an identified or identifiable natural person (a "**data subject**"). Your name, phone number, address and e-mail address are examples of information which generally is regarded as personal data.

3 VIND'S RESPONSIBILITY AS A CONTROLLER

Our processing of your personal data is described in Section 4 below. We will act as a controller when we process this personal data.

4 OUR PROCESSING OF PERSONAL DATA

4.1 Processing activities, purpose and legal basis

The following list includes information about the personal data which we process, the purposes of the processing activities, as well as their legal basis:

- **Administrating agreements with suppliers, advisors etc.** We process personal data about our suppliers, advisors and other business associates, as well as their representatives and contacts, in order to administer and fulfill the agreements we have entered into with these companies, and maintain our business relationship. Such personal data include the data subjects' name, contact information, occupation, and our communication with the data subject. The legal basis for this processing activity is the legitimate interest test under the GDPR.
- **Identifying and assessing investments and investment opportunities.** We process personal data about the representatives of companies which we are contemplating to invest in, as well as companies which we have invested in. We will in this respect process the name, occupation, contact information, place of work of these representatives, as well as our information from our correspondence and meetings with the representatives. We will

furthermore process information regarding the company which these persons represent, including the company name, business registration number, and financial information. We process this personal data on the basis of our legitimate interest of identifying and assessing investments and investment opportunities.

- **Investments and transactions.** We process the personal data of the representatives of companies which we either invest in or divest from, as well as the personal data of such companies' personnel and business associates. We process this personal data in order to satisfy our duty to conduct due diligence reviews (when we acquire ownership interests) and to enable buyers to satisfy their duty to conduct due diligence review (when we sell ownership interests). We will in this respect process the contact information of the representatives of the relevant companies, as well as agreements and other business documentation provided by the companies. Based on our assessment, these legitimate interests are not overridden by the interests, rights and freedoms of the data subject.
- **Recruitment.** If you are a job applicant or a potential candidate for any of our positions, we will collect and process your personal data, such as contact details, i.e. your name, email address, postal address and phone number, as well as your job title, your application, CV, test results, diplomas, certifications and statements from references. We may also process the aforementioned personal data when we assist companies we have ownership interests in with hiring new personnel. Our processing is based on our legitimate interest in finding and hiring new personnel, as well as assisting companies which we have ownership interest in with the same.

We may, depending on the circumstances, also process other categories of personal data, and/or the above listed personal data for other purposes. This may for example be the case if you contact us with questions or comments. You may at any time request confirmation and/or information regarding the personal data which we process about you, by contacting us at the contact information set out below.

4.2 The sources we obtain personal data from

We collect the personal data described in Section 4.1 above from the following sources:

- **Administrating agreements with suppliers, advisors etc.** The personal data we process about the representatives and contact persons of our suppliers, advisors and other business associates are primarily obtained directly from the relevant representatives and contacts.
- **Identifying and assessing investments and investment opportunities.** The personal data we process for the purpose of identifying and assessing investments and investment opportunities is obtained from the representatives of the relevant companies, publicly available sources and investment advisors.
- **Investments and transactions.** The personal data we process in connection with our investments and transactions is obtained from the company which we invest or divest in.
- **Recruitment.** The personal data we process for recruitment purposes is primarily obtained directly from LinkedIn, the candidate, as well as from the candidate's references and other publicly available sources. We may also obtain the candidate's personal data from head hunters and recruitment agencies.

5 DO WE TRANSFER OR DISCLOSE DATA TO THIRD PARTIES?

We use external service providers to assist with IT services and other administrative services. These service providers will act as processors on our behalf. We have entered into data processing agreements with our processors which inter alia obligates the data processor to implement technical and organizational measures to ensure an appropriate level of security, confidentiality and integrity of the personal data, as well as to only process the relevant personal data in accordance with data protection legislation.

We enter into non-disclosure agreements before we share any information and personal data to persons and companies (such as financial advisors, legal advisors etc.) involved in our investments and divestments of companies. These non-disclosure agreements require the recipient of information to keep the information confidential, and to only use it for specific purposes.

We may share the personal data of candidates when we assist companies we have ownership interest in with recruiting new personnel.

We will not disclose your personal data to any other third parties than the third parties described above, unless we are required to do so under applicable law, or if it is necessary in order to establish, exercise or defend legal claims.

6 DATA RETENTION

We will delete or anonymize personal data when they are no longer necessary in relation to the purposes for which they were collected or otherwise processed (if there are no legal basis for further processing of the personal data). If we process personal data to comply with our legal obligations (such as our obligations under the Norwegian Bookkeeping Act), we will delete or anonymize the personal data when it is no longer necessary to process the data to comply with the relevant legal obligations.

7 YOUR DATA PROTECTION RIGHTS

You have certain rights under data protection legislation, we need to make you aware of. The rights available to you inter alia depend on our reason for processing your personal data. You have the following rights in connection with our processing of your personal data:

- **Access.** You may contact us if you want to obtain confirmation with respect to whether or not we are processing your personal data, as well as access to and further information regarding our processing of your personal data. You may also request a copy of the personal data we are processing about you. However, please note that we may be subject to a duty of confidentiality with respect to our investments and due diligence processes. This duty of confidentiality may limit our possibility to give you access to the personal data which is processed in connection with the investments.
- **Rectification.** You may request us to rectify and/or complete inaccurate or incomplete personal data.
- **Erasure.** You may request that we erase your personal data. We will respect and comply with your request unless we inter alia are prohibited from deleting your personal data under mandatory retention requirements, or the personal data is necessary for the establishment, exercise or defense of legal claims.

- **Restriction of processing.** You may also request the restriction of our processing of your personal data in accordance with data protection legislation. If the processing has been restricted, such personal data will, with the exception of storage, only be processed with your consent, for the exercise or defense of legal claims, the protection of the rights of another person, or for reasons of important public interest.
- **Right to object.** You are entitled to object to certain processing activities, including for example processing of your personal data for marketing purposes. You are furthermore, on grounds relating to your particular situation (for example, a specific need for protection of your identity), entitled to object to processing of personal data based on legitimate interests, which we will comply with, unless there exists compelling legitimate grounds for our processing which override your interest, or if our processing is necessary for the establishment, exercise or defense of legal claims.
- **Data Portability.** If we process your personal data based on consent or based on our performance of a contract, and the processing is carried out by automated means, you may request us to transfer the personal data to you or another controller, in a structured, commonly used and machine-readable format.

Please contact us at the below listed contact information if you wish to invoke your rights. Please also note that we may request additional information from you, if such information is necessary to confirm your identity.

8 SECURITY

As a controller, Vind is responsible for the security and confidentiality of the personal data we process. We are furthermore responsible for implementing appropriate technical and organizational measures to ensure an appropriate level of security of processing.

All of our employees are bound by a duty of confidentiality with respect to the personal data which we process. We have furthermore implemented measures, policies and routines to ensure the security of our processing.

9 LODGING COMPLAINTS – THE NORWEGIAN DATA PROTECTION AUTHORITY AND OTHER SUPERVISORY AUTHORITIES

You may contact us at any time if you have any questions or complaints regarding our processing of your personal data. You may also file a complaint to the Norwegian Data Protection Authority, or a data protection authority in the EU/EEA Member State of your habitual residence, place of work, or the place of the alleged data protection infringement. The Norwegian Data Protection Authority is responsible for supervising Norwegian organizations' processing of personal data.

You can obtain the contact details of the Norwegian Data Protection Authority on the following website: www.datatilsynet.no. You will also find more information on your rights and the data protection legislation on this website

10 CHANGES

We may, from time to time, update this Privacy Notice for example due to changes in our processing activities, applicable data protection legislation or other legislation which may affect our processing of personal data. An updated version of this Privacy Notice will be published on our website if any revisions to the Privacy Notice is made.

11 CONTACT INFORMATION

If you have any questions about this Privacy Notice, including how we process personal data, or would like to submit a request to exercise your rights, please contact us at:

Vind AS

Parkveien 53A, 0256 Oslo, Norway

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