Privacy Policy / GDPR

In May 2018 the EU regulation regarding data protection (GDPR - General Data Protection Regulation) came into force.

The present is a general overview of Accunia's handling of its clients' personal data.

As a client you have always the possibility to contact Accunia regarding your personal data. See contact information at the end of the text.

Registration of personal information at Accunia

Accunia registers a number information regarding you as client. This takes place at the initiation of the client relationship as well as continuously over time, as long as you are client.

This happens for two reasons: Firstly, because we want to give you the best client experience at Accunia. Secondly, due to our obligation as financial institution. These regulatorily based registrations are based on various laws and regulations, including regulations regarding Anti-Money Laundering and Investor Protection. This is legislation relevant for all financial institutions

What do we register? - and for how long do we keep the information?

The information which we collect and register regarding you as a client includes various basic information, as name, address, national ID number, account numbers, securities depositary number etc.

In addition, we register at the initiation of the client relationship and continuously information regarding your preferences and knowledge about investment products and information regarding your economic situation and investment horizon.

We are under obligation to keep information on you as soon as a client relationship is initiated. If you choose to end your client relationship in Accunia, we will keep your information 10 years after the client relationship has ended.

Most of the information we register we get directly from you. Other information might be added from publicly accessible sources – for instance the Danish Central Business Register's website.

The legislation states that a number of information must not be registered on a client – for instance, ethnicity, sexual orientation, political alliances. This kind of information is of no relevance to Accunia's business relationship with you, and Accunia does not register these information.

Lastly, it should be mentioned that we record phone conversations. These records are also subject to GDPR.

With whom do we share your information?

Accunia is data responsible for the processing of your personal data.

Accunia only shares information with third parties either subject to your permission or subject to financial legislation. The latter typically happens in connection with securities trading, where the settlement bank receives certain relevant information.

Lastly, Accunia uses the services of certain external data system providers, for instance Vitec (the Portman portfolio management system) and Bloomberg (reporting of trades to the Danish FSA). Accunia's general IT service supplier is Lisberg Dataservice ApS.

Your rights in relation to your data at Accunia

GDPR gives you a number of rights in connection with the data which we have registered concerning you.

You have a right to access to the information we register concerning you (Right of access). In order to get this, you are welcome to contact one of the two contact persons mentioned at the end of this document. You will hereafter within a month get a copy of our registrations.

You have a right to get incorrect information corrected (Right of rectification) You are welcome to contact one of the two contact persons mentioned at the end of this document if you observe or believe that Accunia has registered erroneous information about you. Please, describe the error and tell us what the correct information should be.

You have the possibility to limit your usage of your data (Right to restriction of processing) and to recall your permission to use your data (Right to be forgotten). You do this either by contacting your client advisor or one of the two contact persons mentioned at the end of this document. We emphasize that certain limitations and the right to be forgotten might end our client relationship, as we would not be able to be in compliance with financial legislation. However, it is always possible to inform us that you do not wish to receive invitation or general information from Accunia. This will be noted in our systems, if you contact us in the manner mentioned above.

You can ask Accunia to move your data to a third party (Right to data portability). After your request to us, you will get your data in a standard data transferring format. Please, contact one of the two contact persons mentioned below.

Contact information and complaints

You are welcome to contact us regarding GDPR questions and the personal data which Accunia as registered about you as clients.

Contact persons:

John Lind, Chief Operating Officer Klaus Runge, Chief Compliance Officer

Mail: john.lind@accunia.com Mail: klaus.runge@accunia.com

Phone: +45 33 18 82 34 Phone: +45 33 18 82 31

In case you are dissatisfied with the way we register your personal data and the way we use them – or if you have been dissatisfied with your contact to the above mentioned GDPR contact persons in Accunia, you have the possibility to file a complaint with the complaint responsible office at Accunia; Chief Compliance Officer Klaus Runge – mail klaus.runge@accunia.com or phone 33 18 82 31.

You have also the possibility to file a complaint with your relevant local data protection agency:

In Denmark: In Finland:

Danish Data Protection Agency The Data Protection Ombudsman

Carl Jacobsens Vej 35 P.O. Box 800 DK-2500 Valby FI-00531 Helsinki

Denmark Finland

<u>dt@datatilsynet.dk</u> tietosuoja@om.fi