



PRIVACY POLICY SUPPLIERS

April 2024





1 INTRODUCTION

1.1

According to Regulation (EU) 2016/679 of the European Parliament and of the Council, C WorldWide Asset Management Fondsmæglerselskab A/S ("CWW AM") is obliged to inform natural persons ("Registered Persons") of its collection and processing of their personal data. The purpose of this document is to fulfil this obligation towards actual and potential suppliers ("Suppliers").

1.2

CWW AM collects and processes data relating to its Suppliers. In relation to Suppliers which are legal persons CWW AM may collect and process data relating to natural persons affiliated with the Supplier, e.g. management and relevant employees of the Supplier.

2 TYPES OF DATA PROCESSED

2.1

CWW AM processes the following personal data:

- Contract information such as name, address, e-mail address and phone number. For Suppliers which do not have a registration in a company register, additionally identifiers.
- Information regarding authorized signatories of Suppliers which are legal persons.
- Information regarding goods and services provided to CWW AM and payments made by CWW AM.
- Communication (via phone, e-mail or otherwise) with CWW AM.
- In relation to research: CWW AM's internal ratings of the work performed by the employee of the research provider.



2.2

CWW AM receives the data directly from its Suppliers, including the Suppliers' employees themselves, and do not use other external sources.

3 THE BASIS FOR PROCESSING OF PERSONAL DATA

3.1

CWW AM processes personal data for the following purposes:

- To purchase goods and services.
- To fulfil its obligations according to agreements with Suppliers.
- To fulfil its obligations according to laws and regulations and requests from public authorities, including:
 - The Danish act on investment firms and investment services and activities
 - Tax laws
 - Danish and foreign bookkeeping legislation
- To prevent fraud and abuse.

4 TRANSFER OF PERSONAL DATA

4.1

In some instances, CWW AM transfers personal data to third parties:

- Public authorities, such as regulators of the financial sector and tax authorities entitled to receive information according to law.
- CWW AM's external auditors, consultants and advisors such as lawyers.
- Service providers of IT related services such as cloud services and IT solutions supporting CWW AM's administrative tasks. In this relation, personal data may be transferred to data processors outside the EU and the EEA. In these cases, CWW AM will put in place



agreements to ensure that the processing of personal data by the services providers is subject to requirements equivalent to the requirements to which CWW AM's processing is subject.

5 STORAGE OF PERSONAL DATA

5.1

CWW AM stores personal data as long as required to fulfil the purpose for which the data has been collected and is processed. CWW AM stores basis information regarding the Supplier relationship at least for the duration of the agreement with the Supplier. After the termination of the agreement, CWW stores the information for 5 years to fulfil its requirements according to law. The data may, however, be stored for longer, provided that CWW AM has a legitimate interest herein.

6 RIGHTS OF REGISTERED PERSONS

6.1

According to law, Registered Persons have certain rights which are further described below. If a Registered Person wishes to make use of his or her rights, CWW AM may be contacted.

6.2

Registered Persons are entitled to:

- Get insight in their personal data processed by CWW AM, from where the information is derived and the purpose that it is used for. CWW AM is also obliged to inform the Registered Person to whom the information is transferred. The access to insight may, however, be limited by other legislation, by other persons' rights and by CWW AM's legitimate interests.
- Ask for a rectification of their personal data or an addition to their personal data if this makes the data more complete or updated.
- In certain instances, to have their personal data erased before the time of CWW AM's normal and general erasure of personal data occurs.



- In certain instances, to have the processing of their personal data limited. In these instances, CWW AM may thereafter only process the personal data (storage excluded) with the permission of the Registered Person or in order to establish, claim or defend a legal claim, to protect a person or vital public interests.
- In certain instances, to object to CWW AM's otherwise lawful processing of their personal data.

7 COMPLAINTS REGARDING PERSONAL DATA

7.1

Any complaints shall be sent in writing by letter or e-mail.
Registered Persons may send their complaints to:

C WorldWide Asset Management Fondsmæglerelskab A/S
Att. Compliance
Dampfaergevej 26
2100 Copenhagen
Denmark

Or via e-mail to: compliance@worldwide.com

Registered Persons who object to CWW AM's processing of their personal data may submit a complaint to:

- For Denmark: the Danish Data Protection Agency (Datatilsynet). The contact information of the Danish Data Protection Agency is available on: www.datatilsynet.dk.
- For Sweden: The Swedish Data Protection Authority (Datainspektionen) The contact information of The Swedish Data Protection Authority is available on: <https://www.datainspektionen.se>.
- For Finland: The Office of the Data Protection Ombudsman. The contact information of the Data Protection Ombudsman is available on: www.tietosuoja.fi/en/.



8 CWW AM'S CONTACT INFORMATION

8.1

CWW AM acts as a data controller. Questions regarding personal data may be submitted to:

C WorldWide Asset Management Fondsmaeglerselskab A/S
Att. Compliance
Dampfaergevej 26
2100 Copenhagen
Denmark

Or via e-mail to: compliance@worldwide.com

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