

# Information on the processing of your personal data ("Privacy Policy")

This Privacy Policy is effective as of October 14, 2024.

## General information on the processing of personal data

At Navia Corporate Finance AB (hereinafter referred to as "Navia", "we" or "us"), we protect your privacy and strive towards always maintaining a high level of data protection. This Privacy Policy describes how Navia collects and use Personal data that is collected via our website [www.naviacorporatefinance.com](http://www.naviacorporatefinance.com) and when Navia's services are used. It also describes your rights and how you can exercise them. If you have any questions, you are welcome to contact us via the contact details stated below.

Throughout this Privacy Policy, the term "processing" is used, which includes all operations involving Personal data, including without limitation, collection, handling, storage, sharing, access, use, transfer and deletion of Personal data.

"Applicable legislation" means applicable laws, ordinances and regulations, including regulations issued by relevant supervisory authorities, concerning the protection of the fundamental rights and freedoms of natural persons and in particular the right to the protection of their Personal data applicable to the processing in question; including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR") as well as laws, ordinances and regulations supplementing the GDPR.

"Personal data" shall have the meaning ascribed to it under the GDPR and means any information relating to an identifiable or identified natural person.

## Who is the data controller for the personal data we collect?

Navia Corporate Finance AB, company registration number 559490-2552, Box 13134, 250 13 Helsingborg, is the data controller for the company's processing of Personal data.

## From where do Navia collect personal data?

Navia collects Personal data from:

- You, that you either provide to us yourself or that we collect from you based on your visit of our website or when you become a client of Navia, or when using Navia's services.
- Publicly available sources, databases or registers.
- Other external persons, such as your employer or principal.

## When and why do we process Personal data?

### Provide you with information about our business via newsletters

We process your Personal data to handle and send out newsletters to you. These newsletters can e.g. contain information and news regarding our business and services, including marketing. You can unsubscribe from Navia's newsletters at any time by clicking the unsubscribe link in the e-mail or by contacting us.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact information</li> <li>• Organisational information if you are associated with a company</li> </ul>	<p>Legitimate interest. The processing is necessary to fulfill our legitimate interest in sending out our newsletter to you.</p> <p>Consent. The processing may also be based on your consent, as applicable.</p>
Retention period: Personal data will be retained for this purpose until you opt-out, which you may do in conjunction with each email, or by contacting Navia on the contact details set out below in this Privacy Policy.	

## Agreements in connection with capital raisings

We process your Personal data by saving copies of agreements regarding for example capital raisings such as subscription commitments, lock-ups and guarantee commitments in order to fulfill Navia's contractual obligations.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Personal identity number and date of birth</li> <li>Contact information</li> <li>Organisational information if you are associated with a company</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in fulfilling our contractual obligations. Personal identity numbers are necessary to process with regard to the purpose of the processing as such.
Retention period: Personal data is retained for up to seven (7) years from the time when the information is produced.	

### Market soundings in connection with capital raisings

If you are a potential investor, we collect and process your Personal data in a marketing context in connection with capital raisings.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Contact information</li> <li>Organisational information if you are associated with a company</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in sending out marketing materials.
Retention period: Personal data will be retained for this purpose until you opt-out, which you may do in conjunction with each email, or by contacting Navia on the contact details set out below in this Privacy Policy.	

### Documentation of information relating to market soundings

If you consent to receive information about marketing soundings, Navia must document certain information in order to comply with legal obligations regarding market abuse.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Contact information</li> <li>Organisational information if you are associated with a company</li> <li>Documentation of the consent to receive information relating to market soundings</li> </ul>	Legal obligation. The processing is necessary to fulfill legal obligations to which we are subject.
Retention period: Personal data is retained for a period of five (5) years.	

### Enter into agreements with Navia's potential and existing customers and manage the customer relationship

We process your Personal data in order to communicate with you prior to the possible conclusion of a customer agreement and, if such an agreement is entered into, to be able to handle the customer relationship with the company that you are associated with. This includes registering your contact information in our customer register, communicating with you, administering invoices and managing and archiving customer agreements.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Contact information</li> <li>Organisational information</li> <li>Your communication</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in being able to enter into and manage the customer relationship.
Retention period: Personal data is retained during the period you are associated with the customer.	

### Know Your Customer process

In connection with a customer intending to enter into a business relationship with Navia, we will process Personal data regarding the customer's senior executives, board and major shareholders in order to be able to perform applicable Know Your Customer checks. Navia has legal obligations to carry out such checks in order to e.g. combat money laundering and terrorist financing.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Contact information</li> <li>Organisational information</li> <li>Know Your Customer information</li> <li>Board related information</li> <li>Copy of ID</li> <li>Personal identity number and date of birth</li> </ul>	<p>Legal obligation. The processing is necessary to fulfill our legal obligations regarding customer knowledge in order to combat money laundering and terrorist financing. Personal identity numbers are necessary to process with regard to the purpose of the processing as such.</p> <p>Exceptions for sensitive Personal data</p> <p>Any personal data relating to criminal convictions and offences will only be processed if it is necessary to fulfill</p>

	our legal obligations to combat money laundering and terrorist financing.
Retention period: Personal data will be retained for this purpose for a period of five (5) years from the time when your Personal data was collected, for the purpose of complying with Navia's legal obligations. If it is necessary to prevent, detect or investigate money laundering or terrorist financing, Navia may retain your Personal data for a total period of ten (10) years from the time the Personal data was collected.	

### Manage and respond to questions and potential complaints

If you contact us, e.g. via our digital channels, we will process your Personal data that you provide us with to communicate with you and respond to and investigate any questions and/or complaints that you may have.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Contact information</li> <li>Your communication</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in managing and responding to your submitted questions and/or complaints.
Retention period: Personal data is retained until your question or complaint has been solved.	

### Evaluate and follow up the customer relationship

Navia will process your Personal data to the extent necessary, in order to evaluate and follow up our customer relationships. This can e.g. include mapping through which channels we have come into contact with our customers.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>Identity information</li> <li>Organisational information</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in evaluating and follow up our customer relationships.
Retention period: Statistics and other information at the aggregate level that cannot identify you as an individual are saved for an indefinite period.	

### Evaluate and monitor the use of our website

Navia will process your Personal data when customising services to become more user-friendly (e.g. change the user interface to simplify the flow of information or to highlight functions that are often used by customers in our digital channels). In order to analyse and better understand how you use our website, we further process your Personal data, which we e.g. have collected via cookies and similar technologies. This is done by e.g. collecting visitor and click statistics, from which website you came from, which pages you visited on our website and for how long time/number of times.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>User-generated data</li> <li>Identity information</li> <li>Geographical information</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in evaluating and monitoring the use of our website.
Retention period: Reports at an aggregative level that do not contain any Personal data and statistics are stored for an indefinite period.	

### Improve your experience on our website

In order to improve your experience on Navia's website and provide you with tailored content when appropriate, we will collect and process your Personal data, e.g. via cookies and similar techniques. This means that we e.g. can save information about your web history and selected website settings (such as language and display settings) for the purpose mentioned above.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>User-generated data</li> <li>Identity information</li> <li>Geographical information</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in improving your experience on our website and providing you with tailored content.
Retention period: Reports at an aggregative level that do not contain any Personal data and statistics are stored for an indefinite period.	

### Establish, exercise and defend legal claims

In order to establish, exercise and defend legal claims, e.g. in connection with a dispute or legal process, Navia process your Personal data (where applicable).

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>All information necessary to manage and address the legal claim.</li> </ul>	<p>Legitimate interest. The processing is necessary to fulfill our legitimate interest in establishing, exercising and defending legal claims, e.g. in connection with a dispute or legal process. Personal identity numbers are necessary to process with regard to the purpose of the processing as such.</p> <p>Exceptions for sensitive Personal data</p> <p>We only process sensitive Personal data, including information about crime or suspected crime, when necessary, in order to establish, exercise and defend legal claims.</p>
Retention period: Personal data is retained during the statutory limitation period for the purposes of establishing, exercising and defending legal claims. The general statutory limitation period in Sweden is ten (10) years.	

### Fulfill legal obligations

Navia processes your Personal data in order to fulfill other legal obligations to which we are subject, in addition to the legal obligations mentioned above in this Privacy Policy. Such obligations may e.g. include obligations regarding accounting and bookkeeping as well as requirements pursuant to the Data Protection Regulation.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>All information that is necessary to fulfill the respective legal obligation.</li> </ul>	Legal obligation. The processing is necessary to fulfill legal obligations to which we are subject.
Retention period: Personal data is retained for the period necessary in order for Navia to fulfill legal obligations to which we are subject.	

### Manage and protect IT systems and services

Navia processes your Personal data if necessary, in order to manage and protect our IT systems and services, e.g. in connection with logging, troubleshooting, backup, change and problem management in systems and in connection with any IT incidents.

Categories of Personal data	Legal basis
<ul style="list-style-type: none"> <li>All information listed above.</li> </ul>	Legitimate interest. The processing is necessary to fulfill our legitimate interest in managing and protecting our IT systems and services.
Retention period: Personal data is retained for the same period as stated in relation to the respective purpose above.	

### Recipients who Navia share personal data with

When necessary, Navia share Personal data with the recipients specified below. Unless otherwise stated, named recipients are independent data controllers for their own processing of Personal data.

Recipient	Purpose	Legal basis
Authorities (e.g. the Police, the Swedish Tax Agency and the Swedish Financial Supervisory Authority)	In order to fulfill any legal obligations to which we are subject, e.g. in connection with requests from authorities or other legal claims.	Legal obligation. The processing is necessary to fulfill legal obligations to which we are subject.
Authorities (incl. courts) and legal representatives	To establish, exercise and defend legal claims.	Legitimate interest. The processing is necessary to fulfill our legitimate interest in disputes and cases being managed by competent courts and legal representatives.
Buyers, sellers and external advisors/other parties involved	To enable business changes, e.g. sale or merger of the business or investments in general.	Legitimate interest. The processing is necessary to fulfill our legitimate interest in conducting and executing business changes.
Issuer agents	In order to fulfill any legal obligations to which we are subject.	Legal obligation. The processing is necessary to fulfill legal obligations to which we are subject.
The stock exchange	In order to fulfil our contractual obligations with the stock exchange.	Legitimate interest. The processing is necessary to fulfill our legitimate interest in fulfilling our contractual obligations.

External advisors/other parties involved	In order to fulfil our contractual obligations with our customers.	Legitimate interest. The processing is necessary to fulfill our legitimate interest in fulfilling our contractual obligations.
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## Service providers

To fulfill the purposes of the processing of Personal data, Navia share your Personal data with service providers that we have engaged. These suppliers provide services within e.g. IT services (companies that manage necessary operations, technical support and maintenance of our IT systems). The service providers we have engaged are only allowed to process your Personal data in accordance with our explicit instructions and may not use your data for their own purposes. They are also required by law and agreement to take the appropriate technical and organisational security measures in order to protect your information.

## Appropriate safeguards for the transfer of Personal data to third countries

If Navia transfers or discloses your Personal data to a recipient in a country outside the EU/EEA area (third country), Navia will ensure that appropriate safeguards have been taken (such as the EU Commission's standard contract clauses and other necessary measures) in order to protect Personal data. Pursuant to applicable data protection legislation, you have the right, upon request, to receive a copy of the documentation demonstrating that the necessary protective measures have been taken in order to protect your Personal data when transferring it to a third country. If you would like to know more about the processing of your Personal data and if your Personal data is transferred to a third country, please contact Navia by using the contact information below.

## Security

Navia will ensure that access to your information is adequately protected by having appropriate security measures implemented and, depending on the circumstances, taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks. To uphold this warranty, Navia have also implemented appropriate technical, physical and organisational measures to protect your Personal data from unlawful or accidental destruction, alteration or disclosure, misuse, damage, theft or loss by accident or unauthorised access.

## Your rights

Rights in relation to your Personal data in connection with Navia's processing of your Personal data, you may, under certain conditions, exercise the following rights:

- Access  
You can request confirmation of whether or not your Personal data is being processed and, if it is being processed, request access to your Personal data and additional information such as the purpose of the processing. You also have the right to receive a copy of the Personal data that is processed. If the request is submitted electronically, the information will also be obtained in a commonly used electronic form unless you request otherwise.
- Rectification  
If you notice that Personal data about you is inaccurate or incomplete, you have the right to have your Personal data rectified.
- Object to specific processing  
You can object to processing of your Personal data if it is based on a legitimate interest, on grounds relating to your particular situation or if the processing takes place for direct marketing purposes. If we are unable to demonstrate compelling legitimate grounds to continue processing, that override your interests, or if the processing is not necessary to establish, exercise and defend legal claims, Navia is obliged to cease the processing.
- Erasure  
You can have your Personal data erased under certain circumstances, e.g. when the Personal data is no longer needed to fulfill the purpose for which the Personal data was collected.
- Restrict processing  
Under certain circumstances, you can request that we restrict the processing of your Personal data to only involve the storage of your Personal data, e.g. when the processing is unlawful but you do not want your Personal data deleted.

- Withdraw consent  
To the extent that the processing of Personal data is based on your consent, you always have the right to withdraw your consent.
- Data portability  
You have the right to request a machine-readable copy of the Personal data processed based on your consent or when the processing is necessary to fulfill an agreement with you as well as when Personal data has been obtained from you (data portability), and to request that the information be transferred to another data controller (if possible).
- Complaints to the supervisory authority  
You are welcome to contact Navia with questions or complaints regarding the processing of your Personal data. However, you also always have the right to lodge a complaint regarding the processing of your Personal data to the Swedish Authority for Privacy Protection.

## Contact Navia

If you have any questions regarding the processing of your Personal data or if you wish to exercise any of your rights pursuant to applicable data protection legislation, please contact Navia by using the contact details below. If needed, we have the right to change and supplement the Privacy Policy.

The Data Controller is:

Navia Corporate Finance AB

Email address: [info@naviacf.se](mailto:info@naviacf.se)

## Categories of personal data

Below you will find an explanation of the categories of Personal data that Navia may collect and store about you.

Categories of Personal data	Examples of Personal data
User-generated data	Click and visit history, technical data regarding used devices and their settings (e.g. language setting, IP address, browser settings, time zone, operating system, screen resolution and platform), information about how you interacted with us, login method, which pages and how long different pages have been visited, response times, download errors, how to access and leave the service, etc.
Your communication	Personal data that you provide in your communication with us
Geographical information	Location data from your device that e.g. may be collected via cookies
Identity information	First name, surname
Contact information	Email address, phone number, postal address
Know Your Customer information	This includes information regarding actual beneficiaries, Political Exposed Persons, connections to high risk third countries, sanctions lists data.
Board related information	Information regarding other Board appointments, ownership, bankruptcies, liquidations and sanctions.
Organisational information	Title, position, employer or client if you associated with a company
Copy of ID	
Personal identity number and date of birth	Date of birth and personal identity numbers are processed for Board and management members and investors
Documentation of the consent to receive information relating to market soundings	