

PRIVACY POLICY

1 INTRODUCTION AND PURPOSE

As data controller, Oberon Family Office, reg. no. 559167-1424, (the “Company”) is responsible for the processing of personal data relating to the Company’s activities. This policy states the purposes for which the data will be processed and how the processing will be carried out and aims to safeguard privacy. The policy sets out how the Company will process personal data recorded by the Company, in accordance with the rules of 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 (“GDPR”). The policy also describes the rights of individuals and how these rights can be enforced.

External questions regarding the policy should be addressed to

Oberon Family Office AB

Hovslagargatan 5

111 48 Stockholm

info@oberonfamily.com

2 TERMINOLOGY AND DEFINITIONS

For the purposes of this policy, the following terms shall have the meanings set forth below:

Personal data refers to any information that can be directly or indirectly attributed to a natural person. For example, images and sound recordings processed electronically may constitute personal data even if no names are mentioned. Encrypted data and various kinds of electronic identities (such as IP numbers) are personal data if they can be linked to natural persons.

Processing of personal data means any operation or set of operations which is performed on personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, transmission or deletion.

The **data subject** refers to the person to whom the personal data relates.

Sensitive data refers to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

Rights refer to the rights that data subjects have under the GDPR, which are set out below under section 5. The relevant rights are described in more detail on [the website of the Swedish Authority for Privacy Protection](#).

Definitions of some specific terms used in this policy can be found on [the website of the Swedish Authority for Privacy Protection](#).

3 WHAT PERSONAL DATA DOES THE COMPANY COLLECT AND FOR WHAT PURPOSE?

The Company is an investment firm providing portfolio management and other investment services. The Company processes personal data during its business operations. The Company collects and processes personal data in the business areas and functions set out below. Processing of personal data is carried out on the categories and for the purposes listed below, on the legal basis specified in relation to each processing operation.

3.1 Client due diligence

Purpose and legal basis

Under the Anti-Money Laundering and Terrorist Financing Act (2017:630), investment firms are obliged to make an assessment regarding how their products and services could potentially be used for money laundering or financial terrorism. The investment firms must make such assessment before establishing a business relationship with the clients.

The purpose of the processing of personal data is to comply with these legal requirements, which are thus based on a legal obligation. The Company's client due diligence procedures include verification of the identity of the representative of the legal entity and, where applicable, the beneficial owner, as well as verification of whether the beneficial owner (legal person) or the client (natural person) is a Politically Exposed Person (PEP) and whether the beneficial owner or client appears on any sanctions lists.

Categories of personal data

In the context of the Company's client due diligence measures, the Company processes the following categories of personal data.

When the client is a legal person:

- Name and social security number of the beneficial owner or alternative beneficial owner, which shall be evidenced by a copy of the passport, driving license or identity card submitted to the Company and which shall also indicate the nationality, sex and height of the beneficial owner.
- Financial information.
- Information on the PEP-status of the beneficial owner, including profession/function.
- Information on offences relating to the beneficial owner, which may be detected during checks against sanctions lists.

When the client is a natural person:

- Name and social security number, which must be proven by a copy of the passport, driving license or identity card submitted to the Company, and which, in addition to the name and

social security number, contains information on the nationality, sex and height of the natural person.

- Address.
- Financial information.
- Where applicable, details of professional experience and education.
- PEP-status, if any, including information on profession/function.
- Information on offences that may be detected during checks against sanctions lists.

In order to ensure that information processed by the Company is accurate and kept up to date, the Company may also obtain information from a third party. The Company may obtain data from the national population register, the national companies register, the register of beneficial owners, EU sanctions lists and register of persons with PEP-status.

Recipients of personal data

Data processed by the Company in connection with the Company's due diligence procedures is stored in the Company's server provided through Office 365 Sharepoint, which is the cloud-based document storage service used by the Company. The Company may also share the relevant data with other IT and system providers who provide support for the Company's systems and cloud services. The client due diligence process is partly carried out in a tool provided by Trapets AB, which is used when onboarding and then on a quarterly basis. The Company may also share data with the Financial Police if disclosure is required by law.

Storage of personal data

The personal data collected as part of the Company's client due diligence measures are stored by the Company for the duration of the client relationship and for a further five years after the relationship with the client has ended (up to then years if requested by law enforcement authorities).

3.2 Client registration

Purpose and legal basis

The Company processes personal data for the purpose of concluding contracts with clients and registering clients with the Company.

The provision of personal data is not a legal requirement, but a prerequisite for the conclusion of a contract between the Company and the client. Personal data is processed for the purposes of administering client lists and carrying out suitability assessments for investment services.

Categories of personal data

- The Company processes the following categories of personal data:
- Name, e-mail address and telephone number of contact person/representative.
- Personal identity number of contact person/representative.

- Copy of the identity document of the representative.
- Account details.
- Financial data such as bank accounts, assets, transactions, credits, income and debts.
- Information on tax residence and foreign tax identification number.

The Company collects the data provided to the Company when the client enters into a contract with the Company. The Company also collects information that the client subsequently provides to the Company, for example when updating client data.

To ensure that the Company's information is accurate and up to date, the Company also collects information from third parties. The Company may also obtain information from civil and company registers.

Recipients of personal data

The data is stored in the Company's server provided through Office 365 Sharepoint.

How long will the data be stored?

The Company does not store information longer than necessary for the purposes of the processing and therefore carries out regular deletions of personal data. According to law, the Company is obliged to store certain data even after a client relationship has ended. Data relating to taxation, accounting or for the defence of legal claims is stored for between 5-10 years.

Personal data relating to potential clients or client representatives of potential client companies are deleted if no client relationship has been established.

3.3 Administration of client assignments (including execution of investment services)

Purpose and legal basis

The Company processes personal data to carry out and administer the assignment and to protect the client's interests.

The Company processes personal data to fulfil contractual obligations and

- Execute transactions on behalf of the client and otherwise provide and manage access to investment products and services.
- To be able to communicate with clients by email, post, and telephone.
- To manage and book meetings.
- To send out quarterly reports and other reports related to the performance of investment services.
- To provide efficient and accurate documentation, administration, and management of the assignment.

The provision of personal data is not a legal requirement, but a precondition for the conclusion of a contract between the Company and the client.

Categories of personal data

The Company processes the following categories of personal data:

- Name, e-mail, address and telephone number of the client.
- Financial details, including account number with the client's custodian bank.

The Company collects the data provided to the Company when the client enters into a contract with the Company. The Company also collects information that the client subsequently provides to the Company, for example when updating client data.

Recipients of personal data

The data is stored in the Company's server provided through Office 365 Sharepoint. In addition, the Company may share the data with other IT system providers who provide support for the Company's systems and cloud services. This data is also shared with the client's custodian bank.

Storage of personal data

The Company does not store information longer than necessary for the purposes of the processing and therefore carries out regular deletions of personal data. According to law, the Company is obliged to store certain data even after a client relationship has ended. Data relating to taxation, accounting or for the defence of legal claims is stored for between 5-10 years.

3.4 Recruitment*Purpose and legal basis*

The Company collects and processes personal data when dealing with applications and conducts interviews in the context of a recruitment procedure. The Company may store the personal data in its CV-database in order to contact the applicant for future recruitments. The legal basis for the processing is the conclusion of an agreement and the Company's legitimate interest in receiving and processing an application for employment.

The provision of personal data is not a legal requirement, but a prerequisite for conducting a recruitment process.

Categories of personal data

In the context of a recruitment process, the Company processes the following categories of personal data:

- Name, address, e-mail address and telephone number.
- Where applicable, photograph of the applicant.
- Details of previous work experience as well as professional references.
- Education and training certificate.
- Contact details of any references.

The application shall not contain information on ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sex. Job applicants should only provide personal information about themselves in their cover letter. If the Company obtains references about the applicant, the Company will share and receive personal data in the reference process.

Recipients of personal data

The recipients of the personal data are mainly managers of the Company and recruitment agencies.

Storage of personal data

The Company does not store information longer than necessary for the purposes of the processing and therefore carries out regular deletions of personal data. However, the Company may need to store personal data after the recruitment process is completed if the Company deems such storage necessary to handle any legal claims against the Company. In these cases, the storage period is 2 years.

The Company may save applications from candidates of interest for future recruitment. In such cases, the data is saved for a maximum of 2 years. Candidates must always be given the opportunity to object to future contacts by the Company.

3.5 Employees

Purpose and legal basis

Employees' personal data is processed in order to comply with obligations pursuant to law, for the entering into or performing of contracts or otherwise on the basis of balancing legitimate interests.

The processing of the employee's personal data is required for the following purposes: salary payments, calculation of commission, salary review and calculation of other remuneration and benefits, general personnel administration, time reporting, deviation reporting, management of directors' fees, contacting employee's relatives in case of incidents/accidents, holiday management, provision of occupational health care, administration of employment benefits (including pensions, life insurance and health insurance), maintaining sickness and absence records for calculating sick pay and participating in rehabilitation investigations in accordance with Work Environment Act, deciding on suitability for particular work, evaluating and reviewing performance (including performance, other assessment information and development dialogues with the employee), fulfilling legal obligations such as payment of withholding tax and social security contributions, complying with employment legislation such as seniority rules, and for the purpose of issuing employer's certifications.

Categories of personal data

The Company processes the following categories of personal data:

- Name, e-mail address, telephone number, address, social security number, bank details, basis for remuneration and benefits, information about relatives, qualifications, work experience and development, periods of absence, illness and possible rehabilitation.

Recipients of personal data

The recipients of the data are mainly managers of the Company, the Company's finance department, internal or external actors who administer salaries and other benefits, etc., as well as public authorities.

Storage of personal data

The Company does not store information longer than necessary for the purposes of the processing and therefore carries out regular deletions of personal data. When an employment is terminated, there is normally no need to save the former employee's personal data. This also applies to the employee's e-mail address. In such cases, deletion should take place as soon as possible after the termination of the employment.

To comply with the Company's obligations under applicable employment law, tax law and social security law, the Company is obliged to store certain data about the employee for a period even after the termination of employment. Data must be saved to comply with the legal obligations relating to taxation, accounting, declaration regarding the employee's preferential right to re-employment in the law (1982:80) on employment protection and to deal with any legal claims that may be made against the company. In some instances, it is required that data is stored for disbursement of pension or severance payment. In these exceptional cases the data is stored in 2 years respectively 10 years (regarding accounting, taxation, and limitation periods). In some pension commitments data must be stored for a longer time than prescribed.

Some of the personal data processed by the Company because of the employment may comprise data of a sensitive nature. These include medical conditions. See more about the Company's handling of sensitive data below.

3.6 Board members

Purpose and legal basis

The personal data of the board members are processed to comply with legal obligations, to enter or fulfil contracts or otherwise based on a balance of interest.

The personal data is processed for the following purposes: election committee and nomination of members and board, payment of board fees, invoicing, accounting and otherwise managing the member assignments.

Categories of personal data

The Company handles the following categories of personal data:

- Name, address, e-mail address, telephone number, social security number, board fees, bank information, professional background, qualifications, and details of current employer.

Recipients of personal data

The recipient of the data is mainly the Company's Board of Directors, its employees, suppliers, clients, and authorities.

Storage of personal data

The Company does not store the information longer than necessary with regards to the purpose of the processing. The Company therefore carries out regular deletions of the personal data. The personal data is finally deleted one year after the mandate of the member has ended. In order to fulfil its obligations under the law the Company needs to keep certain data about the member even for a period after the end of the mandate. For example, data must be retained to comply with legal obligations relating to taxation, or bookkeeping. In these exceptional cases, data is retained for 10 years (relating to accounting, taxation, or limitation periods).

3.7 Suppliers and partners

Purpose and legal basis

In order to enter and fulfil a contract with suppliers, the Company processes personal data of representatives of the suppliers. Some personal data may also be processed on the basis of balancing of interest or on the basis that the company is legally obliged to do so, for example with regard to personal data on invoices. The Company processes personal data in order to administer contracts, manage invoices and to be able to ask the supplier questions regarding the goods or services that the Company is purchasing.

Categories of personal data

The Company handles the following categories of personal data:

- Name, telephone number, e-mail address and professional title.

Recipient of personal data

The recipient is mainly the Company's Board, and employees.

Storage of personal data

The Company does not store the information longer than necessary with regards to the purpose of the processing. The Company therefore carries out regular deletions of the personal data. The Company may need to retain personal data after the contractual relationship has ended, for example to handle any legal claims against the Company and ensure compliance with legal obligations, for example with regards to taxation or accounting. Exceptionally, therefore, personal data is stored for 7 years (accounting) or 10 years from the end of the contractual relationship.

3.8 Other processing

Purpose and legal basis

Personal data can also be processed for other purposes such as to answer inquiries, establish, exercise, and defend legal claims, manage complaints, process, protect and develop systems and services and to fulfil legal obligations.

The basis for this processing is balancing of interests/legitimate interests and legal obligation.

Categories of personal data

The Company processes the following categories of personal data:

- Name, contact details, information about completed assignments, log information, information on paid fees, fees and other financial transactions with the data subject.

Recipient of personal data

Recipient of the data is mainly the Company's administrative department and the customer complaints manager.

Storage of personal data

The Company does not store the information longer than necessary with regards to the purpose of the processing. The Company therefore carries out regular deletions of the personal data. The Company stores information to respond to the inquiry for 12 months from the time when the inquiry was received. In the event of legal claims, the Company applies the appropriate time bars. In the management, protection and development of systems and services the Company stores the data for 12 months from the time that the event was logged. In fulfilling of legal obligations, for example according to the Accounting Act, the Company may store data for 7 years from the end of the calendar year in which relevant financial year ended.

4 THE COMPANY'S PROCESSING OF PERSONAL DATA

4.1 General

When the Company collects, processes, and stores personal data, this should be done in a legal, correct, transparent and appropriate manner and only to the extent the Swedish Companies Registration Office deems it necessary. The Company shall continuously process personal data in a way that avoids violating the personal privacy of the data subject. The Company ensures that the personal data is protected by appropriate security measures.

As mentioned above, when the Company requests personal data this is in many cases done to fulfil legal or contractual requirements or requirements that are necessary to conclude a contract with an employee. If the information requested is not provided, this may result in the company being unable to enter into a contract or fulfil its obligations in an agreement with the data subject.

4.2 Collection of data from others

In addition to the information provided by the data subject, the company may also collect personal data from others (so-called third parties). Data collected from third parties are:

- Address information from public registers to ensure that the company has the right address information to the person concerned.
- Information regarding credit rating from credit rating agencies, banks or credit reference companies.

4.3 Disclosure of data to external parties

The Company may have to disclose information to relevant third parties when this is due to a legal obligation and exceptionally also in other cases. In each such case, to ensure that personal data is processed in a safe and secure manner, the Company establishes agreements with the external party that processes personal data on behalf of the Company. Such agreements always specify the subject of the processing, the duration of the processing, the nature and the purpose, the type of personal data and categories of data subjects and the Company's obligations and rights as personal data controller. Furthermore, the Company always provides documented instructions to the personal data processor that the personal data processor is obliged to follow.

The Company may also share personal data with companies that are independent data controllers. The fact that the Company is an independent data controller means that it is not the Company that controls how the information provided to the Company is processed. Independent data controllers with whom the Company may share personal data include financial and legal advisors and accountants. When personal data is shared with a company that is an independent data controller, it is subject to the company's privacy policy and personal data management principles.

4.4 Transmission to third countries

In general, personal data is processed only within the EU/EEA but may in some cases be transferred to and processed in countries outside the EU/EEA. For this to happen, one of the following conditions must be met:

- The EU Commission has decided that there is an adequate level of protection in the country concerned, or
- other appropriate safeguards are in place, or
- it is an exception in a specific situation, for example to fulfil a contract with a client or if the client consents to the specific transfer.

4.5 Processing of social security numbers

The Company only processes personal data when it is clearly justified by the purpose, necessary for secure identification or if there are other legitimate reasons. The Company tries to minimize the use of social security numbers by, where sufficient, using birth numbers.

4.6 Processing of sensitive data

The Company does not process sensitive personal data within the scope of the areas and functions stated in section 3 above.

5 THE RIGHTS OF THE DATA SUBJECT

According to GDPR, the data subject has the right to control his/her personal data and has the right to obtain information from the Company regarding the processing of personal data. Information regarding these rights is set out below.

5.1 Right to access (so-called extract from the register)

The data subject has the right to be informed of the processing operations carried out by the Company. This shall include, inter alia, a description of the purposes and legal basis of the processing, the categories of personal data concerned and the recipients of the personal data. The purpose of a register extract is to provide an overview of the personal data processed so that it is clear for which purpose the processing is to be carried out.

5.2 Right to rectification, deletion, or limitation

The data subject has the right to request the rectification or, under certain conditions, the restriction or deletion of his/her personal data. If the data subject considers that the Company is processing personal data concerning him/her that is inaccurate or incomplete, the data subject may request that it be corrected or completed. The Company will rectify and delete the personal data, if possible, in relation to the purposes of the processing by the Company and applicable law.

5.3 Right to object to certain types of processing

The data subject has the right to object at any time to the processing of his/her personal data if the lawful ground for processing is a public interest or a balance of interests.

The data subject also has the right to object at any time to the processing of his/her personal data if they are processed for direct marketing purposes.

5.4 Right to data portability

The data subject has the right to obtain the personal data provided to the controller and has the right to transfer this data to another controller. This right applies when the data subject has given his/her consent to the Company's processing of personal data, or if the Company processes personal data provided by the data subject to the Company to fulfil a contractual obligation that the Company has undertaken.

5.5 The right to withdraw consent

If the processing of personal data is based on the data subject's consent, he/she has the right to withdraw this consent at any time. Such withdrawal does not affect the lawfulness of the processing of personal data prior to the withdrawal of consent.

5.6 Right to complain about the processing of personal data

The data subject always has the right to contact the Swedish Authority for Privacy Protection if he/she wishes to lodge a complaint relating to the Company's processing of personal data.

Contact details for the Swedish Authority for Privacy Protection

Phone number: 08-657 61 00

E-mail address: imy@imy.se

If the data subject wishes to exercise his/her rights or obtain answers to other questions, the contact details can be found in section 1. The data subject has the right to address the Company instead of the Swedish Authority for Privacy Protection.

6 HOW DOES THE COMPANY PROTECT THE DATA SUBJECTS PERSONAL DATA?

The safe and secure storage of the data subject's personal data is important to the Company. The Company uses IT-systems to protect the confidentiality, integrity, and access to the personal data. The Company has taken special security measures to protect the data stored against unlawful or unauthorized processing (loss, misuse, unauthorized access, disclosure, alteration, and destruction). Only those persons who need to process personal data in order for the Company to fulfil its stated purposes have access to it.

7 CONTACT THE COMPANY

If the data subject has any questions or comments regarding the processing of personal data, the Company may be contacted as described below. The same applies to those who wish to exercise their rights (see above). Jasmina Vacic is responsible for personal data management at the Company.

info@oberonfamily.com

Hovslagargatan 5, 111 48 Stockholm

8 CHANGES TO THE POLICY

The Company reserves the right to change and update the policy. In the event of material changes to the policy or if existing information is to be treated in a manner other than specified in the policy, the Company will provide appropriate notice.