PRIVACY POLICY

HEARTCORE CAPITAL A/S (CVR-no. 40295860)

1. INTRODUCTION

Heartcore ("Heartcore", "us" or "we") understand that your privacy is important to you. We are committed to respecting your privacy and protecting your personal data, which is any information that can identify you as an individual person. This Privacy Policy describes how we handle and protect your personal data in connection with Heartcore's business activities.

2. INFORMATION WE COLLECT

At Heartcore we collect personal data during our business activities, including in connection with sourcing new potential portfolio companies. We also collect personal data when you apply for jobs at Heartcore. The personal data collected varies and may include information that you provide, such as your name, mailing address, email address, telephone number, and background information required to apply for a job.

3. YOUR RIGHTS

Where granted by applicable law, you may have the right to request access to the personal data that we have collected about you for the purposes of reviewing, modifying, or requesting deletion of the data. You may also have the right to request a copy of the personal data that we have collected about you and to have any inaccuracies in that data corrected. In certain circumstances, you may also request that we cease processing your personal data.

If you would like to make a request to access, review, or correct the personal data we have collected about you, or to discuss how we process your personal data, please contact us at GDPR@Heartcore.com.

To help protect your privacy and security, we will take reasonable steps to verify your identity, such as requiring an email address as verification of your identity, before granting you access to your personal data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Different laws may prevent us from providing access to your personal data or otherwise fully complying with your request depending upon the circumstances and the request, such as for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee for complying with your request as allowed by applicable law, and/or deny your requests where they may be manifestly unfounded, and/or excessive, or otherwise objectionable or unwarranted under applicable law.

In addition, and as granted by local law, you have the legal right to lodge a complaint with a competent data protection authority: Datatilsynet.

4. USE OF INFORMATION

We process data about you to comply with our obligations as data controller, to fulfil contracts and in connection with data

processing, where consent has been given. We also make use of systems that collate publicly available information.

The data we process is the minimum necessary data required to fulfill our specific purpose. It includes:

- General personal data: Name, address, email, and telephone number etc.
- Confidential personal information: CPR nr. and passport copy

We collect and store your data in connection with specific purposes or other legitimate interests:

1. To carry out any obligations forming from a contractual agreement between us

   We store and process your name, telephone number, and contact email, which is necessary for the fulfilment of the contract and is one of the legitimate processing reasons according to the personal data regulation article 6(1)(b).

2. To identify, evaluate, and enter into investment and exit opportunities

   Steps required prior to entering into a contract is our legitimate processing reason according to the personal data regulation article 6(1)(b), which states that the processing of data is lawful when it is necessary for the performance of a contract.

3. To monitor and support portfolio companies of the funds

   Fulfilment of the contract is our legitimate processing reason according to the personal data regulation article 6(1)(b), which states that data processing is lawful, when necessary for fulfillment of contract.

4. To contact you for administrative and promotional purposes relating to our services.

   Your consent is our legitimate interest for handling your personal data according to the personal data regulation article 6(1)(a). You can withdraw your consent at any time, by emailing GDPR@heartcore.com.

5. For internal record keeping

   We process your personal data such as name, email, phone number, title, address, and bank information when you are a part of a financial transaction with us. The legitimate processing reason is the personal data regulation article 6(1)(b) regarding fulfilment of contract.

6. To document your identity.

   We have an obligation in the Danish anti-money laundering act to document identity of the legal and / or beneficial owners of the limited partners that have invested into any of the funds managed by Heartcore. Our legal basis for such processing is the personal data regulation article 6(1)(c) – which states that processing is lawful when it is necessary for compliance with at legal obligation to which the controller is subject.

We have entered into a data processing agreement with Mazanti-Andersen Advotkatpartnerselskab, who processes the data from the limited partners on behalf of Heartcore. Heartcore is the data controller and Mazanti-Andersen Advokatpartnerselskab is the data processor, who is subject to the instructions from Heartcore.

Furthermore, we collect KYC information from some of the founders of our portfolio companies, by obtaining their consent. Our legal basis for such processing is the personal data regulation article 6(1)(a), which states that the processing of data is lawful when the data subject has given consent to the processing of their personal data for specific purposes.

The KYC information is stored and processed via the software service, New Banking Identity. It is noted that the data subjects have the right to withdraw their consent at any time, though the consent is a condition for the collaboration.

7. To store an application of employment

When you apply for a position at Heartcore, we store your personal data for as long as we are processing your application. Unsolicited applications will be stored for 9 months.

Our legal basis for such processing is the personal data regulation article 6(1)(b) regarding performance of a contract with you or the personal data regulation article 6(1)(c) regarding compliance with a legal obligation.

8. To store information about potential future cooperation

Our legitimate processing reason is according to the personal data regulation article 6(1)(f), which states that processing of data is lawful when it is necessary for the purposes of the legitimate interests pursued by the controller.

9. To host events and activities in partnerships with other organizations

In those cases, we may share your name and company name with them for the operations of the event or activity. We will not share any contact information with other organizations unless we have your explicit consent. Our legal basis for such processing is the personal data regulation article 6(1)(a) regarding consent.

5. SOCIAL MEDIA

By following or otherwise associating your social media account with Heartcore using your social media account credentials, you give us permission to access information that you have made available in your public profile for that social media account. The information available in your public profile varies based on the social media and your settings,

but may include your email address, real name, profile picture, gender, and location. We use the information we receive from your social media account in accordance with the social media's terms of use and this Privacy Policy. Please refer to the privacy settings in your social media account for information about what data is shared with Heartcore and other connected applications and to manage the data that is shared through your account.

If you would like to disconnect a social media account from us, refer to the settings of that social network account and its provider.

6. DATA RECIPIENTS AND INTERNATIONAL DATA TRANSFERS

Personal data collected during Heartcore business activities or through direct email to Heartcore employees may be transferred to other Heartcore employees as well to third parties collaborating with Heartcore when submitting necessary documents to authorities in third countries where the local law may grant you fewer rights than you have in your own country.

Additionally, the Heartcore's website may be viewed and hosted by Heartcore and our third-party service providers. Where required by law, we have put in place legal structures and procedures designed to ensure adequate data protection of your personal data that is processed by Heartcore, connected experts and third-party service providers, including the transfer of your personal data to countries other than the one in which you reside. If you would like more information about these legal structures and procedures, please contact us at the address below.

By using any direct email correspondence to Heartcore's personnel providing information, you consent to such trans-border (to other countries-third countries i.e., when finding a CRO) transfer and hosting of such information.

Heartcore will not intentionally disclose or transfer (and will take reasonable steps to prevent the unauthorized or accidental disclosure of) your personal data to third parties without your consent or as otherwise permitted by law, whether for such third parties' own marketing purposes or otherwise, except as follows. Heartcore may provide access to your personal data to third party service providers engaged by Heartcore to provide services related to the website, online systems and data rooms as well as related to Heartcore's business activities, in the manner agreed upon in our limited partnerships agreements. We maintain processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Policy and protects the confidentiality, availability, and integrity of your personal data.

We also may share your personal data with third party service providers who perform services and functions on our behalf to support our interactions with you, including for example, administering data.

In addition, we may disclose information about you:

- If we are required to do so by law or legal process;
- To law enforcement authorities or other government officials;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;

- If disclosure is necessary to protect the vital interests of a person;
- To protect our property, services and legal rights;
- To prevent fraud against Heartcore, Heartcore employees and/or business partners;
- To support auditing, compliance, and corporate governance functions; or
- To comply with any and all applicable laws.

In addition, we may disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business while we are working with you.

Our website may contain links to other websites. We do not have any control over these websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

7. SECURITY

Heartcore has implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, alteration, or destruction. Only authorized Heartcore personnel and third- party service providers are provided access to personal data, and these employees and service providers are required to treat this information as confidential. Despite these precautions however, Heartcore cannot guarantee that unauthorized persons will not obtain access to your personal data.

Heartcore utilizes a number of service providers to store and process data. In order to prevent unauthorized access or disclosure, all information is securely stored with services that are compliant with the personal data regulation.

8. DATA RETENTION

Heartcore retains personal data during business relationships, as necessary, for the duration of the relevant business relationship.

We may also retain personal data for longer than the duration of the business relationship should we need to retain it to protect ourselves against legal claims or comply with our information management policies and schedules. If you request that we delete your personal data, Heartcore will make reasonable attempts to delete all instances of the information in their entirety. For requests for access, corrections, or deletion, please refer to the “Your Rights” section of this Privacy Policy.

In order to ensure that personal data is not stored longer than there is a legitimate interest hereto, we have a yearly “deletion day” where all employees review and delete personal data and information which is no longer necessary to store.

9. CONTACT US

If you have any questions about this Privacy Policy, please contact us at: GDPR@heartcore.com

or

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1265København K
https://www.heartcore.com/

10. REVIEW

The board of directors shall at least once a year review this policy to assess whether it needs to be revised to fit the development of the Company.

Approved by the Company's board of directors on 29 October 2024.