

# Privacy policy

## 1 Data controller and contact information

The data controller of your personal data is:

ROYC AB

Reg. no.: 559360-9422

Sturegatan 6,  
114 35 Stockholm  
Sweden

This Privacy Policy (the “**Policy**”) describes how ROYC AB and our affiliates (“**ROYC**”, “**we**”, “**us**” or “**our**”) processes your personal data.

We are responsible for the processing of your personal data as described in this Policy in the capacity of data controller. If you would like to know more about our processing of your personal data, you are welcome to contact us.

It is important to us that you feel comfortable with how we process your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes to the Policy, the new version will apply from the time it is published on our website.

## 2 The scope of this Policy

The Policy covers our processing of personal data collected in relation to your interactions with us, if you are a job applicant, website visitor, customer or a representative of our business partners and customers.

## 3 How we collect your personal data

The personal data we process relating to you is collected directly from you or from third party data sources. If you would like to know more about from which third parties we collect your personal data, you are welcome to contact us.

## 4 How we process your personal data

We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This means that we need to have a legal basis for the purposes of our processing of your personal data, which in our context generally means one of the below legal bases. If you are acting on behalf of someone else, e.g., in the capacity of a representative of an entity, our processing is carried out with reference to our legitimate interest balanced against your interests or fundamental rights or freedoms, where our legitimate interest is to conclude and perform the contract with the entity you represent.

**Performance of a contract:** the processing is necessary in order for us to provide you with our services or otherwise perform a contract between us or the entity you represent, or to take steps at your request prior to entering into a contract.

**Performance of legal obligations:** the processing is necessary to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are subject to orders or decisions by courts or authorities, which require us to process your personal data.

**Legitimate interests:** the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, if they are not overridden by your interests or fundamental rights or freedoms.

**Consent:** the processing is carried out with your prior consent, where we are responsible for clearly informing you of what processing you consent to and your right to withdraw your consent in relation to our continued processing.

Below, we explain more about the categories of personal data we process, for what purposes we process them and what legal bases we rely on when processing your personal data, including for how long we store your personal data.

#### **4.1 Cookies for the functionality of and to improve our website**

##### **Types of personal data**

ROYC uses cookies on the website [www.roycgroup.com](http://www.roycgroup.com) and in this connection processes your personal data. ROYC may collect the following personal data about you, when you visit our website.

- IP address
- MAC address
- Information about your use of our website
- Other technical information which is generated upon visiting our website, such as what type of device is used and web browser

We use cookies to collect the above-mentioned personal data. You can read more about the use of cookies in our cookie policy, which you can find via the following link: [https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5\\_Cookie%20Policy.pdf](https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5_Cookie%20Policy.pdf)

##### **The purpose of the processing activity**

To maintain, facilitate and improve the functions and user experience of our website, as well as support our work on detecting and counteracting flaws, breaches, and incidents. We further process the personal data for statistics and analyses purposes.

##### **Legal basis for processing**

**Legitimate interests:** We base the processing of your personal data on our legitimate interests in, conducting statistics, analyses, providing support, as well as improving and developing our products and services and to maintain, facilitate and improve the functionality and security on our website (Article 6(1)(f) of the General Data Protection Regulation).

##### **Retention period**

Cookies are deleted in accordance with our cookie policy. In most cases, the collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.

#### **4.2 Cookies for marketing**

##### **Types of personal data**

ROYC uses cookies on the website [www.roycgroup.com](http://www.roycgroup.com) and in this connection processes your personal data. ROYC may collect the following personal data about you, when you visit our website.

- IP address
- MAC address
- Browsing history
- Information about your use of our website, including click-behaviour
- Other technical information which is generated upon visiting our website, such as what type of device is used and web browser

**The purpose of the processing activity**

To market our products and services.

**Legal basis for processing**

Consent: We use cookies to collect the above-mentioned personal data. When you visit our website, we ask for your informed consent to place cookies that are not functional cookies (Article 6(1)(a) of the General Data Protection Regulation). You have the right to withdraw your consent at any time. You can read more about how you change your cookie settings in our cookie policy, which is available here: [https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5\\_Cookie%20Policy.pdf](https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5_Cookie%20Policy.pdf).

**Retention period**

Cookies are deleted in accordance with our cookie policy. In most cases, the collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.

**4.3 Management of user account / customer relations**

**Types of personal data**

- Your name
- Your e-mail address
- Your phone number
- Your address
- Your professional title as well as information about the entity you represent
- Information which you provide to us when communicating with you
- Individual information, e.g., preferred languages

**The purpose of the processing activity**

To manage your user account and to maintain and develop our relation with you or the entity on whose behalf you represent.

**Legal basis for processing**

Legitimate interest: Our legitimate interest to engage in, maintain and develop our business relation with you or the entity you represent (Article 6(1)(f) of the General Data Protection Regulation).

### **Retention period**

We process and keep your personal data while we have a business relation with you or the entity you represent, however for a maximum of twenty-four (24) months from the time we last were in contact because of our business relation.

#### **4.4 To register as a user on ROYC's investor portal**

##### **Types of personal data**

When you register as a user on the investor platform via the onboarding link provided by us, ROYC processes your personal data. ROYC may collect, process, and store the following types of your personal data:

- Your name
- Your e-mail address
- Your phone number
- Your address
- Your nationality
- Your country and city of birth
- Your source of wealth and funds
- Your political exposure within the past 12 months
- Digital footprints
- Your professional classification in accordance with MiFID and other relevant legislation
- Your tax residency
- Your tax ID
- Contractual information such as contracts and other agreements between you and ROYC
- Individual information, e.g., preferred languages

##### **The purpose of the processing activity**

To enter into or fulfil contracts between us or the entity you represent concerning the ROYC investor portal.

##### **Legal basis for processing**

Contractual obligations: We need to process your personal data in order to fulfil our obligations in relation to the contract (Article 6(1)(b) of the General Data Protection Regulation).

Legal obligation: We are also required by law to establish the identity and risk assessments of our customers (Article 6(1)(c) of the General Data Protection Regulation).

### **Retention period**

We process and store your personal data until the contract terminates and up to ten (10) years thereafter or for a period of time to fulfil legal obligations, for example according to applicable accounting laws, whichever is longer.

If we identify a potential risk in how you use our services, we will continue to use your information for this purpose and continuously update our risk assessment if there is a risk of fraud. This processing lasts as long as we are required by applicable law to keep your information.

#### **4.5 To improve the ROYC's investor portal**

##### **Types of personal data**

- IP-address
- MAC address
- Information about your use of our portal
- Other technical information which is generated upon visiting our portal, such as what type of device is used and web browser
- Information and feedback which you provide to us when communicating with you

##### **The purpose of the processing activity**

To maintain, facilitate and improve the functions and user experience of our portal, as well as support our work on detecting and counteracting flaws, breaches, and incidents.

##### **Legal basis for processing**

Legitimate interest: Our legitimate interest to gather information to maintain, facilitate and improve the functionality, user experience, investor portal quality and security on our portal (Article 6(1)(f) of the General Data Protection Regulation).

##### **Retention period**

We process and keep information on how our users interact with our portal for a period of maximum six (6) months. In most cases, the collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.

#### **4.6 Shareholder or investor relationship with ROYC**

##### **Types of personal data**

- Your name
- Your e-mail address
- Your phone number
- Your address
- Your nationality
- Your country and city of birth
- Information about you as a shareholder or investor relationship with ROYC, including financial information such as bank details, investment amounts or ownership shares, voting rights and other rights associated with your relationship with ROYC

##### **The purpose of the processing activity**

To manage the investor relationship.

#### **Legal basis for processing**

Contractual obligations: We process your personal data to fulfil an agreement with you (Article 6(1)(b) of the General Data Protection Regulation).

#### **Retention period**

The applicable retention period is set forth in the agreements in regard to your application to subscribe for, or for the holding of, one or more shares of the funds provided by ROYC via the investment platform, however normally no longer than ten (10) years after the termination of such agreements or for a period of time to fulfil legal obligations, for example according to applicable accounting laws, whichever is longer.

### **4.7 Newsletter(s) and marketing material**

#### **Types of personal data**

ROYC collects, processes, and stores your personal data for marketing purposes when you sign up for newsletter(s) and marketing material. ROYC may collect, process, and store the following types of your personal data:

- Your name
- Your e-mail address
- Your consent
- Your click-behaviour in relation to published material
- Your interests (that you have provided us with)

#### **The purpose of the processing activity**

To provide you with our newsletters and marketing materials and for us to conduct analyses and statistics.

#### **Legal basis for processing**

Consent: We will only use your personal data for sending out newsletters and marketing materials, if you have given your prior and explicit consent to this (Article 6(1)(a) of the General Data Protection Regulation).

Legitimate interests: If you however act as sole proprietorship owners or a representative of contacts of suppliers and other business partners working with ROYC, our legal basis for sending out newsletters and marketing materials is based on our legitimate interest in marketing our products and services (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: The processing of your personal data will, in connection with analyses and statistics, be based on our legitimate interests in being able to improve and develop our service (Article 6(1)(f) of the General Data Protection Regulation).

#### **Retention period**

We keep your personal data for as long as your consent to receive newsletters and marketing materials is active. You can always withdraw your consent by clicking on the unsubscribe link at the bottom of each e-mail or by contacting us as described below. However, withdrawing your consent does not affect the legality of the processing that preceded the withdrawal. In most cases, the

collected personal data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.

Documentation of your marketing consent is kept for a period determined by ROYC's legal obligations to document that the direct marketing has been carried out in accordance with the applicable legislation (Article 6(1)(f) of the General Data Protection Regulation), normally no longer than two (2) years after the consent is no longer active.

#### **4.8 Recruitment**

##### **Types of personal data**

- Your name
- Your e-mail address
- Your phone number
- Your address
- Your personal data contained in CV, personal letter, letter of recommendations, diplomas, and information provided by references
- Information about you, including information regarding your previous jobs, activities, competencies, performance, as well as your general appearance, which is publicly available on the internet
- Results of personality tests and other tests as part of the recruitment process
- Criminal records (to the extent required by applicable laws)
- Evidence of right to work and/or immigration status (to the extent required by applicable laws)
- Additional information you will provide in relation to the recruitment process

##### **The purpose of the processing activity**

Recruitment and employment process.

##### **Legal basis for processing**

Request to enter into an employment contract with us: We may process your personal data on the basis of your request to enter into an employment contract with ROYC (Article 6(1)(b) of the General Data Protection Regulation).

Legitimate interest: Our legitimate interest to make it possible for us to evaluate your qualifications and personal qualities in connection with decisions on recruitment (Article 6(1)(f) of the General Data Protection Regulation).

Legal obligation: We only process your criminal records and evidence of right to work and/or immigration status to the extent required by applicable laws (Article 6(1)(c) of the General Data Protection Regulation).

##### **Retention period**

We need to retain your personal data after you have participated in a recruitment process to protect our rights under applicable discrimination laws. We therefore save the information from the

recruitment process for two (2) years after the application process is over unless otherwise required by applicable laws.

If we have collected your criminal records, we will delete them immediately after we have received and reviewed them unless otherwise required by applicable laws.

#### **4.9 Contracts with a supplier, collaborator etc.**

##### **Types of personal data**

This section contains the policy for ROYC's processing of personal data of sole proprietorship owners or contacts of suppliers and other business partners working with ROYC.

- Your name
- Your e-mail address
- Your phone number
- Your address
- Individual information, e.g., preferred languages
- Organizational information, such as the name and address of the company, job title, employment area, primarily place and country of work
- Contractual information, such as orders, invoices, contracts, and other agreements between you or your entity and ROYC that may contain e.g., your contact information
- Financial information, such as payment terms, bank details and credit ratings (in the case of a sole proprietorship)

##### **The purpose of the processing activity**

To enter into or fulfil collaborations or contracts between us or the entity you represent.

##### **Legal basis for processing**

Contractual obligations: We need to process your personal data in order to enter into a contract and to fulfil our obligations in relation to the contract (Article 6(1)(b) of the General Data Protection Regulation).

Legitimate interest: We may need to process your personal data on the basis of our legitimate interest in managing our day-to-day operations in accordance with legitimate and fair business practices, including collaborations with third parties (Article 6(1)(f) of the General Data Protection Regulation).

Legal obligation: The processing of your personal data will in some cases be necessary for compliance with legal obligations, such as our obligation to prevent illegal activities (Article 6(1)(c) of the General Data Protection Regulation).

##### **Retention period**

We process and store your personal data until the contract terminates and up to ten (10) years thereafter or for a period of time to fulfil legal obligations, for example according to applicable accounting laws, whichever is longer.

Other personal data is retained for the duration of our business relation with you or the entity you represent, however for a maximum of twenty-four (24) months from the time we last were in contact because of our business relation.

## **5 Security measures**

We have taken security measures to ensure that your personal data is handled in a safe way. For example, access to systems where personal data is stored is limited to our employees and service providers who require it in the course of their duties. Such parties are informed of the importance of maintaining security and confidentiality in relation to the personal data we process. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure, or misuse. We also monitor our systems to discover vulnerabilities.

## **6 Transmission to other controllers and entrustment to data processors**

To achieve the above purposes, we may give third parties access to your personal data, which, based on a contractual relationship with ROYC, provides relevant services, this could be IT suppliers, our affiliates or other suppliers that process personal data for us. Such suppliers will only process personal data in accordance with our instructions according to the signed data processing agreements. In the context of ROYC's development, the corporate structure may change, e.g., by the total or partial sale of the company. In the case of a partial transfer of assets containing personal data, the processing basis for the related transfer of personal data is, as a rule, based on our interest in transferring parts of our assets and making commercial/structural changes.

You may also share certain account details with other users through your account settings. The recipient, the personal data and categories of personal data shared depends on your account settings and can be adjusted at any time. No other account details can be seen by other users.

We may also share your account details to a person who holds a proxy over your financial affairs. We may share your personal data with such proxy holder who is authorised to access the personal data based on your consent (Article 6(1)(a) of the General Data Protection Regulation).

In addition to what is described above, your personal data is generally not disclosed to a third party without your consent unless required by applicable law.

We strive to process your personal data within the EU or EEA. However, we will transfer your personal data to service providers who, either themselves or by their sub-contractors, are located or have business activities in a country outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it occurs, e.g. by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission, or by ensuring appropriate safeguards based on the use of standard contractual clauses that the European Commission has adopted and other appropriate measures to safeguard your rights and freedoms.

You may access a list of the countries that the European Commission has decided to provide an adequate level of data protection [here](#).

You may access the European Commission's standard contractual clauses [here](#).

Please contact us for more information concerning which countries outside the EU/EEA to which we currently transfer personal data.

## 7 Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them. Please note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights.

We also ask you to note that we may need more information from you to confirm your identity before proceeding with your request to exercise your rights.

To exercise your rights or request information about them, you are welcome to contact us.

### 7.1 Right of access

You have the right to obtain a confirmation as to whether we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.

### 7.2 Right to rectification

You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.

### 7.3 Right to erasure

You have the right to obtain that we erase your personal data without undue delay in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- Our processing is based on your consent, and you withdraw your consent to the relevant processing;
- You object to the processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
- The processed personal data is unlawfully processed;
- The processed personal data must be erased for our compliance with one or more legal obligations.

### 7.4 Right to restriction

You have the right to request that we restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- The processing is unlawful, and you oppose erasure of the personal data and request restriction instead;

- The personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defence of legal claims;
- You have objected to the processing of the personal data which we carry out based on a legitimate interest, pending the verification whether your objection overrides our or another party's legitimate interest to continue with the processing.

#### **7.5 Right to object**

You have a right to object to our processing of your personal data when it is based on our or another party's legitimate interest. If you object, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms in order to be allowed to continue with our processing.

#### **7.6 Right to data portability**

If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible. We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

#### **7.7 Right to withdraw consent**

If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

### **8 Complaints with the supervisory authority**

In Sweden, the Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndigheten) is the authority responsible for supervising the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact us so that we can review your concerns. However, you may lodge a complaint with the Swedish Authority for Privacy Protection at any time through the contact details listed below.

### **9 Contact details**

If you have any questions about this Policy or if you wish to complain about the way we process your personal data, please feel free to contact us:

ROYC AB

Reg. no.: 559360-9422

Sturegatan 6, 114 35 Stockholm, Sweden

E-mail: [contact@roycgroup.com](mailto:contact@roycgroup.com)

If your complaint is not resolved by us and you want to proceed with the case, you can complain to the Swedish Authority of Privacy Protection:

Swedish Authority of Privacy Protection

Reg. no.: 202100-0050

Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden

Complain scheme link: <https://e-tjanster.imy.se/en/klagomål>.

Policy last updated. [XX] November 2024