

## PRIVACY POLICY– NPV GROUP A/S

This Privacy Policy (“Policy”) describes how NPV Group A/S, Jægersborg Allé 1A, 2920 Charlottenlund, company registration number 42390569, (“we”, “us”, “our”) in the capacity of a data controller processes certain personal data about you pursuant to Regulation (EU) 2016/679 of 27 April 2016 (“GDPR”) and the Danish Data Protection Act.

By either i) signing the application form for the purchase of shares (“Application Form”) referring to this Policy or ii) requesting access to our online investor portal (the “Portal”) as either a potential investor or a bond holder, you acknowledge and agree that your personal data may be processed in accordance with this Policy. If you have any enquires related to this Policy, please do not hesitate to contact us at [gdpr@npv.as](mailto:gdpr@npv.as).

### **1 OUR PROCESING OF PERSONAL DATA**

- 1.1 We process the personal data provided via the Application Form for the purpose of issuing your shares, for subsequently handling them and for communicating with you in relation to said shares. The personal data in question is processed because it is necessary for entering into and performing under the contract entered into when you sign the Application Form pursuant to Article 6(1)(b) of the GDPR and in order for us to comply with our legal obligations, including under Chapter 4 of the Companies Act, related to the issue and subsequent handling of your shares, and Article 6(1)(c) of the GDPR.
- 1.2 We process the personal data provided via the Application Form in order to create a user account, including a username and a password, which allows you to access the Portal where you can read all relevant information, including annual reports, quarterly reports etc. The personal data is processed in order for us to comply with our legal obligations, including under Chapter 6 of the Companies Act, related to the provision of mandatory information on your investment, and Article 6(1)(c) of the GDPR.
- 1.3 We process the personal data provided by you as bond holder when requesting access to the Portal for the purpose of providing you access to said Portal where you can read all relevant information, including annual reports, quarterly reports etc. The personal data is processed because it is necessary for performing under the contract entered into when you accept the terms and conditions governing the purchasing of corporate bonds pursuant to Article 6 (1)(b) of the GDPR.
- 1.4 We process the personal data provided by you as a potential investor in shares or corporate bonds when requesting access to the Portal for the purpose of providing you access to said Portal where you can read all relevant information, including annual reports, quarterly reports etc. The personal data in question is processed because it is necessary for the purpose of our legitimate interest in being able to provide you with such access to the Portal pursuant to Article 6 (1)(f).
- 1.5 In the event of a legal dispute, we may to the extent relevant process the personal data collected because it is necessary for the purposes of our legitimate interest in being able to establish, exercise or defend our legal rights pursuant to Articles 6(1)(f) of the GDPR.
- 1.6 Unless longer storage is required to resolve a legal dispute or is required by applicable law, including Chapter 4 of the Companies Act, the personal data collected about you will be stored as follows:

- a. Personal data of share holders will be processed by us for as long as you have shares and for a period of 3 years thereafter.
  - b. Personal data of bond holders with access to the Portal will be processed by us for as long as you have a user account and for a period of 3 years thereafter.
  - c. Personal data of potential investors with access to the Portal will be processed by us for as long as you have a user account and for a period of 1 year thereafter.
  - d. Personal data processed when communicating with you about a matter, including in respect of enquires made by you, will be deleted when there is no reason to believe that further correspondence will be needed.
- 1.7 We may share your personal data with the below categories of third parties for the purposes mentioned above:
- a. Financial institutions taking part in facilitating the issue of shares and/or corporate bonds and in subsequently handling them;
  - b. Værdipapircentralen (Euronext Securites);
  - c. Service providers assisting with our business activities and the operation of the Portal, including hosting providers and providers of IT support;
  - d. External advisors, including accounting firms and law firms subject to a duty of confidentiality;
  - e. Public authorities to the extent required by law, court order or if necessary to establish, exercise or defend our legal rights; and
  - f. Other third parties i) with your consent, ii) if they are involved in a merger, de-merger or a sale which involves all or part of our business or assets, or iii) if otherwise compatible with the purpose for which the personal data were initially collected.

## **2 YOUR RIGHTS**

- 2.1 Subject to certain conditions set out in data protection legislation, you have the following rights in respect of your personal data:
- a. The right to obtain a copy of the personal data we have collected about you in a commonly used electronic form and to transmit said copy to another data controller.
  - a. The right to rectify or complete the personal data we have collected about you if it is inaccurate or incomplete, and (in special circumstances) to have the data deleted.
  - b. The right to restrict the processing of the personal data we have collected about you.
  - c. The right to object to the processing of the personal data we have collected about you, including in respect of direct marketing.

- 2.2 If you would like to exercise any of the above rights or have any questions regarding the processing of your personal data, please contact us by using the contact information stated above in this policy by way of introduction.
- 2.3 You also have the right to lodge a complaint with the Danish Data Protection Agency (“Datatilsynet”):

Carl Jacobsens Vej 35  
2500 Valby  
Telefon 3319 3200  
Mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
[www.datatilsynet.dk](http://www.datatilsynet.dk)

### **3 CHANGES TO THIS POLICY**

- 3.1 From time to time we may change this Policy. We will notify you about any changes unless they are without material effect.

Last update: 3 April 2023