

VNV Global  
Privacy Policy  
(External)

VNV

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# Privacy Policy (External)

**VNV Global AB (publ) and its subsidiaries (“VNV Global”, “we”, “us”) are committed to protecting personal data and respecting your privacy. We process personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable Swedish data protection law. This policy describes how we collect and process personal data about shareholders, business contacts, newsletter subscribers, and other stakeholders.**

## Scope

This privacy policy applies to personal data we process about external parties, including shareholders, newsletter subscribers, persons on PDMR and PCA lists, representatives of portfolio companies, and service providers. It does not cover personal data about our employees and board members, which is addressed in our Internal Privacy Policy.

### Responsible Data Controller:

VNV Global AB (publ)  
Corporate identity number 55 65 88-8880

### Registered address:

Mäster Samuelsgatan 1,  
111 44 Stockholm, Sweden

### Contact email:

[legal@vnv.global](mailto:legal@vnv.global)

### Contact for Data Protection Matters:

If you have questions about how we process your personal data, please contact our Data Protection Officer at [legal@vnv.global](mailto:legal@vnv.global).

## Personal data we collect

We collect and process different categories of personal data depending on your relationship with VNV Global.

### Categories of Personal Data

- For shareholders: name, personal identification number, address, and number of shares held
- For persons on PDMR (persons discharging managerial responsibilities) and PCA (persons closely associated) lists: names and relationship to VNV Global
- For newsletter subscribers: email address
- For representatives of portfolio companies and service providers: names, personal identification numbers, addresses, and business contact information
- Information received in connection with investment due diligence and know-your-customer (KYC) processes

## How We Collect Personal Data

Directly from you when you:

- Subscribe to our press releases or newsletters
- Are registered as a shareholder
- Are designated as a person discharging managerial responsibilities (PDMR) or person closely associated (PCA)

From third-party sources:

- Share registers maintained by Euroclear Sweden AB
- Portfolio companies (for investment due diligence and know-your-customer (KYC) purposes)
- Service providers (for fulfilment of service agreements)
- Publicly available sources and registers

## Purposes and legal bases for processing

We process personal data only for specific, lawful purposes and on defined legal bases in accordance with the GDPR. For more information on each individual purpose for which we process personal data and associated legal bases, please see below.

### Shareholder register management

*Purpose:* To maintain accurate and up-to-date share registers with information about our shareholders, including name, personal identification number, address, and number of shares held. This ensures that shareholders' ownership and rights are protected.

*Legal basis:* Legal obligation (Article 6(1)(c) GDPR) under the Swedish Companies Act (Aktiebolagslagen), which requires us to maintain accurate share registers. We also rely on legitimate interest (Article 6(1)(f) GDPR) to protect shareholders' ownership rights and interests.

*Note:* We do not request separate consent for this processing as it is legally required and of high importance to protect your interests as a shareholder.

## Compliance with Market Abuse Regulation

*Purpose:* To maintain lists of persons discharging managerial responsibilities (PDMRs) and persons closely associated (PCAs) in accordance with the EU Market Abuse Regulation.

*Legal basis:* Legal obligation (Article 6(1)(c) GDPR) under Regulation (EU) No 596/2014 (Market Abuse Regulation).

### Newsletter and press release distribution

*Purpose:* To provide press releases and company news to subscribers who have requested to receive information about VNV Global.

*Legal basis:* Legitimate interest (Article 6(1)(f) GDPR). Our legitimate interest is to maintain transparent communication with stakeholders interested in our company as a publicly listed entity. We have assessed that this interest is not overridden by your interests or fundamental rights, given that you have requested to subscribe to our news, the information is relevant to investors and stakeholders, and the risk of misuse is low. You can unsubscribe at any time.

### Investment due diligence and Know-Your-Customer (KYC)

*Purpose:* To conduct due diligence on potential and existing investments in portfolio companies and to fulfil know-your-customer (KYC) and anti-money laundering (AML) obligations.

*Legal basis:* Legitimate interest (Article 6(1)(f) GDPR) to make informed investment decisions and manage our portfolio responsibly. For KYC and anti-money laundering purposes, we also rely on legal obligation (Article 6(1)(c) GDPR) under applicable anti-money laundering legislation.

### Managing relationships with service providers

*Purpose:* To fulfil service agreements with our service providers and manage business relationships.

*Legal basis:* Legitimate interest (Article 6(1)(f) GDPR). Our legitimate interest is to conduct

our business operations effectively and maintain necessary business relationships with service providers.

We only process personal data for the specific purposes described above. We do not use your personal data for automated decision-making or profiling.

### Recipients of personal data

We may share your personal data with the following categories of recipients when necessary for the purposes described above:

- VNV Global group companies (subsidiaries and affiliates)
- Euroclear Sweden AB (for shareholder register management)
- Portfolio companies in which VNV Global has invested (for investment management and due diligence purposes)
- Professional advisers, and other legal, tax, and financial advisers
- IT service providers, including Nasdaq (for newsletter distribution) and other technology service providers
- Public authorities and regulators when required by law, such as the Swedish Financial Supervisory Authority (Finansinspektionen) and tax authorities

We require all third-party service providers to respect the security of your personal data and to treat it in accordance with applicable law. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### International transfers

Some of our service providers and IT systems may be located outside the European Economic Area (EEA), which may result in your personal data being transferred to countries that do not provide the same level of data protection as EEA countries.

When we transfer personal data outside the EEA, we ensure appropriate safeguards are in place, including:

- The European Commission's Standard Contractual Clauses (SCCs) for transfers to third countries
- Transfers to countries that have been granted an adequacy decision by the European Commission

You may request further information about the safeguards we use for international transfers and obtain a copy of the relevant documents by contacting us at [legal@vnv.global](mailto:legal@vnv.global).

### Retention of personal data

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal obligations.

Specifically:

- Shareholder information: Retained for as long as you are a registered shareholder in our share register, and thereafter for 10 years in accordance with the Swedish Companies Act and accounting legislation
- PDMR/PCA lists: Retained for at least 5 years after the person ceases to be a PDMR or PCA, in accordance with the Market Abuse Regulation (Regulation (EU) No 596/2014)
- Newsletter subscribers: Retained until you unsubscribe, after which your email address is deleted within 30 days
- Due diligence and know-your-customer (KYC) information from portfolio companies: Retained for the duration of our investment and thereafter for 10 years in accordance with accounting and tax legislation
- Service provider contact information: Retained for the duration of the service agreement and thereafter for up to 7 years in accordance with accounting legislation

Personal data may also be retained for longer periods where required by law, regulation, or to establish, exercise, or defend legal claims.

### Your rights

Under the GDPR, you have the following rights regarding your personal data. You can exercise these rights by contacting us at [legal@vnv.global](mailto:legal@vnv.global).

- *Right of access:* You have the right to request a copy of the personal data we hold about you and information about how we process it.
- *Right to rectification:* You have the right to request that we correct any inaccurate personal data about you and to complete any incomplete personal data.
- *Right to erasure:* In certain circumstances, you have the right to request that we delete your personal data, for example if the data is no longer necessary for the purposes for which it was collected. Please note that we may be required to retain certain personal data due to legal obligations, such as shareholder information under the Swedish Companies Act or PDMR/PCA information under the Market Abuse Regulation.
- *Right to restriction of processing:* In certain circumstances, you have the right to request that we restrict the processing of your personal data, for example if you contest the accuracy of the data or object to our processing.
- *Right to data portability:* Where we process your personal data based on your consent or for the performance of a contract, and the processing is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller.
- *Right to object:* Where we process your personal data based on our legitimate interests (such as for newsletter distribution or investment due diligence), you have the right to object to such processing. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims.

To exercise any of these rights, please contact us at [legal@vnv.global](mailto:legal@vnv.global). We may need to verify

your identity before processing your request. We will respond to your request within one month, although this period may be extended by two further months where necessary, taking into account the complexity and number of requests.

### Unsubscribe from newsletter

If you wish to unsubscribe from receiving our press releases and newsletters, you can do so at any time by clicking the "unsubscribe" link in any email communication from us, or contacting us at [legal@vnv.global](mailto:legal@vnv.global). After you unsubscribe, we will remove your email address from our mailing list within 30 days.

### Complaints

If you have any concerns about how we process your personal data, please contact us first at [legal@vnv.global](mailto:legal@vnv.global) so that we can try to resolve the matter.

You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State where you habitually reside, where you work, or where an alleged infringement of the GDPR occurred.

In Sweden, the supervisory authority is:  
Swedish Authority for Privacy Protection  
(Integritetsskyddsmyndigheten, IMY)  
Box 8114  
104 20 Stockholm, Sweden  
Telephone: +46 (0)8 657 61 00  
Email: [imy@imy.se](mailto:imy@imy.se)  
Website: [www.imy.se](http://www.imy.se)

### Changes to this privacy policy

We may update this privacy policy from time to time to reflect changes in our processing activities or legal requirements. The current version is always available on our website at [vnv.global](http://vnv.global). We encourage you to review this policy periodically.

*This privacy policy was last updated on November 26, 2025*

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