

Privacy Policy – Fenja Capital Partners A/S

Data controller and contact information

Fenja Capital Partners A/S is a data controller.

Fenja Capital Partners A/S
Østre Alle 102
9000 Aalborg
CVR-nr.: 37 08 93 62
info@fenjacapital.com

Policy for controlling and processing personal data

Fenja Capital Partners A/S is committed to protect any customer information or personal data, and to apply the necessary confidentiality and security measures to any personal data which from time to time is collected regarding our contacts (i.e. customers, potential customers, former customers), suppliers, applicants and other persons with whom the company interacts, also including other third parties or their employees, directors, officials or representatives (referred to as “you” in this policy).

In this policy we describe how we use your personal data, meaning how we collect, use, process, store or share personal data in accordance with the EU general data protection regulation (GDPR).

We ensure that your personal data is protected. We are subject to secrecy of duty and confidentiality, and hence our systems are protected with appropriate technical and organizational measures. Our internal rules on IT security contain instructions and measures protecting your personal data against destruction, deletion or changes, and against unauthorized or unlawful loss or disclosure.

In case of a data protection breach we will inform you and the relevant authorities as soon as practicable possible and within the time limits stipulated in the GDPR.

1. The purposes and the legal basis for the processing of personal data

We process personal data for the following purposes:

- General client administration in relation to our services as an alternative investment fund manager.
- Complying with Anti-Money Laundering and Counter Terrorism regulation and reporting regulations.

Our legal basis for the processing of personal data is:

- You have given consent to the processing of your personal data for one or more specific purposes (GDPR article 6, 1, a).
- You have entered into or you are considering entering into a contract with us regarding a service or product (GDPR article 6, 1, b).
- The processing is necessary for compliance with a legal obligation which we are subject to (GDPR article 6, 1, c):

- Know Your Customer requirements and AML monitoring, reporting etc., including sanctions screening, pursuant to the Danish Anti-Money Laundering Act.
- The Danish Bookkeeping Act.
- Reporting to the tax authorities in accordance with the Danish Tax Control Act.
- Reporting to supervisory authorities etc. according to e.g., the Danish Investment Firms Act and the Danish Alternative Investment Funds Managers Act.
- The processing is necessary for the purposes of our legitimate interests (GDPR article 6, 1, f).

We may collect personal data about contact persons who are employees of our suppliers and business partners when such person is acting on behalf of the other party. We collect such information as part of entering into a contract with the collaborator or when receiving services from suppliers. Further, we might need to collect contact information about employees of the authorities.

2. Categories of personal data

The personal data is in most cases collected directly from you or generated as part of the usage of our services. Sometimes additional information is required to keep information up to date or to verify information we collect. The personal data may include the following categories:

- Identification information: name, identification number, documentation of such information, for instance a copy of a passport, driver's license or the like, and information about control structures and beneficial owners.
- Contact information: postal address, email address, telephone number(s).
- Employer or position.
- Messages you have sent to us.
- Publicly available information from external sources such as registers held by governmental agencies, sanction lists, and from commercial information providers providing information on e.g. beneficial owners and politically exposed persons.
- Information about participation in Fenja Capital Partners A/S events or information about you as a subscriber of a Fenja Capital Partners A/S newsletter.

3. Who we might disclose your personal data to

Employees of Fenja Capital Partners A/S, who are tasked with serving you as a customer and to process your information, have access to your personal data. Such employees only have access to view and use your information to the extent it is necessary to serve you as a customer or to comply with applicable law.

As part of our business as an alternative investment fund manager, we may share your personal data with the following recipients or categories of recipients:

- Public authorities including the Danish Money Laundering Secretariat, Tax authorities, and supervisory authorities.
- Suppliers and service providers assisting with technical support and services.
- Business partners.
- Data Processors.

We have entered into agreements with selected suppliers, which as part of their services to us process personal data on behalf of us. Examples hereof are suppliers of IT development, maintenance, hosting and support.

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Before sharing we will always ensure that we respect relevant confidentiality obligations. In some cases, we might transfer personal data to countries outside EU/EEA. In these cases, we use standard contractual clauses approved by the EU Commission or the Danish Data Protection Agency to protect your rights and to ensure appropriate level of protection.

Fenja Capital Partners A/S only transfers personal data to partners who are tasked with maintaining necessary functions related to Fenja Capital Partners A/S business. These include:

Legal firm:

Advokatfirmaet HjulmandKaptain is the outside legal firm used by Fenja Capital and its affiliated investment funds. Advokatfirmaet HjulmandKaptain assists in the subscription process by receiving payments of subscription amounts, collecting and validating subscription documentation, and implementing and registering subscription of shares with the relevant authorities.

Accountant and auditor:

Beierholm is the auditor for Fenja Capital and its affiliated investment funds. Beierholm performs an ongoing and end of year audit, and provides the annual reports for Fenja Capital and its affiliate investment funds. As part of the audit process, subscriptions and redemptions, containing personal data, are reviewed.

Euronext Securities:

Relevant personal data is transferred with the purpose of issuing shares and maintaining a shareholders registry for the alternative investment funds under management.

Banking:

Danske Bank is the bank used by Fenja Capital and its affiliate investment funds. Data is shared upon request with Danske Bank, if required to comply with applicable legislation (i.e. the Anti Money Laundering Act).

Mailchimp:

Mailchimp is used as a service for sending out newsletters and periodic return reports.

Hubspot:

Hubspot is utilized as CRM-system for the purpose of administrating and servicing existing and potential co-investors.

Penneo KYC (CLA):

Penneo KYC is used for documenting the identities of co-investors and ensuring compliance with current law.

4. How long do we keep your personal data?

We will only keep your personal data for as long as needed for the purposes of which the data was collected and processed or for as long as it is required by laws and regulations, e.g. the Danish Bookkeeping Act and the Danish Anti-Money Laundering Act.

When a client relationship is terminated, information regarding KYC is stored for 5 years according to the Danish Anti-Money Laundering Act.

5. Your privacy rights

You have certain rights under the GDPR. These include the following:

- Access to your personal data: You have the right to obtain a copy of the personal data that we hold about you.
- Correction of incorrect or incomplete data: You have the right to rectification of inaccurate personal data concerning you and to have incomplete personal data completed.
- Erasure: If there is no longer a legal basis for our processing of personal data you have the right to obtain the erasure of personal data concerning you and we have the obligation to erase personal data without undue delay. However, due to financial regulation, we are in many cases obliged to retain personal data during a client relationship, and even after that, e.g. to comply with a legal or regulatory obligation or where processing is carried out to manage legal claims.
- Limitation of processing: You have the right to ask us to suspend processing of personal data in special cases.
- Object to processing: In certain specific cases you have the right to object to processing of personal data concerning you. We may not be able to comply with such request where there are compelling legitimate grounds for us to process your personal data or where the processing of your personal data is required for compliance with a legal or regulatory obligation or relating to legal proceedings.
- Data portability: You have in certain cases the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance.

Your request to exercise your rights as listed above will be assessed given the circumstances in the individual case.

At any time, you can recall your consent to our controlling and processing of your personal data. However, please be aware that our controlling and processing of your personal data primarily comes from regulatory requirements or to enable a customer relationship with us where we can serve you.

If you have further questions regarding your personal data with Fenja Capital Partners A/S, and its processing, you can contact Fenja Capital Partners A/S at

Fenja Capital Partners A/S:
Østre Alle 102
9000 Aalborg
info@fenjacapital.com

6. Updating your personal data

It is important for us that we maintain accurate records of your personal data. Please inform us of any changes to or errors in your personal data as soon as possible and we will update our records accordingly.

7. Data/information on the use of the website, www.fenjacapital.com

Data/information, about which parts of the website are visited, is collected in log files along with the IP address, and the information is used for further development of the website to match the demands and needs of the customers or potential customers who use the website.

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The website uses cookies. A cookie is a small text file that is stored in your terminal equipment through your browser. The cookies used by Fenja Capital cannot contain viruses and no personal information is stored.

If you do not want to receive cookies, you can block all cookies, delete existing cookies from your hard drive or receive a warning before saving a cookie. Click here for instructions on how to set this up in your browser/smartphone: <http://minecookies.org/cookiehandtering>. The guide applies for most browsers and smartphones.

You can always use the help function in your browser for more information on cookie settings. You typically do this by pressing "F1" on your PC. Search for "cookies".

Authorized employees of Fenja Capital, have access to the data collected.

Fenja Capital uses Albacross and Google Analytics to analyze traffic on www.fenjacapital.com. We wish to continuously improve the website and make it more user friendly, and data collected by Google Analytics is a help in this process. In this context, cookies are used to keep statistics on the number of users, time spent on the website, and which sub-pages are visited. In order to collect data for these statistics, Google places cookies in your terminal equipment. The IP address used is passed to Google for Google Analytics measurements. See above for how to avoid these cookies. You can also opt out of Google Analytics metrics in general, see more here:

<https://tools.google.com/dlpage/gaoptout>.

On selected pages, Fenja Capital Partners A/S uses "LinkedIn Insight Tags", which is a tracking technology on the LinkedIn-platform, delivered by LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2 (Ireland). This technology enables us to show you relevant advertising based on your interests. In addition, we receive anonymous (to the extent this is possible) reports from LinkedIn regarding advertising activity and information about how you interact with our web pages. LinkedIn uses cookies for this purpose. The information gathered through cookies is used to compile the before mentioned anonymous statistics and reports, and to show advertising based on your interests. Further information about data protection on LinkedIn is available at www.linkedin.com/legal/privacy-policy. You can object to the analysis of your page visits by LinkedIn and the subsequent retargeting by clicking on the following link (opt-out): www.linkedin.com/psettings/guest-controls/retargeting-opt-out.

8. Data/information on the use of Mailchimp when sending out newsletters etc.

Fenja Capital uses mail chimp to send out periodic newsletters and/or relevant return updates. You will receive these distributions if you are either an investor in the affiliated investment funds, or if you are a stakeholder who actively, or through dialogue with Fenja Capital, have chosen to receive these distributions. For each distribution sent, Mailchimp collects information about the recipient's interaction with the distribution, and this information is used by Fenja Capital to target relevant information/material to the recipient according to perceived needs. Mailchimp i.e. gathers statistics on the number of recipients who open the e-mail, number of clicks on the links in the e-mail etc. If you do not want this data to be collected about you as a recipient, you can unsubscribe from the distribution (done using the link at the bottom of the e-mail distribution), and you can always contact us to get your data updated or deleted.

You can read more about Mailchimp here <https://mailchimp.com/legal/privacy/>

9. Data/information on the use of HubSpot in connection to handling client data.

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As a co-investor in any of our investment companies under management, or any other interested parties, who through a dialogue with Fenja Capital Partners A/S has shown interest in Fenja Capital Partners A/S or any of its managed investment companies, any email correspondence and information regarding physical or online meetings will be registered in HubSpot. Other disclosed information/data which is relevant for maintaining the dialogue and co-investor relationship will also be registered. Upon termination of the co-investor relation or upon end of interest in Fenja Capital Partners A/S or one of its managed investment companies, any registered information will be deleted once this is deemed no longer relevant. If you do not wish for any previously mentioned information to be registered, you are welcome to contact us for the purpose of updating or deleting your registered information.

You can read more about HubSpot here: <https://legal.hubspot.com/privacy-policy>

10. Data/information on the use of Penneo KYC (CLA) in connection to identification of co-investors.

Penneo KYC (CLA) is used for collecting documentation of a co-investor's identity, for understanding the purpose of the co-investor relation, and for collecting other information needed to assess the risk (in the context of the Danish Anti-Money-Laundering law) of the co-investor. If you do not wish for your information to be registered, you are welcome to contact us for the purpose of updating or deleting your registered information. Fenja Capital Partners A/S is legally obliged to collect and document all co-investor relations.

You can read more about Penneo KYC (CLA) here: <https://penneo.com/da/privacy-policy/>

11. Notification of changes

This Privacy Policy is dated 6th of October 2023.

We may amend this Privacy Policy from time to time as required by applicable data protection legislation.

12. Data protection authority

You have a right to file a complaint about the processing of your personal data with the Danish Data Protection Agency. You can find contact information here:

WWW.DATATILSYNET.DK.