



PRIVACY POLICY

CLIENTS AND DISTRIBUTORS

April 2024





1 INTRODUCTION

1.1

According to Regulation (EU) 2016/679 of the European Parliament and of the Council, C WorldWide Asset Management Fondsmæglerselskab A/S ("CWW AM") is obliged to inform natural persons ("Registered Persons") of its collection and processing of their personal data. The purpose of this document is to fulfil this obligation towards actual and potential clients and distributors ("Clients").

1.2

CWW AM collects and processes data relating to its Clients. In relation to Clients which are legal persons CWW AM may collect and process data relating to natural persons affiliated with the Client, e.g. management and relevant employees of the Client.

2 TYPES OF DATA PROCESSED

2.1

CWW AM processes the following personal data:

- Contract information such as name, address, e-mail address and phone number.
- Identifier (personal identification number, copy of passport or other personal identity documentation), information regarding control structures, beneficial ownership, politically exposed persons and transactions with financial instruments.
- Information regarding authorized signatories of Clients which are legal persons.
- Information regarding accounts, deposits and investments.
- Information regarding financial situation such as income, assets and liabilities, marital status and ability to bear losses.
- Information regarding knowledge and experience with investments.



- Information regarding purpose of the investment and risk tolerance.
- Information regarding services delivered by CWW AM.
- Communication (via phone, e-mail or otherwise) with CWW AM, including communication regarding transactions in financial instruments.
- Information regarding participation in CWW AM's events.
- Information about use and clicks in relation to email marketing.
- Information about Clients participating in online events, client events and receiving newsletters.

2.2

CWW AM receives the data directly from its Clients and by consent via third parties such as depositaries. In relation to the investigations which CWW AM shall undertake according to anti-money laundering/terrorist financing legislation, data may be collected from publicly available registers and other publicly available sources and by consent via a third party.

3 THE BASIS FOR PROCESSING OF PERSONAL DATA

3.1

CWW AM processes personal data for the following purposes:

- To deliver the right solutions to its Clients.
- To fulfil its obligations according to agreements with Clients.
- To fulfil its obligations according to laws and regulations and requests from public authorities, including:
 - The Danish act on investment firms and investment services and activities
 - The Directive and the Regulation on markets in financial instruments (MiFID and MiFIR)



- Anti-money laundering/terrorist financing legislation
- The Market Abuse Regulation
- Tax laws
- Danish and foreign bookkeeping legislation
- To prevent fraud and abuse.
- To manage CWW AM's risks.
- To market CWW AM's services and products.
- To analyze behavior in relation to email marketing.

4 TRANSFER OF PERSONAL DATA

4.1

In some instances, CWW AM transfers personal data to third parties:

- Depositories and other third parties appointed by Clients as well as distributors appointed by CWW AM, where the transfer is made as a part of the administration of the client relationship.
- Management companies as a part of the management of agreements regarding Clients' investments in units in collective investment undertakings.
- Public authorities, such as regulators of the financial sector and tax authorities entitled to receive information according to law.
- CWW AM's external auditors, consultants and advisors such as lawyers.
- Service providers of IT related services such as cloud services and IT solutions supporting CWW AM's administrative tasks. In this relation, personal data may be transferred to data processors outside the EU and the EEA. In these cases, CWW AM will put in place agreements to ensure that the processing of personal data by the services providers is subject to requirements equivalent to the requirements to which CWW AM's processing is subject.



5 STORAGE OF PERSONAL DATA

5.1

CWW AM stores personal data as long as required to fulfil the purpose for which the data has been collected and is processed. CWW AM stores basis information regarding the client relationship at least for the duration of the agreement with the Client. After the termination of the agreement, CWW normally stores the information for 7 years to fulfil its requirements according to law. The data may, however, be stored for longer, provided that CWW AM has a legitimate interest herein.

6 RIGHTS OF REGISTERED PERSONS

6.1

According to law, Registered Persons have certain rights which are further described below. If a Registered Person wishes to make use of his or her rights, CWW AM may be contacted.

6.2

Registered Persons are entitled to:

- Get insight in their personal data processed by CWW AM from where the information is derived and the purpose that it is used for. CWW AM is also obliged to inform the Registered Person to whom the information is transferred. The access to insight may, however, be limited by other legislation, by other persons' rights and by CWW AM's legitimate interests.
- Ask for a rectification of their personal data or an addition to their personal data if this makes the data more complete or updated.
- In certain instances, to have their personal data erased before the time of CWW AM's normal and general erasure of personal data occurs.



- In certain instances, to have the processing of their personal data limited. In these instances, CWW AM may thereafter only process the personal data (storage excluded) with the permission of the Registered Person or in order to establish, claim or defend a legal claim, to protect a person or vital public interests.
- In certain instances, to object to CWW AM's otherwise lawful processing of their personal data. This includes the Registered Person's ability to object to the processing of their personal data for the purpose of direct marketing.

7 COMPLAINTS REGARDING PERSONAL DATA

7.1

Any complaints shall be sent in writing by letter or e-mail.

Clients may send their complaints to:

C WorldWide Asset Management Fondsmæglerselskab A/S
Att. Compliance
Dampfaergevej 26
2100 Copenhagen
Denmark

Or via e-mail to: compliance@worldwide.com

Registered Persons who objects to CWW AM's processing of their personal data may submit a complaint to:

- For Denmark: the Danish Data Protection Agency (Datatilsynet). The contact information of the Danish Data Protection Agency is available on: www.datatilsynet.dk.
- For Sweden: The Swedish Data Protection Authority (Datainspektionen) The contact information of The Swedish Data Protection Authority is available on: <https://www.datainspektionen.se>.
- For Finland: The Office of the Data Protection Ombudsman. The contact information of the Data Protection Ombudsman is available on: www.tietosuoja.fi/en/.



8 CWW AM'S CONTACT INFORMATION

8.1

CWW AM acts as a data controller. Questions regarding personal data may be submitted to:

C WorldWide Asset Management Fondsmaeglerselskab A/S
Att. Compliance
Dampfaergevej 26
2100 Copenhagen
Denmark

Or via e-mail to: compliance@worldwide.com

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