

# Privacy Policy for Laccure AB

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## **1. Background**

Your privacy is important to us. This policy ("Privacy Policy") explains how Laccure AB ("Laccure", "we", "us") processes your personal data in a legal, appropriate and safe manner.

The Privacy Policy further describes when, how, and why we collect, use, transfer, and store personal data and what rights you have according to the rules in the EU's General Data Protection Regulation (GDPR) (EU) 2916/679 with associated statutes of implementation and supplementary statutes on data protection (the "Data Protection Rules").

The Privacy Policy applies (i) when Laccure provides its services to you as a financier, shareholder, existing or potential innovator, or other existing or potential business contact, regardless of whether you are in contact with us as a private person or as the representative for the company or organisation you work for or on behalf of, (ii) to mailings regarding events or newsletters, (iii) to other marketing events or marketing actions, (iv) to all other contacts with Laccure in connection to visits to our website [www.laccure.com](http://www.laccure.com) ("Website"), and (vii) to requests or other contacts with us via e-mail or phone.

Laccure AB, Corporate Identity Number, 556725-2076, Kullagatan 8, SE-252 20 Helsingborg Sweden, is the data controller responsible for the processing of your personal data which is carried out in accordance with this Privacy Policy.

## **2. Definitions**

In this Privacy Policy, the term “personal data” includes any information which can be attributable to an identified or identifiable natural person, such as e.g. name, address, personal registration number, e-mail address, phone number and photo (“Personal Data”).

This Privacy Policy describes how we Process your Personal Data. The term “processing” includes e.g. our registering, storing, transmitting, and in other ways using your Personal Data in such a manner as is described in this Privacy Policy (“Processing”).

### **3. Why do we Process your Personal Data?**

Laccure Processes Personal Data regarding those who in different ways come into contact with Laccure. Laccure only collects and otherwise Processes your Personal Data for the below-mentioned purposes. The overall aim of the Processing is to handle existing, former and new business relations. This entails that Personal Data is Processed in order for us to:

- conduct our business and in other ways fulfil the agreement that has been made with you personally, your company, with your employer, or with the person, organisation or company your work for or on behalf of
- offer and enable general service and handling of business contacts, e.g. when you contact us via e-mail, telephone, social media platforms or via our Website;
- inform and market our business through, inter alia, publishing material on our Website;
- leave information regarding events, send out newsletters and information via post, e-mail, phone or via social media platforms; and
- comply with applicable legislation.

What Personal Data we collect and Process depends on how you come into contact with Laccure or which relationship you have with us.

In addition to the Personal Data you provide to us, we may also collect Personal Data from third parties. These third parties vary from time to time but include inter alia suppliers of address information from public records in order to ensure we have the correct address information, and credit rating agencies or banks from where we obtain information regarding creditworthiness or information in order to conduct anti-money laundering controls.

When you are asked to provide us with Personal Data, e.g. in connection with investments in Laccure or its project companies, or upon regeneration of a project company, you may choose not to do so. If you choose not to provide necessary Personal Data, this may lead to us not being able to fulfil our obligations or potential obligations towards you.

### **4. What Personal Data is Processed on what legal ground?**

The Personal Data listed below is Processed by us for the purposed explained under section 3 above:

- name;
- billing and delivery address;
- phone number;
- e-mail address;
- personal identification number/ ID number;
- account number;

- photographs of you;
- copy of ID-documentation;
- payment information;
- information from police record extracts; and
- correspondence with you.

The Processing of Personal Data is necessary in order for Laccure to conduct its business through provision of its services and thereby fulfil the agreement that has been entered into with you. In situations where you act as a representative or contact person for a company or an organization which collaborates or has any type of business relation with Laccure, we Process your Personal Data based on our legitimate business interest. For this Processing, we have conducted a balancing of interests where we have, inter alia, taken into account that the Processing does not include any sensitive Personal Data and that we have a clear commercial interest in being able to provide our services to the company or organization you work for on or behalf of in an efficient manner.

Personal Data may also be used in other contacts with you, when we send you invites to events or other information. This Processing is based on our legitimate business interest of being able to provide you, as you have a business relationship with us, with relevant marketing information and other information. For this Processing we have conducted a balancing of interests where we have, inter alia, taken into account that the Processing does not include any sensitive Personal Data and that we have a clear commercial interest in being able to provide our services to the company or organization you work for on or behalf of in an efficient manner.

In the event that we intend to use your Personal Data for marketing purposes or other types of mailings or publications on our Website we will obtain your consent before any publication takes place. In the event that we can no longer Process your Personal Data for marketing purposes based on our legitimate business interest we may come to obtain your consent to e.g. send you information. We will always document whether you have given your consent to our Processing of your Personal Data.

Some of the Personal Data which Laccure collects is Processed in order for us to comply with legal obligations according to applicable legislation, court rulings, or decisions taken by the authorities. Such obligations may e.g. follow from the Accounting Act (1999:1078), the Companies Act (2005:551), or the Money Laundering and the Financing of Terrorism (Prevention) Act (2017:630).

## **5. How long is your Personal Data stored?**

Your Personal Data is stored only as long as needed in order to fulfil the purposes for which the Personal Data was collected in accordance with this Privacy Policy. We therefore only Process your Personal Data as long as we have a business relationship with you or the company or organization your work for or on behalf of.

If you have given your consent to the Processing of your Personal Data for publishing or marketing purposes, even after the business relationship has ended, Laccure Processes your Personal Data for the specific purpose, until you withdraw your consent. You can withdraw your consent at any time by (i) contacting us, or (ii) following the link in the mailings.

In order to ensure Laccure's compliance with the legal obligations stemming from applicable legislation or in order to safeguard our legal interests we may store your Personal Data for a longer period of time. The Personal Data is however never stored for longer than is necessary or statutory for each purpose respectively.

## 6. Your rights

You have a right to receive information regarding the Processing of your Personal Data we carry out. Below you find a statement of the rights you can claim by contacting us. Our contact information can be found at the very end of this Privacy Policy.

### Right to access

You have a right to, free of charge, request information regarding our Processing of your Personal Data. You also have a right to receive a copy of your Personal Data that we Process. Such a request shall be submitted to us in writing with a specification of which information you wish to receive. We will respond to your request without unnecessary delay. If we cannot grant you access to the information your request concerns, we will provide a reason as to why. The copy of your Personal Data will be sent to your registered address unless otherwise is agreed with you in writing. In order to ensure your identity upon a request, we may come to request more information from you.

### *Right to rectification*

The main responsibility to ensure that the Personal Data we Process is correct lies with Laccure as the data controller. If you inform us that the Personal Data you have provided to us is no longer correct, we will promptly correct, block or erase such Personal Data.

### *Right to erasure*

You have the right to request that Laccure, without unnecessary delay, erases your Personal Data. Personal Data shall be erased in the following cases:

- if the Personal Data is no longer necessary for the purposes for which it was collected;
- if you withdraw your consent and the Processing was based solely on consent as the legal ground;
- if Processing is carried out for purposes of direct marketing and you oppose your Personal Data being used for such purposes;
- if you oppose the Processing of Personal Data after a balancing of interests has been carried out and your interest outweighs ours;
- if your Personal Data has not been Processed in accordance with the Data Protection Rules; or
- if erasure is necessary in order to comply with a legal obligation.

There may be obligations which hinder us from immediately erasing all your Personal Data. These obligations stem from applicable legislation regarding inter alia accounting. If certain Personal Data cannot be erased due to applicable legislation, we will inform you of this as well as ensure that the Personal Data will be used solely for the purpose of complying with such legal obligations and not for any other purposes.

### *Right to restriction*

You have a right to request that Laccure temporarily restricts the Processing of your Personal Data. Such a restriction can be requested in the following cases:

- if you consider the Personal Data, we have about you to be incorrect and in connection with this have requested rectification;
- when the Processing of your Personal Data which is carried out is not compliant with the Data Protection Rules, but you still do not want your Personal Data to be erased but rather restricted; and

- when we no longer need your Personal Data for the purposes of our Processing, but you need it in order to establish, exert, or defend a legal claim.

If you have objected against the Processing of your Personal Data, the use of your Personal Data may be restricted during the time of the investigation. Upon the restriction of your Personal Data, Laccure will only store your Personal Data and for further Processing obtain your consent.

#### *Right to data portability*

You have a right to, in the cases where we Process your Personal Data with your consent or in order to fulfil contractual obligations toward you, require that we provide you with all Personal Data we have about you and which is Processed in an automated manner, in a machine-readable format, which may be inter alia an Excel-file or a CSV-file. If it is technically possible, you further have the right to require that we transfer your Personal Data to another data controller.

#### *Right to object*

You have a right to object to our Processing of your Personal Data if the Processing is based on our legitimate interest. Laccure will in such a case ask you to specify which Processing you object to. If you object to any Processing, we will only continue our Processing of the Personal Data if there are legitimate interests for Processing which outweigh your interests.

### **7. Consent to the Processing of Personal Data**

If you have requested to receive newsletters or similar information, we base the Processing of your contact information on your consent. You decide yourself if you wish to consent to the intend Processing and when you wish to withdraw your consent. You can withdraw your consent by (i) contacting us, or (ii) following the link in the mailings.

### **8. To whom do we transfer your Personal Data?**

In order to provide some of our services we appoint select third parties. This entails that we share some of the Personal Data we have collected with them, e.g. to Laccure's project companies and other business partners which provide services for Laccure. In connection with such transfer of your Personal Data, Laccure takes organisational and technical measures in order to ensure that your Personal Data is handled as safe and secure as possible. These selected third parties will only process your Personal Data in manners which follow from this Privacy Policy and in order to fulfil one or more of the purposes which are listed in this Privacy Policy. Laccure is responsible toward you for ensuring that the Processing of your Personal Data carried out by these third parties is carried out in a correct and legal manner.

Laccure may transfer your Personal Data to countries outside the EU/EES, if any of Laccure's suppliers or business partners are located there. If Personal Data is transferred to a country outside the EU/EES, Laccure will ensure that the Personal Data will remain protected as well as take measures needed in order to transfer Personal Data to a country outside the EU/EES in a legal manner.

We will disclose your Personal Data if it is required by law or if we, as a company, reasonably deem it to be necessary in order to protect our rights and/or in order to comply with a court ruling or abide by the verdict of a legal negotiation or legal process. We will however do everything we can to ensure that your Personal Data will remain protected in the future.

As the business is conducted today, Laccure will not sell your Personal Data to a third party unless we have previously obtained your consent. However, we may, in the case that Laccure decides to sell, buy, merge with another company or organisation, or in any other way reorganise the business, transfer your Personal Data to potential or actual buyers and their potential advisors.

## **9. How do we protect your Personal Data?**

In order to protect your personal integrity, discover, prevent and limit the risks of a hacking attack etc., Laccure takes several technical and organisational information safety measures. Laccure also takes measures in order to protect your Personal Information against unauthorised access, misuse, reveals, changes and damages. Laccure ensures that access to your Personal Information is only granted to employees who need to Process it in order to fulfil their work assignments, and that they abide by confidentiality in accordance with Laccure's applicable policies and routines.

## **10. Supervision and compliance**

If you are dissatisfied with how your Personal Data has been Processed or believe that your Personal Data has been Processed contrary to the Data Protection Rules you can at first-hand contact [dpo@Laccure.se](mailto:dpo@Laccure.se). You can also file a complaint to the supervisory authority, which currently is Datainspektionen. More information on how to file a complaint can be found at [www.datainspektionen.se](http://www.datainspektionen.se).

Laccure annually reviews this Privacy Policy.

## **11. Third party's terms and conditions**

Laccure's services may in some cases be subject to third party's terms and conditions. Laccure is not responsible for such a third party's use of your Personal Data as they themselves are data controllers and responsible for the Processing of your Personal Data. Hence, it is important that you observe and read through the terms and conditions of such third parties. The same applies if there is a link on our Website to other websites.

## **12. Changes to the Privacy Policy**

Laccure reserves the right to change this Privacy Policy when we deem it to be necessary in order to comply with applicable legislation. Such changes are especially warranted upon potential changes in legislation, due to statements from the supervisory authority or other authorities issuing statements pertaining to the Data Protection Rules. Further, this Privacy Policy will be updated when it is necessary due to changes in our business activities.

If Laccure makes comprehensive changes to this Privacy Policy or changes concerning how we Process your Personal Data, you will be informed of this before such a change come into force.

## **13. How do you contact us?**

If you have questions pertaining to this Privacy Policy or the current Processing of your Personal Data, wish to file a request in accordance with this Privacy Policy or wish to report a violation of this Privacy Policy etc., you are welcome to contact us on the following:

Laccure AB

Corporate Identity Number 556725-2076

Kullagatan 8, SE-252 20 Helsingborg, Sweden

E-mail: [dpo@aqilion.com](mailto:dpo@aqilion.com)