



Privacy Policy

Vaekstkapital FAIF gives you, as a registered AIFM (d. FAIF, Alternative Investment Fund Manager) at the Financial Supervisory Authority in Denmark, access to attractive investment opportunities. We are exploring new paths and uncovering investment opportunities that others have yet to discover.

We have adopted this privacy policy to inform you how we, handle the processing of personal data, including how we collect, disclose, process and store your personal data when you are in contact with us and use our services, whether via our website, by telephone or as part of a customer relationship.

We respect your privacy and your rights to protect your personal data. Therefore, we ensure legal, fair and transparent processing of your information, regardless of where and why we have received your data.

Personal data is all types of information about a person that can be attributed to them. This is usually first and last name, address, e-mail address, telephone number and other contact information.

Data Controller

We are the data controller and therefore responsible for processing personal data that takes place as part of our role as a registered AIFM (d. FAIF) the administration of Alternative Investment Funds (AIFs), or the promotion of other companies.

Furthermore, we are responsible for ensuring that the processing is carried out in accordance with the principles outlined in this privacy policy.

You will find our contact details below:

Vaekstkapital FAIF A/S
CVR 43449265
Lergravsvej 59
2300 Copenhagen
Denmark
Mail: Info@vaekstkapital.com

We are not obliged to appoint a Data Protection Officer (DPO), as we do not process sensitive information on a large scale, and our activities do not include regular and systematic monitoring of the registered. If you have any question about the processing of your personal data, you can contact us via invest@vaekstkapital.com.



Collection of personal data

Vaekstkapital FAIF only collect basic personal data about you that is necessary for our relationship with you, and essential for optimizing our services and offerings:

- When you use our website, including ordering material and subscribing to our investment opportunities (newsletter), we collect your contact information, including name, address, phone number and email address. By ordering material or consenting to a subscription to our newsletter or otherwise contacting us via our website, you also accept that we collect and store this information in order to corporate with you.

We retain your personal data only for as long as it is needed to provide the services we deliver to you. Your personal data will therefore be deleted on an ongoing basis, unless we are required to retain it under applicable law. We regularly review whether we hold information that is no longer necessary to retain.

- When you enter a customer relationship with us and use our investment opportunities or purchase our services, we may require additional information. You will receive further information about our personal data processing in these situations. By using our services, you also accept that we collect and retain this information in order to administer and fulfil the customer relationship

We retain your personal data only for as long as it is needed to provide the services we deliver to you. Your personal data will therefore be deleted on an ongoing basis, unless we are required to retain it under applicable law. We regularly review whether we hold information that is no longer necessary to retain.

In any event, the data that we are required to collect, retain and, where relevant, disclose to third parties will be deleted no later than 6 years after you cease to be a customer with us or after we have concluded any subsequent dispute with you, unless otherwise required by law.

- When you contact us directly in other situations, your contact information is processed in our telephone and/or IT systems. By contacting us directly in other situations, you also accept our consent declarations (which are also available on our website), allowing us to collect and store this information. This information is stored for up to 5 years plus the current year. We retain your personal data only for as long as it is needed to provide the services we deliver to you. Your personal data will therefore be deleted on an ongoing basis.

You may request access to the information we process about you at any time by contacting us. See also information about your rights below.

Withdrawal of Consent

If our processing of your personal data is based on your consent (e.g. for marketing purposes), you have the right to withdraw it at any time. Please note that withdrawing your consent may affect



our ability to manage your customer relationship and investment activities, as consent is required for certain data processing activities.

Disclosure of data

When you choose to register as a customer with us, you also acknowledge and accept that we may disclose relevant information about you to, for example, third parties who assist us with tasks performed under the Danish Anti-Money Laundering Act and with the subscription and registration/recording of shares in the underlying AIFs.

This may, for example, be relevant for the processing of personal data carried out as part of Vaekstkapital FAIF A/S' activities as a registered manager (registered FAIF) and its administration of alternative investment funds (AIFs).

Where necessary, we may also exchange information with lawyers and other advisers who provide consulting assistance in relation to specific disputes, and information may also be exchanged with the Danish Financial Supervisory Authority (Finanstilsynet) and other relevant authorities.

Any such disclosure will take place as part of our cooperation with you, and you will therefore be informed of it, unless the exchange is subject to statutory confidentiality.

Specific information regarding the investment platform Vaekst (also known as Endavu)

Vaekst Fondsmæglerselskab A/S is the controller for the processing of your personal data (profile information) on the platform that is necessary for the operation, security, logging and support of the platform (e.g. the creation and maintenance of your profile information).

The contact details of Vaekst Fondsmæglerselskab A/S are:

Vaekst Fondsmæglerselskab A/S

CVR no. 43605445

Sturlasgade 12B

2300 Copenhagen S

Denmark

dataprotection@endavu.com

You can read more about Vaekst Fondsmæglerselskab A/S' processing in its Privacy Policy, which is available at the bottom (footer) of its website: www.endavu.com

However, Vaekstkapital FAIF A/S have each been granted view-only access to your profile information (name, date of birth, address, telephone number, email address, and investment portfolio).

This is access for viewing only (no data is exported or extracted from the platform). Vaekstkapital FAIF A/S are independent controllers in relation to this view-only access, which is solely intended to enable them to provide you with general customer care.



Vaekstkapital FAIF A/S may also—depending on any consent you have given—contact you unsolicited regarding our services and offerings.

Sharing of data with suppliers (data processors)

Furthermore, in certain cases, Vaekstkapital FAIF A/S may share your data with other partners. This will only occur with full control of your data retained by us, as such a partner can only access and process your data after a data processing agreement has been established between us and the relevant partner.

The company may transfer personal data to one or more of the following categories of data processors:

- Marketing and communication systems, as well as other administrative systems.
- Lawyers and other consultants who provide advisory assistance.
- Operations operators, such as server providers.

This list is not exhaustive.

The purpose of disclosing your data may, for example, be to establish, maintain, or terminate your customer relationship. Additionally, data may be disclosed to facilitate the provision of our services.

We will only disclose your personal data for marketing purposes with your consent or if we are pursuing a legitimate interest. You may, at any time, request to be excluded from marketing communications from us or our partners by contacting us.

Non-EU/EEA countries (Third countries)

As a general rule, your personal data is not transferred to countries outside the EU/EEA (third countries). If such a transfer nevertheless becomes relevant, you will be informed, and we will ensure that an appropriate legal basis for the transfer is in place.

Cookies

Vaekstkapital FAIF A/S use cookies on our website to improve the user experience on our website. Cookies are short text files that are stored on the user's terminal device by a web server.

After saving, the browser sends the data back to the server as part of the request. This allows the service site to recognize and track web browsers.

Cookies tell us how users use our website. We use cookies to develop our services and website and to analyse the use of the website, as well as to target and optimise marketing.

We thus use “necessary cookies” which help make the website usable by enabling basic functions such as page navigation and access to secure areas of the website.

In addition, we use:

- **Functional cookies**, which support fonts, video playback, or interactive Web 2.0 features. Content from, for example, video platforms and social media platforms is blocked by default and can be enabled based on your consent. If the service has been



accepted/consented to, such content will load automatically without further manual consent.

- **Statistical cookies (third-party cookies)**, which provide insight into visitors to the website and their interaction with the website, enabling us to optimise the website.

We use these cookies – which are not necessary for the website’s basic functionality – only with your consent.

When accessing the Website, the Website user can either give their consent to the use of cookies or refuse the use of cookies. The website user can, at any time, choose to revoke any consent they have given and block cookies by clicking “Change privacy settings” at the bottom of the website. You can find more detailed cookie-specific information in the cookie settings.

The basis for processing your personal data

Our basis for processing your personal data includes the following conditions:

- You have entered into, or are considering entering into, an agreement with us, pursuant to Article 6(1)(b) of the General Data Protection Regulation (GDPR).
- We are legally required to process your data under Article 6(1)(c) of the GDPR, or as mandated by law, such as under Section 11(2)(1) of the Danish Data Protection Act, in accordance with regulations like the Anti-Money Laundering Act, the Bookkeeping Act, or the Data Protection Act.
- Processing is necessary for us or our partners to pursue a legitimate interest, pursuant to Article 6(1)(f) of the GDPR and Section 12(2) of the Danish Data Protection Act. Legitimate interests we pursue include, among others, preventing and investigating criminal activity, marketing purposes, targeting materials we distribute, and optimizing our internal processes, products, and services. You have the right to object to this processing of your personal data at any time. For further information on how we balance our legitimate interest, you are welcome to contact us.
- You have provided us with consent to process your personal data, pursuant to Article 6(1)(a) of the GDPR.

We safeguard your personal data through both technical and organizational measures, protecting your information from accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access.

We may update this privacy policy periodically and reserve the right to do so to ensure compliance with the requirements for the proper processing of your personal data. The current version of the policy will be available on our website.

Your Rights

Under the General Data Protection Regulation (GDPR), you have several rights regarding our processing of your personal data. If you wish to exercise your rights, please contact us.

- *Right of Access (d. indsigtsret)* You have the right to access the information we process about you, as well as additional relevant details.



- *Right to Rectification (d. rettelse)*. You have the right to have incorrect information about yourself corrected.
- *Right to Erasure* In certain circumstances, you have the right to have your information deleted before it would typically be erased as part of our standard data retention practices.
- *Right to Restriction of Processing* In specific cases, you have the right to request that the processing of your personal data be restricted. If processing is restricted, we may only process the data – apart from storing it – with your consent, for the establishment, exercise, or defense of legal claims, to protect a person, or for important public interest.
- *Right to Object* In certain cases, you have the right to object to our otherwise lawful processing of your personal data. You may also object to the processing of your data for direct marketing purposes.
- *Right to Data Portability (d. dataportabilitet)* In certain circumstances, you have right to receive your personal data in a structured, commonly used, and machine-readable format, as well as to have this data transferred directly from one data controller to another, where technically feasible.

You can find more information about your rights in the Danish Data Protection Agency's guidance on data subject's rights, available at www.datatilsynet.dk.

Complaint

You have the option to file a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. You can find the contact details for the Danish Data Protection Agency at www.datatilsynet.dk.