



PRIVACY NOTICE

Information on how Carnegie AS process personal data

Protecting your personal data

Carnegie strives to be open about how we process your personal data. It is of great importance to us that you feel safe with our processing of your personal data. We implement relevant and suitable measures to ensure that your personal data are protected and that the processing takes place in accordance with applicable data protection legislation and our internal policies. When we collect and process information about you, you have rights under data protection rules and legislation.

Below, you can read more about how, why, and to what extent we process personal data. In addition to this we further describe your rights as an individual providing personal data.

Contact us

If you have any questions about our processing of your personal data, please contact us or our data protection officer via the contact details provided in section 1 below.



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1 The Data controller

Carnegie AS (publ), reg. no. 936 310 974, ("Carnegie", "we", "us", or "our") is the data controller of the processing of your personal data and is accountable for ensuring that your personal data are processed in accordance with applicable data protection legislation. Contact information stated below:

Carnegie AS
Att: Carnegie AS DPO
Aker Brygge Fjordalléen 16
0250 Oslo
+47 22 00 93 00

Our data protection officer is assigned to monitor our compliance with applicable data protection legislation. If you have any questions or would like to make a complaint about our processing of your personal data, please contact our data protection officer at dataprotection@carnegie.no.

2 Who do we process personal data about and what type of personal data do we process?

2.1 The individuals for whom we process personal data

We process personal data about persons who are in contact with our business in different ways. In the table below you will find details pertaining to different scenarios associated with the processing of your personal data. As the table is divided in different categories you may only read the sections that applies to you and your situation. Please note that you may be included in more than one category depending on your relationship with us.

When using the term customer, we are referring to any private individual or company/foundation/institution with which we have a contractual relationship and who falls within the categories below.

Category of individuals	Explanation	Reading reference for information on our processing of personal data
Investment Banking	Individuals identified as a contact person, representative or authorised signatory of a company, foundation or institution using our Investment Banking services including individuals in possession of inside information or that are involved in market soundings. This also includes individuals reporting to us when we act as an issuing institution or settlement agent e.g., upon a new share issue where the shareholders have pre-emption rights where the individual reports to us, or in a takeover where the individual accepts through a subscription form in accordance with the offer document or prospect.	See section 3.1 and the general information in sections 3.5 - 3.7.
Securities	A (i) private individual and/or a professional/non-professional customer or (ii) an individual identified as a contact person, representative or authorised signatory for a company, foundation, or institutional customer using our Securities services.	See section 3.2 and the general information in sections 3.5 - 3.7.
Office visitors	Individuals visiting our office in Oslo, Norway.	See section 3.7 for general information.
Website visitors	Individuals visiting our website or in use of our online services.	See section 3.3 and the general information in section 3.7.
Suppliers	Individuals in contact with us through the role as an identified representative or a contact person for a supplier or similar.	See section 3.4 and the general



		information in section 3.7.
Individuals related to a customer	Individuals involved with a customer of ours in their role as a guardian, trustee, mandatary/proxy, family member (if politically exposed person), beneficiary of the estate, beneficial or alternative owner, main shareholder, guarantor, endowment insurance policy holder or other such connection.	See sections 3.1.3, 3.2.3 and the general information in section 3.8.
Family members	You who are a family member or other close relative of one of our employees.	See section 3.7
Potential customers	Individuals who have shown interest in our services or products and/or other potential customers.	See sections 3.5 and the general information in section 3.7.
Individuals in contact with us by phone	Individuals who make a call to our recorded telephone numbers intended for advice, order placement, complaint handling or Investment Banking services.	See sections 3.5 and the general information in section 3.7.
Individuals in contact with us by Teams-meetings/calls	Individuals who are participating in a Teams call with employees in connection with our Investment Banking services.	See sections 3.5 and the general information in section 3.7.

2.2 What type of personal data do we process?

The personal data we process about you depends on how you interact with us and our relationship. The table below describes what types of personal data we process. However, please note that this does not mean that we necessarily process all personal data about you listed under each category.

Category of personal data	Example
Identification details	Personal data used for identification such as name, gender, personal identification number, date of birth, customer number, passport/ID number, copy of identity document (such as passport or other approved ID) digital identity document, place of residence, birth country, tax country and nationality.
Contact details	Personal data used for communication such as name, address, telephone number and/or e-mail address.
Financial information	Personal data relating to financial transactions of money or securities such as bank and account details, securities account, holdings, assets, liabilities, financial instruments, liquid assets.
Credit information	Personal data relating to credits such as credit applications and credit information and other data in relation to this matter.
Company information	Personal data relating to a company such as registration number and certificates, share register, share certificates, annual reports, information on board members, and members of management, VPS and LEI details etc
Employment information	Personal data relating to an individual's employment relationship, including, but not limited to, employment contracts and salary specifications.
Know Your Customer (KYC)	Personal data relating to customer due diligence for individuals and legal entities such as information regarding identity, financial information, tax residency, citizenship, tax liability, politically exposed person (PEP), profession/employment, property ownership, managed assets, ownership in companies, income, investment horizon, purpose and nature of the business relationship (assets, origin and foreign transactions), beneficial owner(s) and searches against sanctions lists.
Needs analysis	Personal data relating to origin of funds, knowledge and experience of the securities market and financial instruments, investment objectives and horizon, risk appetite, sustainability preferences and target return.
Communication	Personal data provided in communication with us such as the content of e-mails, recorded telephone calls, Teams meetings/calls and received documents.
Technical data	Personal data obtained from the use of electronic devices such as IP address, website behaviour and website settings.

3 Why and for how long do we process your personal data and what is the legal basis

3.1 Investment Banking

3.1.1 Entering into a contractual relationship

Purpose	Personal data	Legal basis	Storage time
Identity verification and authorization before entering into a contractual relationship.	Identification details, Contact details.	<p>Legitimate interest (GDPR, article 6.1(f))¹ - be able to ensure your identity and authorization to represent the company/foundation/institution with which we are to enter into a contractual relationship.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years after the end of the contractual relationship.

3.1.2 During the time of the contractual relationship

Purpose	Personal data	Legal basis	Storage time
Documenting, administrating and performing contractual and legal obligations.	Identification details, Contact details, Know Your Customer (KYC).	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to document, administer and perform contractual and legal obligations with the company/foundation/institution you are representing.</p> <p>Legitimate interest (GDPR, article 6.1(f)) – be able to establish, exercise or defend Carnegie's or your legal claims.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years after the end of the contractual relationship.
Ongoing communication.	Identification details, Contact details, Communication.	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to communicate with you on matters relating to the company/foundation/institution you represent and with which we have a contractual relationship.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years after the end of the contractual relationship.
On request, purchase and sell financial instruments, underwriting and placing of financial	Identification details, Contact details, Communication, Financial information.	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to act at your request on behalf of the company/foundation/institution you represent and with which</p>	The personal data is stored for five years after the end of the contractual relationship.

¹ GDPR – EU General Data Protection Regulation: [EUR-Lex - 02016R0679-20160504 - EN - EUR-Lex \(europa.eu\)](#)



instruments, provide financial advice to customers, etc.		we have contractual relationship. Contact us if you would like to know more about how we have balanced your interests against ours.	
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3.1.3 Compliance with our legal obligations

Purpose	Personal data	Legal basis	Storage time
Take measures to know our customers.	<u>Investment Banking and Individuals related to a customer:</u> Identification details, Contact details, Financial information, Know Your Customer (KYC).	Compliance with a legal obligation (GDPR, article 6.1(c) and 10) - the Norwegian Act relating to Measures to Combat Money Laundering and Terrorist Financing (the "Norwegian Anti-Money Laundering Act") ² .	The personal data is stored for five to ten years (depending on risk classification) after the end of the contractual relationship.
Establish a register of individuals who come into contact with inside information.	Identification details, Contact details, Technical data.	Compliance with a legal obligation (GDPR, article 6.1(c)) - EU Market Abuse Regulation no 596/2014 (MAR).	The personal data is stored for five years.
Establish a register of individuals involved in market soundings and who thereby come into contact with inside information.	Identification details, Contact details, Technical data.	Compliance with a legal obligation (GDPR, article 6.1(c)) - EU Market Abuse Regulation no 596/2014 (MAR).	The personal data is stored for five years.
Legal obligation to record and store telephone calls and/or Teams meetings/calls to us, or notes from meetings, relating to investment services and investment activity, including all transactions.	Identification details, Contact details, Communication.	Compliance with a legal obligation (GDPR, article 6.1(c)) – Directive (2014/65/EU) and Regulation (600/2014) on Markets in Financial Instruments, EU Market Abuse Regulation no 596/2014 (MAR) and the Norwegian Act on Securities Trading ³ (the "Norwegian Securities Trading Act").	Recorded telephone calls are stored for five years. If a criminal investigation has been initiated, the retention period can be extended if it is necessary for the ongoing investigation.
Carry out checks against compiled lists of politically exposed persons (PEP) and EU sanctions lists.	<u>Investment Banking and Individuals related to a customer:</u> Identification details, Know Your Customer (KYC).	Compliance with a legal obligation (GDPR, article 6.1(c) and 10) - the Norwegian Anti-Money Laundering Act. The EU Commission's consolidated list of financial sanctions and other lists (OFAC etc.) and the Norwegian Act on Implementation of International Sanctions ⁴ (the "Sanctions Act"), with associated regulations. ⁵	The personal data is stored for a maximum of five years after the end of the contractual relationship.
Monitor and review transactions to	Identification details, Know Your Customer	Compliance with a legal obligation (GDPR, article 6.1(c))	The personal data is stored for a

² LOV-15-10-2018 (Lov om tiltak mot hvitvasking og terrorfinansiering (hvitvaskingsloven) - Lovdata)

³ LOV-2019-12-06-77 (Lov om verdipapirhandel (verdipapirhandeloven) - Lovdata)

⁴ LOV – 2021-04-16-18 (Lov om gjennomføring av internasjonale sanksjoner (sanksjonsloven) - Lovdata)

⁵ <https://www.regjeringen.no/no/tema/utenrikssaker/Eksportkontroll/sanksjoner-og-tiltak1/sanksjoner-og-tiltak/id2008477/>



prevent our business from being used for financing of terrorism or money laundering.	(KYC), Financial information.	and 10) - the Norwegian Anti-Money Laundering Act.	maximum of ten years (if high-risk customer, otherwise, five years) after the end of the contractual relationship.
Carry out checks against other international sanctions lists.	Identification details, Know Your Customer (KYC).	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to perform checks against international lists (such as the consolidated list from UN's Security Council as well as counterparts from other international organisations) in order to obtain more detailed customer information in accordance with the Norwegian Anti-Money Laundering Act.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p> <p>Personal data relating to criminal convictions and offences are processed in accordance with an exemption granted under Chapter 4, of the Norwegian Act relating to the processing of personal data (the "Norwegian Personal Data Act")⁶, containing supplementary provisions to the GDPR.</p>	The personal data is stored for five years after the end of the contractual relationship.

3.2 Securities

3.2.1 Entering into a contractual relationship

Purpose	Personal data	Legal basis	Storage time
Verify your identity and authorization before entering into a contractual relationship.	Identification details, Contact details.	<p><u>Private individual</u>: Performance of a contract (GDPR, article 6.1(b)).</p> <p><u>Contact person, representative or beneficial owner</u>: Legitimate interest (GDPR, article 6.1(f)) - be able to verify your identity and authorization to represent the company with which we will enter into a contractual relationship.</p> <p>Contact us if you would like to know more about how we</p>	The personal data is stored for five years after the end of the contractual relationship.

⁶ LOV-2018-06-15-38 (Act relating to the processing of personal data (The Personal Data Act) - Lovdata)



		have balanced your interests against ours	
Credit agreements and credit assessments.	Identification details, Contact details, Financial information, Know Your Customer (KYC), Credit information, Employment information, Communication, Company information.	Compliance with a legal obligation (GDPR, article 6.1(b) and 6.1(c)) - the Norwegian Act on Financial Contracts ⁷ (the "Norwegian Financial Contracts Act").	The personal data is stored for the duration of the credit and five years thereafter.

3.2.2 During the time of the contractual relationship

Purpose	Personal data	Legal basis	Storage time
Documenting, administrating and performing contractual and legal obligations.	Identification details, Contact details, Know Your Customer (KYC).	<p><u>Private individual:</u> Performance of a contract (GDPR, article 6.1(b))</p> <p><u>Contact person, representative or beneficial owner:</u> Legitimate interest (GDPR, article 6.1(f)) - be able to document, administer and perform contractual and legal obligations with the company/foundation/institution you are representing.</p> <p>Legitimate interest (GDPR, article 6.1(f)) – be able to establish, exercise or defend Carnegie's or your legal claims.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years after the end of the contractual relationship.
Communication, e.g., via customer services and assistants.	Identification details, Contact details, Communication.	<p><u>Private individual:</u> Performance of a contract (GDPR, article 6.1(b)).</p> <p>Compliance with a legal obligation (GDPR, article 6.1(c)) to handle complaints – The Norwegian Securities Trading Act and Circular 4/2019⁸, The Norwegian Financial Supervisory Authority's general guidelines regarding complaints management concerning financial services to consumers.</p> <p><u>Contact person, representative or beneficial owner:</u> Legitimate interest (GDPR, article 6.1(f)) - be able to communicate with you on</p>	The personal data is stored for five years after the end of the contractual relationship.

⁷ Lov om finansavtaler (finansavtaleloven) - Lovdata

⁸ Retningslinjer for klagebehandling i bank-, finans-, forsikrings- og verdipapirverksemd - Finanstilsynet.no



		<p>matters concerning the company/foundation/institution you represent.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	
On request, provide brokerage, sales trading, and perform stock market related transactions.	Identification details, Contact details, Communication, Financial information.	<p><u>Private individual</u>: Performance of a contract (GDPR, article 6.1(b)).</p> <p><u>Contact person, representative or beneficial owner</u>: Legitimate interest (GDPR, article 6.1(f)) – be able to act at your request on behalf of the company/foundation/institution you represent.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years after the end of the contractual relationship.
Provide analyses in the online service Carnegie Edge.	Identification details, Contact details, Technical data.	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to provide you with relevant online services in relation to the service provided by us.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years after you close your account and your use of our online service Edge, or terminate your customer engagement with Carnegie.

3.2.3 Compliance with our legal obligations

Purpose	Personal data	Legal basis	Storage time
Take measures to know our customers.	<u>Securities and Individuals related to a customer</u> : Identification details, Contact details, Know Your Customer (KYC).	Compliance with a legal obligation (GDPR, article 6.1(c) and 10) - The Norwegian Anti-Money Laundering Act.	The personal data is stored for five to maximum of ten years (depending on risk classification) after the end of the contractual relationship.
Establish a register of individuals who come into contact with inside information.	Identification details, Contact details, Technical data.	Compliance with a legal obligation (GDPR, article 6.1(c)) - EU Market Abuse Regulation no 596/2014 (MAR).	The personal data is stored for five years.
Establish a register of individuals involved in market soundings and who thereby come into contact with inside information.	Identification details, Contact details, Technical data.	Compliance with a legal obligation (GDPR, article 6.1(c)) - EU Market Abuse Regulation no 596/2014 (MAR).	The personal data is stored for five years.
Comply with a legal obligation to record and store telephone calls, or notes from	Identification details, Contact details, Communication.	Compliance with a legal obligation (GDPR, article 6.1(c)) – Directive (2014/65/EU) and Regulation	Recorded telephone calls are stored for five years. If a criminal

meetings, relating to investment services and investment activity, including all transactions.		(600/2014) on Markets in Financial Instruments, EU Market Abuse Regulation no 596/2014 (MAR) and the Norwegian Securities Trading Act.	investigation is initiated, the retention period can be extended if it is necessary for the investigation.
Carry out mandatory monitoring against compiled lists of politically exposed persons (PEP) and EU sanctions lists.	Identification details, Know Your Customer (KYC).	Compliance with a legal obligation (GDPR, article 6.1(c) and 10) - the Norwegian Anti-Money Laundering Act, the EU Commission's consolidated list of financial sanctions and the Norwegian Sanctions Act, with associated regulations.	The personal data is stored for five years after the end of the contractual relationship.
Monitor and review transactions to prevent our business from being used for financing of terrorism or money laundering.	Identification details, Financial information, Know Your Customer (KYC).	Compliance with a legal obligation (GDPR, article 6.1(c) and 10) - the Norwegian Anti-Money Laundering Act.	The personal data is stored for a maximum of ten years, (if high-risk customer, otherwise, five years) after the end of the contractual relationship.
Carry out checks against other international sanctions lists.	Identification details, Know Your Customer (KYC).	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to perform checks against international sanction lists (such as the consolidated list from UN's Security Council as well as counterparts from other international organisations) in order to obtain more detailed customer information in accordance with the Norwegian Anti-Money Laundering Act.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p> <p>Personal data relating to criminal convictions and offences are processed in accordance with the exemption granted under Chapter 4, of the Norwegian Personal Data Act, containing supplementary provisions to the GDPR.</p>	The personal data is stored for five years after the end of the contractual relationship.

3.3 Website visitors

Purpose	Personal data	Legal basis	Storage time
Contact information you have filled out in a notice of interest on our website and/or to	Identification details, Contact details.	Legitimate interest (GDPR, article 6.1(f)) – be able to fulfil your request.	The personal data is stored for up to five years after you have submitted the notice to us



assist with your enquiry.		Contact us if you would like to know more about how we have balanced your interests against ours.	(unless there is an ongoing contractual relationship).
Display relevant marketing messages to you. The data is collected via cookies or other tracking technologies. <i>Please read more in our cookie policy: https://career.carnegie.no/cookie-policy</i>	Technical data.	Your consent (GDPR, article 6.1(a)).	Your personal data is stored for a maximum of ten years or until you withdraw your consent.
To facilitate your user experience. The data is collected via cookies or other tracking technologies. <i>Please read more in our cookie policy: https://career.carnegie.no/cookie-policy</i>	Technical data.	Your consent (GDPR, article 6.1(a)).	Your personal data is stored for a maximum of ten years or until you withdraw your consent.

3.4 Suppliers

Purpose	Personal data	Legal basis	Storage time
Identity verification and authorization before entering into a contractual relationship.	Identification details, Contact details.	Legitimate interest (GDPR, article 6.1(f)) – be able to verify your identity and authorization to represent the company with which we are to enter into a contractual relationship. Contact us if you would like to know more about how we have balanced your interests against ours	The personal data will be stored for the duration of our contract with the company you represent and five years thereafter.
Documenting, administrating and performing contractual and legal obligations.	Identification details, Contact details.	Legitimate interest (GDPR, article 6.1(f)) – be able to document, administer and perform the contractual and legal obligations with the company/foundation/institution that you represent. Contact us if you would like to know more about how we have balanced your interests against ours.	The personal data will be stored for the duration of our contract with the company you represent and five years thereafter.
Communicate with you regarding our co-operation.	Identification details, Contact details, Communication.	Legitimate interest (GDPR, article 6.1(f)) – be able to communicate with you on matters relating to our co-operation with the company you represent. Contact us if you would like to know more about how we	The personal data will be stored for the duration of our contract with the company you represent and five years thereafter.



Evaluation of our co-operation.	Identification details, Contact details, Communication.	<p>have balanced your interests against ours.</p> <p>Legitimate interest (GDPR, article 6.1(f)) – be able to continuously evaluate the performance of the contractual obligations by the company you represent.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data will be stored for the duration of our contract with the company you represent and five years thereafter.
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3.5 Marketing

Purpose	Personal data	Legal basis	Storage time
Compile a list of participants to our events.	<u>Customers and Potential customers:</u> Identification details, Contact details.	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to create a list of participants to our events.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five years.
Promote products and services through different channels, e.g.,	<u>Customers and Potential customers:</u> Identification details, Contact details	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to market the services and products we think you might be interested in.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	<p><u>Customers:</u> The personal data is stored for five years after the end of the business relationship.</p> <p><u>Potential customers:</u> The personal data is stored for five years.</p>

3.6 Evaluate and improve our business, products and services

To develop our internal operations and provide the best possible services and products to our customers, we process your personal data in the following ways.

Purpose	Personal data	Legal basis	Storage time
Develop, streamline, monitor and quality-assure our processes, systems and tools, and carry out statistical processing and compilations.	<u>Customers:</u> Identification details, Contact details, Financial information, Know Your Customer (KYC).	<p>Legitimate interest (GDPR, article 6.1(f)) - be able to evaluate and improve our business operations.</p> <p>Contact us if you would like to know more about how we have balanced your interests against ours.</p>	The personal data is stored for five to maximum of ten years after the end of the contractual relationship.

3.7 Supervision, legal claims, acquisitions, exercise of rights, etc.

Purpose	Personal data	Legal basis	Storage time
Investigate incidents, respond to requests and provide requested information to a	The categories of individuals and personal data requested in relation to the incidents and supervision.	Compliance with a legal obligation (GDPR, article 6.1(c)) - GDPR, articles 33-34 and 58 respectively, the	The personal data is stored for the duration of the incident or supervision and up

supervisory authority in the event of supervision.		Norwegian Securities Trading Act and the Act on the Supervision of Financial Undertakings ⁹ (the “Financial Supervision Act”).	to five years or longer if required by law.
Protect our interests in the event of a dispute.	The categories of individuals and personal data necessary regarding the subject matter of the dispute and the parties involved.	Legitimate interest (GDPR, article 6.1(f)) - be able to protect our interests in case of a dispute. Contact us if you would like to know more about how we have balanced your interests against ours.	The personal data is stored for the duration of the dispute and 5 years thereafter or longer if required by law.
The categories of individuals and personal data covered by the merger or acquisition.	The categories of individuals and personal data covered by the merger or acquisition.	Legitimate interest (GDPR, article 6.1(f)) - be able to carry out a merger or acquisition. Contact us if you would like to know more about how we have balanced your interests against ours.	Not applicable.
Accommodate your request to exercise any of your rights.	<u>All categories of individuals</u> : Contact details, Identification details and other personal data about you that you provide in your request and that are necessary to fulfil your request.	Compliance with a legal obligation (GDPR, article 6.1(c) - GDPR, Chapter III.	The personal data is stored for one year after we have handled your request.
Legal obligation to record and store telephone calls relating to advice and order placement.	<u>Family members</u> : Identification details, Contact details, Communication.	Legitimate interest (GDPR, article 6.1(f)) - be able to follow up on advice and verify customer orders and to comply with industry regulations on securities transactions by employees and their relatives. Contact us if you would like to know more about how we have balanced your interests against ours.	Recorded telephone calls are stored for five years. If a criminal investigation has been initiated, the retention period can be extended if it is necessary for the investigation.
Legal obligation to save accounting information.	Financial information.	Compliance with a legal obligation (GDPR, article 6.1(c)) - the Norwegian Accountants Act ¹⁰ .	The personal data is stored for up to ten year and will be stored until the year end.

⁹ <https://lovdata.no/dokument/NL/lov/1956-12-07-1>

¹⁰ <https://lovdata.no/dokument/NL/lov/2022-12-16-90?q=regnskapsf%C3%B8reren>



4 Who do we share your data with?

4.1 General

In order to provide our products and services to you, and to comply with laws and regulations, we sometimes need to share your personal data with others, including other companies within the Carnegie Group and third parties who assist us in various aspects of our business.

4.2 Suppliers and partners

We may share your personal data with our suppliers and partners who process personal data on our behalf, such as:

- *IT service providers*: companies that manage the necessary operation, technical support and maintenance of our IT solutions.
- *KYC service providers*: companies that provide us with services to enable us to fulfil our legal obligation to carry out customer due diligence measures.
- *Credit-rating agencies*: companies that carry out credit-ratings on our behalf.
- *Marketing*: companies that help us with the printing and distribution of marketing materials, managing our social media and other digital channels, and advertising agencies.
- *Other banks, securities companies and central securities depositories*: such banks, securities companies and central securities depositories to which Carnegie delivers securities, receives securities from or registers information regarding securities with.
- *Companies that organise analyst meetings for Carnegie's institutional customers*: such companies that seeks investors among Carnegie's institutional customers. Personal data is only shared with such companies regarding the contact persons, representatives or authorised signatories of institutional customers who have informed Carnegie that they wish to attend the relevant analyst meeting.

4.3 Other third parties

We may also share your personal data with other third parties, such as:

- *Authorities*: including, but not limited to, the Norwegian Tax Administration (*Norwegian: Skatteetaten*), the Police (*Norwegian: Politiet*), the Financial Supervisory Authority of Norway (*Norwegian: Finanstilsynet*), the National Authority for Investigation and Prosecution of Economic and Environmental Crime (*Norwegian: Økokrim*).
- *Courts and arbitration boards*: in the event of a dispute or other proceedings.
- *Euronext Securities Oslo (Verdipapirsentralen ASA)*.

5 Where is your data processed?

We always strive to process your personal data within the EU/EEA and all our data storage takes place within the EU/EEA. However, in certain situations we may need to transfer your personal data to partners or service providers located outside the EU/EEA (third countries).

Regardless of where your personal data is processed, we implement all reasonable contractual, technical and organisational measures to ensure that the level of protection is equivalent to that of the EU/EEA. We always ensure that there is a transfer mechanism in place and we therefore use the [European Commission's standard contractual clauses](#). We also take additional technical and organisational security measures where necessary, such as encryption and pseudonymisation. For transfers to the USA, an adequacy decision of the European Commission is applied, which you can find [here](#).



6 How do we collect your personal data?

We mainly collect personal data directly from you, for example when you communicate with us, use our website or enter into a contract with us. We also collect your personal data from other sources, such as:

- Address information from private and public registers to ensure that we have the correct contact details for you in our registers, e.g., from Bisnode, 1881 or similar platforms.
- Information from sanctions lists or international organisations to prevent money laundering.
- Information from google searches, and other publicly available sources, in relation to the KYC documentation.
- Financial information from credit-rating agencies.
- Shareholder information from the CSD when, in our role as an issuing institution, in connection with specific company transactions, we receive personal data on all shareholders of the specific company on behalf of the company. The personal data we receive are name, address, personal identification number, securities account and linked bank account and holdings in the specific company.

7 Do you have to provide your personal data?

In order for us to comply with legal requirements imposed to us as an investment firm you need to provide the personal data we request. The purpose of processing personal data is to offer and provide services to our customers and the legal basis for the processing is to be able to fulfil the agreement we have with our customers. The scope of the personal data may vary for different products and services that we provide. If you do not wish to provide us with the personal data upon request, we may not be able to provide you with the services and products we offer.

If you have any questions regarding this matter or need information on what personal data we require in order to provide you with the services and/or products we offer, you can contact us by using the contact details in section 1 above.

8 Your rights

8.1 General

We are accountable for your personal data being processed in a legal, transparent and open manner in relation to you. You have certain rights regarding our processing of your personal data. If you want to exercise any of your rights, you can contact us by using the contact details in section 1 above.

We will get back to you as soon as we can, and at the latest within one month of receiving your request. If we cannot answer your request within the timeline, you will be notified of the reason in writing.

8.2 Right of access

You have the right to know if we process personal data about you or not. If we do, you also have the right to receive information about what personal data we process and how we process it. You also have the right to receive a copy of the personal data we process about you.

If you are interested in any specific information, please indicate this in your request. For example, you can specify if you are interested in a certain type of information or if you want information from a certain time period.

8.3 Right to rectification

If you believe that some of the personal data we process about you are inaccurate or misleading, you have the right to require the personal data to be corrected or supplemented by additional information. Once we have corrected or completed your personal data request, we will attempt to notify third parties of the changes if relevant. The obligation to notify does not apply if it proves to be virtually impossible. Upon request, we



can provide you with information of who we have shared your personal data with. If you request rectification, you also have the right to request that we restrict our processing during the time we are handling your matter.

8.4 Right to erasure (to be forgotten)

In certain cases, you have the right to request that we erase the personal data we process about you. You have the right to request your personal data erased if the following conditions are met:

- The personal data is no longer necessary for the purposes for which they were collected or otherwise processed,
- We process your personal data on the basis of your consent, and you withdraw your consent,
- The personal data is processed for direct marketing purposes, and you object to the processing,
- You object to the processing of personal data based on our legitimate interest and we cannot demonstrate that our reasons for processing outweigh your interests,
- The personal data is processed unlawfully, or
- We have a legal obligation to erase the personal data.

If we erase the personal data following your request, we will also notify those third parties that we have shared your personal data with of the erasure. The obligation to notify does not apply if it proves to be virtually impossible. Upon request, we can provide you with information on who we have shared your personal data with.

8.5 Right to restriction

You may request that we restrict the way we process your personal data. Right to restriction means that the personal data is marked so that it can only be processed for certain limited purposes in the future. The right to restrict processing applies:

- If you believe the personal data is inaccurate and you have requested rectification. You can also request that we restrict our processing while we investigate if the personal data is accurate or not,
- If the processing is unlawful and you do not want the personal data to be erased,
- When we no longer need to process the personal data for the purposes for which we collected it, but you need it to be able to establish, exercise or defend legal claims,
- If you have objected to processing based on our legitimate interest, you can request that we restrict the processing while we investigate whether our interest in processing your personal data outweighs your interests.

In the event that you have requested that we restrict our processing, we have the right to use the data for storage, if we have your consent to the processing, to establish, enforce or defend a legal claim or to protect someone else's rights. We may also use the personal data for reasons relating to important public interest. We will notify you before the restriction expires.

In the event that we restrict the processing of your personal data, we will also notify those we have shared your personal data with. The obligation to notify does not apply if it proves to be virtually impossible. Upon request, we can provide you with information on who we have shared your personal data with.

8.6 Right to object

You have the right to object to our processing of your personal data that is based on our legitimate interest. If you object to the processing, we will, based on your specific situation, evaluate whether our interests in processing the personal data outweigh your interests in not having your personal data processed for that purpose. If we cannot demonstrate compelling legitimate grounds that outweigh yours, we will stop the processing to which you object - provided that we do not need to process the personal data for the establishment, enforcement or defence of legal claims.

You always have the right to object to the processing of your personal data for direct marketing. We are then no longer permitted to process your personal data for direct marketing.



If you object to the processing, you also have the right to request restriction while we investigate the matter, see section 8.5 above.

8.7 Right to data portability

Data portability means that you have the right to obtain the personal data we have collected about you, from you, in a structured, publicly available and machine-readable format, if available, and that you have the right to transfer it to another controller.

The right to data portability applies only to the personal data:

- you directly have provided to us, about yourself,
- If the processing takes place due to the performance of a contract with you, and
- Where the processing is automated.

8.8 Right to object against decisions based on automatic decision-making

You have the right to request that we shall review the decision that is based solely on automated decision-making, and which has legal effects for you or significantly affects you in a similar way. You also have the right to object against the decision.

8.9 Right to withdraw consent

You have the right to withdraw a given consent for a particular processing based on the legal basis of consent at any time. A withdrawal does not affect the lawfulness of our processing before the consent was withdrawn.

8.10 Right to complain

If you believe that we have processed your personal data incorrectly or are dissatisfied with our processing of personal data, please contact us and we will try to resolve your issue. Our contact information is stated in the section 1 above,

You also have the right to lodge a complaint with the supervisory authority. The Norwegian Data Protection Authority is the Norwegian supervisory authority for our processing of your personal data. You also have the right to lodge a complaint with the supervisory authority in the country where you live, work or where you believe an infringement has taken place. The Norwegian Data Protection Authority's contact information and more information on how to complain can be found at www.datatilsynet.no.

9 Cookies

We use cookies to facilitate the use of our websites. A cookie is a small text file that is sent from our web server and that is saved by your internet browser. The cookie helps recognize what type of content and what sites that have been visited on our websites.

On our website we also have so-called third party cookies, which are cookies from external parties that we use to, for example, count the visitors on our website and evaluate the traffic. The cookie information, or other background data collection, will not be used to identify you in any way.

The purpose of cookies is that we can adapt and develop our services based on the user's needs and to better target our marketing.

Sometimes we will use third party cookies from other companies to conduct market surveys, traffic surveys, facilitate marketing and to enhance the functionality of the website.

You can delete cookies from your hard drive whenever you want, but this will make your personal settings disappear. You can also change the settings in your internet browser so that it does not allow cookies to be saved on your hard drive. This will however impair the functionality of certain websites, may prevent access to log on sites and may make certain content and functions unavailable.



9.1 Changes

We may, from time to time, change the way we use cookies in order to comply with legal requirements and our own practice for the collection and processing of data.

10 Changes to the information

We reserve the right to change and update this information from time to time.

The information text was last updated on 21 December 2023.