

## General information regarding processing of personal data

We respect your personal privacy and we are committed to protecting your personal data. We are as transparent as possible with our handling of personal data and always strive for a high level of data protection. We do not process more personal data about you than what is necessary, and we will always inform you about new data processing before it is performed.

If, for any reason, we are in need of data processing that is not considered to be absolutely necessary, we will, before starting the processing, ask you for consent. If you deny, your personal data will not be included in this processing. If you approve, you always have the opportunity at a later time to withdraw your consent. We will in that case immediately end this processing.

Should an incident occur, we will inform you as soon as possible if there is a high risk regarding your personal privacy.

This privacy policy describes how we process your personal information in detail when you sign up as a subscriber to our press releases, our financial reporting or our annual report. We describe how your personal data is collected, what data is processed, why we process it, who we can share it with, how we protect it and how you can use your legal rights.

### Controller

Mekonomen Company AB (publ), corporate identity number 556724-9254, with address: Box 195 42, 104 32 Stockholm, Sweden, is the Controller for the processing of your personal data in accordance with this Privacy Policy.

If you have any questions or if you want to exercise any of your legal rights related to our processing of your personal data, you are welcome to contact our GDPR-team: [gdpr@mekonomengroup.com](mailto:gdpr@mekonomengroup.com)

### What personal data we process about you

We process your name, email address and phone number when you sign up as a subscriber to our press releases and our financial reporting.

Besides the data you provide to us or data that we collect from you, we do not collect any data from third parties.

### How and why we use your personal data

We process data about you, for example, because you have chosen to register a user account with us. The personal data we collect about you is processed for the purposes and legal basis described below:

Purpose	Processing	Categories of personal data	Legal basis	Storage time
To manage mailing of press releases and financial reporting.	<ul style="list-style-type: none"><li>Register you as a subscriber.</li><li>Manage mailings.</li></ul>	<ul style="list-style-type: none"><li>Name.</li><li>E-mail.</li><li>Phone number.</li></ul>	Performance of contract.	Until you end your subscription.
In order to handle the distribution of annual reports to you as a shareholder.	<ul style="list-style-type: none"><li>Managing mailing of annual report</li><li>Maintaining correct and updated information through external registers.</li></ul>	<ul style="list-style-type: none"><li>Name.</li><li>Address.</li><li>Social security number.</li></ul>	Legitimate interest <sup>1</sup>	Until you sell your shares and for a period of up to 1 year thereafter.

# Mekonomen

In order to handle notifications to and implementation of the Annual General Meeting and to be able to fulfill our obligations regarding management of the share register.	<ul style="list-style-type: none"><li>• Receive and manage your application.</li><li>• Implement the measures we are required to take in order to manage the share register.</li></ul>	<ul style="list-style-type: none"><li>• Name.</li><li>• Address.</li><li>• Social security number.</li></ul>	Legal obligation.	Until you sell your shares and for a period of up to 1 year thereafter.

## Processing of social security number

Social security number has a special position in the Swedish legislation. The ability to process a social security number is regulated in the Swedish Data Protection Act, which complements the Data Protection Regulation. According to the law, social security numbers may only be processed if there is a clear justification for the purpose, it is necessary for secure identification or if there is some other substantial reason.

We process your social security number in order to maintain accurate and up-to-date contact information about you, in order to fulfill our agreement regarding the mailing of our annual report.

We also process your social security number in order to handle notifications to, and implementation of the Annual General Meeting (eg to investigate whether shareholdings are directly owned or registered, and to take action accordingly) and to take the actions that we are required to take under the management of the share register.

## Data Processors

If it is necessary for us to provide our services, we share your personal data with Data Processors. A Data Processor is someone that processes personal data on our behalf and according to our instructions. We have written agreements with all Data Processors to ensure proper and safe handling of the personal data they process. Our Data Processors assist us with:

- IT services (companies handling operations, technical support and maintenance of our IT solutions)
- Distribution (companies that handle the release of our annual report)

## Where your personal data is processed

We aim to process your personal data within the European Union or the European Economic Area ("EU/EEA"), but, in certain situations, your personal data may be transferred to, and processed by recipients in, countries outside of the EU/EEA.

In all such cases, we will take all reasonable legal, technical, and organizational measures required to ensure that your personal data is handled securely with an adequate level of protection comparable to and at the same level as the protection offered within the EU/EEA. Examples of appropriate safeguards include approved code of conduct in the recipient country, standard contractual clauses, or binding company-internal rules

## How long do we store your personal information?

We store your personal information for as long as is necessary for each purpose. See more about specific storage periods under the heading "How and why do we process your data?". We may also process your personal data to fulfill legal obligations due to legal requirements, judgments, or government decisions. This may, for example, be a requirement in the Accounting Act. In addition, we may process your personal data for the purpose of defending a legal claim for as long as this can be asserted.

## Your legal rights

We want to be open and transparent about how we process your personal data and you are entitled to request information about the processing.

If we receive a request for access, we may ask for additional information to ensure that we provide the information to the right person and that the information corresponds to your request.

You are entitled to:

- Receive a confirmation from us if we treat personal data about you and if so, get access to the personal data we hold about you (records) at no charge. In case of manifestly unfounded or unreasonable record requests (in particular due to repeated requests), an administrative fee may be charged, or the request can be denied.
- Correct incorrect or incomplete personal data.
- have your data deleted in some cases, for example if your personal data is no longer necessary for the purpose for which it was collected.
- Limiting processing of your personal data in some cases. For example, if you have objected to the processing of your personal data (primarily when legitimate interest is the basis of the processing), while determining if our reasons for processing outweighs your interests, rights and freedom.
- Obtain and transfer personal data to other Data Controllers in certain cases (data portability). The right to data portability covers only data that you have provided to us and which we process on the basis of certain legal bases, such as an agreement with you.

## Objection to processing based on legitimate interest

You have the right to object to the processing of your personal data, based on a legitimate interest. Continued processing of your personal data requires in this case that we can show compelling legitimate reasons that weigh heavier than your interests, rights and freedom or whether it is for the purpose to determine, exercise or defense legal claims.

\*In order to handle the mailing of our annual report and to ensure that we maintain accurate and up-to-date information about your address, we process your social security number in external personal registers. We have made the assessment that the benefits of maintaining accurate data outweigh your interest that no more information than necessary is being processed.

## Objection to processing based on legitimate interest

You have the right to object to the processing of your personal data based on our legitimate interest. Further processing of your personal data presupposes that we can demonstrate legitimate grounds for the processing which overrides your interest and rights or due to legal claims.

1 In order to be able to handle the mailing of our annual report and to ensure that we maintain correct and updated information about your address, we use your social security number to search external personal data registers. We have made the assessment that the benefits of maintaining accurate information outweigh your interest in not using more information than necessary.

## Complaints to the supervisory authority

If you believe we handle your personal data incorrectly, you may contact us in the manner described below. You also have the right to file a complaint with the supervisory authority.

## Updates to our Privacy Policy

We reserve the right to make changes to this Privacy Policy at any time. All changes made will be published on our homepage ([www.mekonomen.com](http://www.mekonomen.com)) and be reflected through the published Privacy Policy. You should therefore review this policy periodically to make sure that you are satisfied with the changes that have been made. If we make extensive changes of material significance, we will notify you by email (presupposing you have given us your email address).

If the changes concern the processing of personal data that is performed with the support of your consent, we will give you the opportunity to give your consent again.

## How to contact us

If you have any questions regarding our handling of your personal data or if you wish to exercise any of your rights related to the handling of your personal data, you are welcome to contact our GDPR team: [gdpr@mekonomencompany.com](mailto:gdpr@mekonomencompany.com)

*This privacy policy was last updated on: **2023-06-21***