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**PRIVACY NOTICE FOR PERSONAL DATA PROCESSED IN  
CONNECTION WITH A GENERAL MEETING OF  
SHAREHOLDERS**

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## 1. ABOUT THIS PRIVACY NOTICE

### 1.1 To whom is this notice directed?

This notice applies to personal data processed in connection with a general meeting of shareholders (“GM”) in AB Industrivärden (publ), reg. no. 556043-4200, (“**Industrivärden**”, “**the Company**”, “**we**” or “**us**”). Industrivärden’s registered office is Stockholm.

This notice applies to personal data processed regarding shareholders of the Company as well as any other individual attending or otherwise connected to the GM (“**you**” or “**your**”).

This notice explains what types of personal data are gathered about you, how the personal data is used, and with whom the personal data is shared. It also describes your rights in relation to your personal data.

### 1.2 Who controls your personal data?

Industrivärden is the controller for the processing of personal data carried out in connection with the GM, regardless of whether the personal data is processed by us or by a service provider.

Please note that in some cases we may be joint controllers together with a service provider and that a service provider may also be the sole controller if this is required by law. An example of such a service provider that processes your personal data in connection with a GM is the central securities depository Euroclear Sweden AB.

### 1.3 Updates of this privacy notice

This notice may be updated from time to time to comply with changing legal or technical requirements as well as business developments. You can see when it was last updated by checking the “last updated” date displayed at the front page of this notice. Please consider the version available online as the latest version.

## 2. HOW YOUR PERSONAL DATA IS PROCESSED

### 2.1 What personal data do we process and why?

Our purpose for collecting and processing your personal data is to carry out a GM and provide services in connection therewith as well as to comply with applicable law and regulations:

Purpose	Categories of personal data	Legal basis	Retention period
In order to fulfil our legal obligations under Swedish company law.	<ul style="list-style-type: none"><li>• Contact details (e.g. name and address);</li><li>• identification details (e.g. date of birth and/or ID-number);</li><li>• financial information (e.g. voting rights at the GM, information regarding holdings and entitlements connected to the holdings);</li><li>• if a proxy is appointed, information on who you are representing or are represented by (as relevant);</li><li>• if a shareholder or a proxy gives notice of attendance for assistant(s) to attend the GM, information regarding who you assist or are assisted by (as relevant);</li></ul>	The legal basis for the processing is a legal obligation under Swedish company law.	<p>Personal data included in the GM share register (for example, your name, address, ID-number and holdings) is retained for a period of ten years following the GM, in accordance with rules issued by Euroclear Sweden AB.</p> <p>Personal data included in the minutes from the GM will also be retained for a period of ten years following the GM.</p>

	<ul style="list-style-type: none"> <li>• information on how you have voted may be processed, e.g. in case of postal voting, if voting devices are used, vote counting is carried out as well as through publication of the voting results to the extent your voting is possible to connect to you (e.g. in some cases a certain number of votes may be connected to a certain number of shares held by you); and</li> <li>• notes in the minutes from the GM (e.g. dissenting opinions or when exercising the right as shareholder to propose business at the GM, make statements or ask questions).</li> </ul>		
To fulfil our legal obligation to prevent sanctioned parties from attending the GM.	<ul style="list-style-type: none"> <li>• Contact and identification details.</li> <li>• Where applicable, information resulting from a review of EU sanctions lists.</li> </ul>	The legal basis for the processing is a legal obligation under applicable sanctions legislation.	The data is retained for a period of ten years following the GM, in accordance with the statute of limitations of the Swedish Criminal Code.
To prepare, administer and conduct the GM, to provide services in connection therewith and to ensure adequate security and order during the GM.	<ul style="list-style-type: none"> <li>• Contact details (e.g. name, title, address, telephone number and email address).</li> <li>• Video and audio recordings of any surveillance cameras.</li> </ul>	<p>The legal basis for the processing is the legitimate interest of the Company.</p> <p>We consider that the processing of your personal data is necessary to make the GM more accessible to our stakeholders and to maintain adequate security and order during the GM.</p> <p>We also consider that these interests outweigh any conflicting interests and fundamental rights and freedoms. You have the right to object to this assessment and can read more about your rights in section 2.4.</p>	Personal data processed solely for the purposes of administering and conducting the GM and ensuring adequate security and order during the GM will normally be deleted shortly after the GM has ended.
Documentation of the GM.	<ul style="list-style-type: none"> <li>• Recording of images, photographs, video and audio, to the extent resolved by the GM or the board of directors.</li> </ul>	<p>The legal basis for the processing is the legitimate interest of the Company.</p> <p>We consider that the processing of your personal data is necessary to document and communicate externally about the GM.</p> <p>We also consider that these interests outweigh any conflicting interests and fundamental rights and freedoms. You have the right to object to this assessment and can read more about your rights in section 2.4.</p>	If recording of images, photographs and video recordings of the GM are published openly on the internet, personal data contained in these recordings will be retained for as long as the recording is available, but no longer than ten years after the day of the GM.
Digital participation at the GM.	<ul style="list-style-type: none"> <li>• Technical data (e.g. information about your computer, smartphone or other device, your IP address and user settings), to the extent that the GM is made available by electronic connection;</li> <li>• usernames, personal data communicated at the GM and other participant information, to the extent that the GM is made available by electronic connection.</li> </ul>	<p>The legal basis for the processing is the legitimate interest of the Company.</p> <p>The technical data is necessary to enable you to participate in the meeting digitally.</p> <p>We consider that the processing of your personal data is necessary to make the GM more accessible to our stakeholders.</p> <p>We also consider that these interests outweigh any conflicting interests and fundamental rights and freedoms. You have the right to object to this assessment and can read more about your rights in section 2.4.</p>	<p>Personal data processed solely for the purposes of administering and conducting the GM and ensuring adequate security and order during the GM will normally be deleted shortly after the GM has ended.</p> <p>If the GM is published on the internet, personal data that appear in the recording of the GM will be retained for as long as the recording is available, but no longer than five years after the day of the GM.</p>

Webcast of the GM.	<ul style="list-style-type: none"> <li>• Technical data (e.g. information about your computer, smartphone or other device, your IP address and user settings necessary for the webcast), to the extent that the GM is made available online;</li> <li>• Data contained in the actual recording of the GM (recording of images, photography, video and audio).</li> </ul>	<p>The legal basis for the processing is the legitimate interest of the Company.</p> <p>The technical data is necessary to provide the broadcast on your device.</p> <p>The data contained in the recording (such as data contained in presentations during the GM) are necessary to process in order to make the GM publicly available on the internet.</p>	If the GM is published openly on the internet, personal data that appear in the recording of the GM will be retained for as long as the recording is available, but no longer than five years after the day of the GM.
Archiving of documents.	<ul style="list-style-type: none"> <li>• Data contained in the minutes of the meeting.</li> <li>• Other data to be documented but where archiving is not necessary to fulfil the Company's legal obligations.</li> </ul>	The legal basis for archiving the documents beyond the time periods required by Swedish company law is based on the Company's legitimate interest. In these cases, we consider that these interests outweigh any conflicting interests and fundamental rights and freedoms. You have the right to object to this assessment and can read more about your rights in section 2.4.	Personal data contained in the minutes of the GM will be archived if storage for a period longer than 10 years is justified considering the decisions taken at the GM or for other reasons.

## 2.2 Where does your personal data come from?

The personal data we collect about you comes from the following sources:

### a) Personal data you give us

We collect personal data directly from you, e.g. when you send us personal data via forms, e-forms, e-mails, telephone or during the GM either at the meeting venue or remotely by participating online.

### b) Personal data we receive from other sources

We may receive your personal data through:

- information received from public records;
- information received from the central securities depository (Euroclear Sweden AB) or other third party service providers in conjunction with the GM (such as legal advisors); or
- the shareholder you represent or your proxy (if relevant).

## 2.3 With whom may we share your personal data?

### a) Transfer within the Group or third parties

- We may transfer personal data to other affiliated entities or business partners to the extent necessary in connection with the GM. We only allow access to personal data to staff members who need to have access to it in the course of their duties and have limited the possibilities to use the personal data for any other purpose.
- We may provide personal data to any competent law enforcement body, regulatory, government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities, the tax agency or the Swedish companies registration office, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.

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- We may disclose personal data to our third party vendors, service providers and partners who provide services to us (e.g. third party consultants working with the GM, law firms/advisors, security agents or providers of services to conduct the GM digitally if such services are used at the meeting), which are or will be involved in providing services in connection with the GM or who otherwise process personal data for purposes that are described in this privacy notice or as notified to you when we collect your personal data.
  - We may disclose personal data to our auditors, advisors, legal representatives and similar agents as may be necessary in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the personal data for any other purpose.
  - We may provide the list of notices of attendance (which contains names of shareholders together with information regarding their number of shares and votes, and information on their respective proxy and/or assistant(s), if any) to the participants in the GM as the basis for determining the voting list at the GM.
  - We may disclose personal data to other shareholders who request a copy of the minutes from the GM to fulfil our legal obligations.
  - We may also publish certain information containing personal data on our website, to the extent we are obliged to do so according to law or other regulations (e.g. minutes from the GM).
  - Personal data that appear in the recording of the GM may be published on the website if the recording is made available to the public. The GM may be published to fulfil our legitimate interests in informing stakeholders about our business operations.

b) International personal data transfers

As a general rule, we process your personal data within the EU/EEA. In cases where personal data is processed by group companies or third-party providers in a country outside the EU/EEA, there is either a decision from the European Commission that the country in question ensures an adequate level of protection or we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this notice. These measures include, where applicable, that we have concluded EU standard contractual clauses with the recipient of your personal data in third countries. You have the right to receive a copy of these clauses by contacting the Company.

If other safeguards are used, we will provide additional information to you regarding such safeguards (as indicated in the notice to the GM).

You can find more information on which countries are considered to have an ‘adequate level of protection’ on the European Commission website, and you can read more about standard contractual clauses on the website of the Swedish Authority for Privacy Protection (Sw.

*Integritetsskyddsmyndigheten*).

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## 2.4 What are your rights in respect to your personal data?

You have several rights when we process your personal data. These rights are described in further detail below.

<b>The right to information and access</b>	You have the right to request to be informed on whether we are processing your personal data and receive a copy of it (a so-called register extract) together with some more detailed information on how we use your personal data.
<b>The right to rectification</b>	If you consider your personal data to be inaccurate, not complete or up to date, you have the right to have your personal data rectified or completed, provided that we are not legally obliged to keep the data unchanged. If such personal data has been disclosed to a third party in accordance with this privacy notice, we will also ask them to rectify or update your personal data (if relevant).
<b>The right to erasure (the right to be forgotten)</b>	In some cases, you can have your personal data erased. Erasure may apply, for example, to personal data that is no longer necessary to process or retain for the purpose for which it was collected. In some circumstances, we are not able to erase your personal data, for example when your personal data is needed to fulfil a legal obligation, if it is still necessary to process for the purpose for which it was collected or if our interest in continuing to process the data outweighs your interest in having it erased.
<b>The right to object</b>	You have the right to object to the processing of your personal data based on a balance of interests. If we cannot show that there are compelling and legitimate grounds for continuing to process the personal data, we must cease the processing.
<b>The right to restrict processing</b>	In some cases, you have the possibility to request the restriction of the processing of your personal data, which means that the data is marked so that it can only be processed for certain limited purposes in the future. This is possible, for example, if you have objected to the processing, if you do not think the information, we have about you is correct or if the processing is against the law. By requesting a restriction on the processing, you have the possibility, at least for a certain period of time, to prevent us from using the personal data for purposes other than, for example, the defense of our legal claims or the fulfilment of our legal obligations.
<b>The right to data portability</b>	In some cases, you are allowed to obtain your personal data kept by us in a structured, commonly used and machine-readable format and to transmit those personal data to another controller.
<b>The right to complain to a Supervisory Authority</b>	If you have any objections or concerns about how we process your personal data, you have the right to contact or complain to the Swedish Authority for Privacy Protection, which is the Supervisory Authority for our processing of personal data.

Please contact us if you wish to exercise any of your rights described above, using the contact details stated in section 3 below.

## 2.5 Data security and quality

To keep your personal data secure we have implemented a number of security measures, such as the following:

- **Secure operating environments** – We store your data in secure operating environments and only accessible to our employees, agents and contractors on a need-to-know basis. We also follow generally accepted industry standards in this respect.

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- **Prior authentication for IT access and access to premises** – We require our staff and contractors to verify their identity (e.g. through login ID, password, pin codes and badges) before they can access IT bases and business premises. This is aimed at preventing unauthorized access of personal data.

## **2.6 What if you choose not to give us your personal data?**

If you do not want to give us your personal data and the personal data is necessary in order to (i) admit you as an attendee to a GM, or (ii) provide you with further information on our services, then we may not be able to allow you to attend the GM or provide the requested services or information.

## **3. QUESTIONS OR CONCERNS? CONTACT US!**

If you have any questions or concerns about this privacy policy, you are welcome to contact Industrivärden at [legal@industrivarden.se](mailto:legal@industrivarden.se).

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