

*It was resolved by the Group Management Team of Lifco AB (publ) (Reg. No. 556465-3185) (the "Company") at a meeting held on 4 March 2024 to adopt this*

# Privacy Policy

## Processing of your personal data

We at Lifco AB ("Lifco", the "Company", "we" or "us") care about your integrity and want you to feel safe when we process your personal data.

We provide this text with information on how and why we process your personal data, the lawful basis for processing and the storage period for which we keep your personal data. We also describe your rights, e.g. your right to complain to the relevant authority and your option to withdraw your consent at any time.

## In summary: How we process your personal data

- If you subscribe to get notified with press releases and financial report, we process your data to be able to communicate the information to you.
- If you contact us and want us to send our annual reports physically to you, we process your data to be able to send the report.
- If you register to participate in one of our webcasts/teleconferences in connection with quarterly reports, we process your personal data to know who is participating.
- We process data on the contact persons of suppliers, analysts, business brokers, investors for the purpose of establishing, respectively answering, and subsequently maintaining, contact.
- If you are a shareholder, we process the data we need to do to fulfill legal requirements and to have knowledge of the company's shareholders.
- If you contact us with a business proposal, we may process your data for preparation of, and if an agreement is concluded for the fulfillment of, the agreement.

Our detailed description of the personal data processing is divided into different sections, as shown above.

## Lifco is responsible for processing of your personal data

Lifco AB (Swedish registration number 556465-3185) is responsible for the processing of your personal data and is consequently the data controller of your personal data as described in this privacy policy.

Should you have any questions regarding our processing of data, or if you wish to exercise any of your rights under data protection legislation, please contact us via our e-mail [ir@lifco.se](mailto:ir@lifco.se) or give us a call on +46 72 717 59 33. Our postal address is Lifco AB, Verkmästaregatan 1, 745 39 Enköping.

## The personal data you need to provide to us

You are not required to provide your personal data to us. But if you want to become a shareholder, enter into an agreement with us or otherwise use our services we need some of your personal data to administrate the service and to comply with legislation and official decisions.

Below you can read more about in which cases you need to provide your personal data (e.g. when you are a shareholder). This is when the lawful basis is "performance of contract" or a "legal obligation". If you do not inform us about the personal data, we will for example not be able to perform the service.

## Detailed description on how we process your personal data

You can read more about your personal data in the charts below. The below charts describe in detail why we process your personal data, which personal data we process, in which case you need to provide the personal data to us and the lawful basis for the processing. The lawful basis is the basis for processing your personal data according to the General Data Protection Regulation 2016/679 (GDPR). You will also find information about how long we process your data.

## Services related to information and distribution of financial reports and press releases

Subscription to press releases and financial reports		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Send press releases and/or financial reports after you have signed up for the service</li> </ul> <p>We only send you press releases/financial reports if you not previously have objected to receiving them</p>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Phone number</li> <li>Name of employer</li> <li>Postal address/Visit address</li> </ul>	<p>Consent</p> <p><i>The personal data will be processed based on you consent. You can withdraw such consent at any time.</i></p>
<p><b>Storage period:</b> You will receive press releases and/or financial reports for as long as you subscribe to the service. You can withdraw your consent to the service at any time.</p>		

Request to receive a physical annual report		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Distribution of physical annual report at your request</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Postal Address</li> </ul>	<p>Legal obligation</p> <p><i>The personal data will be processed to fulfil legal obligations under the Swedish Companies Act.</i></p>
<p><b>Storage period:</b> Personal data is deleted after the purpose of the processing is fulfilled. The storage period varies depending on when our supplier cleans in different systems, but deletion takes place at least once a year. Your personal data is only used when the annual report is sent to you.</p>		

Participation in our webcasts/teleconferences in connection with quarterly reports		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>When registering and participation in our webcasts/teleconferences in connection with quarterly reports</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Phone number</li> <li>Name of employer</li> <li>Job title</li> <li>Department name/other information</li> <li>IP address</li> <li>Data related to the video playback</li> <li>Activities on the platform</li> </ul>	<p>Legitimate interest</p> <p><i>The personal data will be processed based on our legitimate interest to know which existing and potential investors and other stakeholders are following the company's financial performance.</i></p>
<p><b>Storage period:</b> The length of the storage period depends on the nature of the personal data and the purpose for which it is processed. The storage time may therefore vary depending on the purpose of use.</p>		

## Shareholders

Registration for general meetings and payment of shares		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Administration of registration for general meetings and postal voting</li> <li>Administration of payment of shares</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Personal identification number</li> <li>Postal Address</li> </ul>	<p>Legal obligation</p> <p><i>The personal data will be processed to fulfil legal obligations under the Swedish Companies Act and other stock exchange regulations.</i></p>
<p><b>Storage period:</b> We will store the data for as long as required by law to fulfil legal obligations including, but not exclusively, such as those related to the provision of minutes and voting records under the Swedish Companies Act.</p>		

List of shareholders		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Every quarter we receive a list of registered owners with over 500 shares from our financial market infrastructure services provider</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Personal identification number</li> <li>Postal Address</li> </ul>	Legitimate interest  <i>The personal data will be processed based on our legitimate interest in having knowledge of the company's shareholders.</i>
<b>Storage period:</b> We receive the list every quarter and store the data for a maximum of twelve months.		

Share register		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Maintenance of the share register</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Personal identification number</li> <li>Postal Address</li> <li>Information relating to the shares (such as type of share)</li> </ul>	Legal obligation  <i>The personal data will be processed to fulfil legal obligations under the Swedish Companies Act</i>
<b>Storage period:</b> We will store the data for as long as required by law to fulfil legal obligations including, but not exclusively, such as those related to the provision of share register under the Swedish Companies Act.		

## Contact and business relations with suppliers, analysts, investors, and business brokers/owners

Contact and dialogue with analysts and investors		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Answer, contact and follow up on ongoing discussions with analysts and investors</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Phone number</li> <li>Name of employer</li> <li>Postal address/Visit address</li> </ul>	Legitimate interest  <i>The personal data will be processed based on our legitimate interest to respond to contact requests, making contact and follow up ongoing discussions with analysts and investors.</i>
<b>Storage period:</b> We will store the data for as long as the contact person remains in his/her job position and there is a mutual interest in dialogue between the parties.		

Contact and business relations with suppliers		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>When we are approached by a supplier, or when we contact a supplier proactively, to initiate a possible business relationship</li> <li>When a business relationship is established, we process personal data of the supplier's contact person as part of the performance of the contract</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Phone number</li> <li>Name of employer</li> <li>Postal address/Visit address</li> </ul>	<p>Legitimate interest</p> <p><i>The personal data will be processed based on our legitimate interest to respond to contact requests and contacting suppliers.</i></p> <p>Performance of contract</p> <p><i>If the dialogue between the parties leads to contract negotiations, we process the data prior to entering a contract. If a contract is concluded, we process the data as part of the performance of the contract.</i></p>
<p><b>Storage period:</b> We will store the data for as long as the contact person remains in his/her job position and there is a mutual interest in dialogue between the parties.</p> <p>When there is a contract between the parties, the data is stored for as long as there is a contractual relationship and as long as it is necessary in relation to guarantee commitments following by the contract or as long as it is necessary to be able to establish, exercise or defend legal claims.</p>		

Contact with business brokers/owners		
What processing we perform	What personal data we process	Our lawful basis for the processing
<ul style="list-style-type: none"> <li>Responding to contact requests, or on our initiative contacting, business brokers/owners regarding discussions about companies for sale</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>E-mail address</li> <li>Phone number</li> <li>Name of employer</li> <li>Postal address/Visit address</li> </ul>	<p>Legitimate interest</p> <p><i>The personal data will be processed based on our legitimate interest to respond to contact requests and contacting business brokers/owners.</i></p>
<p><b>Storage period:</b> We will store the data for as long as the contact person remains in his/her job position and there is a mutual interest in dialogue between the parties.</p>		

## Who can gain your access to your personal data and why?

Your personal data is initially collected and processed by us. To conduct our business, we need to work with suppliers and partners which therefore will process your personal data. We are responsible for any sharing of your personal data to such suppliers or partners and to make sure your personal data is safe when shared with third parties as set out below.

We will share your personal data with the following recipients:

- If you use of any of our services such as request to receive a physical annual report or participate in webcasts/teleconferences, your personal data is shared with suppliers who provide us with the service.

- If you are a shareholder, your personal data is shared with our financial market infrastructure services provider.
- In the context of contract negotiations, personal data may be shared with our subsidiaries.

Your personal data may also be disclosed for the purpose of the Company's compliance with certain legal obligations, and it may be transferred to the Police and other relevant public authorities when permitted and required by law.

## **Where are your personal data processed?**

We and our suppliers and partner mainly process your personal data within the EU/EEA.

In certain cases, we may transfer or share your personal data to companies outside the EU/EEA. We will take steps to ensure that your personal data is processed securely and with an adequate level of protection comparable to the protection offered within the EU/EEA.

## **What are your rights when we process your personal data?**

### **Right to lodge a complaint with a supervisory authority**

You always have the right to lodge a complaint with a supervisory authority. You may do this in the EU/EEA member state where you are live, work or where an infringement of applicable data protection laws is alleged to have occurred. The supervisory authority in Sweden is the Swedish Data Protection Authority (Integritetsskyddsmyndigheten).

### **Right to withdraw your consent and object to processing**

In the event that we process your personal data based on your consent, e.g. regarding subscription, you may withdraw your consent at any time by contacting [ir@lifco.se](mailto:ir@lifco.se). Such withdrawal may be made in whole or in part.

You also have the right to object to our processing of your personal data when the processing is based on the lawful basis "legitimate interest".

If you withdraw your consent or object to processing, we may no longer be able to continue to give you access to our services being offered to our users and permitted under this privacy policy. In some instances, we may continue to process your personal data based on our legitimate interest even if you have objected. This can be the case if we can show compelling, legitimate reasons for the processing that outweigh your interests, rights, and freedoms in us not processing your personal data or if the purpose of the processing is to establish, exercise or defend against a legal claim.

### **Right to information and access**

You have the right to obtain confirmation as to whether we are processing personal data about you or not. If we process your data, you have the right to information about how we process your personal data as well as a right to obtain a copy of the personal data processed.

### **Right to rectification**

You have a right to correct any inaccurate personal data concerning you that we may be processing and ask us to have incomplete personal data completed.

## **Right to erasure**

Under certain circumstances, you have a right to request that we delete your personal data. This is the case for example when the personal data is no longer necessary for the purposes for which they were collected.

Under certain circumstances, you also have a right to request that we restrict our processing of your personal data. That is the case for example when the accuracy of the personal data is contested by you, or the processing is unlawful, and you do not want us to delete your personal data but instead you request that we restrict our use of them.

## **Right to data portability**

Under certain circumstances, you have a right to receive your personal data from us in a structured, commonly used, machine-readable format and have your personal data transferred to another company ("data portability").

## **Changes to the privacy policy**

Please note that the terms of the privacy policy may be changed or amended. The latest version is available on the Company's website.