

Privacy Policy¹

Company	Nordic Issuing AB (the "Company")
Document owner	CEO
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Approved by	Board of Directors
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Adopted in accordance with the following regulations	EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data etc. (GDPR) Articles 72–76 EU Regulation 2017/565 on organisational requirements, etc. Article 25 EU Regulation 600/2014 on markets in financial instruments etc. (MiFIR) Articles 11, 18, 29 EU Regulation 596/2014 on market abuse etc. (MAR) Act (2018:218) containing supplementary provisions to the EU General Data Protection Regulation (the Data Protection Act) Chapter 8 Section 20 of the Securities Market Act (2007:528) Chapter 5 Sections 3-4 the Act (2017:630) on measures against money laundering and terrorist financing Chapter 8 Section 1 of the Swedish Financial Supervisory Authority's regulations regarding investment services and activities (FFFS 2017:2) Chapter 5 Sections 1-2 of the Swedish Financial Supervisory Authority's regulations regarding measures against money laundering and terrorist financing (FFFS 2017:11)

¹ Note that this document is a translation of the original Swedish version. It is provided for convenience only. In the event of any discrepancy, ambiguity, or conflict between this English translation and the Swedish original, the Swedish version (Sw. *Integritetspolicy 2026.1*) shall prevail and take precedence.

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1 Introduction and purpose

The Company prioritizes the protection of individual privacy. The Company implements technical, physical and organisational security measures to guarantee the integrity and availability of the personal data and other information processed. As a data controller, the Company strives to ensure that its services and internal processes meet the requirements set for the processing of personal data.

This policy clarifies what personal data the Company processes, as well as the legal grounds for this processing. Furthermore, the sources of personal data collected, with whom they are shared and for how long they are stored, and the information on how to access their personal data, submit comments or ask questions to the Company is described.

The policy is supplemented by the Company's *Personal Data Policy (Sw. Personuppgiftspolicy)*.

The policy has been adopted by the board of directors. Revisions must be made annually or more frequently as necessary.

2 Categories of personal data

Personal data processed by the Company is divided into the following categories, with examples specified in parentheses:

- Basic identification data (such as name, personal identification or social security number, contact details, identity document details, such as copy of passport, ID card);
- Data enabling the carrying out of investigations, assessment and classification relating to money laundering and terrorist financing prevention. Information that makes it possible to ensure compliance with international sanctions, including the purpose of the business relationship and whether the client or investor is a politically exposed person or has any connection with such a person;
- Contract-related information (such as account numbers and powers of attorney);
- Financial transactions (such as transfers and securities transactions);
- Communications (including physical and electronic communications); and
- Other data related to the services provided by the Company (such as performance of contracts, execution of transactions, inquiries and complaints).

The following also applies, where applicable, to representatives, legal guardians, or trustees.

3 Purpose and legal grounds for processing

Personal data is primarily used to comply with legal obligations imposed on the Company as an investment firm, as well as to fulfil agreements that the Company has or intends to enter into. Below is a description of the purposes that the Company has when processing personal data, as well as the legal ground for each purpose.

3.1 Legal obligation

The Company is obliged to comply with securities law and other legislation and regulations relevant to its operations. Within this framework, personal data is processed to, for example:

- Carry out anti-money laundering checks;
- Document and archive personal data related to securities transactions;
- Perform customer due diligence and establish contractual relationships;
- Document services and transactions that fall within the Company's authorisation to operate as an investment firm; and

- Report to competent authorities such as the Swedish Tax Agency and the Swedish Financial Supervisory Authority.

3.2 Performance of contracts

The Company collects, processes and stores personal data in order to prepare, provide and administer the Company's services. Within the framework of the fulfilment of contractual obligations, telephone conversations with the Company may also be recorded, to the extent that they relate to calls that lead or may lead to transactions being carried out. This processing is also based on a legal obligation.

3.3 Legitimate interest

The Company offers financial services with the aim of establishing long-term and favourable relationships with its customers. Therefore, personal data is processed for the following purpose:

- Carry out marketing activities where relevant services are identified and proposed. It is always possible to unsubscribe from newsletters and offers.

3.4 Consent

Processing of personal data is based on consent when visiting the Company's website. In this context, a cookie with a unique ID is placed in the browser for web analysis. Consent is given upon acceptance of the use of cookies on the first visit to the website. It is noted that consent can be withdrawn at any time.

4 Sources of personal data collection

Personal data is collected directly from the individual, for example when establishing a customer relationship or when using the Company's services. Information can also be obtained from public and other registers, such as Bisnode.

4.1 Sharing of personal data

The Company is not permitted by law to disclose information about individuals unless there is clear legal support for this, for example in connection with the fulfilment of contractual terms or for a legal purpose that requires or permits it, such as reporting to authorities.

In order to be able to fulfil contractual terms and other commitments, information may be shared internally within the Company and in some cases also with external companies that provide agreed services to the Company and its customers. This may include financial infrastructure parties, suppliers, actors acting on behalf of customers or other parties to the customer agreement.

Situations when personal data is shared outside the organisation include:

- To approved credit reference agencies for credit checks;
- To other banks and/or brokers in the case of transfer of cash or securities on behalf of the client; and
- To various authorities in order to comply with laws and other regulations, for example regarding taxes and money laundering or terrorist financing.

5 Transfers to third countries

The processing of personal data is carried out within the framework of the European Union and the European Economic Area (EU/EEA). No transfer of personal data takes place to countries outside the mentioned jurisdictions. In exceptional cases, however, personal data may be transferred to and processed in countries outside the EU/EEA (so-called third countries). Prior to such transfer, the

Company ensures that adequate safeguards have been implemented and that the transfer is made in accordance with standard contractual clauses approved by the European Commission.

6 Storage period

Personal data is only processed for the period of time that is strictly necessary to fulfil the purposes for which it was collected. In cases where personal data is processed on the basis of a contractual relationship, these will be stored for the duration of the contractual relationship and thereafter for a maximum period of ten years.

It should be noted that other retention periods may apply when personal data is stored for purposes unrelated to a contractual relationship. In such cases, the retention period will be determined in accordance with relevant laws and regulations or decisions issued by competent authorities, including, but not limited to, accounting or anti-money laundering measures.

7 Rights regarding personal data

Individuals whose personal data is processed by the Company have the following rights:

- Right of access to processed personal data, which is provided in the form of a copy (by means of an extract from the register). Requests for register extracts are usually free of charge.
- The right to rectification, meaning the right to request correction or completion of inaccurate or incomplete personal data.
- The right, under certain conditions, to request the restriction of the processing of personal data for specific purposes.
- The right to object to the processing of personal data based on a balancing of interests.
- The right to request, under certain conditions, the erasure of personal data (the "right to be forgotten"). However, the Company has the right to refuse deletion if there are statutory reasons for retaining the data.
- The right to unsubscribe from direct marketing from the Company at any time.
- The right to data portability, i.e. the right, under certain conditions, to have personal data in a structured, commonly used and machine-readable format transferred to another controller.

Normally, the exercise of the above rights is free of charge.

The Company will respond to the request without undue delay, and usually within one (1) month from the date of receipt of the request. If the request is unreasonable or unfounded, the Company reserves the right to either charge a reasonable fee or to refrain from complying with the request. Additional information may be requested to confirm the identity of the requestor.

8 Contact information

In case of questions or comments regarding the processing of personal data, it is possible to contact the Company by info@nordic-issuing.se or by mail to the following address:

Nordic Issuing AB
Stortorget 3
211 22 Malmö

It is also possible to submit any complaints to the Company's complaints officer or to the Swedish Authority for Privacy Protection (IMY).

9 Changes to the Privacy Policy

The Company reserves the right to make changes to this Privacy Policy. The latest version of the policy will be available on the Company's website.