

## **Guidelines for managing personal data**

### **30 May 2023**

CB Fonder ("the Company") has a privacy policy designed to protect the privacy of individuals and to provide a high level of service, relevant information adapted to the recipient, and compliance with legal requirements regarding both minimum requirements for storage and restrictions on how information may be used and to what extent it may be saved.

The General Data Protection Regulation (GDPR) implies new constraints on what information may be saved as well as increased opportunities for persons to limit, request and correct the stored information. In addition to GDPR, many other laws affect the extent to which information may be deleted, which sometimes affect what rights may be required with reference to the GDPR.

The Company processes personal data to

- 1) inform about the funds the company manages,
- 2) comply with legal requirements under directives, regulations, guidelines, and more, *and*
- 3) manage the funds CB European Quality Fund and CB Save Earth Fund.

Information about name, email, and language is stored for the company to spread information about our funds to those who expressed interest in receiving our newsletters. Other information provided to us might be saved if it is relevant for selecting which information we should give. Processing performed on the data are searches for sending monthly fact sheets and other information that we perceived that the applicant expressed interest in obtaining. The legal basis for saving this data is the consent of the person we save information about. If someone wishes to withdraw consent, this can be done by contacting the Company by phone or email.

In many cases, information must be saved due to legal requirements. Electronic communications are generally saved to derive possible complaints as well as the basis for any money laundering investigations. The legal basis for saving information in this way is a legal obligation.

Under the management of the funds, data may need to be saved due to business deals for contact with our partners. Tasks are stored, for example, in contracts and often with associated e-mail communications. Contact information is also saved on business cards that we receive at meetings and electronically in email signatures. Trade in the funds is documented and the communication is saved at least seven years. The legal basis is a contractual relationship with registered for contract and legal obligation for information related to trading in the funds.

Table 1 below shows which personal data is saved. If a task belongs to several categories, it is saved for as long as needed according to the category that means the longest time.

The Company does not sell the data to third parties. If the Company transfers data to third parties, third-party obligations as set out below will be governed by agreements with the Company. The information will only be used on behalf of the company for the above purposes. Third parties shall by contract be required not to save, process, or forward the data beyond the extent approved by the Company, which must be for the above purposes. Third parties shall also protect the data from unauthorized access, and if there is a risk of data being disseminated, the Company shall be notified if there is a risk that the incident may endanger the rights and freedoms of natural persons.

If information about a person is disseminated in such a way that the dissemination entails a risk to the freedoms and rights of natural persons, the Company will notify the Privacy Protection Authority as soon as possible, but no later than within 72 hours and with supplementation thereafter if all information could not be provided at the first opportunity. This applies both if the information is disseminated from the Company or from a third party to whom the Company has transferred the information, as described above, in which case it is regulated in an agreement. The reporting must take place in a manner specified by the Integritetsskyddsmyndigheten, which is currently filling in a form and sending it to the Integritetsskyddsmyndigheten by letter. The form is available on the website of Integritetsskyddsmyndigheten in two versions in Swedish, one of which is for cross-border personal data incidents, as well as corresponding versions in English.

A physical person with whom the Company stores information is entitled to request access to such information, as well as correction or deletion and limitation or removal of consent for processing. The person is entitled to receive the information in an electronically portable format.

If your personal data is registered with the Company, you as a registered person have the right to receive information about which of your personal data that the company processes and to object to a certain type of processing. If the company processes your personal data based on consent, you always have the right to withdraw such consent. You also have the right to correct incorrect information, the right to deletion and restriction, and to object to the processing of personal data. If you want information about which personal data is being processed, you can request information about this in writing at the address given below.

Contact person at the Company is CEO Alexander Jansson [alexander@cbfonder.se](mailto:alexander@cbfonder.se). If any person considers the Company to handle data in violation of current legislation, complaints may be submitted to Integritetsskyddsmyndigheten. This authority shall notify whether supervision shall commence within three months after receiving the complaint. Should a message not come back within this time, the matter may be referred to court.

**Table 1**

| Data saved   | Purpose  | Treatment   | Legal basis              | Time*  | Categories            |
|--|--|---|--------------------------|--|-----------------------|
| Names, e-mail addresses, and registration for monthly reports as well as other information that is voluntarily given to us if it is relevant to provide better-adapted information (eg language for electronic mailings and physical address for letters and meetings) | Dispatch of monthly reports and other relevant information       | Searches for subscribers to monthly reports and other information | Consent                  | Until revocation   | Institutional, retail |
| Identity documents and communication around it   | Derive complaints, the basis for money laundering investigations | Money laundering investigations                                   | Legal obligation         | The duration of the business relationship and thereafter according to any legal requirements | Customers             |
| Agreements and the like as well as communication including clarifications about these  | Documentation of business agreements                             | Follow-up   | Contractual relationship | The duration of the business relationship and thereafter according to any legal requirements | Business partners     |
| Chat history, e-mail   | Communication with brokers                                       | Possibility to recreate trading in the funds                      | Legal obligation         | The duration of the business relationship and thereafter according to any legal requirements | Brokers               |

\* If a task fits into several categories, the longest time will be applied.

The above guidelines were adopted at the Board meeting on 21 May 2018. It is re-established in the

event of changes in the content and at least once a year. The last time it was established was at a board meeting on 30 May 2023.