

## **Privacy statement**

This privacy statement applies to all personal data collected at:

- Nordic Trustee Holding III AS (org. nr. 918954600)
- Nordic Trustee AS (org. nr. 963 342 624)
- NT Services AS (org. nr. 916 482 574)
- NT Pensjon AS (org. nr. 987 172 932)
  - Haakon VII gate 1  
Postboks 1470 Vika  
N-0116 Oslo
- Nordic Trustee & Agency AB (org. no.556882-1879)
  - Norrlandsgatan 23  
P.O. Box 7329  
SE-103 90 Stockholm
- Nordic Trustee A/S (CVR-nr 3470 5720)
  - Bredgade 30  
1260 København K
- Nordic Trustee Oy (org. nr 2488240-7)
  - Aleksanterinkatu 44  
FI-00100 Helsinki
- Nordic Trustee GmbH (org nr HRB 126429)
  - Brüsseler Str. 1-3, 60327 Frankfurt am Main, Germany

The companies above are referred to collectively as "*NT Group companies*".

Each NT Group company receiving the personal data will be defined as the data controller. NT Holding AS is also data controller for personal data collected through NT Group companies' websites.

NT Group companies comply with the General Data Protection Regulation (GDPR) and local data protection laws and regulations in the countries that they operate.

## **When we collect data and what data we collect**

### **Examples of how and when personal data is collected:**

- Bondholder register and information on voting on bondholders' meetings according to the terms of the bond
- Investor registry in connection with loans where an NT Group company is the agent according to the loan agreements
- Customer register according to the customer agreement with an NT Group company
- Parties involved in investment or payment services related to NT Services AS according to the customer agreement
- Register of holders of rights where NT Pensjon AS is agent for pension schemes
- Contact information related to the regular CRM registration according to the regular customer relation

- Information that is collected during anti- money laundering control according to law
- Registered information in connection with visits to the NT Group companies' websites

#### **Examples of the types of personal data collected:**

- Contact information: name, telephone number, company address(es), including postal address and country of domicile
- Identification information, if applicable, depending on the product or service we provide: national identity number and name. We are obliged to collect documentation of such information, for instance in the form of copies of passport, driver's license or similar identification
- Information related to legal requirements: ensuring basic knowledge of customers and anti-money laundering requirements
- Information about the use of the websites, in the form of, among other things, the subpages being visited and the IP address of the user

#### **The lawfulness of processing personal data according to the General Data Protection Regulation (GDPR)**

NT Group companies must have a lawful basis for processing personal data. The most important legal grounds are listed below:

- i. Processing is necessary for the performance of a contract (GDPR article 6 (1) b)
- ii. Processing is necessary for compliance with legal obligation (GDPR article 6 (1) c)

NT Group companies only collect information that is required to fulfill the purpose of their business. The customer information collected through an NT Group company's website is used only for internal use. Cookies are used only in order to improve the functionality at the actual website and will not be used for marketing purposes.

Unless otherwise required or permitted by law, the personal data collected will not be kept longer than necessary given the purpose of the processing.

No marketing will take place in violation of the local Marketing Practices Acts.

Information on the use of NT Group companies' websites may be basis for internal analyzes, but only on an aggregated, not on individual, level.

NT Group companies do not collect personal information such as date of birth or personal number. The exception could be where such information is necessary to implement persons' rights of payment or issuance of financial instruments, or in connection with the legally required anti-money laundering control.

NT Group companies do not collect sensitive information as mentioned in GDPR article 9 and 10.

NT Group companies do normally not hand over information to external parties. The exception could be where such information is necessary to implement persons' rights of payment or issuance of financial instruments.

The data controller has carried out proper data storage with access control so that personal information is only available on a need-to-know basis. The data controller has also implemented security and internal control.

For the sake of statutory custody duty and examination purposes, some information might be stored by a NT Group company after the relationship has ended with the data subject.

Users of our website have the right to require access to the personal information that NT Holding AS stores about the data subject and how it is processed.

### **Privacy rights**

Subject to any legal preconditions, the applicability of which have to be assessed in each individual case, data subjects have the rights as follows. Data subjects have right to get access to their personal data and may request the same in writing at the address of the NT Group companies, respectively. In addition, data subjects have the right to (i) request that personal data is rectified or erased, (ii) object to specific processing, (iii) request that the processing be restricted and (iv) receive personal data provided by themselves in machine-readable format.

Data subjects are also entitled to lodge complaints with the relevant supervisory authority if dissatisfied with the processing carried out.

### **Contact information**

Contact address to the data controller is *mail@nordictrustee.com*.