

## Rights of the Registered

When we process personal data about the data subject, either on our own or for others, the data subjects have a number of rights under the GDPR. Therefore, we have adopted a policy that informs you about your rights if we process personal data about you.

Should you wish to exercise your rights you may send a letter to Stronghold Invest AB, P O Box 7795, SE-103 96 Stockholm.

When submitting your request, please state the name of the company in which you want to exercise your rights, your full name and, personal number. This is mandatory, as we need to verify your identity and ensure that the legal basis for fulfilling your rights are met, as well as making sure that the information is sent to the correct person.

Once we have received your request, we will assess whether your identity can be verified and if the legal basis for exercising your rights are met. If those are fulfilled, Stronghold or the data controller, in case we are the data processor, will make sure to fulfill your rights.

As a starting point, we do not charge you for the request. However, should you request additional copies of information; we may charge a reasonable fee. For requests that are unfounded or excessive, we may charge a fee for providing the information or oppose complying with the request. Exercising your rights must not violate the rights and freedoms of others, and we may therefore refuse to fully or partially fulfill your rights, should this be the case.

### **Right to withdraw consent**

If our processing of your data is based on your consent, you are entitled to withdraw your consent. By withdrawing your consent, your personal data will be deleted if there is no other legal basis for its treatment, also see section Right to erasure. The withdrawal of consent will not affect the legal basis for which the processing of your personal data was made.

### **Right to information and access to personal data**

You are entitled to the following information on what personal data is being processed:

- The purpose of the treatment
- The recipients or categories of recipients to whom the personal data have been or will be disclosed
- The period the personal data will be stored or, if this is not possible, the criteria used to determine this period
- From where we collected the personal data, if not collected from you
- Information about automated decision making, should we use such
- Information about transfer for processing outside the EU or EEA and the necessary guarantees in connection with such a transfer.

### **Right to rectification**

Should your personal data be incorrect, you are entitled to have the data corrected or supplemented. If so, please contact us indicating the inaccuracies.

**Right to erasure (right to be forgotten)**

You have the right to require your personal data to be deleted from us if your personal data is no longer required to fulfill the purpose for which they were collected, if our processing of your personal data is based on your consent and you withdraw your consent, and there is no other legal basis for the treatment, if you raise a legitimate objection to treatment in the interests of society or others, if treatment is for direct marketing, in the case of an illegal treatment or if deletion follows from local law. However, you do not have the right to require personal data deleted from us if processing of personal data is required to fulfill a contract for which you are a party, to exercise the rights of freedom of expression and information, in order to comply with a legal obligation subject to local law, or for legal claims to be established, exercised or defended.

**Right to restriction of processing**

You have the right to restrict our processing of your personal data if you contest the accuracy of your personal data until we have determined whether the personal data is correct, if the processing is illegal, but you wish to restrict the processing instead of erasure of the personal data, if we no longer need the personal data for processing, but the personal data is necessary for a legal claim to be established, exercised or defended, or if you have objected to treatment in the interests of society or others until it is determined that the interests in question adhere with your interests. In connection with a limitation of processing of personal data, we may treat your personal data only, except for storage, with your consent or for the purpose of establishing, exercising or defending a legal claim, or for protecting another natural or legal person or to consider important social interests.

**Right of notification**

You are entitled to be informed of all recipients that we have disclosed or shared your personal data with, and that the recipients concerned are notified of a correction, deletion or restriction of your personal data unless this is impossible or disproportionate.

**Right to data portability**

You are entitled to receive in a structured, commonly used and machine-readable format, the personal data about you that you have given us and you are entitled to transmit this information to another data controller when the processing is based on a consent or on a contract and the processing is done automatically. If technically possible, you also have the right to require us to transmit your personal data directly to the other data controller.

**Right to object**

You have the right to object to the processing of your personal data that is necessary to fulfill a need that is based on a public interest, the interest of governmental bodies or other legitimate interests. The data may no longer be processed unless we can demonstrate legitimate reason of higher importance than your interests, rights and freedoms, or the processing is necessary for a legal claim to be established, exercised or defended. You also have the right to object to the processing of your personal data for direct marketing at any time and the personal data may no longer be processed for this purpose.

**Right not to be subject to automatic processing**

You are entitled not to be subject to a decision that is solely based on automatic processing, including profiling, which has legal effects or similarly significantly affects you. However, this does not apply if the decision is necessary for the conclusion or performance of a contract to which you are a party, if the decision is based on your consent or if the decision is given in local law.

**Right to notification of a security breach**

If there is a breach in our personal data security, which will pose a high risk to your rights and freedoms, you have the right to be notified. However, this right does not apply if we have applied appropriate technical and organizational safeguards to the personal data affected by the violation, such as actions that make your personal data incomprehensible to anyone who has no authorized access, if we have implemented subsequent actions, ensuring that the high risk of your rights and freedoms is likely to no longer be real, or if direct notification to you will require disproportionate action. In the latter case, however, instead, we must make a public notice or equivalent measure by which you are informed in a similarly effective manner.

**Right to complain about processing your personal data**

You have the right to appeal to the Supervisory Authority in your local country or in Sweden if you believe that our processing of your personal data exceeds the local interpretation of GDPR.

We will appreciate receiving a copy of the complaint in connection with the transmission to the Supervisory Authority, so that we can act on the complaint.

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