

# **PRIVACY POLICY**

## **CRESCO CAPITAL SERVICES A/S**

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Reviewed and updated in 2024

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## **1 INTRODUCTION**

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Cresco Capital Services A/S (hereinafter "CCS") is committed to protecting and respecting your privacy. Through this Privacy Policy, we seek to inform all visitors to our website, partners, customers, and potential customers about the personal data processed by CCS.

Our aim is to ensure that your personal data is processed securely and accurately while considering appropriate technical and organizational measures. This includes implementing user and access controls, firewalls, and providing training for our employees in good IT security practices.

The processing of personal data at CCS is carried out in accordance with applicable legislation on personal data, including the Data Protection Act<sup>1</sup>.

### What is personal data?

Personal data refers to any form of information about an identified or identifiable natural person. This means it includes all types of information that can directly or indirectly be linked to a person. For example, it can be a name, address, phone number, or images and IP addresses.

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<sup>1</sup> LBK nr 289 af 08/03/2024: Databeskyttelsesloven

## **2 PROCESSING OF PERSONAL DATA IN CRESKO CAPITAL SERVICES A/S**

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### **2.1 WHAT PERSONAL DATA IS COLLECTED?**

When you invest in funds and companies managed by CCS, we register and use various types of personal data, including:

- Basic personal data, such as your name, contact information, and civil registration number (CPR).
- ID documentation, such as photocopies of passports, driver's licenses, and health cards. We may also register other personal data if required by law.

We have placed cookies on our website to collect information about how you use the digital channel. Necessary cookies ensure the functionality of our digital channels.

It is important that the personal data we have is correct and up-to-date, and that you continuously inform us of any changes.

When you become a customer of CCS, you will be asked to provide a range of information to us, including your name, address, Danish civil registration number (CPR) and/or Danish business registration number (CVR). You must also document the information and submit a passport or other photo ID that contains your civil registration number. Additionally, you must state the purpose and expected scope of your relationship with us. This follows from the Money Laundering Act, which CCS is subject to.

According to the Money Laundering Act, we must investigate the background and purpose of all complex and unusual transactions and activities. We must also check whether you are a politically exposed person (PEP) or closely related to a PEP. We must store the results of our investigation for at least 5 years after the customer relationship has ended or the individual transaction has been completed, after which we delete the personal data.

CCS only processes data for as long as it is necessary to either fulfill the purposes of the processing or its legal obligations.

### **2.2 PERSONAL DATA TO THIRD PARTIES**

We do not disclose information to third parties without your consent unless it is necessary for us to advise and serve you, to fulfill a contract, or because it is necessary to ensure compliance with a legal obligation. We do not use your information for purposes other than those described in this Privacy Policy.

CCS may use external partners/suppliers (and data processors) to perform tasks on behalf of CCS (e.g., order processing, IT hosting, property management, electronic communication, and marketing activities). CCS may also disclose information to other data controllers, such as auditors. The performance of such services may result in CCS' partners both in Denmark and the EU/EEA gaining access to your personal data.

When you provide information to third parties with whom we cooperate, we may also receive your information. This could include partners who assist with advice, property management, and/or marketing. We

may also purchase services and data from companies that control contact details and personal information you have provided to us. This is to ensure that the information we have about you is correct and to prevent money laundering.

It is our responsibility to ensure that your personal data is not misused. Therefore, we place high demands on our partners when your personal data is used by others, and our partners must guarantee that your personal data is protected and obtained correctly. CCS strives to always enter into data processing agreements with companies that handle personal data on behalf of CCS to ensure a high level of security concerning your personal data – even with our partners.

Regardless of whether we disclose your personal data to partners located in countries within or outside the EU/EEA, we have entered into agreements with them to ensure that their level of personal data protection complies with applicable legislation. If it becomes relevant to work with partners outside the EU/EEA (in third countries), special security measures will be taken – including agreements containing standard contractual clauses for the transfer of personal data approved by the European Commission and available on the European Commission's website.

If you visit or communicate with us via accounts on social media, i.e., third-party platforms such as LinkedIn, CCS may receive information about your profile and your interactions on the third-party platform from the provider of this platform.

CCS also discloses information to others when it is necessary to fulfill agreements with you. This could, for example, be in connection with order processing, where CCS discloses information to your bank to complete an order.

CCS may also disclose information to third parties in connection with various events if this is necessary for the organisation of the event. The events may include, among other things, booking hotel rooms, airline tickets, golf events, hunting events, or similar. External co-organisers may not process the information for their own purposes.

## **2.3 PURPOSE OF PROCESSING PERSONAL DATA**

We register and use personal data about you for several reasons. The personal data collected and processed about you, as mentioned above under section 2.1, is processed by CCS or their respective data processors to offer you the best advice and to comply with our agreement with you. Furthermore, we do so to comply with the legal requirements imposed on us.

This means that we register and use your personal data for the following purposes:

- To provide investment services, including, among other things, investment advice, discretionary portfolio management, and order processing.
- To ensure proper customer care, customer administration, and internal risk management.
- To communicate with you as part of our customer service (e.g. via email and accounts on social media).
- To organise events.
- To fulfill legal obligations imposed on CCS.

- To fulfill contractual obligations with you.
- To maintain, develop, test, and improve our systems.

We may also ask for your consent to process your personal data to manage marketing activities, provided you have given your consent to this.

## **2.4 LEGAL BASIS AND LEGITIMATE INTEREST IN PROCESSING PERSONAL DATA**

CCS processes your personal data in accordance with applicable legislation. We therefore only process your personal data when:

- It is necessary to fulfill an agreement with you, including responding to your inquiries to customer service.
- We have a legal obligation, such as compliance with the Danish Money Laundering Act and the Danish Act on Alternative Investment Fund Managers.
- We have your consent.
- We have another legitimate interest and justified interest in processing your personal data. This could, for example, be to prevent misuse and loss as part of direct marketing, share register information for investor inquiries. We only register and use your personal data if our purpose clearly outweighs your interest in us not doing so.

## **3 HOW LONG DO WE PROCESS YOUR PERSONAL DATA?**

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We store your personal data for as long as necessary to fulfill the purpose for which your personal data is registered and used in connection with. For example, we also store personal data so that we can assess whether you have any potential claims against us. We therefore store your personal data as long as we provide a service or product. We delete your personal data when there is no longer a work-related need to process it. As a general guideline, CCS intends to follow these rules:

- Information about applicants for vacant positions is deleted when the application process is completed for those applicants who were not hired, and at the latest ½ year after receipt of the application.
- Information about employees is deleted when the employment relationship ends; however, information about salary, taxes, and – concerning foreigners – passport information, is kept for 5 years after the employment relationship ends due to the authorities' control of the company. Other information is deleted no later than 1 year after resignation.
- Information about trading partners (tenants, customers, and suppliers) is deleted 5 years after the last transaction has occurred.

## **4 SECURITY IN CONNECTION WITH THE PROTECTION OF PERSONAL DATA**

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CCS seeks to ensure high security regarding the protection of your personal data, and we therefore have relevant technical and organisational security measures to protect your personal data from, for example, unauthorized access, alteration, and destruction.

All employees at CCS are subject to confidentiality. This means that information about you is both personal and confidential, and it will not be disclosed to third parties without authorization. To increase security regarding the storage of your personal information, a limited number of employees will have access to your personal information.

## **5 RESTRICTIONS REGARDING DISCLOSURE OF PERSONAL DATA**

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We disclose the information required by law, such as reports to authorities.

If there is suspicion of money laundering or terrorist financing, we must notify The Danish State Prosecutor for Special Crime (SSK) and provide information on the background for the notification. We may disclose information about investigations and notifications to SSK to your financial institution. We are also obliged to disclose information obtained under the Money Laundering Act to The Danish Financial Supervisory Authority (DFSA) if they request it.

CCS may also be required to disclose personal data to third parties, such as the police or other authorities, in connection with criminal investigations or if we are otherwise obliged to disclose such information under the law or court and authority decisions.

## **6 ACCESS TO YOUR PERSONAL DATA AND RIGHT TO COMPLAIN**

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You have the right under applicable law to request access to the personal data we process about you at any time. Furthermore, you can always request:

- Correction of incorrect personal data.
- CCS to stop processing.
- Deletion of your personal data processed by CCS.
- That we restrict the processing of personal data.
- That you wish to exercise your right to data portability.
- To object to the processing of personal data.

If you wish to take one or more of the above actions, you must contact us as indicated in section 8.

## **7 PROCESSING OF PERSONAL DATA CONCERNING CHILDREN**

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CCS does not knowingly collect personal data from children under 18 years of age without guardian consent. If you become aware that a child has provided us with personal data without parental or guardian consent, you can contact us as indicated in section 8.

## **8 CONTACT INFORMATION**

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If you have questions about how CCS processes your personal data or want information and contact details of the data controller at CCS, you are welcome to contact us at [info@crescocapitalservices.com](mailto:info@crescocapitalservices.com), att. Anja Romby Hauge, or by post to:

Cresco Capital Services A/S  
Vejlsøhus  
Vejlsøvej 51  
8600 Silkeborg

## **9 COMPLAINTS TO THE DATA PROTECTION AGENCY**

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If you wish to complain about CCS's processing of your personal data, you can submit a complaint to:

Datatilsynet  
Carl Jacobsens Vej 35  
2500 Valby  
Denmark  
Telephone: 33 19 32 00  
Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
[www.datatilsynet.dk](http://www.datatilsynet.dk)

## **10 REPORTING TO THE BOARD OF DIRECTORS**

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CCS reports annually to the Board of Directors on matters covered by this policy. The Board of Directors must be promptly informed of any significant breach of the policy or any underlying procedures.

## **11 REVIEW**

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The policy must be reviewed and, if necessary, adjusted by CCS's Board of Directors at least once a year to ensure that it continually addresses all relevant areas associated with CCS's business model. Any changes to the policy must be updated on CCS's website.

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Approved by the Board of Directors 2<sup>nd</sup> of September, 2024.