

Privacy Policy - Website

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Introduction

It is important for Infranode AB (“**Infranode**”, “**we**”, “**us**” or “**our**”) that you can trust that we process your personal data in accordance with applicable data privacy legislation (“**Data Privacy Legislation**”), including regulation (EU) 2016/679 (the “**GDPR**”).

The purpose of this privacy policy (“**Privacy Policy**”) is to provide all website visitors and representatives of our investors, prospective investors, portfolio companies, business partners, suppliers, and job seekers with information on how Infranode collect and use your personal data as well as how you may exercise your rights as set out in Data Privacy Legislation.

If you have any questions regarding this Privacy Policy or our processing of your personal data, please contact us at the address listed under the “**Contact**” section below.

Processing Description

Infranode is the manager of its funds and shall be deemed the data controller of the processing activities carried out as part of its business. Below we list which personal data we process about you, for which purposes and on what legal ground we base the processing on. We will only process your personal data for the purposes it was collected, and we will not share it with other persons or parties than as described herein this Privacy Policy.

Administration of our relationship with you or the company you represent

<p>Processing activities:</p> <ul style="list-style-type: none"> • Entering into agreements with you or the company you represent. • Administration of our relationship with you or the company you represent. • Processing necessary to fulfil our obligations under a contract with you or the company you represent (e.g. sending out quarterly reports or invites to investor meetings). • Communicating with you. 	<p>Categories of personal data:</p> <ul style="list-style-type: none"> • Name • Contact details (e-mail address, telephone number, as applicable) • Role / Position at the company you represent
<p>Legal ground for the processing:</p> <p>The processing is required to fulfil Infranode’s obligation under a contract with the company you represent.</p> <p>Infranode’s legitimate interest to being able to communication with you or the company you represent.</p>	

Press releases

<p>Processing activities:</p> <ul style="list-style-type: none"> • Sending out press releases to persons who have signed up to receiving news from us via e-mail. 	<p>Categories of personal data:</p> <ul style="list-style-type: none"> • Name • E-mail address • Company and role/title
<p>Legal ground for the processing:</p> <p>Infranode's legitimate interest to send out press releases.</p>	

Legal obligations

<p>Processing activities:</p> <ul style="list-style-type: none"> • Fulfilling our legal obligations under mandatory laws, such as anti-money laundering measures, bookkeeping and tax requirements. 	<p>Categories of personal data:</p> <ul style="list-style-type: none"> • Name • Address • Role/title • Passport copy • Information whether you are a politically exposed person
<p>Legal ground for the processing:</p> <p>Infranode's legal obligations under mandatory laws.</p>	

Recruitment

<p>Processing activities:</p> <ul style="list-style-type: none"> • Receiving and processing job applications. • Communicating with candidates during recruitment processes. 	<p>Categories of personal data:</p> <ul style="list-style-type: none"> • Information you provide us in your application, such as name, contact details, CV, description of experience, and photo.
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<ul style="list-style-type: none"> • In some instances, we may store your information for future recruitment purposes. 	
<p>Legal ground for the processing:</p> <p>Infranode has a legitimate interest to process the candidate’s personal data for recruitment purposes.</p> <p>In case we want to store your personal data for future recruitment purposes, we will ask for your consent to this.</p>	

When you contact us through e-mail or website form

<p>Processing activities:</p> <ul style="list-style-type: none"> • Receiving and responding to messages you send to us via e-mail or the contact form on our website. • Processing required for follow-up measures (if any). 	<p>Categories of personal data:</p> <ul style="list-style-type: none"> • Name • Contact details (e-mail address, telephone number, as applicable) • Information you submit via the form on our website
<p>Legal ground for the processing:</p> <p>Infranode’s legitimate interest to being able to communication with you or the company you represent.</p>	

We usually collect the information we process directly from you or the company that you represent. However, in some situations we also collect personal data from external sources. This is e.g., the case when we collect information from public registers and authorities.

Security measures

We take necessary technical and organisational measures to ensure that your personal data is processed in a safe and secure manner. Such technical measures include e.g., the use of firewalls, anti-virus programs, authorization checks and other appropriate safety measures. We also use organisational measures, e.g., by restricting access to information to only persons who need the information as part of their work.

Transfer of personal data

We may disclose information about you to:

- Our service providers which process personal data on our behalf while providing us services, e.g., IT services.
- Our service providers which need to process data to provide us services, e.g., law firms, auditors, accountants, travel agencies, and insurance companies.
- Authorities to the extent we are required to do so under mandatory laws, e.g., the Swedish Financial Supervisory Authority.
- Our investors to the extent we are required to share information with them.
- Other third parties to the extent we are required to do so by law, in connection with any legal proceedings, and/or to establish, exercise or defend our legal rights.

We generally process your personal data inside the EU/EEA. We may however in some situations transfer your personal data outside the EU/EEA, e.g., when a service provider operates in such country. Upon transfers, we will take all necessary measures to protect the privacy of the transferred personal data.

Retention period

The Data Privacy Legislation require us not to store any personal data longer than necessary for the purpose of the processing. We will only keep your personal data as long as necessary in order for us to achieve the purpose it was collected for or as required in order to comply with any mandatory retention periods under applicable law. To determine the retention periods, we consider the requirements of the Data Privacy Legislation, government regulations and recommendations from authorities as well as any professional practices.

- Infranode is a registered alternative investment fund manager (fund management) with the Swedish Financial Supervisory Authority. This means that all information about our businesses, services, business relations, clients etc. must be archived and retained for at least five (5) years.
- Should the personal data be collected on basis of the KYC rules in the regulations for measures against money laundering and financing of terrorism the personal data will be stored for at least five (5) years. If the individual that the data related to has been subject to an investigation, which we are prohibited from informing the individual of, it will have to be saved for ten (10) years
- Information required for the purpose of accounting and book keeping shall be stored in accordance with the Swedish Accounting Act for at least seven (7) years.

Your rights

In accordance with the Data Privacy Legislation, you are at any time entitled to:

- request to receive access to the personal data we process about you and/or receive a free copy of the personal data;
- request that your incorrect personal data is corrected and/or taking into account the purposes of the processing, have incomplete personal data about you completed;
- ask for deletion in the following cases:
 - if the personal data is no longer necessary for us to process in relation to the purposes for which they were collected or otherwise processed;
 - if we process the personal data based on your consent, and you choose to withdraw the consent;
 - if we process your personal data on the basis of our legitimate interest, and there are no overriding legitimate interests for the processing; or
 - if our processing of your personal data is deemed unlawful;
- request that we stop or limit the processing and delete your personal data (subject to certain legal obligations preventing us from immediately deleting certain information);
- oppose the processing of personal data (you are always entitled to object to your personal data being used for direct marketing);
- recall your consent, to the extent we process your personal data based on your consent as legal ground; and
- exercise your right to data portability, in certain circumstances, by receiving your personal data which you have provided to us in a structured and commonly used and machine-readable format, and/or to get the personal data transmitted to another data controller.

Complaints

If you are of the opinion that we have processed your personal data in breach with the Data Privacy Legislation you should inform us of that as soon as possible. You are however also entitled to lodge a complaint directly with the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*).

Policy amendments

We may update this Privacy Policy from time to time e.g., in case we start processing personal data for new purposes, if we collect additional personal data about you, or share your data with new recipients than the ones listed herein.

Contact persons

If you have any questions regarding this Privacy Policy or Infranode's processing of your personal data, or if you have a request regarding your rights, please contact gdpr@infranode.se. Please note that you must be able to identify yourself to be able to exercise your rights.