

# Personal data policy

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# Background and purpose

Lysa Fonder's business consists of managing funds. We will only process personal data when it is a natural part of running fund operations. Lysa Fonder is the data controller for all such processing.

This privacy policy provides information on the processing of personal data. Here you can read about (i) what data about you we collect, (ii) why we process your data, (iii) which other companies and authorities we share your data with, (iv) how long we save your data and (v) your rights in relation to your data.

Lysa Fonder takes great care to protect your personal integrity and will only use your data in the manner stated in this personal data policy. We would also like to emphasise that Lysa Fonder's customer register and other information Lysa Fonder has about you as a fund unit holder.

are protected by confidentiality in accordance with Chapter 2, Section 19 of the Swedish Investment Funds Act (2004:46). This means that Lysa Fonder may not disclose this information without authorisation.

## What personal data about you do we collect?

### Information you provide to us

When you become a customer or submit an expression of interest in becoming a customer with us, you (or, where applicable, your representative) provide us with personal data so that we can administer your request. The personal data we collect includes name, social security number, e-mail address, bank account number, financial status, account statements and information regarding customer knowledge as required by legislation to combat money laundering. In addition to the above, in connection with certain transactions, we may need to collect additional information from and about you, such as receipts, invoices or other documents proving the legality of the transaction. When you invest in our funds, we will also process data relating to the structure of your monthly savings, the frequency and size of deposits and withdrawals, and your balance over time. We also document communications with our customers.

### Data we receive from sources other than you

We may supplement your personal data by obtaining it from private and public registers. We may use e.g. company data from Checkbiz AB, your name data from BankID or such other verification method that Lysa approves from time to time, and information about account numbers from your bank or via payment service providers.

## Why do we process your personal data?

We use your personal data only for the purposes and on the legal grounds set out below. The processing will last for the period indicated under the heading "Period of processing".

processing" (note however that we are obliged by law to retain certain data for longer periods, see more under "Legal requirements").

## Acceptance of customer

### Purpose of the treatment

If you express an interest in investing in our funds and thus become a client, we will process your personal data to verify your identity and information.

The processing is done to decide whether we can accept you as a client. If we do not get a hit against such sanctions lists that we are required to apply by law, you will be able to become a client of ours and invest in our funds. You can always contact us if you wish to contest such a decision or otherwise discuss the decision with us.

### Legal basis for processing

The processing is necessary to fulfil Lysa Fonder's legal obligations.

### Time for treatment

We will process the data for as long as required by applicable legislation (such as the law on measures against money laundering and terrorist financing).

## The service

### Purpose of the treatment

When you are our client, we will process your personal data in order to offer you shares in our funds in accordance with the client agreement.

### Legal basis for processing

The processing is necessary to fulfil the customer contract with you.

### Time for treatment

We will process the data for as long as you are our customer.

## Contact person (business customers)

### Purpose of the treatment

If you are the contact person of a corporate client, we will process your personal data in order to offer investment in fund units to the corporate client.

## Legal basis for processing

The processing is necessary for our legitimate interest in offering investment in fund units to corporate clients.

## Time for treatment

We will process your data for as long as you are registered as a contact person with the business customer.

## Beneficial owner (business customers)

### Purpose of the treatment

If you are the beneficial owner of a business customer, we will process your personal data for the purpose of complying with applicable law.

### Legal basis for processing

The processing is necessary to fulfil Lysa Fonder's legal obligations.

### Time for treatment

We will process your data for as long as required by applicable legislation (such as the Law on Measures against Money Laundering and Terrorist Financing).

## Potential customer

### Purpose of the treatment

If you are not a customer of ours, but have only submitted an expression of interest, we will process your data for the purpose of managing our potential relationship with you.

### Legal basis for processing

The processing is necessary for our legitimate interest in nurturing potential customer relationships.

### Time for treatment

If you have not become a customer or contacted us in such a way that there is reason for us to assume that your interest in becoming a customer remains, we will delete your data after that time.

## Support

### Purpose of the treatment

If you contact us for support, we will process your data to assist you with the relevant issue.

### **Legal basis for processing**

The processing is necessary to fulfil the customer contract with you.

### **Time for treatment**

We will delete your personal data within 12 months after the case has been processed.

## **Marketing**

### **Purpose of the treatment**

If you sign up to receive newsletters or other information from us, we will process your personal data in order to provide you with the requested information.

### **Legal basis for processing**

The processing is necessary for our legitimate interest in maintaining good customer relations.

### **Time for treatment**

We will cease processing if you opt out of the marketing. You can do this by contacting us at [kontakt@lysafonder.se](mailto:kontakt@lysafonder.se).

We will then also delete your data, unless you are our customer and we need the data for our other processing operations.

## **Legal requirements**

### **Purpose of the treatment**

If you are a customer of ours, we need to process your data for the purpose of complying with applicable law, such as anti-money laundering and terrorist financing rules (including requirements to perform risk assessments, customer due diligence, risk classifications, monitoring of transactions, auditing, etc. and suspicious transaction reporting), checks against sanctions lists, capital adequacy requirements, accounting rules and tax rules.

### **Legal basis for processing**

The processing is necessary to fulfil Lysa Fonder's legal obligations.

### **Time for treatment**

We will process the data for as long as required by applicable legislation (such as the Accounting Act, the Act on Measures against Money Laundering and Terrorist Financing, the Swedish Financial Supervisory Authority's regulations on investment funds, the Tax Procedure Act).

## Misuse of the service

### Purpose of the treatment

If you express interest in becoming a customer or are a customer of ours, we will process your personal data for the purpose of preventing and detecting misuse of the service (including risk management, traceability and evidence and fraud detection measures).

### Legal basis for processing

The processing is necessary for our legitimate interest to prevent and detect misuse of the service.

### Time for treatment

We will process the data for as long as you are our customer.

## Anonymisation

### Purpose of the treatment

We will anonymise some of your personal data for the purpose of compiling anonymous and aggregated statistics (e.g. on web visitor behaviour, web traffic, page views, searches, customer analysis, business monitoring, development of the services).

### Legal basis for processing

The processing is necessary for our legitimate interest in generating anonymous statistics.

### Time for treatment

We will anonymise your personal data every day. Once your personal data has been anonymised, it is no longer considered as personal data under the current legislation, data protection legislation.

## Recipients of your personal data (including third country transfers)

### Suppliers/contractors

We use suppliers who provide storage and communication services. The providers will, as part of the services to us, carry out some processing of your personal data on our behalf. Some of these providers are located within the EU/EEA, but the majority of the providers are located in the US. The transfers to the US are subject to appropriate safeguards in the form of the European Commission's standard contractual clauses.

## Authorities and other third parties

Lysa Fonder may disclose information about you to the Swedish Financial Supervisory Authority, the Police, the Swedish Tax Agency, the Swedish Enforcement Authority and other applicable authorities if Lysa Fonder is required to do so by applicable law, regulation or decision of an authority. We may also share certain information with your pre-registered bank, custodian, payment service providers, Bankgirocentralen, Mobilt BankID and Swish.

## Your rights

As a data subject, you have the possibility to exercise the following rights in relation to our processing of your personal data:

Right of access. You have the right to obtain access to your personal data (including a copy) and certain information concerning its processing.

Right to rectification. You have the right to have inaccurate personal data corrected and to complete incomplete personal data.

Right to erasure. Under certain conditions, you have the right to have your personal data erased. This is the so-called "right to be forgotten". Please note that we are required to retain certain personal data in order to fulfil requirements imposed on us (such as the Accounting Act, the Act on Measures against Money Laundering and Terrorist Financing, the Swedish Financial Supervisory Authority's regulations on securities business and the Tax Procedure Act).

Right to restriction of processing. Under certain conditions, you have the right to have the processing of your personal data restricted.

Right to data portability. You have the right to obtain your personal data (or, in certain circumstances, to have it transferred to another controller) in a structured, commonly used and machine-readable format.

Right to object. Under certain circumstances, you have the right to object to specific personal data processing operations.

You can always contact our Data Protection Officer at [dpo@lysafonder.se](mailto:dpo@lysafonder.se) to make a request as described above.

You also have the right to lodge a complaint about our processing of personal data with the supervisory authority, the Swedish Data Protection Authority. You can find contact details for the Swedish Data Protection Authority here: <https://www.imy.se/kontakta-oss/>.

## Contact details of the Data Protection Officer

Lysa Fonder's Data Protection Officer: David  
Vikström Email: [dpo@lysafonder.se](mailto:dpo@lysafonder.se)

Lysa Fonder AB, reg. no. 559187-7526  
Email: [kontakt@lysafonder.se](mailto:kontakt@lysafonder.se)

## Amendment of the personal data policy

Lysa Fonder may change this personal data policy if necessary. If the policy is changed, you will be informed if the change affects the processing of your personal data. The latest version of the personal data policy is always available on Lysa Fonder's website. At the top of this policy you will see the date of the latest update.