

## Privacy Policy, Website

### 1 Introduction

- 1.1 This document (the “**Privacy Policy**”) describes how Adelis Equity Fund I AB, Adelis Equity Fund II AB and Adelis Equity Fund III AB with registered address at Regeringsgatan 20, 111 53 Stockholm (hereinafter, the “**Adelis**”, “**we**”, “**us**”, “**our**”) process personal data in the capacity of a controller.
- 1.2 In the event of any questions with respect to our processing of personal data or with respect to this Privacy Policy, please contact Adelis by using the details provided in section 9 below.
- 1.3 This Privacy Policy applies to the processing of personal data that occurs through:
  - the use of Adelis’s website [www.adelisequity.com](http://www.adelisequity.com) (the “**Website**”);
  - in the context of our administration of supplier relationships;
  - in the context of interactions with persons who may contact us;
  - in the context of recruitment; and
  - when you visit our premises.

### 2 Definitions

- 2.1 Terms such as “personal data”, “processing” and other terms used in this Privacy Policy shall be construed in accordance with applicable data protection laws, i.e. the 2016/679 General Data Protection Regulation and the Directive 2002/58/EC on Privacy and Electronic Communication as well as the Swedish national implementations and related Swedish national legislation (together the “**Applicable Data Protection Laws**”).

### 3 The personal data processed

- 3.1 Adelis processes the following categories of personal data:
  1. **Contact information**, such as name, e-mail address, telephone number, address and postal code, business/company name, title or role.

2. **System information**, such as IP address, web browser type and version, operating system, information on your Website activity.
3. **Recruitment information**, such as CV or résumé, motivation letter and other information that may arise in the context of recruitment or commencement of consultancy.
4. **Event-related information**, such as dietary preferences, if and where applicable.
5. **Any other information that you may share with us when you communicate with us.** Please bear in mind that you should not share more personal data than what is necessary for the inquiry you have.

3.1.1 We may collect personal data from you directly, or from third parties.

#### **4 Purposes and legal grounds for processing**

4.1 Adelis processes personal data as described above, for the following purposes and based on the following legal grounds:

1. **To administer our relationship with partners and suppliers.**  
The personal data processed in this context is contact information, and any other information that you may share with us. This processing is necessary for Adelis's legitimate interest to administer our relationships with partners, suppliers and to keep in contact.
2. **To promote our business and to reach out to potential customers, suppliers and partners.** The personal data processed in this context is primarily contact information. The processing is necessary for our legitimate interest to market and promote our business.
3. **To recruit personnel.** The personal data processed in this context is primarily recruitment and contact information. The processing is necessary for our legitimate interest to recruit personnel and/or engage consultants.
4. **To comply with applicable laws.** The personal data processed in this context is contact information and any other information necessary for our compliance with applicable laws, such as bookkeeping laws. This processing is based on our legal obligations.

5. **To organise events.** The personal data processed in this context is primarily contact information and event-related information. The processing is necessary for our legitimate interest to organise events. In certain circumstances where we process personal data relating to allergies or food preferences, the processing will be based on your explicit consent.

## **5 Disclosure of personal data**

- 5.1 Adelis may share your personal data with our affiliates, partners and suppliers in order to be able to fulfil the aforementioned purposes of processing and conduct our business. These suppliers may provide services such as delivery of services and marketing.
- 5.2 In some cases, these third parties may require access to some or all of your personal data. In such event, Adelis will undertake steps to ensure that your personal data is processed in accordance with the requirements of the Applicable Data Protection Laws.
- 5.3 In line with the above, we may transfer personal data to third parties who may be established or otherwise process personal data outside the European Union/European Economic Area (“EU/EEA”). In such case, we will ensure that any such transfers comply with Applicable Data Protection Laws, including applying appropriate safeguards such as the EU Commission Standard Contractual Clauses and supplementary measures, as necessary.
- 5.4 At times, we may be legally required to disclose personal data, in situations where we, *e.g.* are involved in legal proceedings, where we are obliged to comply with legal obligations, legal requests by a public authority, to comply with a court order. Such situations may also include instances where we prevent and investigate fraud or other illegal activity to protect ourselves, you and other customers, including, where necessary, for the purposes of an investigation.
- 5.5 We may, from time to time, expand or reduce our business. Such changes may involve a transfer of control of all or part of our business. In such cases, and where it is relevant to any part of our business subject to a transfer, personal data will be transferred to the new owner or newly controlling party who will, under the terms of this Privacy Policy, be permitted to use that personal data only for the same purposes for which it was originally collected by us.

## **6 Retention**

- 6.1 Adelis retains personal data for the time period that is necessary for achieving the purpose(s) for which the personal data was first collected. Some personal data may have to be stored for a number of years, such as in the event of our obligation to comply with legal requirements, *e.g.* bookkeeping laws.

## **7 Cookies**

Adelis uses cookies and similar technologies on the Website. We do this for the purposes of providing a better experience on our Website and to help us analyse and improve our Website. You may read more about our use of cookies in our Cookie Policy, <https://www.adelisequity.com/cookies/>.

## **8 Your rights**

- 8.1 Pursuant to Applicable Data Protection Laws, you have the right to request access to and information about the personal data that we process about you. Additionally, you may also request that we rectify, complete, and in some cases, erase or restrict the processing of personal data relating to you. You also have the right to request a copy of the personal data we process relating to you, free of charge.
- 8.2 When we process personal data on the basis of a contract, you also have the right to data portability. You have an absolute right to object to personal data processing done for the purposes of direct marketing, such as the one described in section 4.1, point 2 above. You have the right to withdraw your consent at any time. To do so, please contact us via the contact details stated in section 9 below. Please note that your withdrawal of consent does not affect the validity of the processing that occurred before the withdrawal.
- 8.3 You have the right to lodge a complaint with a supervisory authority. You can find information regarding supervisory authorities here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **9 Contact us**

- 9.1 If you have questions, complaints, or if you want to exercise your rights as listed in section 8 above, feel free to contact us:

Regeringsgatan 20, 111 53 Stockholm, Sweden

[info@adelisequity.com](mailto:info@adelisequity.com)

9.2 When you contact us to exercise your rights, please state your full name and provide contact details so we can reach you and assist. Please note that we may need to verify your identity before we proceed with your request.

## **10 Changes to this Privacy Policy**

10.1 We may, from time to time, change this Privacy Policy. The latest version of this Privacy Policy will be available on the Website. In the event any changes to this Privacy Policy require your consent, we will provide you with the relevant information and give you an opportunity to provide consent.