

Privacy Policy for the Processing of Personal Data of Shareholders in Spar Nord Bank A/S

Here you will find information on how Spar Nord Bank A/S ("the company") acts as a data controller in connection with the processing of your personal data. This privacy policy applies to the company's shareholders as well as their proxies and advisors. You can read about how and when the company collects, processes, discloses, and stores your personal data. All information is treated confidentially and in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act.

Collection and Processing of Personal Data

The company collects and processes your personal data in connection with the holding of general meetings and shareholder meetings, for administrative purposes, and to ensure effective communication with you. The information is received directly from you when you contact us, register for or participate in general meetings and shareholder meetings, including voting, questions, or statements. Additionally, the company may receive information from third parties such as VP Securities A/S and custodian banks that hold and manage your shares.

The company retains your information as long as it is necessary for the purposes underlying the collection, processing, and storage of data, or as long as the company is obligated to do so.

Company documents – including documents that the company is required to prepare under the Companies Act, such as shareholder register information, notices, and minutes of general meetings – are retained for 5 years after the end of the financial year to which the documents relate, in accordance with the Companies Act section 17. In certain cases, the information may be retained for a longer period if necessary to protect the company's legitimate interests or if there is a legal obligation.

Identification and Registration in the Register of Shareholders

The company processes your personal data to identify and register you as a shareholder in the company's register of shareholders. This information is retained as long as you are a shareholder in the company. If you cease to be a shareholder, the company retains your information for 5 years from the end of the financial year in which your ownership ceased, in accordance with the Companies Act section 17.

Invitation, Registration, and Voting for General Meetings and Shareholder Meetings

The company processes your personal data in connection with invitations to the company's general meetings and shareholder meetings. Invitations to general meetings are published as a company announcement via Nasdaq Copenhagen, on the company's website, and sent via electronic communication to members of the bank councils, major shareholders, and shareholders registered in the register of shareholders who have requested it. Invitations to shareholder meetings are sent via electronic document exchange, electronic mail, or regular mail.

When registering for general meetings and shareholder meetings, the company processes your personal data based on the data registered in the register of shareholders. The company also processes your personal data in connection with the issuance of proxy instructions, granting of proxy to the board, or electronic voting or postal voting.

Holding of General Meetings, Shareholder Meetings, and Preparation of Minutes

Your personal data is processed in connection with the holding of general meetings and shareholder meetings if you actively participate by speaking, making proposals, asking questions, or voting. Additionally, your personal data is processed in connection with the preparation of minutes of shareholder

meetings and general meetings. Furthermore, information about your shareholding is processed to manage the voting process. Your personal data is also processed to verify your status as a shareholder, proxy, or advisor.

Minutes of general meetings are published on the company's website and other relevant platforms.

Video and Audio Recording and Livestreaming of General Meetings

The company's general meeting is livestreamed via the Investor Portal. The livestream is recorded and subsequently made available on the company's website. The livestream and video and audio recording include images and sound primarily from the podium and the speaker's platform, which means that your personal data will be collected and processed if you speak or ask questions during the general meeting.

Shareholder meetings are livestreamed, to the extent they are virtual, via the company's website.

Information about Shareholders

The company processes the following personal data about you:

- Information registered in the company's register of shareholders: name, address, email address, phone number, date of purchase/sale, shareholding, share class, voting rights, deposit number, custodian bank, and any pledges.
- Information about advisors and proxies: name, address, email address, and phone number.
- Information about participation in general meetings and shareholder meetings: including your registration, the questions you ask, the votes you cast, your proposals, and statements.
- Video and audio recordings from general meetings.
- Other personal data you provide through your communication with us.

Basis for Processing Personal Data

The company processes your personal data when it is necessary to fulfill legal obligations under applicable law. Additionally, the company may process your data to fulfill an agreement. Processing may also be based on the company's legitimate interests. Below is an overview of the legal bases for the company's main processing activities of your personal data:

- Processing of personal data for identification and registration in the register of shareholders: The company's legal obligation, in accordance with the Companies Act section 50-53. Processing also occurs to identify you as a shareholder so you can exercise your statutory and bylaw rights in connection with general meetings and shareholder meetings.
- Processing of personal data for invitations and holding of general meetings and shareholder meetings, as well as preparation of minutes of shareholder meetings and general meetings and publication of minutes: The company's legal obligations, in accordance with the Companies Act chapter 6, and the company's obligations under the company's bylaws.
- Processing of personal data during livestreaming and video and audio recording of the general meeting, as well as livestreaming of virtual shareholder meetings: The company's legitimate interest in enabling participation for shareholders who cannot attend physically.

Disclosure and Transfer of Personal Data

The company discloses your personal data in the following cases:

- When livestreaming and video and audio recordings of the general meeting are made available on the Investor Portal and on the company's website, e.g., if you speak, make proposals, or ask questions at the general meeting.
- To persons with power of attorney, advisors, or other persons if you have given us permission to share your personal data with them.
- To Nasdaq Copenhagen, when relevant in connection with the company's activities.
- To public authorities, when required by law or decisions from courts or other public authorities.

Transfers Outside the EU and EEA

In connection with IT development, hosting, and support, personal data is transferred to data processors, including data processors in third countries outside the EU and EEA.

When the company transfers personal data to data processors in countries outside the EU and EEA, we ensure that your personal data is processed in accordance with the level of protection guaranteed by the General Data Protection Regulation. Personal data is only transferred to data processors in countries outside the EU and EEA if the company has a valid transfer basis.

More information on which countries processing occurs can be found on the company's website www.sparnord.dk/databeskyttelse.

Access to the Company's Processing of Data

You can gain insight into which information the company processes about you, where it comes from, and what the company uses it for. You can also find out how long the company retains your data and who receives data about you, to the extent the company discloses your personal data. However, access may be limited by law, the protection of other people's privacy, and the company's business foundation and business practices. Additionally, trade secrets, internal assessments, and other material may be exempt from the right of access.

You request access via the company's website www.sparnord.dk/databeskyttelse.

Correction or Deletion of the Company's Information

If the information is incorrect, incomplete, or irrelevant, you have the right to have the information corrected or deleted with the limitations provided by law and applicable processing grounds, in accordance with the General Data Protection Regulation articles 16 and 17.

Restriction of Processing

If you believe that the information the company has registered about you is incorrect, or if you have objected to the processing of the information under the General Data Protection Regulation article 21, you can request that the company restricts the processing of this information to storage. Processing is only limited to storage until the accuracy of the information can be established, or it can be verified whether the company's legitimate interests override your interests.

If you are entitled to have the information the company has registered about you deleted, you can instead request that the company restricts the processing of this information to storage. If the processing of the information the company has registered about you is only necessary to assert a legal claim, you can also request that other processing of this information is limited to storage.

Complaint about the Company's Processing of Information

It is recommended that you first contact the company as the data controller if you are dissatisfied with the company's processing of your personal data.

You have the right to complain about the company's processing of your personal data to the Danish Data Protection Agency, Carl Jacobsens Vej 35, 2500 Valby, or dt@datatilsynet.dk.

Changes to the Privacy Policy

The privacy policy may be changed without notice if the changes are to your benefit.

The company may change the privacy policy with one month's notice if the changes are not to your benefit. Information about such changes is provided by notification in e-Boks or by letter if you are exempt from digital communication.

Contact Information for Data Controller and Data Protection Officer

Data Controller:
Spar Nord Bank A/S
Skelagervej 15
Postboks 162
9100 Aalborg
CVR-number: 13737584
Phone number: 96344000
E-mail: sparnord@sparnord.dk

Data Protection Officer:
E-mail: dpo@sparnord.dk
Phone number: 96344371
Address: Skelagervej 15, postboks 162, 9100 Aalborg, Att. Data Protection Officer