Privacy Notice - Polaris

At Polaris Management A/S ("Polaris") data protection and confidentiality is a high priority.
This Privacy Notice explains how information about you is collected, used and disclosed by Polaris when you are an investor, if you have another commercial relationship with Polaris, if you receive Polaris press releases or when you otherwise interact with Polaris (collectively, the "Informations").

We may amend this Privacy Notice from time to time. If we make changes, we will notify you by revising the date at the top of the notice and, depending on the specific amendments; we may provide you with additional notice. We encourage you to review the Privacy Notice whenever you access our Services to stay informed about our information practices and the ways you can help protect your privacy in accordance with the General Data Protection Regulation (the "GDPR"), the Danish Data Protection Act (the "Act") and related laws.

1. Data controller and contact information

Polaris Management A/S
CVR-no. 28 50 17 65
Malmøgade 3
DK-2100 København Ø
lmr@polarisequity.dk

2. Collection of personal data

We primarily collect and process your personal data when you enter into a commercial relationship, hereunder when you are an investor in a Polaris fund. If you act as representative of a company that has invested in a Polaris fund, we will process your name, title and contact details. The legal basis for such processing is the performance of the contact according to the GDPR art. 6(1)(b).

If Polaris is obligated to file reporting's according to the mandatory money-, KYC and terror financing obligations, Polaris will process information on your bank- and account details, copy of passport and copy of another official document that proves your identity. The legal basis for such processing is the GDPR art. 6(1)(c) and the Act section 11(2)(1).

We may collect information you provide directly to us, such as when you participate in a Polaris workshop or investor event, if you communicate with Polaris via third party social media sites (e.g. LinkedIn) or if you otherwise interact with us. The types of information we may collect about you include your name, social networking screen names or IDs, email address and any other information you choose to provide. The legal basis for such processing's the performance of the contact according to GDPR art. 6(1)(b) or the GDPR art. 6(1)(f) by Polaris' legitimate interest in responding to your inquiry in relation to the Informations.

We may use information about you for various purposes, including to:
Provide, maintain and improve our current Services;

- Develop new Services;
- Provide and deliver the Services you request and send you related information;
- Respond to your comments, questions and requests;
- Communicate with you about products, services, offers, promotions and events offered by Polaris and others, and provide news and information we think will be of interest to you.

3. Use of personal data

We may share information about you with the following parties or as otherwise described in this Privacy Notice:

- With relevant authorities, hereunder the Danish Financial Supervisory Authority, SKAT, etc.;
- In response to a request for information if we believe disclosure is in accordance with any applicable legal requirement;
- With relevant Data Processors; or
- With financial institutions;
- With legal-, tax or financial advisors.

4. Third country transfers

If your personal data is transferred to data controllers or data processors which are located in countries outside the EU/EEA, including group entities, not ensuring an adequate level of data protection, such transfer will be safeguarded by the EU Commission's standard contractual clauses.

5. Security

We have implemented security measures to ensure that our internal procedures meet our high security policy standards. Accordingly, we strive to protect the quality and integrity of your personal data. This includes encryption of data and use of pseudonymisation, whenever applicable.

6. Your rights

You are at any time entitled to be informed of the personal data about you that we process, but with certain legislative exceptions. You also have the right to object to the collection and further processing of your personal data. Furthermore, you have the right to have your personal data rectified, erased or blocked. Moreover, you have the right to receive information about you that you have provided to us, and the right to have this information transmitted to another data controller (data portability).

If you wish to appeal against the processing of your personal data, please contact us at lmr@polarisequity.dk. You may also contact the Danish Data Protection Agency, Borgergade 28, 5., 1300 Copenhagen K.