



ALK-Abelló A/S – Privacy policy for shareholders, proxies and advisors

The purpose of this policy is to describe how ALK-Abelló A/S (“ALK”), as part of handling its investor relations collects and processes personal data about its shareholders, proxies and advisors, including the registration in the register of shareholders and convening and holding of Annual General Meetings. In addition, the purpose of this policy is to provide information on your rights under the General Data Protection Regulation (“GDPR”).

1. Identity and contact details of the data controller

The legal entity responsible for collecting and processing your personal data and acting as data controller is:

ALK-Abelló A/S

CVR no. 63 71 79 16

Bøge Allé 6-8

2970 Hørsholm

Denmark

Tel: (+45) 4574 7576

Should you have any questions regarding the processing of your data, please contact ALK at the following address: data.protection@alk.net. The contact details of the ALK Data Protection Officer are available [here](#).

2. Detailed information on the processing carried out by ALK

ALK collects, stores and processes only the necessary data about shareholders, proxies and advisors to handle its investors relations. In the table below, it is described how ALK processes your personal data.

PURPOSE	LAWFULNESS OF PROCESSING	STORAGE PERIOD
<p><u>Identification of shareholders and maintenance of the register of shareholders, including the shareholder portal</u></p> <p>ALK will collect and process information about each shareholder, including name, email address, home address, portfolio of shares, voting rights, dates of acquisition/sales, username and password, account number with VP securities, investor ID and custodian bank.</p>	<p>ALK processes the personal data in accordance with:</p> <ul style="list-style-type: none"> - Art. 6.1.c GDPR to comply with obligations and shareholder’s rights set out in section 50 of the Danish Companies Act. - Art.6.1.f GDPR (legitimate interest) for shareholders identification and to be able to answer their request and to communicate with them. 	<p>ALK will keep your personal data for up to 3 years plus current financial year after you no longer owns shares in ALK.</p>
<p><u>Convening and the holding of the Annual General Meetings</u></p> <p>ALK will process personal data to invite shareholders to the Annual General Meetings and enable them to exercise their administrative rights at the Annual General Meeting, issue proxies and vote by post.</p> <p>ALK processes personal data from advisors of shareholders so the advisor can attend the Annual General Meeting.</p> <p>In addition, ALK processes the information to issue admission cards to shareholders, proxies and advisors.</p> <p>ALK will process general personal data, including name, email address, home address, attendance at the Annual General Meeting, advisor’s attendance at the meeting, proxies, votes cast, including vote by post and portfolio of shares.</p>	<p>ALK processes your personal data in accordance with:</p> <ul style="list-style-type: none"> - Art. 6.1.c GDPR to comply with legal obligations in section 93 of the Danish Companies Act. 	<p>ALK will keep your personal data for up to 3 years plus current financial year after you no longer owns shares in ALK.</p> <p>Notice to convene the Annual General Meetings with agenda and complete proposals as well as registrations, proxies and written votes, are stored for up to 2 years plus current financial year after the Annual General Meeting.</p> <p>Material that documents the company’s history, decisions made, etc. is retained as long as ALK exists.</p>

PURPOSE	LAWFULNESS OF PROCESSING	STORAGE PERIOD
<p><u>Submitting questions and proposals prior to the Annual General Meeting, handling of questions and exercising the right to speak at the Annual General Meeting as well as preparation of the minutes of the Annual General Meeting</u></p> <p>If questions are answered in writing prior to the Annual General Meeting, ALK will process your information in order to be able to present questions, answers and the name of the person who put forward the question at the Annual General Meeting.</p> <p>If a proposal with a specific issue to be included on the agenda for the Annual General Meeting is included, ALK will process the name of the person and the proposal.</p> <p>If you exercise your right to speak, your personal information will be processed in the minutes.</p>	<p>ALK processes your personal data in accordance with:</p> <ul style="list-style-type: none"> - Art 6.1.c GDPR to comply with legal obligations in sections 78, 90 and 101 93 of the Danish Companies Act. - Art 6.1.f GDPR, legitimate interest to be able to identify shareholders and proxies in order for them to present proposals and questions prior to and during the Annual General Meeting and to exercise their right to speak. 	<p>ALK will store minutes of the Annual General Meeting until it is no longer necessary for ALK to protect ALK and shareholder's interest, including for the purpose of documenting the deliberations and resolutions passed at Annual General Meeting.</p>
<p><u>Audio and/or visual recording</u></p> <p>General Annual Meetings are audio and/or visually recorded, and ALK may webcast the Annual General Meeting and keep a recording on ALK's webpage.</p> <p>ALK will process your personal data such as voice and image for example if you exercise your right to speak in the Annual General Meeting and the recording will show the agenda (including proposals from shareholders) and it may show questions or statements submitted in writing during the Annual General Meeting.</p>	<p>ALK processes your personal data in accordance with:</p> <ul style="list-style-type: none"> - Art 6.1.f GDPR , legitimate interest in processing the recordings to use them to prepare the minutes and in documenting the proceedings at the Annual General Meeting and making it available to shareholders and media who are unable to attend or view the live webcast of the Annual General Meeting. 	<p>ALK will keep a recording publicly available on demand on its website for a period of up to 5 years after the Annual General Meeting.</p>

3. Recipients of the personal data

ALK may share the personal data about shareholders, proxies and advisors with:

- Service providers, including IT suppliers
- The general public through publication on ALK's website in accordance with applicable law
- Nasdaq Copenhagen A/S
- Public Authorities such as the Danish Business Authority

4. Transfer to third countries

If we were to pass on your personal data to recipients outside located in countries outside of the EU/EEA, this would occur only to the extent that the EU Commission has confirmed the third country has an appropriate level of data protection or subject other appropriate data protection guarantees (such as the European Commission's standard contractual clauses).

5. Rights

You may exercise at any time the below rights by sending an email to: data.protection@alk.net indicating the right you wish to exercise. When we process your data, you have the following general rights:

- a) the right of access to, rectification or erasure of your personal data; and
- b) the right to object to the processing of your personal data and to have the processing of your personal data restricted.

If you consider that data protection legislation has been breached in the processing of your personal data, you can contact the Data Protection Officer at: dpo.alk@bechbruun.com

You may also lodge a complaint before the corresponding Data Protection Authority, for instance the Danish Data Protection Agency.

A list on EU's data protection authorities can be found herein: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

6. Changes to the privacy policy

ALK reserves the right to update and amend this policy when required on an ongoing basis by issuing a new version. This privacy policy was last updated March 2021.