

# Privacy notice for shareholders, proxies and advisors

March 2025

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

## 1. Identity and contact details of the data controller

The legal entity responsible for processing your personal data is:

ALK-Abelló A/S

Address: Bøge Allé 1

2970 Hørsholm

Denmark

Tel.: +45 45747576

Email: [data.protection@alk.net](mailto:data.protection@alk.net)

Our Data Protection Officer:

Bech-Bruun Advokatpartnerselskab

CVR nr.: 38538071

Gdanskgade 18

2150 Nordhavn

Denmark

Tel.: +45 72 27 30 02

Email: [dpo.alk@bechbruun.com](mailto:dpo.alk@bechbruun.com)

Encrypted email via: <https://dpo.bechbruun.com/alk>

If you have any questions regarding the processing of your personal data, you can always reach out to ALK or our Data Protection Officer.

## 2. Detailed information on the processing carried out by ALK

We process your personal data to comply with the legal obligations set out in corporate laws, as well as announcements to the Danish Financial Supervisory Authority and Nasdaq Copenhagen.

In connection with ALK's Annual General Meeting, ALK collects, stores, and processes the personal data. This occurs in different respects, as follows:

**Purpose: Identification of shareholders and maintenance of the register of shareholders, including the shareholder portal.**

ALK will collect and process information about each shareholder, including:

- Name, email address, home address
- Portfolio of shares, voting rights, date of acquisition/sales
- Username and password, account number with VP securities, investor ID and custodian bank

Lawfulness of Processing: ALK processes personal data in accordance with:

- Article 6(1)(c) of GDPR to comply with obligations and shareholder's rights set out in section 50 of the Danish Companies Act
- Article 6(1)(f) of GDPR for shareholders identification to be able to answer their request and to communicate with them (legitimate interest)

Storage period:

ALK will retain your personal data for up to 5 years plus the current financial year after you no longer own shares in ALK.

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**Purpose: Convening and the holding of the Annual General Meetings.**

ALK will process personal data to invite shareholders to the Annual General Meetings and enable them to exercise their rights at the meetings, issue proxies, and vote by post.

ALK processes personal data from shareholders' advisors so that the advisor can attend the Annual General Meeting. In addition, ALK processes this information to issue admission cards to shareholders, proxies, and advisors.

ALK will collect and process information about each shareholder, 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

Lawfulness of Processing: ALK processes personal data in accordance with:

- Article 6(1)(c) of GDPR to comply with legal obligations in section 93 of the Danish Companies Act

Storage period:

ALK will keep your personal data for up to 5 years plus the current financial year after you no longer own shares in ALK.

The notice, including the agenda with complete proposals and certain auxiliary documents (such as, but not limited to, proxy forms and correspondence voting forms), is published as a company announcement through Nasdaq Copenhagen and on ALK's website. It is also distributed by email to shareholders who have requested it and will remain publicly available on our website for fifteen years.

Additionally, ALK may retain the notice, agenda, and auxiliary documents for as long as necessary to protect and pursue the interests of ALK and its shareholders. Materials documenting the company's history, decisions made, etc., are retained for as long as ALK exists.

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**Purpose: Screening of individuals subject to EU, UK, or US sanctions.**

ALK is legally obligated to ensure that individuals subject to economic sanctions imposed by the European Union, the United Kingdom, or the United States of America do not exercise shareholder rights during the Annual General Meeting. To fulfil this obligation, ALK may process personal data of shareholders participating in the Annual General Meeting by screening their information against relevant sanctions lists.

ALK will process the following personal data of shareholders based on information registered in the shareholder register:

- Name and home address

Lawfulness of Processing: ALK processes personal data in accordance with:

- Article 6(1)(c) of GDPR to comply with applicable sanctions laws and regulations, which include preventing sanctioned individuals from exercising shareholder rights.
- Article 6(1)(f) of GDPR as ALK has a legitimate interest in ensuring compliance with international sanctions regimes, maintaining corporate integrity, and mitigating legal and financial risks.

Storage period:

Personal data collected and processed for sanctions screening will be retained only for as long as necessary to fulfil the legal obligations and purposes stated above.

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**Purpose: Confirmation of standing for election.**

Persons standing for election at the Annual General Meeting must confirm their eligibility, along with information about other managerial responsibilities.

In this context, and for the purpose of verifying the candidate's identity and eligibility, ALK will collect and process personal data, including the candidate's name and managerial positions held.

Lawfulness of Processing: ALK processes personal data in accordance with:

- Article 6(1)(c) of GDPR to comply with Danish corporate law as set out in section 112 of the Danish Companies Act
- Article 6(1)(f) of GDPR for processing personal data to ensure transparency in corporate governance, facilitate the election process, and enable subsequent regulatory registrations (legitimate interest)

Storage period:

Personal data collected and processed will be retained for as long as necessary to protect and pursue the interests of ALK and its shareholders.

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**Purpose: 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.**

If questions are answered in writing prior to the Annual General Meeting, ALK will process your information in order to present the questions, answers, and the name of the person who submitted the question at the Annual General Meeting.

If a proposal regarding a specific issue is included on the agenda for the Annual General Meeting, ALK will process the name of the person and the proposal.

If you exercise your right to speak, your personal information will be recorded in the minutes.

Lawfulness of Processing: ALK processes personal data in accordance with

- Article 6(1)(c) of GDPR to comply with legal obligations on section 78, 90, and 101 of the Danish Companies Act
- Article 6(1)(f) of 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

Storage period

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.

**Purpose: Audio and/or visual recording.**

General Annual Meetings are audio and/or visually recorded, and ALK may webcast the Annual General Meeting and maintain a recording on ALK's webpage.

ALK will process your personal data, such as your voice and image, if you exercise your right to speak during the Annual General Meeting.

The recording will include the agenda (including proposals from shareholders) and may also capture questions or statements submitted in writing during the meeting.

Lawfulness of processing: ALK processes your personal data in accordance with

- Article 6(1)(f) of 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.

Storage period

- 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

### **3. Recipients of the personal data**

#### **I. ALK EMPLOYEES & EXTERNAL PROCESSORS**

The recipients of your personal data will be employees of entities belonging to the ALK Group and external processors providing specific services while processing personal data on our behalf. They will receive your personal data only on a 'need-to-know' basis, subject to confidentiality obligations and after signing legal agreements. Furthermore, we may share your data with the general public through publication on ALK's website in accordance with applicable law.

#### **II. INDEPENDENT THIRD PARTIES**

When needed, we may disclose your personal data to third parties, such as Nasdaq Copenhagen A/S and Public Authorities, such as the Danish Business Authority, attorneys, or third-party auditors.

#### **III. TRANSFERS OF DATA FROM EU/EEA TO THIRD COUNTRIES**

If we share data from the EU/EEA with a company or ALK affiliate in a third country, we will apply contractual clauses that meet EU standards to ensure the receiving company handles personal data appropriately, unless the country where the company operates is already deemed by the EU to offer an adequate level of data protection. More information about such clauses is available [here](#). If data transfers are required in other situations, we will inform you about the specific compliance measures in place to enforce EU law.

## 4. Data Subject Rights

Under the General Data Protection Regulation (GDPR), you have certain data protection rights:

- a) Right to access  
You have the right to request access to your personal data held by ALK, as well as additional details.
- b) Right to rectification  
You have the right to request correction of inaccurate or incomplete personal data.
- c) Right to erasure  
You have the right to request the deletion of your personal data, except when retention is required by law.
- d) Right to restrict processing  
You have the right to object to restriction of your personal data.
- e) Right to object  
You have the right to object to the processing of your personal data.
- f) Right to data portability  
In specific situations, you are entitled to receive your personal data in a structured, widely used, and machine-readable format.

If you would like to exercise any of these rights, please contact us using the contact details provided in section 1.

## 5. Right to Complain

You have the right to file a complaint with the Data Protection Authority if you are dissatisfied with the way we process your personal data. Contact information of the Data Protection Authority can be found on their website.

If you have any questions or concerns about this privacy notice or our processing of your personal data, please contact us using the contact details provided in section 1.