



## Privacy Policy

Your privacy is important to us at FCG Fonder AB (FCG). We are committed to protecting your privacy and personal data you provide as you access our website, and we will treat any information that you provide in accordance with this Privacy Policy. To ensure you can remain informed about the information we collect and how we use it, changes to our Privacy Policy will be reflected here. Please read this Privacy Statement carefully. By browsing our website, you agree to be bound by this Privacy Statement. You will find our contact details at the bottom of this page.

### The type of personal data you provide, or we collect

When you use one or more of our services, for example visit our webpage, request information or other materials about us or our funds, invest in our funds, or seek employment, you may provide us with personal data or we may collect them from you.

The types of personal data that is generally collected is

- **Personal information and contact details:** Name, birth date, national security number, invoicing or billing address, email address, mobile phone number, employment, title, CV, etc.
- **Information for anti-money laundering and anti-terrorism financing purposes:** Ownership of shares or other significant influence, information if you or a person closely related to you are a politically exposed person, the origin of your funds etc.
- **Information about services:** For example information about services you have used.
- **Financial information:** Your income, any credit facilities or loans, payment defaults.
- **Historical information:** Your purchases or sales of fund units, payment- and credit history.
- **Information on how you interact with our services:** How you use or services, including response time on webpages, downloading errors, how you reached and left the page/service, as well as delivery notices when we contact you. We use the information gathered to improve our web content, navigation, and overall visitor experience and to provide you with relevant FCG materials.
- **Device information:** For example IP-address, language preferences, web browser set-ups, time zone, operative system, platform, and screen resolution information.
- **Geographical information:** Your geographical location.

The information that you provide, including information about the services and your financial information, is generally needed to be able to enter into an agreement with us, while the other information we collect is generally needed for other purposes as described below.

### What we do with your personal data

All data is used to provide, execute and improve our services and to be able to uphold any agreements that we enter, and to comply with legal obligations or other legitimate interests.



We process personal data on the following legal basis.

Purpose for processing	Lawfulness of processing <i>("why the processing is necessary")</i>	Automated decision process might be used  (Yes/No)
To confirm your identity and verify your personal data and contact details.	The processing is necessary for the performance of a contract with you.	Y
To administer our client relationship with you and your payments, e.g. to fulfill our obligations towards you and to provide information and services that you have requested from us.	The processing is necessary for the performance of a contract with you.	Y
To decide what types of payment methods we can offer, e.g. through internal or external credit approvals.	The processing is necessary for the performance of a contract with you, and to comply with legal obligations.	Y
For customer analysis, administration of our services, and for our internal processes; including error reports, data analysis, testing, research, and for statistical reasons.	The processing is necessary for the performance of a contract with you, and the legitimate interests pursued by us, however after balancing our interests against yours.	Y
To manage agreements with service providers or other contract partners.	The processing is necessary for the performance of a contract with you or your employer, contractor or other contractual affiliate.	N
To ensure that any content is presented in an efficient way for you, including your employer, contractor or other contractual affiliate.	The processing is necessary for the performance of a contract with you or your employer, contractor or other contractual affiliate.	Y
To exercise our specific rights and obligations in the field of employment and social security and social protection laws and collective agreements.	To comply with legal obligations.	N
To prevent abuse or misuse of our services; as a part of our efforts to provide safe and secure services.	The processing is necessary for the performance of a contract with you, and to comply with legal obligations.	Y
To perform risk analysis and risk management, and to prevent fraud.	To comply with legal obligations, and the legitimate interests pursued by us, however after balancing our interests against yours.	J



To enhance our services and to develop our business; in order to minimize fraud, develop new or improved products and functions, and to create new business opportunities.	The processing is for the legitimate interests pursued by us, however after balancing our interests against yours.	N
To comply with legal obligations such as anti-money laundering regulations, bookkeeping and auditing regulations and capital requirements.	To comply with legal obligations.	N

We will not sell, share, or rent or otherwise make available any of that information to other parties, except that we may disclose the information to third parties who perform services on our behalf and have a need to access the information in connection with those services. Any third parties will only process this information to the extent to which and within the limits that FCG itself is permitted to process that data.

## Communications with you

We may use your personal data to communicate relevant information about our services and products, customer events and training, or to perform client satisfaction surveys on our services, for example via electronic channels and phone. If you do not wish to receive information or participate in such surveys please contact your client manager or contact [dataprotection@fcgfonder.se](mailto:dataprotection@fcgfonder.se)

## How we might share your personal data

We may transfer to, or share your personal data with, third parties with whom we may need to share information to help us provide services and products to you, and to run our Website. We take all reasonable legal, technical and organizational actions to ensure that your data is managed securely and with an adequate level of protection, when transferring or sharing information to such chosen third parties. The following third parties may come into question:

- Service providers, sub-providers, and advisors - such as companies within our group  
We may share your personal data with our service providers, sub-providers and/or advisors for the performance of a contract with you, or other purpose mentioned in this Privacy Statement. These third parties may be within our outside of our FCG group and be for example fund managers, experts, valuation experts, distributors, IT-technicians, or internal or external auditors.
- Law enforcement, Tax or Supervisory bodies  
We may have to transfer necessary personal data to law enforcement, tax bodies or other supervisory bodies in accordance with legal obligations of if you have consented to this. One example of such obligatory provision of information is under the anti-money laundering and anti-terrorism financing regulations.
- Disposals  
We may share your personal data to third parties if:
  - We sell or buy assets or business; in such cases we may share your personal data with the potential buyer or seller.
  - If a significant part of our assets is bought by a third party, then personal data may be transferred to such buyer.



## Locations where we process your personal data

We always strive to process your personal data within the EU/EEA. Because FCG is a Nordic organization we might need to transfer personal data across the FCG group of companies to help operate our business efficiently. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect information held in that country, in line with the protection provided by the EU-legislation. If you would like to hear more about these protective measures you are welcome to contact us.

It is important that you understand that this Site may be viewed and accessed anywhere in the world including countries that may not have laws regulating the use and transfer of personally identifiable information. By using the Site, submitting information through this site, or submitting personal data to FCG through other means, you voluntarily consent to such international transfer and hosting of such information to those countries and parties.

## Duration of the storage of your personal data

We only store your personal data for as long as it is required or necessary to comply with contractual or legal obligations towards you or the authorities, for example

- If the personal data is stored for the purpose of complying with the laws on anti-money laundering and anti-financing of terrorism, we will save your data for 5 years. It will be deleted during the following year. If the data has been part of an investigation, which we are not at liberty to reveal, we will save it for 10 years.
- The legal requirements that applies to our fund management may mean that we are cannot delete your personal data for at least 5 years from our acquisition of it.
- General contact details shall be deleted regularly, provided they are not required to be kept on basis of the processing in the table above. Contact details will be subject to overview every other year.
- Information needed for bookkeeping or auditing will be saved in accordance with the Swedish act on bookkeeping and accounting (SFS 1999:1078) for at least 7 years.
- Information needed for investigation of incidents, non-compliance with regulations and suspected criminal activities may, for the preservation of rights and affirmation of legal claims, be stored for 2 years provided that an ongoing legal dispute does not require it to be stored longer. Information on suspected criminal activities can only be stored for as long as we are entitled to act on it. The personal data shall be deleted after these time periods has ended.

## Your rights as a data subject

As a subject for personal data processing you have several legal rights, such as



- **Right to access**  
You have a right to ask if we process your personal data. You may request what personal data is processed and how (extract of register), and to verify that this personal data is correct. Such an extract will be provided without charge.
- **Right to rectification**  
You have the right to rectify any incorrect personal data that we process, and to complete any incomplete information.
- **Right to be erased (“the right to be forgotten”)**  
You have the right to have your personal data erased if the data is no longer necessary for the purpose for which it was collected. There may however be legal obligations or overriding legitimate grounds that prevents us from erasing all or parts of your personal data immediately. These legal obligations or legitimate grounds derives first and foremost from
  - exercising the right of freedom of expression and information;
  - legal obligations, such as bookkeeping and tax regulation, banking and anti-money laundering regulations, or consumer rights regulations
  - reasons of public interest in the area of public health, or
  - protection of legal claims.

We will, in such cases, block the personal data from being used for other purposes than fulfilling the particular legal obligation.

- **Right to restriction of processing**  
You have a right to request restriction of processing of your personal data under certain circumstances. If you wish to exercise this right, please contact us so that we might explain under which circumstances this is possible.

You also have a right to object to any profiling (e.g. through cookies) or automated individual decision-making that concerns you. Please contact your client manager or our Data Protection Officer in such case.

You always have a right to lodge a complaint against us with Datainspektionen, which is the Swedish supervisory authority for the processing of personal data.

## Our security processes

FCG has in place appropriate technological and operational security processes designed to protect personal data from loss, misuse, alteration or destruction. Only authorized employees and contractors will have access to any data provided by you, and that access is limited by need. Each employee or contractor having access to any personal data is obligated to maintain its confidentiality. Although we take steps that are generally accepted as industry standard to personal data, FCG cannot guarantee that your personal data will not become accessible to unauthorized persons. FCG cannot be responsible for any actions resulting from a breach of security when data is supplied over the internet or any public computer network.

This website contains links to other Web sites not operated by FCG. FCG is not responsible for the privacy practices or the content of any non-FCG web sites to which we link from the Site. We are not responsible for the protection and privacy of any information you provide whilst visiting other websites and sites not governed by our Privacy Policy.



This Site is not designed for and does not intentionally target or solicit to children under 18 years of age.

## Cookies and tracking techniques

We may use browser cookies and similar tracking techniques to deliver fit for purpose solutions to the users of our services. Here you will find information about how cookies are used on our websites.

A cookie is a small text file that is saved to your computer or portable device when you visit a website. There are two types of cookies. One type saves a file for a longer period on your device. For example, it uses features that communicate what has changed since the user last visited the current site. The other type of cookies is called session cookies. While you are browsing a page, this cookie is temporarily stored in your computer's memory, for example, to keep track of which language you have chosen during a previous visit. Session cookies are not stored on your computer for a long time and are removed when you close your browser.

You need to allow the storage of cookies on your computer in order to use FCG's websites in the manner we intend. Cookies are used to give you access to various features as visitors. If you do not allow cookies, you will have a poorer user experience.

### **The following cookies are set by WordPress and submitted by WordPress (CSM) and are critical to the functionality of our websites**

wordpress\_test\_cookie – session cookie  
wordpress\_logged\_in – session cookie  
wp-settings-1 – expires in 1 year  
wp-settings-time 1 – expires in 1 year  
WPE-auth – session cookie

### **Cookie Bar Cookies**

The following cookies are set by our cookie bar plugin, which checks to see if visitors have already accepted our cookie policy.

nQ\_cookieId - no expiration date  
nQ\_visitId - no expiration date

### **Web analytics tool**

FCG uses Google Analytics to get a picture of how visitors use the site. The following cookies are set:

\_ga – Used to distinguish users – expires after two years  
\_gid – Used to distinguish users – expires after 24 hours  
\_gat – used to control the amount of requests, i.e. restrict data collection on high-traffic websites – ceases after 1 minute

Submitted by: Google. The information created by these cookies, by your use of the site (including your IP address), is forwarded to and stored by Google on servers in the United States. The purpose of these cookies is to evaluate how the site is used to improve content, navigation and structure. Google may also transfer this information to third parties if required by law, or in cases where a third party analyzes the information on behalf of Google.

### **Language management**



FCG uses an extension in WordPress to display the site depending on the language chosen by the visitor.

The following cookies are used by FCG:

pll\_language – Used to display the user’s selected language – expires after 24 hours

### No to web statistics

If you do not want your visits to FCG websites to appear in the statistics in Google Analytics, you can install an add-on to your browser. The add-on is available for the following browsers:

Internet Explorer, Google Chrome, Mozilla Firefox, Apple Safari and Opera. [The add-on can be downloaded from Google](#) (information is in English).

### Avoid cookies

You can apply settings on your computer if you do not want to accept cookies. This automatically denies the website from storing cookies onto your device or informs you each time a site requests to store a cookie. You can also delete previously stored cookies, through your web browser setting. See the browser’s help pages for more information.

More information about cookies and electronic communications can be found on the [Swedish Post and Telecom Authority \(PTS\) website](#).

To find out more about Google Analytics, Google's privacy policy and opting out of its cookies please visit: <https://tools.google.com/dlpage/gaoptout>.

## Contact us

This Privacy Policy and Statement is applicable to FCG Fonder AB in its capacity as controller.

### Contact details

Name		Organization number	
FCG Fonder AB		556939-1617	
Address		Postal code	City
Östermalmstorg 1		114 42	Stockholm
Contact person	Mobile number	Email address	
Johan Schagerström, CEO	+46 730-703125	Johan.schagerstrom@fcgfonder.se	

Our Data Protection Officer Veronica Sommerfeld can provide you with more details about how we work with data protection and personal data. You can reach our Data Protection Officer at the following email address: [dataprotection@fcgfonder.se](mailto:dataprotection@fcgfonder.se)

The Privacy Policy and Statement was updated 2020-10-01 by Veronica Sommerfeld