



GRO Capital A/S

Privacy Policy

June 24, 2024



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This privacy policy explains how GRO Capital A/S ("we", "us" or the "Manager") process your personal data, namely what kind of information is collected, used, disclosed and stored, who the information is about, and for what purposes the information is processed, as well as the rights of the individuals.

We manage investments in GRO Fund I K/S, GRO Fund II K/S, GRO Fund III K/S, GRO CV I K/S and GRO Generation Fund I K/S (the "AIF"). In order for us to provide fund management services, we must process certain personal data about investors who are natural persons and the beneficial owners of investors that are legal persons (beneficial owners either being the ultimate owners of the investor or management members of the investor or others as such term is defined in the Danish Consolidated Act No. 316 of 11 March 2022 on Measures to Prevent Money Laundering and Financing of Terrorism) (in Danish: "Lov om forebyggende foranstaltninger mod hvidvask af udbytte og finansiering af terrorisme") as amended from time to time (the "AML Act") and related individuals, cf. below.

## **1 DATA CONTROLLER**

The legal entity responsible for processing your personal data is:

GRO Capital A/S

Grønningen 17, 2.

1270 Copenhagen

CVR-nr. 2942 5558

Email: gk@grocapital.dk

Telefon: +45 23 73 21 78

## **2 DESCRIPTION OF PROCESSING ACTIVITIES**

Below, we outline our processing activities.

### **2.1 Application process**

#### **2.1.1 Purpose**

During the application process the Manager processes your personal data to assist in completing the subscription application. When the subscription application has been submitted the Manager assesses the application in order to admit or reject investment applicants. If an investment applicant gets admitted as an investor the personal data is also processed to onboard investors to the AIF, e.g. verifying submitted data and carrying out the investment.

#### **2.1.2 Categories of personal data**

We process the following personal data:

For natural persons who are investors:

- a) Name, gender, citizenship, email, postal addresses, and telephone numbers.

Grønningen 17, 2  
1270 Copenhagen K  
Denmark  
GROCAPITAL.DK

- b) Information in subscription application, information about acceptance or rejection hereof, investments made and bank account information.
- c) Investment information (including previous investments, current holdings, portfolio, previous experience, length of time the investor wishes to hold the investment, preferences regarding risk-taking, risk profile and the purpose of the investment).
- d) Transcripts from company registers, articles of association, annual reports, structure charts and share registers.
- e) Status for investors not qualifying as professional, opt-in professional or semi-professional investor, if informed.
- f) Status as semi-professional investor or opt-in professional investor, if informed.
- g) Information about status as a politically exposed person, including any information about the data subject's political opinions.
- h) National identification numbers.
- i) Passport copies and/or copies of health insurance cards (which contain national identification numbers or equivalent).
- j) Information about whether the individual has provided the Manager with proof of identity and identity information in accordance with know-your-customer requirements.
- k) In special circumstances; salary/income and tax information.

For natural persons who have a status as opt-in professionals:

- a) Former and current employment records.
- b) Information about ownership of assets (including liquid assets and real estate).

The beneficial owners of the legal person as the investor:

- a) Name, gender, citizenship, email, postal addresses, and telephone numbers.
- b) Information about status as a politically exposed person, including any information about the data subject's political opinions.
- c) Transcripts from company registers, articles of association, annual reports, structure charts, and share registers.
- d) Transcripts from the relevant financial supervisory authority or business authority, if the investor is under supervision.
- e) National identification numbers.
- f) Passport copies and/or copies of health insurance cards (which contain national identification numbers or equivalent).
- g) Information about whether the individual has provided the Manager with proof of identity and identity information in accordance with know-your-customer requirements.

Members of the management (either the board of directors of the investor and/or members of the board of management of the investor, as applicable), and individual(s) signing the sub-scriptio application on behalf of the investor:

- a) Name, gender, citizenship, email, postal addresses, and telephone numbers.
- b) Information related to contact with the individual.
- c) Complaints from and about the individual.
- d) Transcripts from company registers, articles of association, annual reports, structure charts, share registers and transcripts from the relevant financial supervisory authority or business authority.
- e) National identification numbers.
- f) Passport copies and/or copies of health insurance cards (which contain national identification numbers or equivalent).

- g) Information about whether the individual has provided the Manager with proof of identity and identity information in accordance with know-your-customer requirements.

Other contact persons at the investor:

- a) Name, email address, postal address, and telephone number.
- b) Information related to contact with the relevant entity.
- c) Complaints from and about the contact person (if any).

## 2.1.3 Sources

We collect your personal data from the following source(s):

- a) Directly from you.
- b) GRO Capital as the Manager if it already has the information and is permitted to reuse it for the above purposes.
- c) Publicly available information, e.g. from manager registers, financial supervisory authorities and business authorities.
- d) Third party service providers, e.g. service providers used to verify company information.
- e) Mutual third-party acquaintances, e.g. a placement agent.
- f) Banks and other financial institutions.
- g) Other contacts within the potential or actual investors.

## 2.1.4 Legal basis

We process your personal data on the following legal bases:

For natural persons who are investors:

The processing is necessary for the performance of a contract to which the individual is party and to take steps at the request of the individual prior to entering into a contract, the contract being the limited partnership agreement governing the AIF (the "Limited Partnership Agreement"). The processing consists of carrying out pre-contractual steps and performance of the contract regarding the investment, assessing the subscription and concluding the subscription application, onboarding the investor, communicating with the investor, cf. article 6(1)(b) of the EU Regulation 2016/679 on General Data Protection as amended from time to time (the "GDPR").

To ensure compliance with EU and national anti-money laundering and financial legislation, namely in relation to documentation, including the AML Act, the Danish Consolidated Act No. 2015 of 1 November 2021 on alternative investment fund managers etc. (in Danish: "*Lov om forvaltelse af alternative investeringsfonde m.v.*") as amended from time to time (the "AIFM Act"), and executive orders issued pursuant hereto, and the Commission Delegated Regulation (EU) no. 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision as amended from time to time (the "AIFM Regulation") and the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (recast) as amended from time to time (the "MiFID II Directive"), cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the Danish Act No. 502 of 23 May 2018 on Data Protection (in Danish: "*Databeskyttelsesloven*") (the "DPA"), cf. section 11(1)(a) of the AML Act.

In addition, personal data relating to political opinions will be processed on the basis of article 9(2)(e) of the GDPR if the personal data have manifestly been made public by the data subject or, if not, based on article 9(2)(g) of the GDPR

as the processing is necessary for the Manager to comply with its anti-money laundering obligations, cf. section 18 of the AML Act.

For natural persons who has the status as semi-professional investors and opt-in professionals;

To ensure compliance with investor protection regulations in the AIFM Act, executive orders issued pursuant hereto, the AIFM Regulation, MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

For the beneficial owners of the legal person as the investor;

The processing is necessary for the pursuit of our legitimate interest in carrying out pre-contractual steps and performance of the contract regarding the investment, assessing the subscription and concluding the subscription application, cf. article 6(1)(f) of the GDPR.

To ensure compliance with EU and national anti-money laundering and financial legislation, namely in relation to documentation, including the AML Act, the AIFM Act, and executive orders issued pursuant hereto, and the AIFM Regulation and the MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

In addition, personal data relating to political opinions will be processed on the basis of article 9(2)(e) of the GDPR if the personal data have manifestly been made public by the data subject or, if not, based on article 9(2)(g) of the GDPR as the processing is necessary for the Manager to comply with its anti-money laundering obligations, cf. section 18 of the AML Act.

For members of the management (either the board of directors of the investor and/or members of the board of management of the investor, as applicable), and individual(s) signing the subscription application on behalf of the investor;

The processing is necessary for the pursuit of our legitimate interest in carrying out pre-contractual steps and performance of the contract regarding the investment to which the legal person is party, assessing the subscription and concluding the subscription application, cf. article 6(1)(f) of the GDPR.

To ensure compliance with EU and national anti-money laundering and financial legislation, namely in relation to documentation, including the AML Act, the AIFM Act, and executive orders issued pursuant hereto, and the AIFM Regulation and the MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

For other contact persons at the investor;

The processing is necessary for the pursuit of our legitimate interest in carrying out pre-contractual steps and performance of the contract regarding the investment to which the legal person is party, assessing the subscription and concluding the subscription application, cf. article 6(1)(f) of the GDPR.

## 2.1.5 Recipients

We may disclose your personal data to the following recipients:

- a) The AIF.
- b) The Danish Business Authority (in Danish: "*Erhvervsstyrelsen*") for registration of owner or beneficial owner.
- c) The Manager's and the AIF's advisors, e.g. Plesner Advokatpartnerselskab in its capacity as legal advisor to the Manager and the AIF, auditors and other advisors, e.g. Ernst & Young, and other professional service providers.
- d) Government bodies e.g. tax authorities and business authorities, including the Danish Financial Supervisory Authority (in Danish: "*Finanstilsynet*"), the Danish Tax Agency (in Danish: "*Skattestyrelsen*"), and regulatory, judicial and legislative bodies.
- e) To certain US corporations requesting information necessary to evaluate requirements related to US withholding taxes.
- f) IT suppliers, e.g. Microsoft, including hosting, backup and support providers, ad hoc translators or external (IT) investigators.
- g) Service providers related to KYC-documentation, costumer due diligence and suitability tests.
- h) GRO Capital International Limited, 12 Hay Hill, London W1J8NR, United Kingdom
- i) GRO Capital International AS, Tjuvholmen Allé 1, 0252 Oslo, Norway

## 2.1.6 *Storage*

We will retain personal data processed for this purpose for as long as it is necessary in order to fulfil the purposes, including to establish, exercise and defend legal claims and to comply with minimum retention periods pursuant to the AML Act, the Danish Consolidated Act No. 249 of 1 February 2021 on Certain Commercial Undertakings (in Danish: "*Lov om visse erhvervsdrivende virksomheder*") as amended from time to time, the Danish Consolidated Act No. 1168 of 1 September 2023 on Public and Private limited Companies (in Danish: "*Lov om aktie- og anpartsselskaber*") as amended from time to time, the Danish Act No. 700 of 24 May 2022 on Bookkeeping (in Danish: "*Lov om bogføring*") as amended from time to time, etc. and executive orders issued hereunder, i.e. generally five (5) years after the end of the year during which the matter ceases or the completion of an isolated transaction.

We will keep information about applicants for up to two (2) years following the last date of contact with the applicants even if the investment is not made.

## 2.2 Investor relationship

### 2.2.1 *Purpose*

We process information regarding investors in order to report to the investors and organize meetings.

### 2.2.2 *Categories of personal data*

We process the following personal data about the investors:

- a) Name, gender, citizenship, email, postal address, and telephone number
- b) Information related to contact and correspondence with the individuals.

### 2.2.3 *Sources*

We collect this personal data directly from you.

### 2.2.4 *Legal basis*



We process your personal data for the pursuit of our legitimate interest, cf. article 6(1)(f) of the GDPR. Our legitimate interest is to be able to communicate with you about the investment.

#### 2.2.5 *Recipients*

We may disclose your personal data to the following recipients:

- a) The AIF.
- b) The Danish Business Authority (in Danish: "*Erhvervsstyrelsen*") for registration of owner or beneficial owner.
- c) The Manager's and the AIF's advisors, e.g. Plesner Advokatpartnerselskab in its capacity as legal advisor to the Manager and the AIF, auditors and other advisors, e.g. Ernst & Young, and other professional service providers.
- d) Government bodies e.g. tax authorities and business authorities, including the Danish Financial Supervisory Authority (in Danish: "*Finanstilsynet*"), the Danish Tax Agency (in Danish: "*Skattestyrelsen*"), and regulatory, judicial and legislative bodies.
- e) To certain US corporations requesting information necessary to evaluate requirements related to US withholding taxes.
- f) IT suppliers, e.g. Microsoft, including hosting, backup and support providers, ad hoc translators or external (IT) investigators.
- g) Service providers related to KYC-documentation, costumer due diligence and suitability tests.
- h) GRO Capital International Limited, 12 Hay Hill, London W1J8NR, United Kingdom.
- i) GRO Capital International AS, Tjuvholmen Allé 1, 0252 Oslo, Norway.

#### 2.2.6 *Storage*

We will retain personal data processed for this purpose for as long as it is necessary in order to fulfil the purposes, including to establish, exercise and defend legal claims and to comply with minimum retention periods pursuant to the AML Act, the Danish Consolidated Act No. 249 of 1 February 2021 on Certain Commercial Undertakings (in Danish: "*Lov om visse erhvervsdrivende virksomheder*") as amended from time to time, the Danish Consolidated Act No. 1168 of 1 September 2023 on Public and Private limited Companies (in Danish: "*Lov om aktie- og anpartsselskaber*") as amended from time to time, the Danish Act No. 700 of 24 May 2022 on Bookkeeping (in Danish: "*Lov om bogføring*") as amended from time to time, etc. and executive orders issued hereunder, i.e. generally five (5) years after the end of the year during which the matter ceases or the completion of an isolated transaction.

We will keep information about applicants for up to two (2) years following the last date of contact with the applicants even if the investment is not made.

### 2.3 General contact

#### 2.3.1 *Purpose*

We process information regarding the investors in order to handle day-to-day questions and handle potential complaints.

#### 2.3.2 *Categories of personal data*

We process the following personal data about the investors:

- a) Information related to contact and correspondence with the individuals.



- b) Complaints from the individuals.

## 2.3.3 Sources

We collect this personal data directly from you.

## 2.3.4 Legal basis

We process your personal data because the processing is necessary for the pursuit of our legitimate interests in communicating with and contacting the investors on a day-to-day basis, handling potential complaints, and establishing, exercising and defending legal claims, cf. article 6(1)(f) of the GDPR.

## 2.3.5 Recipients

The personal data may be disclosed to and shared with the following recipients:

- a) The AIF.
- b) The Danish Business Authority (in Danish: "*Erhvervsstyrelsen*") for registration of owner or beneficial owner.
- c) The Manager's and the AIF's advisors, e.g. Plesner Advokatpartnerselskab in its capacity as legal advisor to the Manager and the AIF, auditors and other advisors, e.g. Ernst & Young, and other professional service providers.
- d) Government bodies e.g. tax authorities and business authorities, including the Danish Financial Supervisory Authority (in Danish: "*Finanstilsynet*"), the Danish Tax Agency (in Danish: "*Skattestyrelsen*"), and regulatory, judicial and legislative bodies.
- e) To certain US corporations requesting information necessary to evaluate requirements related to US withholding taxes.
- f) IT suppliers, e.g. Microsoft, including hosting, backup and support providers, ad hoc translators or external (IT) investigators.
- g) Service providers related to KYC-documentation, costumer due diligence and suitability tests.
- h) GRO Capital International Limited, 12 Hay Hill, London W1J8NR, United Kingdom
- i) GRO Capital International AS, Tjuvholmen Allé 1, 0252 Oslo, Norway

## 2.3.6 Storage

We will retain personal data processed for this purpose for as long as it is necessary in order to fulfil the purposes, including to establish, exercise and defend legal claims and to comply with minimum retention periods pursuant to the AML Act, the Danish Consolidated Act No. 249 of 1 February 2021 on Certain Commercial Undertakings (in Danish: "*Lov om visse erhvervsdrivende virksomheder*") as amended from time to time, the Danish Consolidated Act No. 1168 of 1 September 2023 on Public and Private limited Companies (in Danish: "*Lov om aktie- og anpartsselskaber*") as amended from time to time, the Danish Act No. 700 of 24 May 2022 on Bookkeeping (in Danish: "*Lov om bogføring*") as amended from time to time, etc. and executive orders issued hereunder, i.e. generally five (5) years after the end of the year during which the matter ceases or the completion of an isolated transaction.

We will keep information about applicants for up to two (2) years following the last date of contact with the applicants even if the investment is not made.

## 2.4 General administration

### 2.4.1 *Purpose*

We process the investors personal data in order to manage the AIF for the following purposes:

- a) To document investments;
- b) To carry out and facilitate mandatory auditing;
- c) To comply with legal obligations under the AML Act, e.g. customer due diligence requirements, investigations of suspected irregularities and reporting to public authorities of suspected irregularities;
- d) To comply with the requirements relating to registration of owners and beneficial owners under the Danish Consolidated Act No. 249 of 1 February 2021 on Certain Commercial Undertakings as amended from time to time; and
- e) To obtain advice within legal, tax, financial and other professional services; and

For semi-professional investors and opt-in professionals;

- a) to comply with investor protection rules under financial legislation, including documentation requirements and categorisation under the AIFM Act, any executive orders issued pursuant hereto, and the AIFM Regulation; and
- b) to comply with investor protection rules under financial legislation, including documentation requirements and categorisation under the MiFID II Directive.

### 2.4.2 *Categories of personal data*

We process the following personal data about the investors:

For natural persons who are investors:

- a) Name, gender, citizenship, email, postal address, and telephone number.
- b) Investment application, acceptance or rejection, investments made and bank account information.
- c) Status as a party to the Limited Partnership Agreement.
- d) Investment information (including previous investments, current holdings, portfolio, previous experience, length of time the investor wishes to hold the investment, preferences regarding risk-taking, risk profile and the purpose of the investment).
- e) Transcripts from company registers, articles of association, annual reports, structure charts, and share registers.
- f) Status for investors not qualifying as professional, opt-in professional or semi-professional investor, if informed.
- g) Status as semi-professional investor or opt-in professional investor, if informed.
- h) Information about status as a politically exposed person, including any information about the data subject's political opinions.
- i) National identification number.
- j) Passport copies and/or copies of health insurance cards (which contain national identification numbers or equivalent).
- k) Information about whether the individual has provided the Manager with proof of identity and identity information in accordance with know-your-costumer requirements.
- l) In special circumstances; tax information in relation to FATCA and/or CRS reporting
- m) In special circumstances; information on ownership of assets (including liquid assets and real estate).

For natural persons who has the status as opt-in professionals:

- a) Former and current employment records.
- b) Investment information (including previous investments, current holdings, portfolio, and previous experience).

The beneficial owners of the legal person as the investor:

- a) Name, gender, citizenship, email, postal address, and telephone number.
- b) Information about status as a politically exposed person, including any information about the data subject's political opinions.
- c) Transcripts from company registers, articles of association, annual reports, structure charts, share registers and transcripts from the relevant financial supervisory authority or business authority.
- d) National identification number.
- e) Passport copies and/or copies of health insurance cards (which contain national identification numbers or equivalent).
- f) Information about whether the individual has provided the Manager with proof of identity and identity information in accordance with know-your-customer requirements.
- g) Transcripts from the relevant financial supervisory authority or business authority, if under supervision.

Members of the management (either the board of directors of the investor and/or members of the board of management of the investor, as applicable), and individual(s) signing the sub-scription application on behalf of the investor:

- a) Name, gender, citizenship, email, postal address, and telephone number.
- b) Information related to contact and correspondence with the individual.
- c) Information related to any complaints from and about the individual.
- d) Transcripts from company registers, articles of association, annual reports, structure charts, share registers and transcripts from the relevant financial supervisory authority or business authority.
- e) National identification number.
- f) Passport copies and/or copies of health insurance cards (which contain national identification numbers or equivalent).
- g) Information about whether the individual has provided the Manager with proof of identity and identity information in accordance with know-your-customer requirements.

Other contact persons at the investor:

- a) Name, email address, postal address, and telephone number.

## 2.4.3 Sources

We collect the personal data from the following source(s):

- a) Directly from you.
- b) GRO Capital as the Manager if it already has the information and is permitted to reuse it for the above purposes.
- c) Publicly available information, e.g. from manager registers, financial supervisory authorities and business authorities.
- d) Third party service providers, e.g. service providers used to verify company information.
- e) Mutual third-party acquaintances, e.g. a placement agent.
- f) Banks and other financial institutions.
- g) Other contacts within the potential or actual investors.

## 2.4.4 *Legal basis*

We process your personal data on the following legal bases:

### For natural persons who are investors;

The processing is necessary for the pursuit of our legitimate interest in the performance of a contract to which the natural person is party in terms of documenting investments and facilitating auditing among others, cf. article 6(1)(f) of the GDPR.

To ensure compliance with EU and national anti-money laundering and financial legislation, namely in relation to documentation, including the AML Act, the AIFM Act, and executive orders issued pursuant hereto, and the AIFM Regulation and the MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

In addition, personal data relating to political opinions will be processed on the basis of article 9(2)(e) of the GDPR if the personal data have manifestly been made public by the data subject or, if not, based on article 9(2)(g) of the GDPR as the processing is necessary for the Manager to comply with its anti-money laundering obligations, cf. section 18 of the AML Act.

### For natural persons who have the status as semi-professional investors and opt-in professionals;

To ensure compliance with investor protection regulations in the AIFM Act, executive orders issued pursuant hereto, the AIFM Regulation, and MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

### For the beneficial owners of the legal person as the investor;

The processing is necessary for the pursuit of our legitimate interest in the performance of a contract to which the legal person is party in terms of documenting investments and facilitating auditing among others, cf. article 6(1)(f) of the GDPR.

To ensure compliance with EU and national anti-money laundering and financial legislation, namely in relation to documentation, including the AML Act, the AIFM Act, executive orders issued pursuant hereto, the AIFM Regulation and the MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

In addition, personal data relating to political opinions will be processed on the basis of article 9(2)(e) of the GDPR if the personal data have manifestly been made public by the data subject or, if not, based on article 9(2)(g) of the GDPR as the processing is necessary for the Manager to comply with its anti-money laundering obligations, cf. section 18 of the AML Act.

### For members of the management (either the board of directors of the investor and/or members of the board of management of the investor, as applicable), and individual(s) signing the sub-scription application on behalf of the investor;

The processing is necessary for the pursuit of our legitimate interest in the performance of a contract to which the legal person is party in terms of documenting investments and facilitating auditing among others, cf. article 6(1)(f) of the GDPR.

To ensure compliance with EU and national anti-money laundering and financial legislation, namely in relation to documentation, including the AML Act, the AIFM Act, executive orders issued pursuant hereto, the AIFM Regulation and the MiFID II Directive, cf. article 6(1)(c) of the GDPR.

Further, national identification numbers are processed based on section 11(2)(1) of the DPA, cf. section 11(1)(a) of the AML Act.

For other contact persons at the investor;

The processing is necessary for the pursuit of our legitimate interest, cf. article 6(1)(f) of the GDPR. The legitimate interest pursued is to carry out pre-contractual steps and performance of the contract regarding the investment, assessing the subscription and concluding the subscription application.

#### 2.4.5 *Recipients*

The personal data may be disclosed to and shared with the following recipients:

- a) The AIF.
- b) The Danish Business Authority (in Danish: "*Erhvervsstyrelsen*") for registration of owner or beneficial owner.
- c) The Manager's and the AIF's advisors, e.g. Plesner Advokatpartnerselskab in its capacity as legal advisor to the Manager and the AIF, auditors and other advisors, e.g. Ernst & Young, and other professional service providers.
- d) Government bodies e.g. tax authorities and business authorities, including the Danish Financial Supervisory Authority (in Danish: "*Finanstilsynet*"), the Danish Tax Agency (in Danish: "*Skattestyrelsen*"), and regulatory, judicial and legislative bodies.
- e) To certain US corporations requesting information necessary to evaluate requirements related to US withholding taxes.
- f) IT suppliers, e.g. Microsoft, including hosting, backup and support providers, ad hoc translators or external (IT) investigators.
- g) Service providers related to KYC-documentation, costumer due diligence and suitability tests.
- h) GRO Capital International Limited, 12 Hay Hill, London W1J8NR, United Kingdom
- i) GRO Capital International AS, Tjuvholmen Allé 1, 0252 Oslo, Norway

#### 2.4.6 *Storage*

We will retain personal data processed for this purpose for as long as it is necessary in order to fulfil the purposes, including to establish, exercise and defend legal claims and to comply with minimum retention periods pursuant to the AML Act, the Danish Consolidated Act No. 249 of 1 February 2021 on Certain Commercial Undertakings (in Danish: "*Lov om visse erhvervsdrivende virksomheder*") as amended from time to time, the Danish Consolidated Act No. 1168 of 1 September 2023 on Public and Private limited Companies (in Danish: "*Lov om aktie- og anpartsselskaber*") as amended from time to time, the Danish Act No. 700 of 24 May 2022 on Bookkeeping (in Danish: "*Lov om bogføring*") as amended from time to time, etc. and executive orders issued hereunder, i.e. generally five (5) years after the end of the year during which the matter ceases or the completion of an isolated transaction.

We will keep information about applicants for up to two (2) years following the last date of contact with the applicants even if the investment is not made.

### 3 SPECIAL INFORMATION ON ANTI-MONEY LAUNDERING

The Manager is legally required to examine the background and purpose of all complex and unusually large transactions as well as all unusual patterns of transactions and activities that do not have a clear financial or identifiable lawful purpose in order to determine whether there is any suspicion or any reasonable grounds to assume that such transactions are or have been associated with money laundering or financing of terrorism, cf. section 25 of the AML Act.

If the Manager becomes aware of, suspects or has reasonable grounds to suspect that a transaction, funds or activities are or have been associated with money laundering or the financing of terrorism, it has a duty to notify the authorities without informing you. The same applies if a suspicion arises in connection with an investor's attempt to carry out a transaction or an inquiry from a potential investor wanting to carry out a transaction or an activity. This notification duty is set out in section 26 of the AML Act.

Information, including personal data, may in this context be shared with the following recipients:

- a) The Danish Money Laundering Secretariat (in Danish: "*Hvidvasksekretariatet*") (the "**MLS**"), a unit under the Special Crime Unit (in Danish: "*National enhed for Særlig Kriminalitet*") – for the purpose of fulfilling the notification duty.
- b) The Danish Bar and Law Society (in Danish: "*Advokatsamfundet*") – for the purpose of assessing whether there is a duty to notify the MLS.
- c) Businesses and individuals falling within section 1(1) paras 1-14, 16, 18, 20 and 20-22 of the AML Act on the conditions set out in section 38(6) of the AML Act.
- d) External advisors and investigators assisting the controllers with the investigations.

The notification duty is subject to certain exceptions.

### 4 MANDATORY INFORMATION

When we collect personal data directly from you for the above-mentioned purposes, you provide the personal data to be able to apply for and carry out investments in the AIF and for the Manager to fulfil statutory requirements. You are legally obliged to provide the personal data for the investments and for the fulfilment of the statutory requirements. The consequences of not providing the personal data are that the application cannot be assessed, that the investment cannot be made, and that the Manager cannot perform its services.

### 5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

As part of the processing activities outlined above, we may transfer personal data to third countries (countries outside the EU/EEA) when using data processors and subprocessors. This includes Microsoft Ireland Operations Limited and its subprocessors. We generally process personal data within the EU/EEA but may receive support from subprocessors in third countries. We take significant measures to protect the data.

The third countries we may transfer personal data to include:

- USA (adequacy decision by the European Commission for recipients certified under the EU-U.S. Data Privacy Framework)
- Canada (adequacy decision for recipients under the Canadian Personal Information Protection and Electronic Documents Act)
- United Kingdom (adequacy decision)
- Australia



- Chile
- Hong Kong
- Egypt
- Singapore
- India
- Singapore
- Serbia
- South Africa
- United Arab Emirates
- Israel (adequacy decision)
- China

If the European Commission has not made an adequacy decision, we transfer data based on standard contractual clauses under GDPR Art. 46. You may request a copy by emailing [gk@grocapital.dk](mailto:gk@grocapital.dk).

## 6 YOUR RIGHTS

You have the following rights:

- To request access to, rectification of, or deletion of your personal data.
- To restrict the processing of your personal data.
- To withdraw your consent at any time (without affecting the lawfulness of prior processing).
- To receive your data in a structured, commonly used, machine-readable format and transmit it to another controller (data portability).
- To lodge a complaint with a data protection supervisory authority, such as the Danish Data Protection Agency.
- You also have the right to object to the processing of your personal data:
- When based on GDPR Art. 6.1.f, you may object at any time for reasons related to your particular situation.
- For direct marketing purposes, you have an unconditional right to object.

To exercise your rights, email [gk@grocapital.dk](mailto:gk@grocapital.dk) specifying the rights you wish to exercise. Conditions or limitations may apply, depending on the processing activity.

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