Privacy Policy for Website Visitors, Shareholders and Other External Parties

Last modified on 06-10-2026

Background

This Privacy Policy explains how personal data is processed within the engira group and provides information about the processing activities that may apply depending on your relationship with us.

The purpose of this Privacy Policy is to explain what personal data we collect about you, why we collect it, how we use it, and the rights you have under applicable data protection legislation.

Different entities within the engira group may act as data controller depending on the nature of the processing activity and your relationship with the relevant entity.

Data controllers and contact details

Website visitors

For the operation of our website and the processing of personal data collected through the website, the data controller is:

engira A/S
Kristine Nielsens Gade 5, 8000 Aarhus C
CVR no. 45952614
Email: privacy@engira.com

Shareholders and shareholder relations

For the establishment and administration of shareholder relationships, the data controller is:

engira group A/S
c/o engira A/S
Kristine Nielsens Gade 5, 8000 Aarhus C
CVR no. 45319857
Email: privacy@engira.com

Where personal data is processed by another company within the engira group in connection with a specific relationship, transaction or project, that company may act as an independent data controller for the relevant processing activity.

If you have any questions regarding the processing of your personal data, you may contact us at the contact details above.

Your personal data

We process your personal data in different ways depending on how you interact with us, your relationship with us, and the purpose of the processing. Please see below for further information about the various processing activities.

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1. Visiting our website

Data controller: engira A/S

Purpose

When you visit our website, we only process the information that is technically necessary to make the website and its functions available to you as a user. We do not use cookies or similar tracking technologies for analytics, marketing, or personalisation of content.

Legal basis for processing

The processing of personal data is based on our legitimate interest in making the website's content available and ensuring the stable and secure operation of the website, cf. Article 6(1)(f) of the General Data Protection Regulation (GDPR).

Categories of personal data

When you visit the website, ordinary technical information may be processed, including your IP address and information about your browser, operating system, and the time of your visit, to the extent necessary to ensure the operation, functionality, and IT security of the website.

Recipients of personal data

We may disclose personal data to our data processors in connection with the hosting, operation, and security of the website. Personal data is not disclosed to third-party providers for marketing or analytics purposes, and we do not use third-party cookies.

Retention of personal data

Personal data is only stored for as long as necessary to ensure the operation, security, and administration of the website.

Automated decisions and profiling

The information collected is not used for profiling or making automated decisions.

2. Establishments and registration of the shareholder relationship

Data controller: engira group A/S

Purpose

The purpose is to establish, register, and administer your shareholder relationship, including ensuring your proper identification as a shareholder and recording your ownership.

Legal basis for processing

We process your personal data in order to comply with the contract between us and you as a shareholder (in the form of the Articles of Association of engira group) cf. Article 6(1)(b) of the General Data Protection Regulation (GDPR).

Finally, we process your personal data when we are legally required to do, including the registration of ownership interests in accordance with applicable company law, cf. Article 6(1)(c) of the General Data Protection Regulation (GDPR).

Categories of personal data

We process your identification and contact details, information about your shareholdings, securities account information, and documentation of ownership.

Where the shareholder is a legal entity, we also process information about representatives, persons authorised to sign on behalf of the entity, and beneficial owners.

Recipients of personal data

In connection with the establishment and registration of your shareholding, we may, to the extent necessary to fulfil the purpose, disclose your personal data to public authorities, auditors, and other advisors.

In addition, your personal data may be disclosed to our data processors that provide the IT systems we use in connection with fulfilling the purpose, as well as to affiliated companies within the group, where relevant.

Retention of personal data

Your personal data is stored for as long as the shareholder relationship remains in place and for up to five years thereafter, unless a longer retention period is necessary to comply with applicable legislation.

Automated decisions and profiling

The information collected is not used for profiling or making automated decisions.

3. Completion of share transactions

Data controller: engira group A/S

Purpose

The purpose is to be able to handle changes in ownership, including the purchase, sale and transfer of shares, in connection with updating the relevant registrations.

Legal basis for processing

We process your personal data for the purpose of fulfilling the contract between us and you as a shareholder (in the form of the company's Articles of Association), cf. Article 6(1)(b) of the General Data Protection Regulation (GDPR).

Finally, we process your personal data where we are legally required to do so, including in connection with documenting and registering changes in ownership, cf. Article 6(1)(c) of the GDPR.

In addition, we process your personal data based on our legitimate interest in ensuring the proper administration of ownership matters, cf. Article 6(1)(f) of the GDPR.

Categories of personal data

We process your identification and contact details, information relating to your shareholdings and transactions, as well as information concerning your securities custody account.

Recipients of personal data

In connection with the execution of share transactions, we may, to the extent necessary to fulfil the relevant purpose, disclose your personal data to banks, investment firms, public authorities and external advisers.

In addition, your personal data may be disclosed to our data processors, who provide the IT systems we use for the purpose of fulfilling the relevant purpose

Retention of personal data

Your personal data will be retained for the current financial year plus five years, in accordance with the Danish Bookkeeping Act.

Automated decisions and profiling

The information collected is not used for profiling or making automated decisions.

4. Communication, including shareholder information and newsletters

Data controller: engira group A/S

Purpose

The purpose is to enable communication with you as a shareholder, including the distribution of notices of general meetings, investor information, reporting, and other relevant communications.

Legal basis for processing

We process your personal data for the purpose of fulfilling the contract between us and you as a shareholder (in the form of the company's Articles of Association), cf. Article 6(1)(b) of the General Data Protection Regulation.

Finally, we process your personal data where we are legally required to do so, including in connection with the distribution of statutory notices, cf. Article 6(1)(c) of the General Data Protection Regulation.

In addition, we process your personal data based on our legitimate interest in communicating with our shareholders, cf. Article 6(1)(f) of the General Data Protection Regulation.

Categories of personal data

We process your identification and contact details, as well as information about your role as a shareholder or representative.

Recipients of personal data

In connection with communications, your personal data may be processed by our providers of communication and IT systems.

In addition, your personal data may be disclosed to our data processors that provide the IT systems we use in connection with fulfilling the purposes described above.

Retention of personal data

Your personal data will be retained for as long as your shareholding remains in place and for up to five years thereafter.

Automated decisions and profiling

The information collected is not used for profiling or making automated decisions.

5. Management of associated persons

Data controller: engira group A/S

Purpose

The purpose is to administer and document transactions carried out on behalf of a shareholder and to ensure the proper authorisation and identification of associated persons.

Legal basis for processing

We process personal data based on our legitimate interest in administering shareholder relationships and ensuring the proper documentation of transactions, cf. Article 6(1)(f) of the General Data Protection Regulation.

Finally, we process personal data where we are legally required to do so, cf. Article 6(1)(c) of the General Data Protection Regulation.

Categories of personal data

We process identification and contact details, information about your relationship with the shareholder, and documentation of your authorisation.

Recipients of personal data

The information may be shared internally within the organisation and with relevant data processors.

To the extent necessary to fulfil the purpose, the information may also be disclosed to public authorities.

Retention of personal data

Your personal data will be retained for as long as necessary to document the relationship and for up to five years thereafter.

Automated decisions and profiling

The information collected is not used for profiling or making automated decisions.

Transfer to recipients in third countries

In some cases, it may be necessary to transfer your personal data to recipients in countries outside the EU, including countries without equivalent data protection laws. Such transfers will only take place where necessary for the purposes set out in this Privacy Policy or as required by applicable law. Transfers will only take place as part of our use of data processors for the purpose of providing our services and products.

We take appropriate measures to ensure that your personal data is adequately protected during such transfers. Your data will primarily be processed in countries for which the European Commission has adopted an adequacy decision regarding the level of protection. If your data is transferred to third countries for which no adequacy decision has been adopted, the European Commission-approved Standard Contractual Clauses will be used. You may contact us at the email address provided above to request a copy thereof.

Withdrawal of consent

If you wish to withdraw your consent or object to our processing of your personal data, please contact us at the email address provided above.

Please note that withdrawing your consent does not affect the lawfulness of processing carried out prior to the withdrawal. It also does not affect the processing of your personal data based on another lawful basis, such as compliance with legal obligations or the pursuit of legitimate interests.

Your rights

Under the General Data Protection Regulation (GDPR), you have a number of rights in relation to our processing of your personal data:

- **Right to see information (right of access):** You have the right to access the personal data we process about you, as well as certain additional information**.**
- **Right to rectification:** You have the right to have incorrect information about yourself corrected.
- **Right to data portability:** In certain cases, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to have this data transferred to another data controller.
- **Right to erasure:** In some cases, you have the right to have information about you deleted before the time of our general deletion occurs.
- **Right to restriction of processing:** In certain cases, you have the right to have the processing of your personal data restricted. If you have the right to have the processing restricted, we may in future only process the data – except for storage – with your

consent, or for the purpose of establishing, exercising or defending legal claims, or for the protection of a person or important public interests.

- **Right to object:** In certain cases, you have the right to object to our otherwise lawful processing of your personal data.

Finally, we are obliged to inform any recipient to whom the personal data has been disclosed of any rectification or erasure or restriction of processing, unless this proves impossible or is disproportionately difficult. We will inform you who has received a copy of the personal data if you request it.

If you wish to exercise these rights, please contact us. See contact information above.

Complaint

If you wish to submit a complaint regarding our processing of personal data, please send an email containing the details of your complaint to the email address provided in this privacy policy. We will process your complaint and respond to you.

You also have the right to lodge a complaint with the Danish Data Protection Agency (Datatilsynet) regarding engira's processing of your personal data.

For further information on how to lodge a complaint with the Danish Data Protection Agency, please refer to their website http://www.datatilsynet.dk.