



2018-01-03

## **Norama Alternative Investments AB's Personal Integrity Policy**

The processing of personal data by NORAMA ALTERNATIVE INVESTMENTS AB (NORAMA) is regulated by data protection legislation. The prevailing legislation in this respect is "REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL", of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. The purpose of this policy is to protect individuals' personal integrity when it comes to processing personal data.

### **Policy statement**

Norama takes great care to protect personal information about you and when we use it, we do so with respect for your privacy. Norama do not disclose any non-public personal information about you. We may use personal information about you to service, maintain, and protect your personal interests; respond to inquiries from you or your representative; develop, offer, and deliver information and services; or to fulfill legal and regulatory requirements. To better protect your privacy we have issued this policy which explains our practice and the choices you can make about the way your information is collected and used.

### **Definitions**

#### **Personal data**

Personal data is any piece of information that may be either directly or indirectly associated with an individual, such as name, address, telephone number, email address and national identification number etc.

#### **Cookies**

Cookies are small data files that are placed on your device by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

#### **Personal data**

#### **Handling of personal data**

Norama is responsible for the manner in which Norama handles your personal data. Norama's Chief Operating Officer is responsible for the day-to-day processing of personal data.



Norama considers the protection of personal information to be a foundation of an investor's trust and a sound business practice. We employ physical, electronic and procedural controls and we regularly adapt these controls to respond to changing requirements and advances in technology.

At Norama, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you.

### **The purpose of personal data processing**

The main purpose of Norama's processing of personal data is to fulfil client agreements and to provide clients with the best possible service, follow-up and communication. Moreover, the processing is necessary in order to comply with requirements imposed by laws or agreements with authorities, securities registries and other enterprises (data processors) that process personal data on behalf of Norama. The information may also be used in a marketing purpose.

Personal data forms the basis for Norama's market and client analysis, business- and processes development as well as statistics purposes.

### **Which personal data is processed by Norama?**

Norama records personal data for which the company has a legal and justifiable requirement, for example:

- Client's name, birth registration number (date of birth), contact information and bank account information
- Correspondence with the client.
- Information regarding any legal guardians, beneficiaries and other persons with rights of disposal of accounts, or ID holders for other clients.
- Other personal data that Norama is requested by individuals to process, for example request to send information to prospective clients.

### **How is personal data processed?**

Norama process personal data by collecting, storing and systematizing information.

Norama has established a proprietary address registry, in which clients may opt out of receiving marketing communication. However, clients cannot not refuse to receive information that Norama is legally bound to provide.

### **Disclosure of personal data – Use of partners**

If legislation permits Norama may disclose personal data to external partners to be used within the purposes stated for processing. External partners may be financial institutions, the securities register, addressing and distribution entities as well as other Norama subcontractors. The external partners may not use the personal data for own purposes and may not transfer the personal data to other entities.



## **Marketing**

Personal data may be used for the marketing of Norama's products and services, provided that the client has not opted out of receiving this type of communication.

## **Access – Correction – Deletion**

A client may request information about Norama's processing of personal data related to the client by sending a written and signed communication to Norama. The client may ask for a printout of recorded information, how the information is processed, and security measures implemented for processing, on condition that providing this type of information does not impede security or legal obligations.

A client may further demand that inadequate/incorrect personal data be corrected and unnecessary information deleted.

Personal data is deleted when storing is no longer necessary to fulfil the purpose of the processing or as a consequence of legislation.

The client's consent to the processing of personal data by Norama is voluntary and may be withdrawn at any time. If a client withdraws consent and demands that information be deleted, Norama may, however, no longer be able to fulfil its obligations to the client, and the client relationship may as a result be terminated.

## **Personal data manager/Personuppgiftsansvarig**

Norama has appointed our Chief Operating Officer as responsible for personal data protection. The Chief Operating Officer shall ensure that information is processed in accordance with the applicable law. The personal data manager can be contacted at: [kjell.rudsby@norama.se](mailto:kjell.rudsby@norama.se)

Further information about personal data and data protection on the Data Inspektionen website.

<http://www.datainspektionen.se/dataskyddsreformen/>

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&qid=1473069680789&from=SV>

## **Cookies and similar technologies**

Norama and our third-party service providers may use cookies and similar technologies to support the operation of Norama websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor's computer or mobile device. Cookies help us to collect information about visitors to Norama websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. Norama cookies are also used for security purposes and to personalize your experience, such as customizing your screen layout.



You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when on a Norama website, or if you delete cookies, you may experience some inconvenience in your use of Norama websites. For example, we may not be able to recognize you, your device, or your online preferences.

Both Norama and third-party service providers we hire may use cookies and other technologies, such as web beacons or pixel tags, in online advertising as described below.

## Cookies

(<http://pts.se/>), (<http://www.pts.se/en-GB/>)

We use cookies on our website in order to improve your user experience.

## Why do we use cookies?

We use cookies in order to improve the user experience.

<http://www.datainspektionen.se/dataskyddsreformen/dataskyddsforordningen/>  
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&qid=1473069680789&from=SV>

includes regulations regarding how cookies should be handled and which information users have a right to know, particularly with regard to the storage of information on communication equipment.

## What are cookies?

Cookies are small data files which are sent from our website and stored in your browser – after the website has registered your choices and settings. Cookies are not harmful and do not contain viruses.

## Which cookies do we use – and what are they used for?

Cookies should enhance your user experience on our website, whereby the objective is to:

**Provide personal adjustments:** Recognizing the choices you make on the website, such as which method you prefer to use to log in or which language you prefer. This information is stored until the next time you visit our website.

**Recognize visits** from returning users.

**Recognize the nationality** of our users.

**Register information about your usage:** Using analytical tools, we receive information on how you use the website: which pages you visit, which browser you use, which page you are coming from, etc. This helps us to adapt the website to better suit your needs.

**Allow you to carry out your tasks more quickly:** Among other things, making it easier for you to navigate the site, so that content is downloaded quickly and the pages function as they are meant to.



Provide more relevant marketing: Showing you more relevant adverts and offers on other websites that you visit. This is data based on the content and pages you have visited on our website. They are placed on our website by a third party advertising network on our behalf and with our permission.

### **What should I do?**

The cookie settings on our website are set to "Allow all cookies" in order to provide you with the best possible user experience.

If you consent to these settings, you just need to click "YES" on "I confirm that I am a qualified/well informed/professional investor" and navigate further.

### **What if I don't want cookies?**

You can switch off cookies by changing the settings in your browser. However, please note that some functions on our website will no longer be available to you.

In order to have the best possible user experience, we therefore recommend that you keep the "Allow all cookies" setting.