

# Privacy Policy– Data Security and GDPR

## Introduction

Cibus has established this policy for the protection and processing of personal data (“Policy”) to ensure correct, secure and reliable processing of the personal data in its operations in accordance with laws and regulations currently in force. Customers and suppliers should feel confident that the Company only processes personal data for sound and relevant reasons. This Policy describes which personal data is processed, how it is processed and what measures are taken to protect it.

## Personal data

Personal data is any information relating to an identified or identifiable natural person – for example, name, residence, telephone number, e-mail address or IP address. Information that may be associated with a company or other legal entity is not included in the definition of personal data.

### **1. Personal data controller, personal data processor**

The Company is the personal data controller and therefore responsible for processing personal data.

### **2. Data protection officer**

After an assessment, the Company has decided not to appoint a data protection officer. This decision was based on the fact that the Company i) is not an official agency, ii) does not have operational goals or conduct operations that regularly, systematically or broadly monitor individuals and iii) does not process sensitive personal data or data on crime.

### **3. The personal data that will be processed by the Company**

The Company must ensure that a register is kept of the personal data that the Company processes. Below is a summary of the primary personal data that is processed. The Company does not process any sensitive personal data not specifically named below or in the personal data register.

## Tenants

The Company’s customers consist primarily of the tenants who rent the Company’s premises. Thus, each tenant is a legal entity and the personal data that the Company processes for its tenants is considered limited.

The Company may, depending on the tenant, process the following personal data that can be associated with an individual person:

- Contact information for employees of the tenant and/or its management operations: Name, e-mail address, telephone number, address
- Identifying reference data for employees of the tenant and/or its management operations (in exceptional cases): Name, date of birth, personal identity number or equivalent foreign identification number

The Company may, to some extent, utilise external suppliers or consultants. Normally, no personal data is processed when the service is provided by a company. In exceptional cases, however, personal data may be processed by the service provider’s or the consultant’s employees – for example, in connection with issuing authority.

- Contact details: Name, e-mail address, telephone number, address

- Identifying reference data: Name, date of birth, personal identity number or equivalent foreign identification number

## The Board of Directors and employees

The Company processes personal data for its Board of Directors and related parties as well as employees to the extent it is necessary for fulfilling its commitments, employment or statutory requirements.

The Company processes the following personal data for individuals on the Board of Directors, Employees and, to a limited extent, related parties.

- Contact details: Name, e-mail address, telephone number, address
- Identifying reference data: Name, date of birth, personal identity number or equivalent foreign identification number
- Image and information about education and experience
- Information about holdings of financial instruments in the Company
- Account information: Bank account for payment of Board fees, salaries and other remuneration
- Official reporting: Data to ensure accurate tax reporting, bank account, data required by law, regulations or official authorities. Also includes requirements by the stock exchange or marketplace.

## Holders of financial instruments

The Company uses Euroclear Sweden AB as its securities register center to maintain its shareholders' register in accordance with the Swedish Financial Instruments Accounts Act (1998:1479). The Company processes shareholders' personal data before, during and after general meetings.

- Contact details: Name, e-mail address, telephone number, address
- Identifying reference data: Name, date of birth, personal identity number or equivalent foreign identification number
- Image: Copy of passport or ID card

The Company may also, in exceptional cases, be obligated to inform third parties about the Company's ownership structure and provide identification of the beneficial owner. In such cases, the shareholder's identifying reference data is processed in accordance with the above.

## Individuals registered in the Company's insider logbook

In connection with the Company preparing an insider logbook, the Company is obligated to collect and save certain personal data in accordance with the EU market abuse regulation 596/2014 (MAR). In connection with the preparation of an insider logbook, the Company processes the following personal data.

- Contact details: Name, e-mail address, telephone number, address
- Identifying reference data: Name, date of birth, personal identity number or equivalent foreign identification number

## Use of personal data

The Company's purpose in processing personal data is to be able to administer contractual relationships with its tenants as well as the services and obligations that follow as a result of contracted agreements and legal obligations. Other personal data is processed to the extent the law permits or to which the customer has given their express consent.

For the Company's processing of personal data to have a sound legal basis, at least one of six legal grounds must be fulfilled. These are:

- Consent
- Agreement
- Legitimate interests
- Legal obligation
- Exercise of official authority and information of public interest
- Vital interests

The Company's processing of personal data is based on agreement, legal obligation and/or consent.

Based on this, the Company has identified the following legal grounds for its personal data processing.

### **Tenants**

General information

- Contact information for employees of the tenant and/or its management operations: Agreement
- Identifying reference data for employees of the tenant and/or its management operations (in exceptional cases): Agreement/consent

### **Suppliers**

- Contact details: Agreement
- Identifying reference data: Agreement

### **The Board of Directors and employees**

- Contact details: Agreement/Legal obligation
- Identifying reference data: Agreement/Legal obligation
- Image and information about education and experience: Consent
- Information about holdings of financial instruments in the Company: Legal obligation
- Official reporting: Legal obligation

### **Individuals registered in the Company's insider logbook**

- Contact details: Legal obligation
- Identifying reference data: Legal obligation

### **Shareholders**

- Contact details: Legal obligation
- Identifying reference data: Legal obligation

In the event of a dispute or complaint, it may be necessary to review and present earlier customer communications as evidence during arbitration or general court proceedings. The Company may receive inquiries from regulatory authorities, tax authorities and police authorities demanding the release of personal data and information on customer relationships. In the event of such requests, the Company will provide the requested information to the authority on the grounds of legal obligation.

## **Storage of personal data**

Personal data may not be stored longer than necessary or longer than the period of time stipulated by law or regulations.

| Law                                    | Data                   | Minimum storage period |
|--|------------------------|------------------------|
| <b>The Swedish Accounting Act</b>      | Accounting obligations | 7 years                |
| <b>The Finnish Accounting Act</b>      | Accounting obligations | 6 years                |
| <b>The Norwegian Accounting Act</b>    | Accounting obligations | 5 years                |
| <b>The Danish Accounting Act</b>       | Accounting obligations | 5 years                |
| <b>The Belgium Accounting Act</b>      | Accounting obligations | 10 years               |
| <b>The Neatherlands Accounting Act</b> | Accounting obligations | 10 years               |
| <b>The Luxemburg Accounting Act</b>    | Accounting obligations | 10 years               |

## Sharing of information with third parties and/or outside the EU and EEA

Personal data is only shared with third parties when:

- The Company has a legal obligation to do so – for example, if a crime is suspected or at the request of an authority
- To personal data processors at the start of a processing agreement. Personal data processors may only forward personal data to third parties in accordance with the processing agreement
- When it is necessary to protect the company's interests in the event of a dispute
- Consent has been obtained from the individual regarding their own data

Cibus has outsourced its IT operations to Quality of Services (QOS). Cibus is however responsible for personal data.

## Rights for individuals whose personal data is processed by the Company

Tenants, suppliers, members of the Board of Directors, employees, shareholders or other natural persons for whom the Company processes personal data have the right to access the personal data that the Company has stored about them. The individuals in question also have the right to request that incorrect information be corrected or deleted. In addition, individuals have the right to limit processing and to request data portability (the right to download one's personal data from one device to another).

Objections or requests in accordance with the above will be addressed by the Company. In certain cases, the Company will not be able to grant such objections or requests since the Company may have an obligation to save certain customer information on the basis of the law or regulations. This obligation can result in the Company having neither the right nor the practical ability to delete personal data within the imposed storage period. Inquiries may be submitted in writing to the CFO.

The individuals in question also have the right to complain to the Swedish Data Protection Authority if they believe that the Company's processing of personal data is in conflict with the law.

## Contact information

Questions regarding the Company's processing of personal data should be directed to the Company's CFO.