



## WEBSITE PRIVACY POLICY

At A.P. Møller Capital P/S including its branch, subsidiaries, and affiliates ("A.P. Møller Capital", "we", "us" and "our"), confidentiality and data protection is a high priority. This Privacy Policy explains and sets out the guidelines for our processing of your personal data and provides you with information according to applicable data protection law.

### Data controller

The entity responsible for the processing of your personal information is:

A.P. Møller Capital P/S  
Tuborg Havnevej 15  
2900 Hellerup  
Denmark  
CVR no. 38 28 49 67

### Contact

Feel free to direct any questions regarding our Privacy Policy to us on email:  
[privacy@apmollercapital.com](mailto:privacy@apmollercapital.com).

### Description of our processing

At A.P. Møller Capital, we process personal data for six purposes. Below, we describe the nature of the Personal Data and how we process it in more detail for each of these purposes:

#### 1. *Communicate with you*

In order to communicate with you, we process the following ordinary personal data: your name, email address, telephone number and other contact information. The data is collected either a) directly from you or b) from third parties. Consequently, we may base the processing on either the performance of a contract in accordance with Article 6(1)(b) of the GDPR, Article 10(1)(b) of the DIFC Law No. 5 of 2020 – Data Protection Law ("DPL"), Article 5(1)(b) of the ADGM Data Protection Regulations 2021 ("DPR"), and/or Section 13 read with Section 15 of the Singapore Personal Data Protection Act 2012 ("PDPA") (Deemed Consent by Necessity). Processing may also be based on our legitimate interest in being able to effectively communicate with business partners, third parties and other persons, in accordance with Article 6(1)(f) of the GDPR, Article 10(1)(f) of the DPL, Article 5(1)(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions) and b) other group-entities. We will store personal data as long as it is necessary to fulfil the purposes mentioned.

#### 2. *Third party arrangements*

To enter into contracts, deals and other agreements, business partnerships, consultancy agreements etc. and fulfilling such agreements, including subsequent invoicing, board presentations, etc. we process ordinary personal data such as your name, contact information and personal identification number. The data is collected either a) directly from you, b) from the business we enter into an agreement with (normally your employer) or c) from other group-entities or subsidiaries. Processing is based on Article 6(1)(b) of the GDPR, Article

10(1)(b) of the DPL, Article 5(1)(b) of the DPR, and/or Section 13 read with Section 15 of the PDPA (necessary for the performance of the contract between you and A.P. Moller Capital). Additionally, processing may be required to comply with legal obligations, in accordance with Article 6(1)(c) of the GDPR, Article 10(1)(c) of the DPL, Article 5(1)(c) of the DPR, and/or Section 11(1) of the PDPA (necessary for us to comply with a legal obligation, e.g. relevant bookkeeping and tax laws). Processing may also be necessary for our legitimate interest in being able to communicate with people outside the company, and enter into contracts with other businesses), based on Article 6(1)(f) of the GDPR. Section 11(2) of the Danish Data Protection Act ("DPDA"), Article 10(1)(f) of the DPL, Article 5(1)(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities. We will only store personal data as long as it is necessary to fulfil the purposes mentioned. In general, contact information will be kept as part of the contractual documentation and be deleted in accordance with the Danish Bookkeeping Act, unless the contractual documentation is kept for historical and/or documentation purposes.

### 3. *Due diligence and screenings*

In order to perform due diligence and screen potential investors and investment counterparties, incl. advisors, we process the following ordinary personal data: your name, gender, birth date, personal identification number (CPR-no.), CV, educational information, financial profile, marital status, nationality, next of kin information, performance history and scores, personality traits, contact information, position, duration of employment, and photos. For transaction-related due diligences, we also process ordinary personal data such as employee salaries and Human Resource-files, payroll data and home address. We also process *sensitive personal data* such as racial or ethnic origin, political opinions, philosophical or religious beliefs and trade union membership as well as information about criminal convictions and offences such as violations of laws subject to criminal liability as found on international sanctions and screening databases. The data is collected either a) directly from you, b) from the company we enter into an agreement with (normally your employer), c) from other group-entities or subsidiaries, d) from the companies that are part of a transaction, e) from third parties and service providers, including providers of screening-services, f) from public authorities or g) from public sources, such as social media profiles, search engines and various other media. The data is processed based on Article 6(1)(f) of the GDPR, Article 10(1)(f) of the DPL, Article 5(1)(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA (necessary for the pursuit of legitimate interests, e.g. A.P. Moller Capital legitimate interest in performing due diligences and screenings as part of transactions, engagement with counterparties and/or onboarding of new investors). Processing of publicly available sensitive data is based on Article 9(2)(c) of the GDPR, Article 11(1)(c) of the DPL, Article 6(1)(c) of the DPR, and/or Section 17 of the PDPA (the information has manifestly been made public by the data subject), Section 8(3) of the DPDA (as our processing clearly overrides the interests of the data subject) and/or Section 11(2) of the DPDA. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions) and b) other group-entities. We will store personal data as long as it is necessary to fulfil the purposes mentioned. Personal data kept as part of due diligence reports and screenings will be deleted when no longer needed, which means a) once the project is no longer in the pipeline and/or has been abandoned, or b) no longer than 5 years after the project has been executed (following exit). Some information may be kept for a longer period of time in specific cases, e.g. when we need to retain data to document certain decisions etc.

### 4. *Compliance*

In order to comply with legal and other requirements related to book keeping, tax, reporting

etc and to meet requests from government or other public/regulatory authorities, we process three categories of ordinary personal data: a) payment/money transfer data (bank account and credit card number, payment of invoices, transfer of money), b) personal details and contact information (e.g. name and surname, gender, date of birth, e-mail and telephone details, home address, personal identification number (CPR-no.) etc.) and c) AML and KYC information (e.g. driver license number, passport number, information on who the owners of the company are etc.). The data is collected either a) directly from you, b) from the business we enter into an agreement with (normally your employer) or c) from other group-entities or subsidiaries. It is processed based on Article 6(1)(c) of the GDPR, Article 10(1)(c) of the DPL, Article 5(1)(c) of the DPR, and/or Section 11(1) of the PDPA (necessary for A.P. Moller Capital to comply with a legal obligation, including the Danish Bookkeeping Act and applicable tax legislation). Processing may also be based on legitimate interests under Article 6(1)(f) of the GDPR, Section 11(2) of the DPDA, Article 10(1)(f) of the DPL, Article 5(1)(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA (necessary for the pursuit of legitimate interests of A.P. Moller Capital, e.g. our legitimate interest in ensuring compliance with applicable laws) and/or Section 11(2) of the DPDA. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities such as the Danish Financial Supervisory Authority and the Danish tax authorities (SKAT). We will store personal data as long as it is necessary to fulfil the purposes mentioned and to fulfil any legal requirements. Bookkeeping records will be kept for 5 years + running financial year as required under the Danish Bookkeeping Act. AML and KYC information will be kept in accordance with relevant laws and regulations on anti-money laundering, e.g. the Danish Money Laundering Act.

#### 5. *Monitoring*

In order to monitor compliance with internal policies or applicable laws, we process two categories of ordinary personal data: a) payment/money transfer data (bank account and credit card number, payment of invoices, transfer of money) and b) personal details and contact information (e.g. name and surname, gender, date of birth, e-mail and telephone details, home address, copy of passport including personal identification number (CPR-no.) etc.). The data is collected either a) directly from you or b) from other group-entities or subsidiaries, and processed based on Article 6(1)(b) of the GDPR (necessary for the performance of the contract between you and A.P. Moller Capital), Article 6(1)(c) of the GDPR (necessary for A.P. Moller Capital to comply with a legal obligation), Article 6(1)(f) of the GDPR (necessary for the pursuit of legitimate interests of A.P. Moller Capital, e.g. our legitimate interest in monitoring compliance with internal policies and laws) and/or Section 11(2) of the DPDA. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities. We will store personal data as long as it is necessary to fulfil the purposes mentioned and fulfil any legal requirements. Bookkeeping records will be kept for 5 years + running financial year as required under the Danish Bookkeeping Act. KYC-information will be kept in accordance with relevant laws and regulations on anti-money laundering, e.g. the Danish Money Laundering Act.

#### 6. *Whistleblower scheme*

As part of our whistleblower scheme, which allows for reporting violations of various laws and regulations, we process the following ordinary personal data: your name, position, superior, contact information, photos, description of conduct. We also process information about criminal convictions and offences such as violations of laws subject to criminal liability. The data is collected either a) directly from you, b) from other group-entities or subsidiaries or c) from others reporting through the whistleblower scheme, and processed based on Article 6(1)(f) of

the GDPR, Article 10(1)(f) of the DPL, Article 5(1)(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA (necessary for the pursuit of legitimate interests of A.P. Møller Capital, e.g. our legitimate interest in ensuring that all activities involving the firm comply with the applicable law), and/or Section 8(3) of the DPDA, as our processing clearly overrides the interests of the data subject. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities. We will store personal data as long as it is necessary to fulfil the purposes mentioned. The time period - for which the information is stored - depends on how long the specific case is active and/or pending. Information related to specific cases are deleted as soon as the case has been concluded. In most cases this will be within a fairly short time span, e.g. 1 year. However, it is possible that a specific case may result in the termination of an employee's employment, in which case the reasons for the termination will be deleted after 5 years from the termination of the employment, unless there are special reasons for a longer retention period. This retention period is based on guidelines from the Danish Data Protection Agency.

We will also process your personal data when you apply for a job at A.P. Møller Capital. Such processing will take place in accordance with our Privacy Policy for job applicants [here](#).

### **Transfers to countries outside the EU/EEA**

In some cases, we will transfer personal data to our branch located in the Dubai International Financial Centre (Dubai, United Arab Emirates), or our subsidiaries located in the Abu Dhabi Global Markets (Abu Dhabi, United Arab Emirates) and Singapore. Such transfers will only take place for the specific purposes mentioned above and we will always ensure that appropriate safeguards are in place, using the relevant standard contractual clauses together with any supplementary measures assessed as necessary, or any other contractual agreement approved by the competent authorities. You may obtain a copy of the contract/agreement by sending us an email to [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com).

### **Your rights**

In relation to our processing of your personal data, you have the right to:

- Request access to and rectification or erasure of your personal data
- Object to the processing of your personal data and have the processing of your personal data restricted
- Object to the processing of your personal data for direct marketing purposes
- Withdraw your consent at any time, if our processing of your personal information is based on your consent. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent by sending a request to [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com).
- Receive your personal information in a structured, commonly used and machine-readable format (data portability).

You may always lodge a complaint with the relevant data protection supervisory authority:

- The Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, e-mail [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)
- A.P. Møller Capital P/S (DIFC Branch): DIFC Commissioner of Data Protection, The Gate Building, Dubai International Financial Centre, Dubai, United Arab Emirates, telephone +971 4 362 2222, e-mail [commissioner@dp.difc.ae](mailto:commissioner@dp.difc.ae)

- A.P. Møller Capital (ME) Ltd: Commissioner of Data Protection, ADGM Building, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates, telephone number +971 2 333 8888, e-mail Data.Protection@adgm.com
- A.P. Møller Capital (Singapore) Pte. Ltd.: Personal Data Protection Commission, 10 Pasir Panjang Road, #03-01 Mapletree Business City, Singapore 117438, telephone +65 6377 3131, online form

You can take steps to exercise your rights by sending an email to [privacy@apmollercapital.com](mailto:privacy@apmollercapital.com).

There may be conditions or limitations on these rights. It is therefore not certain, for example, that you have the right of data portability in the specific case. This depends on the specific circumstances of the processing activity.

*Last updated: May 2025*