INVESTOR PRIVACY NOTICE

This Privacy Notice explains how A.P. Møller Capital P/S and its relevant branch, subsidiaries, and affiliates (together "A.P. Moller Capital", "we", "us" and "our") process your personal data when you interact with us as an existing or prospective investor, investor representative, beneficial owner, authorised signatory or other individual connected with an investor or prospective investor.

Data controller

The A.P. Moller Capital entity responsible for the relevant fund, investment vehicle, investor relationship or related activity will normally be the data controller responsible for the processing of your personal data under this Privacy Notice. A.P. Møller Capital P/S, including its branch office, may also process personal data for central administration, investor relations, compliance, reporting and other group support purposes, where relevant.

Contact

For questions about this Privacy Notice or the processing of your personal data, please contact:

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

How we use your personal data

We collect and process personal data about you to assess and onboard prospective investors, manage subscriptions and investor relationships, carry out AML/KYC, sanctions, tax, regulatory, conflicts of interest, due diligence and other compliance checks, administer funds and investments, communicate with investors and their representatives, process payments and distributions, maintain records, respond to investor requests, provide investor reporting, and comply with our legal, regulatory and internal governance obligations.

Categories of personal data

Depending on the relevant purpose, your relationship with the investor or prospective investor, and the circumstances, we may collect and process the following categories of personal data about you:

- Contact details, such as name, address, email address, telephone number, job title, organisation and other contact information
- Identification and verification information, such as date of birth, nationality, place of birth, copies of passport or other identification documents, photographs, signature, national identification number or equivalent, and proof of address
- Investor and relationship information, such as your role or relationship with an investor or prospective investor, authorised signatory status, power of attorney, board or management role, ownership or control information, beneficial ownership information, investment interest, commitment information and investor communications

- Tax information, such as tax residency, tax identification number, FATCA, CRS or similar tax classification and reporting information
- Banking, payment and distribution information, such as bank account details, payment instructions and transaction records
- AML/KYC, sanctions, politically exposed person ("PEP"), adverse media, criminal activity, criminal convictions and offences, regulatory enforcement, fraud, money laundering, terrorist financing, tax evasion, conflicts of interest, source of funds, source of wealth, due diligence and other compliance screening information, where relevant and required or permitted by applicable law
- Information contained in subscription documents, investor questionnaires, declarations, confirmations, correspondence, meeting notes, due diligence materials and other documents or communications provided to or received by us
- Technical and communication data generated when you communicate with us or use portals, platforms or other systems made available in connection with the investor relationship, where relevant

This Privacy Notice may apply to personal data about individual investors and, where an investor or prospective investor is a legal entity, personal data about individuals connected with that entity, including representatives, directors, officers, employees, authorised signatories, beneficial owners, controllers, trustees, settlors, beneficiaries, advisers, agents and other relevant individuals.

Sources

We normally collect personal data directly from you, the investor or prospective investor, or persons acting on behalf of the investor or prospective investor. We may also collect personal data from other A.P. Moller Capital entities, affiliates, fund administrators, depositaries, banks, payment providers, AML/KYC, sanctions and screening providers, public registers, public sources, business partners, advisers, regulators, authorities or other third parties, where relevant and required or permitted by applicable law.

Legal basis

Depending on the relevant A.P. Moller Capital entity, jurisdiction and processing activity, the data protection laws that may apply include the EU General Data Protection Regulation ("GDPR"), the Danish Data Protection Act ("DDPA" or "Databeskyttelsesloven"), DIFC Law No. 5 of 2020 – Data Protection Law ("DPL"), the ADGM Data Protection Regulations 2021 ("DPR"), Moroccan Law No. 09-08 relating to the protection of individuals with regard to the processing of personal data, and the Singapore Personal Data Protection Act 2012 ("PDPA"), in each case as amended from time to time.

The legal basis for processing your personal data will usually be one or more of the following, depending on the relevant processing activity and the entity involved:

- performance of a contract or taking steps prior to entering into a contract with you or the investor or prospective investor you represent, where relevant (Article 6(1)(b) of the GDPR, Article 10(b) of the DPL, Article 5(b) of the DPR, and/or Section 13 read with Section 15 of the PDPA);
- compliance with legal and regulatory obligations, including AML/KYC, sanctions, tax, regulatory reporting, recordkeeping and other obligations applicable to A.P. Moller Capital, its funds or investment vehicles (Article 6(1)(c) of the GDPR, Article 10(c) of the DPL, Article 5(c) of the DPR, and/or Section 11(1) of the PDPA);

- our legitimate interests in assessing and onboarding investors, managing investor relationships, administering funds and investments, carrying out relevant compliance and due diligence checks, preventing fraud and financial crime, managing conflicts of interest, protecting our business, maintaining records, responding to investor requests and managing related business operations (Article 6(1)(f) of the GDPR, Section 11(2) of the DDPA, Article 10(f) of the DPL, Article 5(f) of the DPR, and/or First Schedule, Part 3, Paragraph 1 of the PDPA); and
- your consent, where consent is required under applicable law (Article 6(1)(a) of the GDPR, Article 10(a) of the DPL, Article 5(a) of the DPR, and/or the consent provisions of the PDPA).

Special category personal data and criminal offence data

We carry out screening on all investors and, where relevant, related individuals such as beneficial owners, controllers, directors, officers, authorised signatories, representatives and other persons connected with an investor. This screening may include sanctions, politically exposed person ("PEP"), adverse media, criminal activity, criminal convictions and offences, regulatory enforcement, fraud, money laundering, terrorist financing, tax evasion or similar financial crime and compliance-related information.

We do not normally seek to collect special category personal data from investors. However, special category personal data may be included incidentally in screening results, public sources, adverse media, due diligence materials or information provided to us. We will only process such data where required or permitted by applicable law and where we have an appropriate legal basis and any additional condition required under applicable law.

We process criminal offence data and related screening information only where required or permitted by applicable law and where there is an appropriate legal basis and any additional condition or safeguard required under applicable law. This may include processing necessary for compliance with AML, sanctions, tax, regulatory or other legal obligations, or for our legitimate interests in assessing and managing financial crime, regulatory, reputational and investment-related risks.

Sharing of your personal data

We share your personal data with affiliates, service providers and vendors that support our investor, fund administration, compliance and business operations, including fund administrators, depositaries, banks, payment providers, AML/KYC, sanctions and screening providers, IT and cloud service providers, investor portal providers, professional advisers, auditors and tax advisers; relevant A.P. Møller Capital group entities; and external advisers, regulators, authorities, courts, law enforcement bodies or other third parties where disclosure is required or permitted by law.

Transfers to countries outside the relevant jurisdiction

During the investor relationship, we may transfer personal data to countries outside the jurisdiction in which it was originally collected, including the United Arab Emirates (including DIFC and ADGM), Morocco and Singapore. Such transfers will only take place for the purposes described in this Privacy Notice and where appropriate safeguards or other valid transfer mechanisms are in place under applicable data protection law.

Where we receive a request for disclosure from a public authority, law enforcement body or regulator, we will assess the request in accordance with applicable data protection laws.

Where required, transfers will be protected by an adequacy decision or equivalent recognition, standard contractual clauses or equivalent safeguards, an intra-group data sharing arrangement, or another lawful transfer mechanism recognised under applicable law.

You may request further information about the relevant transfer mechanism by contacting us at privacy@apmollercapital.com.

Retention and deletion of your personal data

We retain your personal data for as long as necessary for the purposes described in this Privacy Notice and in accordance with applicable legal, regulatory and internal retention requirements.

Personal data processed in connection with investor onboarding, AML/KYC, sanctions, tax, regulatory, fund administration and investor relationship purposes will generally be retained for the period necessary to manage the relevant investor relationship and to comply with applicable legal, regulatory and internal retention requirements.

Some information may be kept for a longer period in specific cases, for example where we need to retain data to document decisions, comply with legal or regulatory requirements, respond to requests from regulators or authorities, or establish, exercise or defend legal claims.

Personal data will be deleted or anonymised when it is no longer required for the relevant purpose and the applicable retention period has expired, unless deletion is suspended because of a legal or regulatory hold.

Mandatory information

Certain personal data is required for investor onboarding, AML/KYC, sanctions, tax, regulatory, fund administration, payment, reporting or other investor-related purposes. If required information is not provided, we may not be able to assess or accept an investment, onboard or maintain an investor relationship, process subscriptions, payments or distributions, provide investor services or reporting, or comply with our legal or regulatory obligations.

Your rights

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

- Request access to your personal data and request that inaccurate personal data be corrected or, where applicable, erased.
- Object to the processing of your personal data and request restriction of processing, where applicable.
- Object to the processing of your personal data for direct marketing purposes.
- Withdraw your consent at any time where processing is based on your consent. Withdrawal of consent will not affect the lawfulness of the processing carried out before that withdrawal. You may withdraw your consent by contacting us at privacy@apmollercapital.com.
- Receive your personal data in a structured, commonly used and machine-readable format, and where applicable, request transmission of that data to another controller (data portability).
- You may always lodge a complaint with the relevant data protection supervisory authority.

Relevant supervisory authorities include:

- A.P. Møller Capital P/S: The Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, email 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, email commissioner@dp.difc.ae. Individuals may also bring claims directly before the DIFC Courts.
- A.P. Møller Capital (ME) Ltd: ADGM 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, email data.protection@adgm.com.
- A.P. Moller Capital Morocco S.A.: Commission Nationale de contrôle de la protection des Données à caractère Personnel (CNDP), Avenue Al Arz, Secteur 4, M1, Hay Riad, Rabat, Morocco, telephone number +212 537 57 11 24 / +212 537 57 21 41, email contact@cndp.ma.
- A.P. Moller Capital (Singapore) Pte. Ltd.: Personal Data Protection Commission, 10 Pasir Panjang Road, #03-01 Mapletree Business City, Singapore 117438, telephone +65 6377 3131, online complaint form.

You may exercise your rights by contacting us at privacy@apmollercapital.com.

These rights are not absolute and may be subject to conditions, limitations or exemptions under applicable law. Whether a particular right applies will depend on the circumstances of the specific processing activity.

Further information about the specific legal bases relied on for particular processing activities can be provided on request.

Last updated: 16 July 2026