



WEBSITE PRIVACY NOTICE

This Privacy Notice explains how A.P. Møller Capital P/S and its relevant branch, subsidiaries and affiliates (together "A.P. Møller Capital", "we", "us" or "our") process your personal data when you visit our website, contact us, or otherwise interact with us through our website.

Data controller

A.P. Møller Capital P/S will normally be the data controller responsible for the processing of your personal data under this Privacy Notice. Where another A.P. Møller Capital entity processes personal data for its own purposes, that entity may also be a controller.

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

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 operate, maintain and secure our website, respond to enquiries and other communications, provide information about A.P. Møller Capital and our activities, manage basic business communications and relationships, and comply with legal, regulatory and internal governance obligations that apply to those activities.

Where your interaction with us relates to a specific context, such as an investment relationship, recruitment process, employment relationship or whistleblowing report, the relevant separate privacy notice will apply.

Categories of personal data

Depending on how you interact with us, we may collect and process the following categories of personal data about you:

- Contact details, such as name, email address, telephone number, job title, organisation and other contact information
- Information you provide when you contact us, submit an enquiry or otherwise communicate with us
- Business relationship information, such as your organisation, role and relationship with A.P. Møller Capital

- Technical website data, such as IP address, browser type, device information, operating system, website usage data, access logs and security logs
- Cookie or similar technology data, where relevant

We do not normally seek to collect special category personal data through our website. If you nevertheless provide such data, for example in an enquiry or communication to us, we will only process it where we have an appropriate legal basis and any additional condition required under applicable law.

Other privacy notices

This Privacy Notice applies to our website and general website-related interactions. Other privacy notices may apply where your interaction with us relates to a specific context (available on our website).

If you interact with us as an existing or prospective investor, investor representative, beneficial owner, authorised signatory or other relevant individual connected with an investor, our Investor Privacy Notice will apply to processing carried out in connection with investor onboarding, AML/KYC, sanctions screening, fund administration, investor reporting and the ongoing investor relationship.

If you apply for a role with A.P. Moller Capital, our Recruitment Privacy Notice will apply to processing carried out in connection with the recruitment process.

If you are employed or engaged by A.P. Moller Capital, our Employee Privacy Notice will apply to processing carried out in connection with your employment or engagement.

If you submit or are involved in a whistleblowing report, our Whistleblower Privacy Notice will apply to processing carried out in connection with that report and any related investigation or follow-up.

Sources

We normally collect personal data directly from you when you visit our website, contact us or otherwise interact with us. We may also collect personal data from your organisation, other A.P. Moller Capital entities, affiliates, service providers and vendors, public sources, business partners, advisers 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 organisation you represent, where relevant;
- compliance with legal and regulatory obligations;
- our legitimate interests in operating, maintaining and securing our website, responding to enquiries, communicating with website users and business contacts, managing basic

business relationships, maintaining business records, protecting our website and business from misuse or security threats, and managing related business operations; and

- your consent, where consent is required under applicable law, for example for non-essential cookies or similar technologies.

Website, cookies and similar technologies

We process technical website data, access logs, security logs and cookie or similar technology data to operate, maintain and secure our website, understand how our website is used, manage access, detect and investigate security incidents, and improve website functionality and user experience.

We may use strictly necessary cookies or similar technologies to make the website work. Where we use non-essential cookies, analytics tools or similar technologies, we will obtain consent where required under applicable law. Further information may be provided in our Cookie Policy or cookie settings, where applicable.

Sharing of your personal data

We share your personal data with affiliates, service providers and vendors that support our business operations, including IT and cloud service providers, website hosting providers, technical support providers and, where relevant, analytics providers; relevant A.P. Møller Capital group entities; and external advisers, regulators, authorities or other third parties where disclosure is required or permitted by law.

Transfers to countries outside the relevant jurisdiction

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 where necessary for the specific 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.

Website logs, security logs and technical data are retained for the period necessary to operate, maintain and secure the website, manage incidents and protect our systems and business.

Enquiries and business communications are retained for as long as necessary to respond to the enquiry, manage the relevant relationship and maintain appropriate business records.

Some information may be kept for a longer period in specific cases, for example where we need to retain data to comply with legal or regulatory requirements, or to 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.

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 of your personal data, 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 (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: 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