DATA POLICY

1. Purpose

This policy is established in accordance with:

a) 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 the free movement of such data (General Data Protection Regulation, "**GDPR**"),

b) Lov om supplerende bestemmelser til forordning om beskyttelse af fysiske personer i forbindelse med behandling af personoplysninger og om fri udveksling af sådanne oplysninger (**LOV no. 502 of 23/05/2018,** "**Databeskyttelsesloven**"),

c) Bekendtgørelse om krav til information og samtykke ved lagring af eller adgang til oplysninger i slutbrugeres terminaludstyr (**LOV no. 1148 of 09/12/2011,** "**Cookiebekendtgørelsen**"),

d) Bekendtgørelse af lov om fondsmæglerselskaber og investeringsservice og -aktiviteter (**LBK no. 232 of 01/03/2024**), &

e) Bekendtgørelse om sædvanlige kundeoplysninger i finansielle virksomheder (**BEK no. 816 of 27/06/2007**).

The purpose of this policy is to ensure that Fondsmæglerselskabet CABA Capitals ("the Company") processing of personal and confidential data is secure and that disclosure of customer information complies with applicable laws and regulations. The policy also aims to protect end-users of the Company's website against unauthorized storage and disclosure of their personal data.

The requirements in this policy apply to all processing activities involving personal data and confidential information by the Company, whether performed by employees of the Company or by partners with whom a data processing agreement has been entered into. This includes all information obtained through contact with the Company. The policy applies to all employees, consultants, and the board of the Company.

The board will assess and update this policy continuously and at least once a year. The policy is effective until changed by the board.

2. Personal Data

Personal data refers to any type of information about an identified or identifiable human being. This includes, for example, name, address, telephone number, and email address. The essential criterion for determining whether information is considered personal data is whether it can be attributed to an individual. In contrast, an anonymized information such as the number of end-users on a website is not considered personal data.

3. Special categories of person data

It is strictly prohibited to process special categories of personal data as defined in GDPR, article 9 (1).

4. Confidential Information

In this policy confidential information is defined as information that is of such a nature that, according to the general perception in society, it should be kept from public knowledge, or when it is designated as such by law or other valid provision, or when it is otherwise necessary to keep the information confidential to protect significant public or private interests.

Confidential information may include income and asset information, employment, and educational information.

It is strictly prohibited to disclose confidential information without prior written consent.

5. Ordinary Customer Information

Ordinary customer information in financial businesses is defined in BEK no. 816 of 27/06/2007.

Ordinary customer information must be processed according to the same principles as confidential information.

6. Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

7. General Guidelines

In accordance with LBK no. 232 of 01/03/2024 §114, people associated with the Company may not improperly disclose or exploit confidential information that they have become aware of in the course of their duties.

The Company's board emphasizes that all employees and persons associated with the Company have the necessary knowledge of relevant legislation and internal guidelines, and that all employees and persons associated with the Company act professionally and loyally towards both the Company, its customers, partners and the funds' investors. The management must therefore ensure that all employees are familiar with the Company's policy and business practices for the area.

8. Purpose of Processing Personal Data

Depending on the registered individual's interactions and association with the Company, and the permissions granted to the Company, the Company processes confidential information and personal data for the following purposes:

a) Administrations of contractual agreements
b) Handling of questions, complaints, or general inquiries
c) Communication regarding investment funds in which the registered individual has invested, for the purpose of fulfilling contractual obligations, legal and regulatory requirements.
d) Marketing of investment funds
e) Administration of the Company's website
f) Compliance with applicable laws and other regulatory and administrative purposes, particular in accordance with anti-money laundering regulations.
g) Monitoring and enforcing the Company's and employees' compliance with internal policies and guidelines, regulatory and legislative requirements, for example, in relation to the Market Abuse Regulation (MAR) and MiFID II.
h) Administration of whistleblower system and processing of received reports (see separate policy).

To initiate new processing purposes, it is necessary to obtain approval from both the Compliance Officer and the DPO.

9. Purpose of Processing Confidential Data

The Company process confidential data for the following purposes:

a) Administration of employment
b) Ensure compliance with applicable laws and other regulatory and administrative purposes, especially in accordance with the Anti-Money Laundering Act

GDPR does not describe confidential information, but it must be treated according to the same principles as personal information.

The Company may process the following confidential information:

a) Income and asset information
b) Education, criminal, and career records
c) illness and accident information

d) CPR-numbers (Danish Civil Registration Number)

10. Legal Basis for Processing

The Company only processes personal data to the extent that there is a legal basis for processing.

The Company processes confidential information and personal data with the following legal bases:

a) Bekendtgørelse af lov om fondsmæglerselskaber m.v. (LBK no. 232 of 01/03/2024)
b) Hvidvaskloven (LOV no. 316 of 11/03/2022)
c) Bogføringsloven (LOV no. 700 of 24/05/2022)
d) Databeskyttelsesloven (LOV no. 502 of 23/05/2018)
e) EU General Data Protection Regulation (GDPR)
f) EU Market Abuse Regulation (MAR)
g) Skatteindberetningsloven (LOV no. 1754 of 30/08/2021)
h) Lov om beskyttelse af whistleblowere (LOV no. 1436 of 29/06/2021)
i) Laws and regulations on capital markets

The Company may process personal data cf. GDPR, Article 6 (1)(f). This could include investment services and direct marketing. The Company only processes personal data under this legal basis if the Company's legitimate interests outweigh the interests or rights and freedoms of the registered.

11. Deletion Deadline

The Company may only process personal information for as long as it is necessary for the purposes for which the information is processed. The only exception to this is if there is legislation that obligates the Company to continue processing.

When processing of personal information is no longer necessary it must be deleted according to the following deletion deadlines or anonymized.

Data	Legal Basis	Deletion Deadline
Administration of contractual agreements	GDPR, Article 6, (1)(b)	3 years after termination
Accounting information	LOV no. 700 of 24/05/2022, §10 (1).	Must be kept for at least 5 years from the end of the accounting year to which the material relates.
Service reporting about developments in the funds and marketing	GDPR, Article 6, (1)(a) and (f)	Until redemption or consent withdrawal
Documentation for performed services, activities, and transactions in relation to dissemination of orders.	BEK No. 921, 26/06/2017, §10, (10)	Must be kept for a minimum of 5 years. If the Danish Financial Supervisory Authority requests it, the documentation must be kept for up to 7 years.
Employment contracts	LOV 1238 of 09/11/2015, §4, (1)	5 years after leaving the Company.
KYC documentation (AML)	LOV no. 316 of 11/03/2022, §30, (3)	Must be kept for at least 5 years after the termination of the business relationship or the completion of the individual transaction. Personal data must be deleted 5 years after the termination of the business relationship or an individual transaction, unless otherwise provided by other legislation.
Job applications	GDPR Article 6, (1)(b)	6 months after receipt

12. Disclosure of information

The Company do not share confidential or personal data with third parties for the purpose of conducting business.

Prohibition against disclosure

Pursuant to LBK no. 232 of 01/03/2024, §115, the Company may disclose ordinary customer information, as defined in BEK no. 816 of 27/06/2007, for the purpose of conducting administrative tasks.

The Company only disclose information about the data subject to public authorities when required by law or a court decision cf. GDPR Article 6(1)(c) and (e).

The Company only disclose customer information to business partners with the customer's prior written consent, which will be obtained through the customer's signature on the agreement with the Company.

When disclosing customer information to business partners, the Company must observe the following rules:

a) Confidential information may only be disclosed for the purpose of allowing business partners to perform their tasks in accordance with entered agreements.
b) Only the following types of information may be disclosed to business partners:
    1. Personal and company information
    2. Information about custody and account relations
    3. Information about the customer's advisors
    4. Information about the managed assets
    5. Information about the customer's risk preference and return expectations.
    6. Relevant tax information
    7. Any corporation information
    8. Any information about limitations on investment scope (Risk, SRI, etc.)
    9. Other relevant information related to the Company's or business partners' specific task.

The data subject may withdraw their consent for information disclosure at any time. In this case, the Company may only disclose customer information if the following applies:

a) Disclosure is necessary for the fulfilment of a contract to which the Company is a party, or for the implementation of measures taken at the customer's request before the conclusion of such a contract.
b) Disclosure is necessary to comply with a legal obligation imposed on the Company.
c) Disclosure is necessary to protect the customer's vital interests.
d) Disclosure is necessary for the execution of a task in the public interest.
e) Disclosure is necessary for the execution of a task that falls within the exercise of public authority assigned to the Company or a third party to whom the information is disclosed.
f) Disclosure is necessary for the Company or the third party to whom the information is disclosed to pursue a legitimate interest, and the interests of the data subject do not override this interest.

As per the provisions outlined in §15 of LOV no. 1754 of 30/08/2021 and §32 of BEK no. 888 of 15/06/2020, the Company is required to disclose information to the Danish Tax Agency regarding commissions or similar payments passed on to customers or investors.

13. Cookies

The Company use cookies on the website www.cabacapital.dk. The Company's use of cookies is subject to change. Information about the currently implemented cookies can be located here.

The Company do not share information from cookies.

The Company have implemented software from Cybot A/S to ensure all legal requirements regarding cookies are met.

14. Social media

The Company's website contains social media features and widgets. These features may collect IP addresses and use cookies if users activate them.

Social media features and widgets are either hosted by a third party or hosted directly on the Company's website. Interactions with these features are subject to the privacy policy of the company that offers them.

15. User administration of cookies

At the bottom of the website, there is a link to a subpage where the currently implemented cookies can be located. Users can also withdraw their consent and find information about the cookies used on the same subpage.

16. Data Security

The Company has a responsibility to guarantee that appropriate technical and organizational security measures are in place to prevent unauthorized third parties from accessing personal data.

To fulfil this obligation, the Company has outsourced its IT function to a provider who is contractually obligated to safeguard personal data by implementing robust security measures.

Moreover, the Company must ensure that all partners with access to process personal data have signed a data processing agreement (DPA) that requires their commitment to complying with the same rules and obligations as the Company.

17. Conflict of Interest

Employees must only have access to data that is relevant to their function and responsibilities.

The Company has implemented access restrictions on the network drive where data is processed. The Company has introduced access restrictions on the network drive where the Company's data is processed. The Company has a separate policy and business procedure for handling conflicts of interest.

18. Rights as a data subject

Data subjects whose personal data the Company processes have the following personal rights.

a) The right to be informed about the processing of their personal information.
b) The right to access and receive a copy of the personal information being processed about them.
c) The right to rectify any inaccurate personal information.
d) The right to be forgotten (including the deletion of personal information).
e) The right to data portability, i.e., to have their information transferred to a new company (except for processing based on legitimate interests).
f) The right to restrict (block) processing of personal information.
g) The right to object to the processing itself.
h) The right to object to automated individual decision-making and profiling.
i) The right to withdraw consent.
j) The right to file a complaint with the Danish Data Protection Agency.

19. DPO

You are welcome to contact the Company if you have any questions about our processing of your personal information, including your rights or if you wish to exercise them.

You can contact the Company's DPO at cla@cabacapital.dk.

20. Data Controller

Fondsmæglerselskabet CABA Capital A/S
Toldbodgade 55B, 3rd floor
1253 Copenhagen K, Denmark
info@cabacapital.dk

21. Complaints

If you are not satisfied with the Company's processing of your personal information and wish to file a complaint, you can do so by contacting the Company's complaint officer at moe@cabacapital.dk.

You can also file a complaint with the Danish Data Protection Agency. You will find Danish Data Protection Agency's contact information at www.datatilsynet.dk.

22. Controls and Reporting

It is the responsibility of the management to ensure that:

1. This policy is followed.
2. The board receives regular reports on the Company's compliance with this policy
3. Interested parties are informed of the board's guidelines regarding the extent to which confidential information is disclosed.
4. At least once a year, and as circumstances dictate, the Company evaluates whether its business practices in this area are effective and remedies any deficiencies.

It is the responsibility of each employee to:

5. Delete personal information in their email account.

23. Effective Date

This policy is effective as of September 3, 2024.