

## Privacy Policy for clients who are natural persons

In this privacy policy for clients who are natural persons ("**Policy**"), references to "**Svalner Atlas**", "**we**", "**us**" and "**our**" means Svalner Atlas Denmark ApS (for contact details, see *Contact us* below).

### Why are we informing you?

This Policy describes how we collect, process, use and transfer (collectively "**process**") your personal data.

Personal data is any information that directly or indirectly can be linked to an individual. Common examples of personal data processed by us in our day-to-day activities are name, address and data used in the processing of your matter.

If you have any questions about our personal data processing, please contact us using the details provided under *Contact us* below.

### Who is the data controller?

Svalner Atlas is the data controller, which means that we determine the purposes and means of how personal data is processed by us. This also means that we are obliged to ensure that your personal data is processed in accordance with this Policy and that we are obliged to provide you with the information contained in this Policy. If you have any questions, please contact us using the contact details provided under *Contact us* below.

### Processing of your personal data

#### What personal data do we process?

The personal data we collect can be divided into five categories (i) Contact details, (ii) Regulatory information, (iii) Information about the matter, (iv) Marketing preferences, and (v) Information for meetings, seminars or similar. We primarily collect personal data directly from you, but in some cases we may receive the data from, for example, your employer, companies you own, public registers or authorities. The data is collected in order to perform the work we have undertaken in the agreement with you and to fulfill our legal obligations.

The data we process and where we obtain it from is shown in the table below. Please note that the data we process about you may vary depending on, for example, the type of case we are working on for you. Sometimes the processing is also carried out by others than us and then on our behalf (see *Does Svalner Atlas share your personal data with others?* below).

Category of data	Type of personal data	Collected from
Contact details	<ul style="list-style-type: none"><li>Name</li><li>Address</li><li>Telephone number</li></ul>	<ul style="list-style-type: none"><li>You</li><li>Public sources and registers</li></ul>

<b>Regulatory information</b>	<ul style="list-style-type: none"> <li>• Personal identification number</li> <li>• Identity document, such as a copy of your passport or driving license</li> <li>• Information on whether you are a politically exposed person (PEP)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third party services for regulatory control</li> </ul>
<b>Information on the matter</b>	<ul style="list-style-type: none"> <li>• Information related to your case or questions, case-related communication</li> <li>• Information on family relationships (e.g. information on relatives and housing situation)</li> <li>• Employer information (e.g. payslips, employment contracts, CEO agreements, policies)</li> <li>• Information you provide during meetings or other contact with us</li> <li>• Information for billing and payment</li> <li>• Tax information (e.g. pre-printed tax return, specification of control information, preliminary tax calculation, final tax assessment, property assessments, decisions, tax account statements and previous years' tax returns)</li> <li>• Banking data (e.g. bank statements, annual summaries, information on loans and credits, information on securities accounts, endowment insurance and investment savings accounts (and transactions in these))</li> <li>• Information on pensions (e.g. information on the state pension ('orange envelope'), occupational pensions and pension insurance)</li> <li>• Information on owned properties and condominiums/rental apartments (e.g. purchase contracts, bills of sale, registration documents, mortgage deeds, building permits, information on other permits and other permits under the Environmental Code)</li> <li>• Information on holdings in companies (e.g. annual reports, minutes of general meetings, board minutes, share register, share certificates and share transfer agreements)</li> <li>• Information on owned vehicles and other private assets</li> <li>• Information about decisions by authorities and courts concerning you and companies in which you hold shares (in addition to what is stated above)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>
<b>Marketing preferences</b>	<ul style="list-style-type: none"> <li>• Your areas of interest</li> <li>• Your preferences for marketing communications</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Public sources and registers</li> </ul>

Information before a meeting, seminar or similar	<ul style="list-style-type: none"> <li>Information on food preferences, including any allergies</li> <li>Information on any access requirements, including any disability</li> <li>Information on golf handicaps</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
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## How do we process your personal data?

We use your personal data for several different purposes. We must always have a legal basis under the GDPR to process your personal data. Below is a summary of the purposes for which we process your personal data and the legal basis for the processing.

Legal basis				
Purposes of the processing	Your consent	Performing a contract with you	Complying with a legal obligation	Our legitimate interest
Regulatory information and Contact details				
a) Conducting a customer due diligence process			<input checked="" type="checkbox"/>  The legal obligation is to comply with the rules on customer due diligence in the Money Laundering and Terrorist Financing (Prevention) Act (2017:630).  Where applicable, personal identification numbers are processed on the basis that it is clearly justified by the importance of secure identification.	
Retention time: The data is kept for a minimum of five years as required by law, and a maximum of ten years if necessary for the prevention, detection or investigation of money laundering or terrorist financing.				
b) Adding you as a client to our systems.		<input checked="" type="checkbox"/>  Where applicable, personal identification numbers are processed on the basis that it is clearly justified by the importance of secure identification.		
Retention time: The data is processed for the time necessary for us to be able to administer the client relationship and fulfil our obligations in relation to you as a client.				

Information about the matter and Contact details				
c) Answering your questions and administering the services performed for you as a client.				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to answer questions from clients.
Retention time: The data is processed for the time necessary for us to be able to administer the client relationship and fulfill our obligations in relation to you as a client.				
d) Providing and documenting our services to clients		<input checked="" type="checkbox"/>		
Retention time: The data is processed for the time necessary for us to be able to administer the client relationship and fulfill our obligations in relation to you as a client.				
e) Prepare reports describing the time we spent on your matter		<input checked="" type="checkbox"/>		
Retention time: The data is processed for the time necessary for us to be able to administer the client relationship and fulfill our obligations in relation to you as a client.				
f) Charging for our services		<input checked="" type="checkbox"/>		
Retention time: The data is deleted seven years after the invoice is issued.				
g) Manage, plan and deliver a strategy for our business, including our business and marketing strategy (including targeting clients and potential clients)				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to manage, plan and deliver a strategy for its work.
Retention time: The data is processed for the time necessary for us to be able to administer the client relationship and fulfill our obligations in relation to you as a client.				
h) Accounting purposes			<input checked="" type="checkbox"/> The legal obligation is to comply with the rules on accounting in the Accounting Act (1999:1078)	
Retention time: The data is deleted seven years after the invoice is issued.				
Information before a meeting, seminar or similar and Contact details				
i) Receiving you at our office and provide services related to your visit				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to receive visits and provide services related to visits.
Storage time: The data is processed for the time necessary for us to be able to administer the client relationship and fulfill our obligations in relation to you as a client.				

Information about the matter				
j) Educating our employees				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to use your personal data for the purpose of training our staff in the management of risks and improving the quality of our services.
Retention time: The data is stored for a maximum of 12 months after the matter is closed.				
k) Handle any complaints from or disputes with you.				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to manage and resolve any complaints and complaints and disputes that you might raise with us.
Retention time: The data is stored for ten years as a starting point.				
Marketing preferences and Contact details				
l) Send direct marketing to you				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to send direct marketing to existing clients and other recipients with whom Svalner Atlas has an existing customer relationship.
Retention time: The data is stored until the recipient unsubscribes from marketing mailings or is deleted earlier if the client relationship ends.				
m) Sending direct marketing to you (newsletter sign- up)	<input checked="" type="checkbox"/> Consent is given when signing up for the newsletter.			
Storage time: The data is stored until the recipient unsubscribes from marketing communications.				

Contact details, Regulatory information and Information about the matter				
n) Managing any sale, restructuring or merger of part or all of our business, including responding to queries from the potential buyer or merging business				<input checked="" type="checkbox"/> Svalner Atlas' legitimate interest is to be able to restructure or sell all or part of our business.
Retention time: The data is stored until the relevant sale, restructuring or merger is completed.				

We may also process special categories of personal data. Under applicable data protection law, special categories of personal data are subject to higher security requirements and also require a different legal basis for processing such data. The table below sets out the different purposes for which we may process your sensitive personal data and the relevant lawful basis on which we process the data. In certain circumstances and for certain processing activities, more than one lawful basis may be relevant.

When we process data relating to breaches of law, such as money laundering data, we do so on the basis that the processing is necessary for the establishment, exercise or defense of legal claims.

Legal basis for processing special categories of personal data				
Purposes of the processing	You have provided your explicit consent for the processing	It is necessary to protect anyone's fundamental interests or they are unable to be able to give their consent	It is necessary to establish, make defend legal claims	It is necessary with regard to a important public interest
a) Receive you at our or others' premises and provide services during visits	<input checked="" type="checkbox"/> Health data (allergies and indication of disability, if applicable)			
Retention time: The data is deleted at the end of the visit or seminar.				

b) Conducting a customer due diligence process			<input checked="" type="checkbox"/>  Data relating to criminal convictions and offences.  The legal obligation is to comply with the rules on customer due diligence in the Money Laundering and Terrorist Financing (Prevention) Act (2017:630).	
Retention time: The data is kept for a minimum of five years as required by law, and a maximum of ten years if necessary for the prevention, detection or investigation of money laundering or terrorist financing.				

## Cookies

Information on how we use cookies when you use or visit our platforms can be found in our [cookie policy](#).

## Does Svalner Atlas share your personal data with others?

### Data may be shared when handling your case

We may sometimes share your personal data with external third parties, in which case the following categories of third parties are involved

- (a) other companies or offices within the network of advisers acting under the Svalner Atlas name to the extent necessary for handling your case;
- (b) other advisers, courts or authorities as part of handling your case;
- (c) courts and authorities; if we are asked to represent and answer questions or requests for opinion;
- (d) supervisory authorities and other competent authorities, if it is necessary for an investigation or to respond to inquiries regarding our compliance with the requirements of applicable law;
- (e) authorities;
- (f) financial institutions;
- (g) insurers; and
- (h) other advisors, such as lawyers and accountants.

These organizations will process your personal data as data controllers, which means that they are responsible for their own processing of personal data.

We also engage third parties to provide us with certain services. These third parties are data processors in relation to Svalner Atlas and we have therefore entered into data processing agreements with them. These services are:

- (a) IT support, cloud services and other IT-related services where the provider helps us manage, for example, our website, newsletters and invitations, document management systems, time tracking systems, financial and other systems; and
- (b) Debt collection agencies.

### **Does Svalner Atlas transfer personal data to countries outside the EEA?**

We generally do not transfer your personal data to a country outside the EU/EEA. Where your personal data is processed outside the EU/EEA, there is either a decision by the European Commission that the country in question ensures an adequate level of protection or appropriate safeguards in the form of standard contractual clauses.

If you have any questions about the transfer of data to other countries, please contact us, see contact details under *Contact us* below.

### **How is your personal data protected?**

Svalner Atlas uses IT security systems to protect the confidentiality, integrity and availability of your personal data. In particular, we have taken appropriate security measures against unlawful or unauthorized processing of personal data and against accidental loss of or damage to personal data. Access to your personal data is only granted to persons for whom it is necessary for the performance of their duties.

### **How long does Svalner Atlas store your personal data?**

We will keep your personal data for as long as we need it to fulfill the purposes for which it was collected (see above) and to comply with laws and legal obligations. This may mean keeping some data for longer than others. For example, the length of time we keep your personal data is affected by the following (i) laws we are obliged to comply with, (ii) whether we have any legal proceedings between each other or any third party, (iii) the type of personal data we hold about you, and (iv) whether you or any competent authority asks us to retain the data.

For detailed information on how long Svalner Atlas stores your personal data, please refer to the above description of each processing activity.

### **Your rights and how to use them**

You have various rights under the GDPR. If you have any questions about how to exercise your rights, please contact us, for contact details see *Contact us* below.

Below is a summary of the rights you have under GDPR. The table below also contains information about any conditions and limitations on how the right can be used and how to practically use your right.



Your rights	Explanation
<b>Right of access (Article 15 GDPR)</b>	You have the right to access the personal data we hold about you and how it is processed (known as a 'register extract'). You also have the right to request a copy of the personal data processed by us.
<b>Right to data portability (Article 20 GDPR)</b>	You may have the right to receive the data you have provided to us, in a commonly used machine-readable format if the processing is based on your consent or on our contract with you.  You have the right to transfer the data to another controller or to have our assistance in transferring the data to another controller where this is technically possible.
<b>Right to rectification (Article 16 GDPR)</b>	You have the right to have inaccurate data corrected without undue delay and to ask us to complete incomplete data by providing us with correct data.
<b>Right to object (Article 21 GDPR)</b>	You have the right to object to the processing of your data based on a balance of interests. If we cannot demonstrate compelling legitimate grounds to continue processing the data, we must cease the processing.
<b>Right to erasure and restriction (Article 17 and 18 GDPR)</b>	<p>You may have the right to have your personal data erased (also known as the 'right to be forgotten') if, for example, you believe that the data we are processing is inaccurate, or that the processing is unlawful.</p> <p>There are various situations in which we have the right to refuse your request for erasure. Such situations may be (i) that we need the data to comply with a legal obligation, (ii) that we need the data to exercise or defend legal claims, (iii) that we need the data because certain archiving obligations apply by law, or (iv) that the data is necessary to fulfill contractual obligations we have towards you.</p> <p>You can also request that certain processing of your data be restricted, for example if you object to the accuracy of the data.</p>
<b>Right to withdraw your consent (Article 7.3 GDPR)</b>	You have the right to withdraw your consent to all or part of the processing to which you have previously consented, with effect from the moment of withdrawal.
<b>Right to lodge a complaint (Article 77 GDPR)</b>	You have the right to lodge a complaint with the Swedish Authority for Privacy Protection ( <a href="https://www.datatilsynet.dk">Datatilsynet.dk</a> ).

## Contact us

If you have any questions or would like more information about your rights or our processing of your personal data, you are welcome to contact us by email to [denmark@svalneratlas.com](mailto:denmark@svalneratlas.com), by post to Svalner Atlas Denmark ApS, Havnegade 39, 1058 København K or by telephone to 08-528 01 250.

## Changes to this Policy

We may make changes to this Policy. We will notify you of the changes by email or post them on our website.

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Svalner Atlas Denmark ApS, August 2025.