

## **Privacy Statement**

**Last updated: 28 August, 2025**

At Boden Capital AB ("Boden Capital"), we are dedicated to protecting and respecting your privacy in compliance with the EU General Data Protection Regulation (GDPR) 2016/679, dated 27 April 2016. This privacy statement outlines when and why we collect personal information, how we use it, under what circumstances we may share it, and the measures we take to keep it secure.

This Privacy Statement applies to your use of our products and to our marketing and customer contract fulfilment activities conducted on behalf of Boden Capital and the asset managers we represent in the Nordic region. It also covers employees and job applicants at Boden Capital.

Boden Capital serves as an introducer for asset managers aiming to grow their institutional business in the Nordics, including assisting managers with marketing their capabilities to professional investors. Boden Capital is headquartered at Engelbrektsgatan 9-11, 114 32 Stockholm, Sweden. Boden Capital is the data controller and can be contacted by email at [info@bodencap.com](mailto:info@bodencap.com). The latest version of this policy is available at [www.bodencap.com](http://www.bodencap.com).

### **When do we collect personal data about you?**

We collect personal data when you interact with us—whether in person, through correspondence, by phone, via social media, or on our website.

If we receive personal data from other legitimate sources, such as clients or public sources, we will only use this data if you have consented to its sharing.

We may also collect personal data if we determine there is a legitimate interest that is not overridden by your privacy rights. Before collecting such data, we conduct an assessment to ensure there is a mutual interest between you and Boden Capital.

### **Why do we collect and use personal data?**

Personal data processing includes actions like collection, registration, storage, use, disclosure, or deletion of data.

We primarily use personal data for marketing and client service activities. We also process data concerning suppliers, partners, and job applicants. Your information may be used to:

- Send marketing communications about our products, services, events, and promotions, as well as those of the clients we represent. Some communications require your consent, while others rely on legitimate interest.
- Provide information about products and services from our clients you may have invested in.
- Carry out direct marketing where mutual interest is established.
- Provide content and event details for webinars or events you sign up for.
- Respond to inquiries and support requests via email, chat, or phone.
- Fulfil contractual obligations such as invoicing and reminders.
- Process job applications.

### **Legal basis for collecting personal data**

We document any consent you provide in a standardized format.

Personal data is also used to fulfil contractual obligations with customers, partners, and suppliers.

We rely on legitimate interest as a legal basis when appropriate, ensuring your privacy rights are not overridden. We will always inform you about the purpose of data collection and your privacy rights.

#### **What type of personal data do we collect?**

We collect your name, contact details (phone number, email), job title, company information, and any feedback or questions you share during communication or events. Our website may collect IP addresses and track actions on the site.

For job applicants, we collect the data provided during the application process.

We do not collect or process special categories of sensitive personal data from external contacts. Internally, sensitive data is processed only when required for administrative or regulatory purposes.

#### **How long do we keep your personal data?**

We retain your data as long as necessary to fulfil the purpose it was collected for, to address your inquiries, comply with legal requirements, or handle claims. Once no longer needed, personal data is securely deleted.

#### **Your rights regarding your personal data**

You have the right to:

- Request a copy of your personal data held by Boden Capital.
- Request corrections to inaccurate or outdated data.
- Request deletion of personal data when no longer needed.
- Request that we provide your data to you or transfer it to another controller when processing is based on consent or contract.
- Object to processing based on legitimate interest or direct marketing.
- Withdraw consent to personal data processing at any time, including marketing emails.

To withdraw consent, please email us at [info@bodencap.com](mailto:info@bodencap.com).

#### **How we share your data**

We do not share, sell, rent, or trade your personal information without your consent, except as described here:

- We may share your data with subcontractors or associated organizations providing services on our behalf, under agreements that protect your privacy rights.
- We collaborate with clients to offer products and services related to asset management. When you inquire about these, clients may use and share your data with us in accordance with this policy.
- We disclose personal information if required by law or to protect our rights, complying with legal processes while protecting your privacy as much as possible.
- We ensure subcontractors adhere to this Privacy Policy and relevant data protection laws.

**How we protect your data**

We employ technological and operational measures to safeguard your personal data from loss, misuse, alteration, or unauthorized destruction, including through our CRM system.