

Privacy Policy

HANDLING OF PERSONAL DATA

Vinga Asset Management AB

This privacy policy contains information regarding Vinga Asset Management AB:s ("Vinga" or "the Company") processing of personal data.

Vinga's role

Personal data controller

Vinga is the personal data controller for the processing of personal data that takes place within the company's business operations. Stefan Westfeldt stefan@vingaam.se is appointed data protection officer for Vinga Asset Management AB.

Information about how Vinga processes personal data

General information

Within the framework of Vinga's operations, personal data is processed in order to carry out measures for KYC in accordance with the Act (2017:630) on measures against money laundering and financing of terrorism as well as carry out suitability assessment, fulfill documentation requirements and otherwise assist the customer with signing and handling the customer's investments, in accordance with the law (2007:528) on the securities market. Vinga's processing of personal data is thus mainly based on the legal obligations incumbent on the company according to the regulations. Vinga's customers consist of both natural and legal persons. In cases where the customer is a legal entity, for example, personal data relating to the legal entity's contact persons, signatories, beneficial owners etc. is processed. The legal basis for the process is then a legitimate interest arising from the relationship with the customer (the legal person) and the legal obligations that Vinga must follow in the exercise of its business in relation to the customer.

In addition, consent to the processing of personal data is always obtained before a customer relationship begins. Unless you have given us your consent, we will not use your personal data for marketing purposes.

Categories of personal data

Vinga handles the following categories of personal data.

When the customer is a legal person

- contact information such as name, address, e-mail address and telephone number of contact persons, signatories, owners etc.

- details of beneficial owner or alternative beneficial owner such as name, address and social security number
- information about relatives of the beneficial owner such as name, occupation/function and relationship to the beneficial owner
- bank account number
- information on knowledge and experience regarding financial instruments

When the customer is a natural person

- name, address, social security number and e-mail address
- details of beneficial owner such as name, address and social security number
- information about relatives such as name and occupation/function, as well as
- information about relatives of the beneficial owner such as name, occupation/function, and relationship to the beneficial owner
- bank account number
- information on knowledge and experience regarding financial instruments

Marketing (prospect lists)

After verbal approval via phone call, the natural or legal person's name and email are added to Vinga's distribution list. The list is saved in the email platform "Apsis" from which mailings for marketing purposes are made. Anyone who has approved participation on the list can unregister whenever desired in connection with a mailing or in direct contact with Vinga.

Recipient of personal data

Individuals who may get access to the personal data, in addition to Vinga's employees, are external providers of marketing services, financial and accounting services and other staff who handle orders (e.g. back-office staff).

Storage of personal data

The personal data is saved, in accordance with the regulations that apply to Vinga's operations, for a period of ten years from the inception of customer contact, or the longer period required by the nature of the information.

Use of cookies

A cookie is a small text file that contains data that is downloaded and stored on the device you use to access Vinga's website. The cookies Vinga uses normally improve the services the company offers. Some of Vinga's services need cookies to function properly, while others improve the services for the visitor. At <https://vingagroup.se/cookie-policy/> you can read more about cookies specifically for Vinga.

As a visitor to Vinga's website, you can consent to the use and storage of cookies. You can withdraw your consent to cookies being used for the above purposes at any time. You do this by specifying in the browser settings that you do not want to allow cookies. If you choose not to allow cookies, you can still use Vinga's website, but the use of certain features and parts of our website may be limited.

Your rights

As a registered user, you can have certain rights in relation to Vinga. You can request that Vinga:

- release information about all personal data that Vinga has stored about you,
- correct personal data that is incorrect and supplement it with such personal data that is missing and that is relevant for the purpose of the personal data processing,
- delete personal data relating to you if the data is no longer needed for the purposes for which it was collected or to fulfill a legal obligation,

- limit the processing of personal data concerning you to certain limited purposes.
- facilitate the transfer of personal data if you yourself have provided the data and the processing takes place with the support of consent or to fulfill an agreement with you (data portability), or
- provide you with a decision by a person instead of any form of automated decision-making, including profiling, if the decision may have legal consequences for you or similarly significantly affects you.

If you wish to exercise any of the rights listed above, you can contact Vinga via stefan@vingaam.se (address as above).

If you are dissatisfied with our treatment, you can submit a complaint to the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten) (imy@imy.se)

How Vinga protects your personal data

Vinga uses IT systems to protect confidentiality, integrity, and access to personal data. Vinga has taken special security measures to protect your personal data against unlawful or unauthorized processing (such as unlawful access, loss, destruction, or damage). Only people who need to process your personal data in order for Vinga to fulfill the specified purposes have access to them.

Transfer of data to third parties

Vinga does not disclose your data to other companies or organizations unless it is required by law or is necessary to fulfill Vinga's statutory or contractual obligations towards you. Vinga may disclose your personal data to any of Vinga's partners, suppliers, or subcontractors, but only if it is necessary for Vinga to be able to fulfill its obligations in relation to you as a customer. Vinga never gives out more personal data than is necessary. When required by law, Vinga may have to disclose your data to authorities and other organizations. Vinga may also need to disclose your data if it is necessary to exercise, establish or monitor its legal claims. Vinga never discloses your personal data to other companies or businesses for marketing purposes.

Transfer to countries outside of the EU/EEA

Vinga only processes personal data within the EU/EEA. If transfer takes place to a country outside of the EU/EEA, Vinga will ensure that such transfer takes place in accordance with current data protection legislation.

Internal governance

Vinga has established internal guidelines and policies for handling personal data.

Changes to the privacy policy

Vinga reserves the right to change and update this privacy policy. In the event of material changes to the privacy policy or if existing data is to be processed in a different way than stated in the privacy policy, Vinga will inform about this in an appropriate way.

This privacy policy was established 2024-05-23.