

Privacy notice

1. Background and purpose

At Qblue Balanced A/S (“**Qblue**”, “**we**”) we respect your concerns about privacy. Data protection and confidentiality are important priorities for our company. Given the nature of Qblue’s business activities the occasional processing of personal data is inevitable but will always be in compliance with GDPR legislation.

This privacy notice describes how we process personal data, namely how we collect, use and manage personal data, the type of personal data we obtain and the purpose for which we obtain data as well as the rights of the individuals about whom we collect personal data. (Personal data as defined in Regulation (EU) 2016/697 of the European Parliament and of the Council of 27 April 2017 (“**GDPR**”).

2. Data subjects

Qblue collects personal data relating to a variety of individuals (“**data subjects**”, “**you**”)

- Investors who are physical persons
- Members of the Board of Directors of investors, members of the Management of Investors, and ultimate beneficial owners of investors
- Other relevant contact persons at the investors, including representatives of the investors, registered administrative contact persons, registered commercial contact persons, registered Direct Liaison Officers, representatives of the investors, as well as other individuals with the authority to act on behalf of the investor
- Suppliers, business partners, service providers, counterparties, advisors, contractors and Board Members of Qblue-affiliated entities.

3. Categories of personal data

Personal data may be collected when relevant for Qblue’s business activities.

Depending on the data subject, the information may include the following:

- Name, gender, citizenship, e-mail and postal addresses, telephone numbers, and other relevant contact details
- Information on status as a political exposed person (PEP), including next of kind
- Photographic identification
- National identification numbers
- Passport copies and copies of health insurance cards containing identification numbers
- Salary/income and tax information
- Information on relatives
- Former employment records
- Academic and professional qualifications and experience
- Third party references
- Details of your business
- Transcripts from Company registers and transcripts from the relevant financial supervisory authority, or business authority
- Information about ownership of assets
- Communications between Qblue and the Data Subject

- Feedback provided by the data subject
- Financial and payment information

All personal data collected is by nature non-sensitive and no special categories apply.¹

4. Collection of personal data

Qblue primary collects personal information about you when contact is established between Qblue and you, and otherwise during Qblue's business relationship with you. Additionally, personal data is collected through subscriptions to press releases. Personal data may also be collected from suppliers, current and potential investors, business partners, advisors, service providers and contractors, all of whom Qblue forms a business relationship with. Furthermore, personal data may be collected from publicly available sources, such as company registers, business authorities and financial supervisory authorities.

5. Use of personal data

The purposes for which we collect and process personal data are:

- To provide investment services
- In order to organize meetings
- To send out reports to investors
- To on-board investors and conduct investor due diligence
- To ensure compliance with The Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism
- To process and analyzes statistics relating to our business
- To administer, operate, maintain, and improve our services and business relationship with the data subjects
- To administer our relationship with data subjects, and respond to inquiries
- To communicate with data subjects and provide information about our services
- To ensure compliance with applicable regulation and legislation

We will only use personal data to send marketing material if data subjects have granted their explicit consent, unless legislation allows us to contact you without prior consent. Also, it will always be possible and easily accessible to unsubscribe to reports and press releases.

6. Legal basis of processing

The criteria applying to Qblue lawfully processing personal data are the following:

- When consent to the processing of the personal data has been given by the data subject
- When the processing is necessary for the performance of a contract between Qblue and the data subject
- When the processing is a condition for Qblue complying with legal obligations
- When processing of personal data is necessary in order to protect the

¹ Special categories of personal data: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

- vital interests of the data subject
- When the processing of personal data is necessary in order to protect the interests of the data subject²
- To ensure compliance with the applicable personal data protection legislation

7. Consent

You may at any time withdraw your consent to the disclosure of personal data and we will delete your personal data, unless we can continue the processing based on another legal basis. The withdrawal of consent will not affect the lawfulness of previous disclosure of personal information. If you wish to withdraw your consent, please contact us at privacy@qbluebalanced.com or + 45 2579 6932.

8. Transfer to other data controllers

Under certain circumstances it might be necessary to transfer personal data to accountants and legal advisors, as well as to public authorities or the police.

In the case of a re-organization, full or partial sale of Qblue, the disclosure of personal data will be conducted in compliance with the current legislation on personal data.

9. Disclosure to data processors

Personal data may be disclosed or shared in the following circumstances:

- To third party service providers such as IT service providers, providers of online communication, consultants, legal advisors, other professional services providers and providers of file storage platforms
- To service providers engaged in due diligence and KYC documentation
- To internal Qblue employees who need the personal data for business or legal reasons

10. Transfer to third countries

Under certain circumstances related to actual or potential investments, personal data may be transferred to data controllers located outside the EU/EEA. This transfer is subject to the terms of the standard data protection clauses annexed to the EU Commission Decision 2004/915/EC of 27 December 2004 for the Transfer of Personal Data to Controller established in Third Countries under the Directives 95/46/EC, or any successor standard contractual clauses that may be adopted pursuant to an EU Commission decision.

11. Retention and deletion of personal data

Personal data is stored as long as Qblue needs it to conduct its business activities and in compliance with the minimum retention periods pursuant to the AML Act, the Danish Companies Act, The Danish Bookkeeping Act, etc. When no longer needed for the stated purposes we will proceed to deletion. Notwithstanding, personal data may be stored for a longer period in anonymized form.

12. Security

At Qblue, administrative, technical and physical safeguards have been

² <http://www.privacy-regulation.eu/en/article-6-lawfulness-of-processing-GDPR.htm>

implemented in order to ensure the protection of personal data.

13. Your rights

Data subjects has the following rights:

- The right to access: You may at any time request Qblue for copies of the personal data we have collected about you.
- The right to rectification: If you find the information to be inaccurate you may at any time request that Qblue correct this information accordingly
- The right to erasure: Under certain conditions, you are entitled to request that Qblue delete personal information collected about you
- The right to restrict processing: You have the right to request that Qblue restrict the processing of your personal data, under certain legal conditions
- The right to object to processing: You have the right to object to Qblue's processing of your personal data, under certain legal conditions
- The right to data portability: Under certain conditions, you are entitled to request that Qblue transfer the data we have collected about you to another entity, or directly to you.

14. How to contact us

For any inquiries about our privacy policy, as well as requests regarding updating, amendments and deletion of personal data please contact us at privacy@qbluebalanced.com or +45 25 79 69 32. You can also write to us at the following address:

Qblue Balanced A/S
Højbro Plads 10
1200 Copenhagen K
Denmark

15. Complaints

If you wish to appeal against the processing of your personal data, please contact us by email, telephone or letter. You may also contact the Danish Data Protection Agency (Datatilsynet), Borgergade 28, 5., 1300 København K.