

# IWC GROUP'S PERSONAL DATA POLICY

## (INFORMATION TO CLIENTS)

The IWC Group ("IWC") is subject to the Danish Data Protection Act and the General Data Protection Regulation ("GDPR"), according to which you are entitled to be informed about your rights in respect of the personal data IWC processes about you.

### 1. DATA CONTROLLER

The IWC Group ("IWC") consists of:

- International Woodland Company A/S, CVR no. 15 01 31 76, Amalievej 20, 1875 Frederiksberg C, Denmark,
- IWC Investment Partners A/S, CVR no. 34 46 52 90, Amalievej 20, 1875 Frederiksberg C, Denmark, and
- International Woodland Company Holding A/S, CVR no. 34 07 92 26, Amalievej 20, 1875 Frederiksberg C, Denmark,

which combined are data controller. Contact: IWC's Legal and Compliance department (email [kr@iwc.dk](mailto:kr@iwc.dk)).

### 2. PERSONAL DATA, DATA PURPOSE AND LAWFUL PROCESSING

To manage the client relationship or potential client relationship between you and IWC, including, but not limited to, know-your-client procedures, facilitating sales, issuing newsletters, organizing marketing initiatives, and ensuring compliance with Danish and US legislation, IWC has to process and store the following personal data to the extent necessary:

- Your name, email address, and phone number
- Your job description and current employer
- Your address
- Your date of birth/social security no.
- Proof of identity and address (copy of passport, driver's license, etc.)

All the above-mentioned data will be processed in full confidentiality in accordance with the Danish Data Protection Act and the GDPR.

IWC's legal basis for processing your personal data derives from the legitimate interest that IWC has in the client relationship; cf. article 6 (1) (f) of the GDPR.

Furthermore, IWC is entitled to process your health insurance certificate, driver's license or other types of picture ID, because IWC is subject to the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism and thus required to obtain copies of such identification; cf. article 6 (1) (c) of the GDPR.

To the extent relevant, your consent constitutes IWC's legal basis for processing your passport; cf. article 6 (1) (a) of the GDPR.

In addition, IWC is entitled to use your personal data to send you a newsletter if you have given consent to receive IWC's newsletter in accordance with the Danish Marketing Practices Act; cf. article 6 (1) (a) of the GDPR.

IWC may share your personal data internally in the IWC Group if IWC has a legitimate interest in so doing; cf. article 6 (1) (f) of the GDPR.

### **3. RECIPIENTS AND PROCESSORS OF YOUR PERSONAL DATA**

Your personal data will be processed by IWC, unless processing by a third party is relevant to the nature or the type of IWC's business.

Your data may be transferred to IWC's data processors, including but not limited to Support-IT Network A/S or Admincontrol A/S.

Furthermore, when necessary your data will be transferred to IWC's cooperative partners, for example, lawyers or auditors assisting you or IWC.

When required by law, IWC will transfer your data to various authorities, for example, the Danish Customs and Tax Administration (SKAT), the Danish Business Authority (Erhvervsstyrelsen), the US Securities and Exchange Commission (SEC), or other government authorities.

Your personal data may also be forwarded internally in the IWC Group.

IWC receives the above-mentioned data directly from you and through websites in the public domain, public phone registers, network associates, or placement agents.

### **4. TRANSFER TO A THIRD COUNTRY**

IWC has subsidiaries, cooperative partners and data processors in the EU, the US, and Australia. Accordingly, your personal data may be transferred to a third country as part of IWC's regular procedures.

IWC has ensured that appropriate and suitable safeguards have been implemented to protect your personal data. Either IWC has agreed on the EU Commission's standard clauses with the recipients of your personal data, or the recipients are covered by the EU-US privacy shield or similar applicable standard. You can ask IWC for a copy of the agreed provisions.

## **5. RIGHT TO ACCESS, RECTIFICATION, ERASURE, RESTRICTION, AND OBJECTION**

You are entitled to access the personal data IWC registers about you. If you request such access, IWC will forward you a copy of the registered data. Electronic inquiries will be answered electronically, and if you request several copies of the personal data, you should expect to pay a reasonable fee to cover the expenses defrayed by IWC.

You are entitled to object to any processing of personal data about you.

You are furthermore entitled to demand that any personal data about you be rectified, erased, or that processing of your data be restricted.

**In accordance with the Danish Data Protection Act and the GDPR, under certain specific circumstances IWC may be exempt from complying with the above-mentioned obligations.**

Should you want to request (1) access to or (2) the rectification, erasure, or restriction of any personal data or (3) should you have any objections regarding the processing of your personal data, please contact IWC's Legal and Compliance department (email [kr@iwc.dk](mailto:kr@iwc.dk)).

## **6. DATA PORTABILITY**

In some cases, you are entitled to have your personal data returned or transferred to another data processor.

## **7. DURATION OF STORAGE OF YOUR PERSONAL DATA**

Your personal data will be erased 10 years after the year following the termination of the business relationship. IWC stores your data for this time period in order to comply with the Danish Bookkeeping Act and the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism and to ensure IWC has documentation if claims related to the business relationship are brought against it.

If you have not yet entered into a client relationship with IWC, but have only had preliminary contact with IWC's sales representatives, your personal data will be erased 5 years after your last contact with IWC.

Your personal data used in connection with issuing IWC's newsletter will be erased if you withdraw your consent to receive IWC's newsletters

## **8. COMPLAINTS**

You may complain about the processing of your personal data. Your complaint should be submitted to the Danish Data Protection Agency, Borgergade 28, 5, 1300 Copenhagen K, Denmark, [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)