

# Privacy policy for personal data in connection with shareholders' meetings

## INTRODUCTION

This privacy policy describes how Björn Borg handles personal information regarding shareholders and other participants at Björn Borg's shareholders' meetings.

In this privacy policy, we explain to you:

- What personal data we collect.
- The purpose for which we collect the personal data.
- The legal ground we have for collecting it.
- How we share the information.
- How long we keep the information.
- What rights you have to control your information.
- How you can get in contact with us.

Björn Borg AB (publ), company org. no 556658-0683, is the controller of personal data collected in accordance with this privacy policy and is responsible for ensuring that such personal data is processed in accordance with applicable laws. Please note that in some cases, we may be considered as joint controllers together with a third party service provider and a third party service provider may also be the sole controller, and any third party service provider that is acting as controller is responsible for providing you with information about how they are processing your personal data.

## WHAT PERSONAL DATA WE PROCESS, THE PURPOSE AND THE LEGAL GROUND

### ***(a) Personal data processed***

Björn Borg will collect and process the personal data in connection with shareholders' meetings relating you as shareholder of Björn Borg or other participant at the shareholders' meeting. The personal data processed about you is collected from you directly, e.g. when you send us personal data on forms (e-forms and emails), provide personal data via the phone or provide us personal data during the shareholders' meeting. Björn Borg will also process personal data collected from other sources, e.g. information received from public records, information received from the central securities depository (Euroclear Sweden AB), or from other third party service providers in connection with the shareholders' meeting, or from the shareholder you represent or your proxy (if relevant). The following data is collected and processed by us:

- Contact details (name, address, email and phone number);
- Identification details (date of birth and personal identification number);
- Financial information (voting rights, information regarding holdings and entitlements connected to the holdings);
- If a proxy is appointed, information on who you are representing or are represented by (as relevant);

- Information on how you have voted, e.g. if voting devices are used or vote counting is carried out or to the extent your voting is possible to connect to you based on your holdings (e.g. in some cases a certain number of votes may be connected to a certain number of shares held by you);
- Notes in the minutes from the shareholders' meeting (e.g. dissenting opinions or when exercising the right as shareholder to make proposals or ask questions).

### **(b) Purpose**

Björn Borg's purpose for collecting and processing your personal data is to carry out the shareholders' meetings and providing services in connection therewith, as well as to comply with applicable laws and regulations.

### **(c) Legal ground**

Björn Borg's legal grounds for processing your personal data are, as applicable:

- Complying with applicable laws and regulations;
- Our legitimate interests in processing the data, e.g. to maintain adequate security or order at the shareholders' meeting, and such interest is not overridden by your legitimate interests or fundamental rights and freedoms which require the protection of personal data.

## **HOW DO WE SHARE YOUR PERSONAL INFORMATION?**

We may disclose personal data to our third party vendors, service providers and partners who provide services to us (e.g. third party consultants working with the shareholders' meeting, law firms/advisors or security agents), which are or will be involved in providing services in connection with the shareholders' meeting or who otherwise process personal data for purposes that are described in this privacy policy or as notified to you when we collect your personal data.

We may provide personal data to any competent law enforcement body, regulatory, government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities and the tax agency, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.

We may disclose personal data to our auditors, advisors, legal representatives and similar agents as may be necessary in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the personal data for any other purpose.

We may disclose personal data to other shareholders who request a copy of the minutes from the shareholders' meeting.

We may also publish certain information containing personal data on our website, to the extent we are obliged to do so according to law or other regulation (e.g. minutes from the shareholders' meeting).

When we share your personal data in accordance with the above, we only share the data for the purpose which have been explained to you above. We make sure that all our third party processors give sufficient guarantees as to the security and confidentiality of your personal information. We will always have written agreements with the third party processors.

## HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We do not keep your data for a longer time than what is necessary for the purposes for which it was initially collected, unless otherwise required or permitted by applicable laws or regulations.

Personal data that is only required to carry out the shareholders' meeting will normally be deleted shortly after the conclusion of the shareholders' meeting. Personal data regarding attendance, holdings, votings etc. which is processed to carry out and document the shareholders' meeting according to law will be stored as required or permitted by applicable laws or regulations.

For example, personal data included in a shareholders' meeting's share register (your name, address, ID-number and holdings) must be stored for a period of ten years following the shareholders' meeting, in accordance with rules issued by Euroclear Sweden. Personal data included in the minutes from the shareholders' meeting will be stored during a period of ten years following the shareholders' meeting, unless storage during a longer period is justified based on the resolutions adopted at the shareholders' meeting or otherwise.

## WHERE DO WE STORE YOUR PERSONAL DATA?

The data that we collect from you is stored within the European Economic Area ("EEA") but may also be transferred to and processed in a country outside of the EEA. Any such transfer of your personal data will be carried out in compliance with applicable laws.

For transfers outside the EEA, Björn Borg will use Standard Contractual Clauses and Shields as safeguards for countries without adequacy decisions from the European Commission.

## YOUR RIGHTS

You have certain rights under applicable law in relation to the processing of your personal data. These rights are:

### **(a) Right to be informed**

We are publishing this privacy policy to keep you informed as to what we do with your personal data. We strive to be transparent about how we use your personal data.

### **(b) Right to access**

You have the right to access your personal data. You have a right to receive a copy of your personal data processed by us.

### **(c) Right to rectification**

If your personal data kept by us is inaccurate, not complete or up to date, you have the right to ask us to rectify or update the data. If such personal data has been disclosed to a third party in accordance with this privacy policy, we will also ask them to rectify or update your personal data (if relevant).

### **(d) Right to erasure (the right to be forgotten)**

You have the right to request that we erase your personal data and if we do not have a legal reason to continue to process and hold it, we will erase the data.

### **(e) The right to object**

You have the right to object to certain processing of your personal data.

#### **(f) The right to restrict processing**

In some cases, you have the right to request that we restrict the processing of your personal data. This means we are permitted to store the data but not to process it further unless with your consent or with respect to legal claims.

#### **(g) The right to data portability**

In some cases, you are allowed to obtain your personal data kept by us in a structured, commonly used and machine-readable format and to transmit those personal data to another controller.

If you do not want to give us your personal data and the personal data is necessary in order to (i) admit you as an attendee to a shareholders' meeting, or (ii) provide you further information on our services, then we may not be able to allow you to attend the shareholders' or provide the requested services or information.

### **CONTACT**

If you have any questions about this privacy policy, want to exercise your rights, have complaints or otherwise want to get in contact with us regarding privacy matters, send us an email at: [dataprotection@bjornborg.com](mailto:dataprotection@bjornborg.com). You can also write to us at:

Björn Borg AB (publ)  
Tulegatan 11  
SE-113 53 Stockholm, Sweden

If you are unhappy with the way we process your personal data you can always lodge a complaint with the Swedish data protection authority at [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se).

### **CHANGES TO HOW WE PROTECT YOUR PRIVACY**

This policy may be updated from time to time to comply with changing legal or technical requirements as well as business developments. You can see when it was last updated by checking the "updated" date displayed at the end of this policy. Please consider the version available online as the latest version.

Updated: 8 April 2019