

Privacy policy for shareholders, proxies, advisors, and companions

This policy concerns the processing of personal data by H+H International A/S (H+H) about shareholders, proxies and advisors/companions in connection with general meetings, share emissions, registrations in H+H register of shareholders, registrations in required public registers, required public announcements etc.

1. Data controller

The data controller responsible for processing your personal data is
H+H International A/S
Lautrupsgade 7, 5th floor
2100 Copenhagen Oe.
Denmark
CVR no. 49 61 98 12
Ph. +45 35 27 02 00
Email info@HplusH.com

2. Data processors

H+H may share your personal data with:

- suppliers (e.g. IT suppliers such as the supplier providing the register of shareholders system, the shareholder portal and the system for administration of general meetings)
- the public via regulatory publication of company announcements containing personal data about shareholders and proxies, via regulatory publication of various data (incl. personal data) on the Danish Financial Supervisory Authority's system OASM and via publication on H+H's website www.HplusH.com
- NASDAQ Copenhagen A/S
- the share issuing bank
- public authorities, e.g. the Danish Financial Supervisory Authority and the Danish Business Authority.

3. Transfer to third countries

H+H may transfer personal data to countries outside EU/EEA subject to the requirements under GDPR. Transfers to third countries will only be made to countries that are determined to be so-called safe third countries by the EU Commission due to having an adequate level of personal data protection, or to countries that are not categorised as safe third countries by the EU Commission, but where H+H has ensured appropriate safeguards for the data transfer by execution of standard contractual clauses for the transfer of personal data to third countries, as approved and published by the EU Commission. A copy of relevant standard contractual clauses, if any, can be obtained by contacting H+H.

4. Overview of processing activities

H+H only wants to process necessary personal data about you, and H+H requests you not to submit sensitive personal data or your personal identity number (e.g. Danish CPR no.). The details of H+H's processing are described below.

Registration of shareholders in the share register and on the shareholder portal

Purpose	Sources	Categories	Legal basis	Retention
<p>To maintain a statutory register of shareholders.</p> <p>To contact you, if necessary, about your registration.</p>	<p>VP Securities A/S</p> <p>Yourself via registration in the shareholder portal.</p>	<ul style="list-style-type: none"> - Name - Gender - Email address - Home address - Phone number - H+H share portfolio - VP account number - Voting rights - Date of purchase, sale or pledge - Date of transfer of H+H shares among share depots - User name and password - Custodian bank 	<p>Legal requirement GDPR art. 6(1)(c) (cf. compliance with section 50 of Danish Companies Act)</p> <p>Legitimate interest GDPR art. 6(1)(f) To be able to communicate with you</p>	<p>General personal data: Until you are no longer a shareholder in H+H + 5 additional years till the end of a financial year.</p>

Convening and holding of general meetings

Purpose	Sources	Categories	Legal basis	Retention
<p>To invite you to general meetings and enable you to exercise your shareholder rights.</p> <p>To issue admission cards and voting forms to shareholders, proxies, advisors/companions and to publish them on the H+H website and the shareholder portal and publish the notice as a company announcement.</p>	<p>Yourself, including submission via the shareholder portal.</p> <p>Register of shareholders.</p>	<ul style="list-style-type: none"> - Name - Email address - Home address - Attendance - Proxies - Votes cast - Portfolio of shares - VP account number 	<p>Legal requirement GDPR art. 6(1)(c) (cf. compliance with section 93 of Danish Companies Act)</p> <p>Legitimate interest GDPR art. 6(1)(f) To be able to communicate with you.</p>	<p>General personal data: Until you are no longer a shareholder in H+H + 5 years till the end of a financial year.</p> <p>Registrations, proxies, written votes: From general meeting + 5 years till the end of a financial year.</p> <p>Notices and agendas, including your proposals, and related proxy forms and voting forms are kept for as long as H+H exists.</p>

Handling questions and proposals from shareholders and proxies in relation to general meetings

Purpose	Sources	Categories	Legal basis	Retention
<p>To handle questions and proposals prior to the general meeting, to handle questions and answers and exercising the right to speak during the general meeting and to prepare minutes of meeting.</p> <p>To publish questions and answers on the H+H website.</p>	<p>Yourself.</p> <p>Register of shareholders.</p>	<ul style="list-style-type: none"> - Documentation of your status as shareholder - Name - Your question - Your proposal - Your opinion expressed during a general meeting 	<p>Legal requirement GDPR art. 6(1)(c) (cf. compliance with legal obligations in sections 78, 90 and 102 of the Danish Companies Act)</p> <p>Legitimate interest GDPR art. 6(1)(f) To be able to document you are a shareholder or proxy so you can exercise your right to ask questions and submit proposals prior to and during the meeting as well as speak during the meeting.</p>	<p>General personal data: Until you are no longer a shareholder in H+H + 5 years till the end of a financial year.</p> <p>Registrations, proxies, written votes: From general meeting + 5 years till the end of a financial year.</p> <p>Notices and agendas, including your proposals, and related proxy forms and voting forms: For as long as H+H exists.</p>

Audio and audio visual recordings during general meetings

Purpose	Sources	Categories	Legal basis	Retention
<p>To record audio and/or audio visuals of general meetings – audio visuals focus on the meeting podium – to enable live streaming if it is a fully or in part electronic general meeting.</p>	<p>Professional AV firms hired in to make the recordings.</p>	<ul style="list-style-type: none"> - Audio recording - Audio visuals recording <p>(if recording your voice and/or your image in a manner that makes you identifiable)</p>	<p>Legitimate interest GDPR art. 6(1)(f) To use the recordings to live stream from general meetings held electronically in part of in full.</p>	<p>Until the minutes are approved.</p>

5. Your rights as data subject

As a data subject, you have the following rights due to H+H's processing of your personal data:

- to demand H+H provides access to, rectifies or deletes your personal data
- in case of your consent for H+H to process your personal data, to withdraw your consent at any time, meaning future processing of your personal data by H+H is not permitted, unless such processing is legitimate based on other grounds such as contractual obligations, legal requirements, other legitimate reasons etc.
- to object to the processing of your personal data and to restrict the processing of your personal data
- to have your personal data with H+H transferred to you or a third party appointed by you, with the data being transferred in a structure, commonly used and machine-readable format (data portability)
- to lodge a complaint with a national data protection authority, in Denmark the Danish Data Protection Agency, see clause 6 below.

6. Contacts

In case you have questions, requests, or complaints regarding H+H's processing of your personal data, please write to GDPR@HplusH.com or call +45 35 27 02 00.

If you are dissatisfied with H+H's response to your complaints or requests, you can also contact your national data protection authority and, if relevant, submit a complaint to them. In Denmark the authority is:

The Danish Data Protection Agency

Carl Jacobsens Vej 35

2500 Valby

Denmark

Tel.: +45 33 19 32 00

E-mail: dt@datatilsynet.dk

7. Changes to this privacy policy

This privacy policy was issued in March 2021. H+H reserves the right to update and amend this policy. The current policy is always available at www.HplusH.com.