

Privacy Policy

Date of update	28 August 2024
Apply to	Sofia Residential A/S
Responsible	Board of Directors for Sofia Residential A/S
Legal basis	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in connection with the processing of personal data and on the free exchange of such information and on the repeal of Directive 95/46 /EC with associated regulation (personal data regulation). The Act on supplementary provisions to the regulation on the protection of natural persons in connection with the processing of personal data and on the free exchange of such information (Act No. 502 of 23 May 2018) (the Data Protection Act).
Version no.	1

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1 Purpose and legal basis

- 1.1 The purpose of this policy is to describe how Sofia Residential A/S (the Company) handles the processing of personal data, including the use of cookies, and constitutes the Company's Privacy Policy.
- 1.2 The legal basis for the Company's processing of personal information is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. In Denmark, Danish legislation (the Data Protection Act) is arranged in accordance with the regulation's provisions, both with effect from 25 May 2018.

2 Data Controller

- 2.1 The Company is the data controller and thus responsible for the processing of personal data that takes place as part of the Company's work as a self-managing registered AIF and is responsible for the processing taking place in accordance with the principles set out in the Privacy Policy.

3 Collection, processing and storage

We collect, process and store your personal data to the extent that you enter, send or otherwise provide the Company with your personal data in connection with your establishment as a customer with the Company.

The personal data we collect is typically divided into the following categories:

- a) Personal information, such as information about your name, address, email address and social security number.
- b) Any information about wealth.
- c) Photo identification, e.g. copy of driver's license or passport, when required.

- 3.1 The purpose of collecting personal data is for the purposes of, but is not limited to:

- Establishment, maintenance and possible termination of customer relationship with the Company
- Reporting on your investments
- Personalizing communications and marketing for you
- General administration of your relationship with the Company
- Compliance with applicable law, including e.g. the Marketing Practices Act and the Data Protection Act.

- 3.2 Disclosure to third parties

When you choose to register as a customer with the Company, you also give us permission to disclose relevant information about you to e.g. a third party who assists the Company with handling tasks in accordance with the Money Laundering Act and subscription and listing of shares in the Company.

- 3.3 Sharing data

In some cases, we share your data with other partners. However, this never happens without the Company having full control over your data, as such a partner can only access and process your data after and when required a data processing agreement has been entered into between the Company and the business partner in question. The Company may transfer Personal Data to one or more of the following categories of third parties:

- Marketing and communication systems and other administrative systems.
- Lawyers and others who provide consultancy services.

- Operating operators, e.g. suppliers of servers.
- The Danish Financial Supervisory Authority and other authorities.

This list is not exhaustive.

The purpose of disclosing your data may be, for example, the establishment, maintenance or termination of your customer relationship. At the same time, data may be disclosed for the purpose of providing our services.

3.4 Third countries

The Company does not transfer your personal data to third countries (countries outside the EU/EEA), unless it is necessary in the specific case or in connection with the provision of specific services. In that situation, we will make sure that there is a transfer basis, and you will be informed in connection with the specific case.

4 Collection from third parties

- 4.1 The Company may need to obtain additional information about you from third parties, e.g. data providers, and add this to the information that the Company processes about you. The information may include credit information, information about whether a company is registered for VAT or information about beneficial owners' information from authorities. Information is only collected to the extent permitted by applicable law or on the basis of your consent.

5 Storage

- 5.1 We will only retain your personal information for as long as the information is needed to perform the services we provide to you. Therefore, your personal information will be deleted on an ongoing basis if we do not have to store the information in relation to applicable legislation. We continuously check whether we have stored information that is no longer necessary to store. The period during which we store your data may therefore vary, as the storage serves different purposes. In some cases, your personal information will be anonymized rather than deleted.
- 5.2 We have also put in place the necessary technical and organisational measures to secure your data. We have the same requirements for companies/data processors to whom we potentially disclose your information. The data that the Company is obliged to collect, store and, if applicable, be used to collect the data. disclosure to a third party, is deleted 5 years after you cease to be a customer of the Company, unless otherwise stated by law.

6 Your rights

- 6.1 You have the right to access the personal data that we process about you, subject to certain exceptions provided for by law. In addition, you can object to the collection and further processing of your personal data. Furthermore, you have the right to rectification of your personal data or to ask us to restrict the processing of your personal data.
- 6.2 If you request it, we will delete the personal data that we have registered about you without undue delay, unless we can continue the processing on another basis, e.g. if the processing is necessary to establish a legal claim or if it is necessary to respond to an inquiry from you.
- 6.3 In certain circumstances, you may also request that we provide you with a copy of your personal data in a structured, commonly used and machine-readable format, and request that we transmit the data to another data controller (data portability).
- 6.4 All inquiries regarding the processing of personal data can be made to info@seeresidential.com

7 Confidentiality

- 7.1 The Company treats all information confidentially.

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8 Consent requirements

- 8.1 If the processing of data requires your consent, you must be aware that you have the option to withdraw your consent. Withdrawal of consent may have an impact on the management of your customer relationship with the Company, as consent is required for certain processing of personal data.

9 Complain

- 9.1 If you disagree with the way we process your personal data or the purposes for which we process it, please feel free to contact us. You can also file a complaint with Datatilsynet (the Danish Data Protection Agency), Carl Jacobsens Vej 35, 2500 Valby, telephone number 33193200, e-mail dt@datatilsynet.dk. In addition, we refer to the Danish Data Protection Agency's website.

10 Cookies

- 10.1 The Company collects cookies in order to improve the user experience. You can opt out of blocking cookies at any time by selecting "Block cookies". Please note, however, that the procedure for turning off cookies differs depending on which internet browser you are using.

11 Publication, update and control

- 11.1 The policy is published on the Company's website.
11.2 This policy is updated at least once a year or as needed.

Approved, Copenhagen 29th August 2024

Board	Goergi Kirov, Chairman Majbritt Stabel Christensen Helle Lund Bjerre
Directorates	Anders Retz Johansson

12 History

Version	Approved	Changes
1	29 August 2024	New policy
