

Privacy policy for shareholders etc.

1 Introduction

- 1.1 As part of our handling of relations with our shareholders, Ringkjøbing Landbobank A/S, company reg. (CVR) no. 37536814, Torvet 1, DK-6950 Ringkjøbing (the “Bank”, “we” and “our”) processes and stores personal data about shareholders, proxies and advisers. This privacy policy sets out how and why we process personal data in our administration of relations with shareholders, proxies and advisers, including registration in the register of shareholders and when convening and holding general meetings.
- 1.2 The Bank is the data controller for the processing of personal data set out in this privacy policy.

2 How and why we process personal data

- 2.1 Below we list what types of personal data we collect, process and store about shareholders, proxies and advisers and for which purposes and on which basis we process the personal data.
- 2.2 Where we refer to our legitimate interest as the legal basis for processing personal data, we have balanced interests to check that your interests or freedoms do not override our legitimate interests.

Purpose	Personal data processing activity	Legal basis
Identifying shareholders and maintaining our register of shareholders	In order to identify our shareholders and maintain the register of our shareholders, we process information about each shareholder, including name, address, email address, buy/sell dates, shareholding, voting rights and charges.	We process the personal data to comply with our legal obligation set out in the Danish Companies Act. The legal basis for processing is Article 6(1)(c) of the General Data Protection Regulation.
Notice of general meetings	Notice of a general meeting in the Bank will be distributed based on the information registered in the register of shareholders, including name, address and email address. We will in this respect process personal data for the purpose of sending the notice of the general meeting to shareholders to enable them to exercise their basic administrative rights at the general meeting.	We process the personal data to comply with our legal obligation set out in the Danish Companies Act. The legal basis for processing is Article 6(1)(c) of the General Data Protection Regulation.

The notice of the general meeting with agenda will be published and distributed in accordance with applicable law and the Bank's articles of association and will thus be published in a corporate announcement via Nasdaq Copenhagen and on the Bank's website and distributed by email or ordinary post to shareholders who have requested this.

Following publication of the notice, certain other documents relevant to the general meeting will be published on the Bank's website, including the full proposals and forms for granting proxy or postal voting.

Notification of attendance, granting of proxy and postal voting

When a shareholder provides notification of the shareholder's and any adviser's attendance at the general meeting or grants a proxy to a third party, we issue an admission card (potentially with voting cards), which will contain certain personal data about the shareholder and any proxy and/or adviser representing the shareholder, including name, address, email address and shareholding.

Access cards will be made available electronically or distributed by email or ordinary post.

Notification of attendance implies that we will process your personal data based on the information registered about the shareholder in the register of shareholders or provided in connection with notification of attendance. Personal data are also processed in connection with granting proxy to a third party or to the board of directors or with postal voting. Similarly, your personal data are processed in order to manage the

We process the personal data to comply with our legal obligation set out in the rules on shareholders' rights in the Danish Companies Act.

The legal basis for processing is Article 6(1)(c) of the General Data Protection Regulation.

voting process, if the shareholder votes at the general meeting (in writing or electronically), to provide confirmation of electronic votes, etc.

If the shareholder grants proxy to a third party and/or registers attendance of an adviser, we will collect and process personal data about such persons (names, addresses and email addresses).

Data are collected and processed for the purpose of ensuring that the relevant persons are granted access to the Bank's general meeting and that they can exercise their rights.

Submitting questions prior to the general meeting	When submitting written questions prior to the general meeting, shareholders must document their status as a shareholder or proxy and in this respect collection and processing of your personal data will take place.	Collection and processing of personal data will in such event be based on the Bank's legitimate interest in being able to identify the shareholder, to enable the shareholder to exercise the right as a shareholder to submit questions.
	If questions are answered in writing, the questions, including your name, and the Bank's answers will be made available upon request and may be presented or mentioned at the general meeting.	The legal basis for processing is Article 6(1)(f) of the General Data Protection Regulation.
Submission of proposals prior to the general meeting	The Bank will collect and process your personal data and the contents of your proposal if you request a specific issue to be included on the agenda for the general meeting.	Your personal data will in this respect be collected based on the Bank's legitimate interest in being able to identify you as shareholder in order to enable you to exercise your right to submit proposals for inclusion on the agenda.
	If your request fulfils the requirements, the proposal and your name will be included (i) on the agenda and in the full proposals, (ii) on the forms for granting proxy or postal voting, which will subsequently be published in accordance with the rules in this respect, and (iii) in the minutes of the general meeting.	The legal basis for processing is Article 6(1)(f) of the General Data Protection Regulation.

<p>The right to speak and ask questions at the general meeting</p>	<p>If a shareholder, a proxy or an adviser chooses to speak at the general meeting, e.g. in order to ask questions to the board of directors or regarding the annual report, the shareholder, proxy or adviser will be requested to document his or her status as a shareholder, a proxy or an adviser.</p>	<p>In this respect, personal data will be collected and processed based on our legitimate interest in being able to identify the shareholder in order for the shareholder to exercise his or her right to speak and potentially ask questions at the general meeting.</p>
	<p>The statement and name will be included in the minutes of the general meeting.</p>	<p>The legal basis for processing is Article 6(1)(f) of the General Data Protection Regulation.</p>
<p>Video recording and/or webcast of the general meeting</p>	<p>The general meeting may be recorded and/or webcast live to shareholders and other relevant attendants via the Bank's website or an app. If we do this, the recording may be made available on the Bank's website after the general meeting.</p>	<p>Personal data will be collected based on our legitimate interest in being able to identify the shareholders, proxies and advisers in order to enable them to exercise their rights at the general meeting, ensure transparency of the process and proceedings at the general meeting, and give shareholders who are unable to attend in person insight into the proceedings by watching the live webcast and/or recording.</p>
	<p>The audio-visual recording and/or webcast will cover the area around the stage and the speaker's stand at the general meeting, and personal data will thus be collected and processed when a shareholder, a proxy or an adviser chooses to speak, votes or otherwise provides input at the general meeting.</p>	<p>The legal basis for processing is Article 6(1)(f) of the General Data Protection Regulation.</p>
	<p>These data comprise name and possibly audio-visual recording of questions, input and voting.</p>	
	<p>Before shareholders, proxies and advisers can log in or speak/provide input at the meeting, including in writing, their status as a shareholder, a proxy or an adviser must be documented.</p>	
	<p>Shareholders, proxies or advisers cannot refuse to be recorded if they choose to speak at the general meeting.</p>	

Minutes of the general meeting	<p>After the general meeting, the Bank will prepare minutes of the general meeting. Therefore, in addition to the initial collection and processing, your personal data may be processed for the purpose of the minutes, e.g. submitting of proposals or exercising the right to speak or otherwise providing input at the general meeting.</p> <p>Decisions made at the general meeting will be made available on the Bank's website and via Nasdaq Copenhagen after the meeting.</p> <p>When the minutes of the general meeting are ready, they may be made available on the Bank's website, where shareholders and the general public can read them.</p>	<p>The Danish Companies Act requires minutes to be taken, and the processing of personal data on our shareholders is thus necessary in order for us to comply with our legal obligations.</p> <p>The legal basis for processing is Article 6(1)(c) and (f) of the General Data Protection Regulation.</p> <p>When submitting a proposal for inclusion on the agenda or when making statements at the general meeting, it is not possible to refuse the mentioning in the minutes of the names of the shareholders, proxies or advisers, as applicable.</p>
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3 Third parties with whom we share personal data

3.1 We may share the personal data of shareholders, proxies and advisers with relevant employees of the Bank and with relevant third party advisers and service providers. Some of these parties may be located in countries outside the EU/EEA. To ensure that your personal data enjoy adequate protection, we have ascertained that security measures enabling the transfer have been implemented, either where the European Commission has established that the third country in question offers an adequate level of protection or by using the standard contractual clauses adopted by the European Commission.

We may also share the personal data with public authorities as well as the general public through publication on our website in accordance with applicable law.

If you want further information on such transfers and the security measures established to enable the transfer of personal data, please email your request to the Bank at soscompliance@landbobanken.dk.

4 How long will we store your personal data?

4.1 We will only store personal data for as long as necessary to fulfil the purposes outlined in this policy. When the Bank no longer has a legitimate purpose and need to process your personal data, we delete or anonymise them.

4.2 Identifying shareholders and maintaining our register of shareholders

We keep the personal data as long as you are a shareholder. If you are no longer a shareholder, we keep the personal data for as long as this is allowed under the applicable law, with a view to protecting the Bank's and the shareholders' interests. This is normally a minimum of five years and, based on a specific assessment, up to ten years from the end of the financial year to which the data relate: see section 17 of the Companies Act.

4.3 Notice of general meetings

We are allowed to keep the notice of the meeting with agenda, full proposals and forms for granting proxy or postal voting until we no longer need the information for the purpose of protecting the Bank's and the shareholders' interests, including for the purpose of documenting the contents of the notice of the general meeting. This means that we will keep the notice of the meeting with agenda, full proposals and forms for granting proxy or postal voting for a period of at least five years and, based on a specific assessment, up to ten years from the end of the financial year to which the minutes relate (see section 17 of the Companies Act), after which personal data in the notice of meeting will be deleted.

The notice of the meeting with agenda will be available on the website for a period of at least five years from the end of the financial year in which the notice was issued. The other documents will be available on the website until the next ordinary general meeting.

4.4 Notification of attendance, granting of proxy and postal voting

For retention periods see section 4.3 on notice of general meetings, section 4.8 on video recording and/or webcast and section 4.9 on minutes of the general meeting.

4.5 Submitting questions prior to the general meeting

For the retention period, see section 4.3 on notice of general meetings.

4.6 Submission of proposals prior to the general meeting

For retention periods, see section 4.3 on notice of general meetings and section 4.9 on minutes of the general meeting.

4.7 The right to speak and ask questions at the general meeting

For retention periods, see section 4.8 on video recording and/or webcast and section 4.9 on minutes of the general meeting.

4.8 **Video recording and/or webcast**

The recording will be available on the Bank's website for a period of up to two years after the general meeting, after which it will be removed from the website.

We keep the recording internally for a minimum of five years and, based on a specific assessment, up to ten years from the end of the financial year to which the data relate: see section 17 of the Companies Act.

4.9 **Minutes of the general meeting**

We are allowed to keep minutes of the general meeting until we no longer need the information for the purposes of protecting the Bank's and the shareholders' interests and of documenting the deliberations and resolutions passed at the general meeting. This means that we will keep the minutes of the meeting for a period of at least five years and, based on a specific assessment, up to ten years from the end of the financial year to which the minutes relate (see section 17 of the Companies Act), after which personal data in the minutes will, in principle, be deleted.

When the minutes of the general meeting are ready, they may be made available on the Bank's website until the next annual general meeting and may thus be generally available to shareholders and the public in that period.

4.10 **Longer retention periods**

We may retain the data in sections **Fejl! Henvisningskilde ikke fundet.**-4.10 above for a longer period if we are required to do so by law or retention is necessary to establish, exercise or defend legal claims.

5 Your rights as a data subject

5.1 Please note that conditions and restrictions apply to the rights below. Therefore, in a specific case, you may not have the right to erasure, for example. This will depend on the specific circumstances of the processing activity.

5.2 **Right of access**

You can obtain further information on the personal data which we retain and process about you by sending an e-mail to the Bank at soscompliance@landbobanken.dk stating this request.

5.3 **Right to rectification, erasure and restriction of processing**

You may have the right to have incomplete or inaccurate personal data about you rectified, to have certain personal data about you erased or to have processing of your personal data restricted. If you wish to have your data rectified or erased or restrict the processing, please send an e-mail to the Bank at soscompliance@landbobanken.dk stating this request.

5.4 **Right to object**

You may object to your personal data being processed by us. If you wish to object to your personal data being processed, please send an e-mail to the Bank at soscompliance@landbobanken.dk stating this objection.

5.5 **Right of complaint**

If you wish to complain about our processing of your personal data, you may contact the Danish Data Protection Agency via their website www.datatilsynet.dk.

6 **Changes to this policy**

6.1 We may change this privacy policy from time to time by issuing a new version on our website.

7 **Contact details and data protection officer**

7.1 Our contact details are:

Ringkøbing Landbobank A/S
Torvet 1
6950 Ringkøbing, Denmark
Telephone: +45 9732 1166
Email: post@landbobanken.dk
Company reg. (CVR) no.: 37536814

If you have any questions, e.g. on our balancing of interests, you can contact the Bank's data protection officer (DPO) at soscompliance@landbobanken.dk

Adopted by the board of directors of Ringkøbing Landbobank on 19 December 2022.