

## 1 Introduction

1.1 As part of our handling of relations with our shareholders, Ringkjøbing Landbobank A/S (hereafter the “Bank” - “we” and “our” in this privacy policy will also refer to the Bank) processes 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 about shareholders, proxies and advisers and for which purposes we process the personal data.

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 collect information about each shareholder, including name, address, email address, buy/sell dates, shareholding, voting rights and pledges.	We process the personal data to comply with our legal obligation set out in the Danish Companies Act.  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.
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 who have requested to receive a copy, 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.

Purpose	Personal data processing activity	Legal basis
Notification of attendance, granting of proxy and postal voting	<p>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, any proxy and/or adviser representing the shareholder, including name, address, email address and shareholding.</p> <p>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 voting process, if the shareholder votes at the general meeting (in writing or electronically), to provide confirmation of electronic votes, etc.</p> <p>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 and addresses).</p> <p>Data are collected and processed for the purposes of ensuring that the relevant persons are granted access to the Bank's general meeting and that they can exercise their rights.</p>	<p>We process the personal data to comply with our legal obligation and with the rules on shareholders' rights set out in the Danish Companies Act.</p> <p>The Bank may keep information on registrations, proxies and postal votes until it is no longer necessary for us to keep this information with a view to protecting the Bank's and the shareholders' interests. This information will, however, be kept for a period of at least ten (10) years, after which it will be deleted.</p>

Purpose	Personal data processing activity	Legal basis
Submitting questions prior to the general meeting	<p>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.</p> <p>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.</p>	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.
Submission of proposals prior to the general meeting	<p>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.</p> <p>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.</p>	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.
The right to speak and ask questions at the general meeting	<p>If a shareholder 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 will be requested to document his or her status as a shareholder, a proxy or an adviser.</p> <p>The statement and name will be included in the minutes of the general meeting.</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.

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Video recording of the general meeting	<p>The general meeting may be recorded. The video recording may be made available on the Bank's website after the general meeting.</p> <p>The audio-visual recording will cover the stage and the speaker's stand at the general meeting, and personal data will thus be collected and processed, when a shareholder chooses to speak at the general meeting.</p> <p>Before shareholders, proxies or advisers can address the assembly, their status as a shareholder, proxy or adviser must be documented and by speaking from the speaker's stand (e.g. to ask a question about the board of directors' report or the annual report) the shareholders, proxies or advisers, as applicable, must consent to our collection and processing of their personal data, including names and audio-visual recording. Shareholders, proxies or advisers cannot refuse to be recorded if they choose to speak at the general meeting.</p>	<p>Personal data will be collected based on our legitimate interest in being able to identify the shareholders, proxies or advisers in order to enable them to exercise their rights at the general meeting, ensure transparency of the proceedings at the general meeting, and give shareholders who are unable to attend in person insight into the proceedings by watching the recording.</p> <p>The recording will be available on the Bank's website for a period of up to two years after 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, personal data may be processed for the purpose of the minutes, e.g. submitting of proposals or exercising the right to speak at the general meeting.</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>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> <p>The minutes of the general meeting will be available on</p>

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		<p>request for a period of up to five years from the date of the meeting.</p> <p>We are allowed to archive minutes of a general meeting 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 deliberations and resolutions passed at the general meeting. This implies that minutes will never be deleted.</p>

### 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. 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. Some of these parties may be located in countries outside the EU/EEA. Please be informed that the level of data protection as currently applied and enforced in some countries outside the EU/EEA does not match the level of data protection currently applied and enforced within the EU. If personal data are processed outside the EU/EEA, such transfer of personal data will either be subject to the EU-U.S. Privacy Shield or the European Commission's standard contracts. You can request a copy of the agreement covering the transfer of personal data by sending an email to the Bank at [post@landbobanken.dk](mailto:post@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. We will generally keep personal data of shareholders, proxies and advisers for up to five years from the date of the general meeting, unless otherwise stated above.

### 5 Your rights as a data subject

5.1 **Right of access.** You can obtain further information on the personal data which we store and process about you by sending an e-mail to the Bank at [post@landbobanken.dk](mailto:post@landbobanken.dk) stating this request.

5.2 **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 [post@landbobanken.dk](mailto:post@landbobanken.dk) stating this objection.

5.3 **Right to rectification and restriction of processing.** You may request that your personal data be rectified or restrict the processing of your personal data. If you

wish to have your data rectified or restrict the processing, please send an e-mail to the Bank at [post@landbobanken.dk](mailto:post@landbobanken.dk) stating this request.

5.4 **Right to data portability.** You may be entitled to obtain a copy of your personal data in a structured, commonly used and machine-readable format by sending an e-mail to the Bank at [post@landbobanken.dk](mailto:post@landbobanken.dk) stating this request. If technically feasible, you may request that the personal data be transmitted directly to another company or person acting as a data controller.

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.

## 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

7.1 Our contact details are:

Ringkøbing Landbobank A/S  
Torvet 1  
6950 Ringkøbing, Denmark  
Telephone: +45 9732 1166  
Email: [post@landbobanken.dk](mailto:post@landbobanken.dk)

*Adopted by the board of directors of Ringkøbing Landbobank on 15 December 2021.*