

Privacy policy

1. Data controller and contact information

The data controller of your personal data is:

ROYC AB
Reg. no.: 559360-9422
Sturegatan 6,
114 35 Stockholm
Sweden

2. If you visit the website www.roycgroup.com

2.1 Cookies

Types of personal data

ROYC uses cookies on the website www.roycgroup.com and in this connection processes your personal data. ROYC may collect the following personal data about you, when you visit our website:

- IP address
- MAC address
- Browsing History
- Information about your use of our website, including click-behaviour

We use cookies to collect the above-mentioned personal data. You can read more about the use of cookies in our cookie policy, which you can find via the following link:

https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5_Cookie%20Policy.pdf

The purposes of the process

Your personal data may be processed for the following purposes:

- Marketing in general
- Product and service development
- Statistics and analysis

Legal basis for processing

ROYC processes your personal data on the following basis:

- Legitimate interests: We base the processing of your personal data on our legitimate interests in, for example, conducting statistics, analyses, providing support, as well as improving and developing our products and services (Article 6(1)(f) of the General Data Protection Regulation).

When you visit our website, we ask for your informed consent to place cookies that are not functional cookies according to the cookie rules. You have the right to withdraw your consent at any time. You can read more about how you change your cookie settings in our cookie policy, which is available

https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5_Cookie%20Policy.pdf

Retention period

Cookies are deleted in accordance with our cookie policy, which is available here:

https://uploads-ssl.webflow.com/63736d12b77485a7e224495c/6418b6b3bf56d842a5404ee5_Cookie%20Policy.pdf

However, the information may be stored for a longer period in anonymised form.

3. When you register as a user on ROYC's investor portal

Types of personal data

When you register as a user on the investor platform via the onboarding link provided by us, ROYC processes your personal data. ROYC may collect, process, and store the following types of your personal data:

- Your name
- Your date of birth
- Your e-mail address
- Your phone number
- Your address
- Your nationality
- Your country and city of birth
- Your source of wealth and funds
- Your political exposure within the past 12 months
- Digital footprints
- Your professional classification terminated in accordance with MIFID and other relevant legislation
- Your tax residency
- Your tax ID
- Contractual information such as contracts and other agreements between you and ROYC
- Information about you as a shareholder or investor relationship with ROYC, including financial information such as bank details, investment amounts or ownership shares, voting rights and other rights associated with your relationship with ROYC
- Communication with you

The purposes of the process

Your personal data will be processed for the following purposes:

- Management of user account/profile
- Statistics and analysis
- Administration, including of your shareholder relationship or the agreement with you as an investor
- Communication with you
- Compliance with applicable law, e.g., fulfilment of our obligations to prevent illegal activities

Legal basis for processing

ROYC processes your personal data on the following bases:

- Legitimate interests: We process your information based on our legitimate interest in managing the created user accounts, as well as our legitimate interest in conducting statistics and analyses. So, we can improve the user experience and our investor portal quality (Article 6(1)(f) of the General Data Protection Regulation).
- Contractual obligations: We process your personal data to fulfil an agreement with you (Article 6(1)(b) of the General Data Protection Regulation).

Retention period

Your relevant personal data will be obtained for as long as necessary to fulfill the purposes it was collected for, including to satisfy any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal information, ROYC considers the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we process personal information and whether those purposes can be achieved through other means and the applicable legal requirements.

Upon expiry of the applicable retention period, we will securely destroy your personal data in accordance with applicable laws and regulations.

Potential additional data protection

An additional set of data protection rules will be imposed when adhering to the agreements in regard to your application to subscribe for, or for the holding of, one or more shares of the funds provided by ROYC via the investment platform.

4. If you sign up for our newsletter(s) and marketing material

Types of personal data

ROYC collects, processes, and stores your personal data for marketing purposes when you sign up for newsletter(s) and marketing material. ROYC may collect, process, and store the following types of your personal data:

- Name and e-mail address
- Your consent
- Your interests
- Your click-behaviour in relation to published material

The purposes of the processing

Your personal data may be processed for the following purposes:

- Marketing
- Analysis and statistics

Legal basis for processing

ROYC processes your personal data on one or more of the following grounds:

- Consent: ROYC will only use your personal data for direct marketing, including for sending out newsletters, if you have given your prior and explicit consent to this (Article 6(1)(a) of the General Data Protection Regulation).
- Legitimate interests: The processing of your personal data will, in connection with analysis and statistics, be based on our legitimate interests in being able to improve and develop our service (Article 6(1)(f) of the General Data Protection Regulation).

Retention period

Your personal data will be stored as long as your consent to receive marketing material including newsletters is active.

You can always withdraw your consent by clicking on the unsubscribe link at the bottom of each e-mail or by contacting us as described below. However, withdrawing your consent does not affect the legality of the processing that preceded the withdrawal.

Documentation of your marketing consent is kept for a period determined on ROYC's legitimate interest in being able to document that direct marketing has been carried out in accordance with the applicable legislation (Article 6(1)(f) of the General Data Protection Regulation).

In addition, the information can be stored for a longer period in anonymised form.

5. If you apply for a job

This section sets out the policy for ROYC processing of personal data in relation to recruitment.

Types of personal data

ROYC may collect, process, and store the following personal data:

- Personal data which you have disclosed in your job application and CV as well as any attachments
- Personal data you disclose during any job interviews

- Information about you, including information regarding your previous jobs, activities, competencies, performance, as well as your general appearance, which is publicly available on the internet, including on social media
- Results of personality tests etc.
- Criminal records
- References from your previous and/or current employers
- Evidence of right to work and/or immigration status
- Additional information you will provide in relation to the recruitment process

Purposes of the processing

Your personal data will be processed for the purpose of assessing whether we can offer you a position at ROYC.

Legal basis

ROYC will mainly process your personal data based on the following legal bases:

- Request to enter into an employment contract with us: We may process your personal data on the basis of your request to enter into an employment contract with ROYC (Article 6 (1) (b) of the GDPR).
- Legitimate interests: We may process your personal data on the basis of our legitimate interests in carrying out further assessments of whether we want to hire you, including on the basis of personality tests, publicly available information on the internet and – if the position entails a financial responsibility - credit information and rating (Article 6 (1) (f) of the GDPR).
- Consent: In exceptional cases and only when no other legal basis can be applied, ROYC may ask separately for your consent to process your personal data (Article 6 (1) (a) and 9 (2) (a) of the GDPR. ROYC will, for instance, only take references from your previous and/or current employers or collect your health information or criminal records if you have consented to this.

Retention period

If you are offered a position with ROYC, your application and additional relevant personal data obtained during the recruitment procedure will be stored in your employee file. ROYC will retain and securely destroy the personal information of former employees, workers or contractors following applicable laws and regulations.

If you are not offered a position, ROYC will only retain personal information for as long as necessary to fulfill the purposes it was collected for, including to satisfy any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal information, ROYC considers the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we process personal information and whether those purposes can be achieved through other means and the applicable legal requirements.

If we have collected your criminal records, we will delete them immediately after we have received and reviewed them.

6. If you are a supplier, collaborator etc.

This section contains the policy for ROYC's processing of personal data of sole proprietorship owners or contacts of suppliers and other business partners working with ROYC.

Collection of personal data

ROYC may collect, process, and store your personal data in the following cases:

- When your company or the company you work at enters into an agreement with ROYC
- When you have shown interest in ROYC's platform and services, e.g., by providing ROYC with your business card
- When collaborating and communicating with ROYC

Types of personal data

ROYC may collect, process, and store the following types of personal data about you:

- Name, e-mail address, phone number, and corresponding contact information
- Individual information, e.g., preferred languages
- Organisational information such as the name and address of the company, job title, employment area, primarily place and country of work
- Contractual information such as orders, invoices, contracts, and other agreements between your company (or your employer) and ROYC that may contain e.g., your contact information
- Financial information such as payment terms, bank details and credit ratings (in the case of a sole proprietorship)

We may receive such information directly from you (primarily through e-mails and other correspondence with you) or from a third party such as your employer.

The purposes of the processing

Your personal data may be processed for the following purposes:

- General planning, fulfilment, and the management of collaborations, including contracts
- Administration such as the processing of payments, rating evaluations, accounting, auditing, as well as providing support
- Newsletters and other marketing communication
- Conducting inquiries from you
- General communication
- Product and service development
- Statistics and analysis
- Compliance with applicable laws and regulations, e.g., fulfilment of our obligations to prevent illegal activities
- Managing conflicts

Legal basis for processing

ROYC primarily processes your personal data on one or more of the following grounds:

- Contractual obligations: In certain cases, the processing of your personal data is necessary to fulfil a contract (Article 6(1)(b) of the General Data Protection Regulation).
- Legitimate interests: We may process your personal data on the basis of our legitimate interests in, for example, managing day-to-day operations in accordance with legitimate and fair business practices, including planning, execution and management of the cooperation or our legitimate interest in, for example, performing credit ratings, statistics, analyses, marketing activities (where consent is not required), provide support and as well as improvement and development of our products and services. The processing may also be necessary for our legitimate interest in preventing fraud or establishing, defending, or asserting legal claims (Article 6(1)(f) of the General Data Protection Regulation).]
- Legal obligation: The processing of your personal data will in some cases be necessary for compliance with legal obligations, such as our obligation to prevent illegal activities (Article 6(1)(c) of the General Data Protection Regulation).

Retention period

ROYC will only retain personal information for as long as necessary to fulfill the purposes it was collected for, including to satisfy any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal information, ROYC considers the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we process personal information and whether those purposes can be achieved through other means and the applicable legal requirements.

7. Transmission to other controllers and entrustment to data processors

To achieve the above purposes, we may give third parties access to your personal data, which, based on a contractual relationship with ROYC, provides relevant services, this could be IT suppliers or other suppliers that process personal data for us. Such suppliers will only process personal data in accordance with our instructions according to the signed data processing agreements.

In the context of ROYC's development, the corporate structure may change, e.g., by the total or partial sale of the company. In the case of a partial transfer of assets containing personal data, the processing basis for the related transfer of personal data is, as a rule, Article 6(1)(f) of the General Data Protection Regulation, since ROYC has an interest in transferring parts of its assets and making commercial/structural changes.

In addition to what is described above, your personal data is generally not disclosed to a third party without your consent. However, in certain circumstances and under the law, it may be necessary to disclose your personal data to e.g.

If your personal data are transferred to data processors or data controllers established in countries outside the EU/EEA that do not have an adequate level of protection, such a transfer will only take place once a transfer basis is secured. In addition, the transfer will be based on the EU Commission's standard contracts.

8. Your rights

- You have the right to access the personal data we process about you
- You have the right to object to our collection and further processing of your personal data
- You have the right to rectification and deletion of your personal data, however there are certain statutory exceptions
- You have the right to ask us to restrict the processing of your personal data
- In certain circumstances, you may also request to receive a copy of your personal data and to transmit the personal data you have provided to us to another data controller (data portability)
- You can withdraw any consents you may have given at any time. We will then delete your personal data unless we may continue the processing on another basis. You can cancel our newsletter by clicking on the link at the bottom of the newsletter

9. Questions and complaints

If you have any questions about this privacy policy or if you wish to complain about the way we process your personal data, please feel free to contact us:

ROYC AB
Reg. no.: 559360-9422
Hovslagargatan 5,
111 48 Stockholm
Sweden
E-mail: contact@roycgroup.com

If your complaint is not resolved by us and you want to proceed with the case, you can complain to the Swedish Authority of Privacy Protection:

Swedish Authority of Privacy Protection
Reg. no.: 202100-0050
Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden
Complain scheme link: <https://e-tjanster.imy.se/en/klagomal>

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