

## **Guidelines for managing personal data for CB Asset Management (CB Funds)**

CB Asset Management (CB Funds) has a privacy policy designed to protect the privacy of individuals and to provide a high level of service, relevant information adapted to the recipient and compliance with legal requirements regarding both minimum requirements for storage and restrictions on how information may be used and to what extent it may be saved.

2018-05-25 the Personal Information Act (Personuppgiftslagen) is replaced by the General Data Protection Regulation (GDPR). This implies new constraints on what information may be saved as well as increased opportunities for persons to limit, request and correct the stored information. In addition to GDPR, there are also many other laws that affect the extent to which information may be deleted, which sometimes affect what rights may be required with reference to the GDPR.

CB Asset Management processes personal data in order to

- 1) inform about the funds the company manages,
- 2) comply with legal requirements under directives, regulations, guidelines and more, *and*
- 3) manage the funds CB European Quality Fund and CB Save Earth Fund.

Information about name, email and language are stored in order for CB Asset Management to spread information about our funds to those who expressed interest in receiving our newsletters. Other information provided to us might be saved if they are relevant for selecting which information we should give. Treatments performed on the data are searches for sending monthly fact sheets and other information that we perceived that the applicant expressed interest in obtaining. Legal basis for saving these data is the consent of the person we save information about. If someone wishes to withdraw consent, this can be done by contacting CB Asset Management by phone or email.

In many cases, information must be saved due to legal requirements. Electronic communications are generally saved in order to derive possible complaints as well as the basis for any money laundering investigations. Legal basis for saving information in this way is legal obligation.

Under the management of the funds, data may need to be saved due to business deals for contact with our partners. Tasks are stored, for example, in contracts and often with associated e-mail communications. Contact information is also saved on business cards that we receive at meetings and electronically in email signatures. Trade in the funds is documented and the communication is saved at least seven years. Legal basis is contractual relationship with registered for contract and legal obligation for information related to trade in the funds.

CB Asset Management does not sell the data to third parties. If CB Asset Management transfers data to third parties, third party obligations as set out below will be governed by agreements with CB Asset Management. The information will only be used on behalf of CB Asset Management for the above purposes. Third parties shall by contract be required not to save, process or forward the data beyond the extent approved by CB Asset Management, which must be for the above purposes. Third parties shall also protect the data from unauthorized access, and if there is a risk of data being disseminated, CB Asset Management shall be notified if there is a risk that the incident may endanger the rights and freedoms of natural persons.

If information about a physical person is spread in a way that it poses a risk to the freedoms and rights of physical persons, CB Asset Management will notify Datainspektionen within 72 hours. This applies if the information is spread from CB Asset Management as well as from third parties that CB Asset Management has assigned the information to, as above, in which case the notification process is regulated by agreements.

A physical person with whom CB Asset Management stores information is entitled to request access

to such information, as well as correction or deletion and limitation or removal of consent for processing. The person is entitled to receive the information in an electronically portable format.

Contact person at CB Asset Management is CEO Alexander Jansson alexander@cbfonder.se. If any person considers CB Asset Management to handle data in violation of current legislation, complaints may be submitted to Datainspektionen. This authority shall notify whether supervision shall commence within three months after receiving the complaint. Should a message not come back within this time, the matter may be referred to court.

The above guidelines were adopted at the Board meeting 2018-05-21.