

Privacy Policy for shareholders of Netcompany Group A/S

This Privacy Policy explains how Netcompany Group A/S ("we" or "us") processes personal data about shareholders, proxies and advisers in connection with registration in the shareholder portal and the register of shareholders and convening and holding of general meetings.

1 Data controller

The legal entity responsible for processing your personal data is:

Netcompany Group A/S

Grønningen 17

DK-1270 Copenhagen

CVR no. 39 48 90 14

info@netcompany.com

+45 7013 1440

The contact details of our data protection officer (DPO) are as follows:

gdpr@netcompany.com

2 Description of the Processing

2.1 Registration of Shareholders in the Register of Shareholders and on Shareholder Portal

We are under a statutory requirement to maintain an updated register of shareholders. In order for us to comply with this requirement, processing of personal data on shareholders is necessary. The categories of personal data being processed is listed in Appendix 1.

2.2 Notice to Convene the General Meeting

The notice to convene the general meeting of Netcompany Group will be based on the personal data registered about you in the shareholders portal and the register of shareholders. This will include your name, address, and e-mail address. We will process your personal data in connection with our invitation of shareholders to annual general meeting in order for you to exercise your fundamental rights as shareholder in Netcompany Group A/S.

The notice to convene as well as the agenda for the general meeting will be published and distributed as required by the applicable legislation and our articles of association. This includes a company announcement through Nasdaq Copenhagen on our webpage and sent by e-mail to shareholders who have requested this.

When the notice to convene is published, we will provide other relevant documents necessary for the general meeting. This will include complete proposals (if any) and forms for appointment of proxy and voting by correspondence.

The notice to convene and the agenda for the general meeting will be available on our website for 5 years plus the current financial year after the general meeting has taken place.

We might store the notice to convene, agenda, proposals, proxies and voting by correspondence forms until it is no longer necessary for us to store such information for the purpose of pursuing the interest of us and our shareholders. See more under Appendix 1.

2.3 Registration of Attendance, Proxies and Voting by Correspondence

When you as a shareholder give notice that you and possibly your advisor will attend the general meeting or you appoint a third-party proxy, we will issue admission details, which will contain certain personal data about you, the proxy and/or advisor, if any, including name, address, e-mail address and shareholding. Admission details will be made available electronically.

The notice of attendance involves processing of your personal data by us on the basis of the information registered about you in the shareholders portal. Your personal data will also be processed if you issue a proxy with instructions or a proxy to the Board of Directors or vote by correspondence. Similarly, your personal data will be processed if you vote at the general meeting (electronically).

If you issue a proxy to a third party and/or give notice of an advisor's attendance, we will collect and process their personal data (name and address). The purpose of collecting and processing the data is to ensure that the relevant persons will have access to attend the general meeting and exercise the relevant rights.

We may store information about registrations, proxies, and votes by correspondence until it is no longer necessary for us to store such information for the purpose of pursuing the interests of us and our shareholders. See more under Appendix 1.

2.4 Submission of questions and proposals before the general meeting

You are welcome to submit written questions and proposals prior to the general meeting. In order for us to ensure your status as shareholder or proxy, we will collect and process personal data for this purpose.

If questions are answered in writing, the questions together with your name and our answers will be presented at the general meeting.

If your request for proposal satisfies the requirements, the proposal and your name will be included (i) on the agenda and in the complete proposals and (ii) in proxy and the forms for voting by correspondence, which will subsequently be published in accordance with the applicable rules.

The Company may store information about questions and proposals submitted until it is no longer necessary for the Company to store such information for the purpose of pursuing the interests of the Company and its shareholders. See more under Appendix 1.

Please also refer to section 7 of the Articles of Association about the right to speak and questions asked at the general meeting.

2.5 Visual and audio of the general meeting

The general meeting will be webcasted live on our website. The recording will also be made available on demand through our website for a period of five years after the general meeting.

The audio-visual recording will show the stage and podium of the general meeting, and your personal data will thus be collected and processed if you choose to take the floor at the general meeting. Before you step up to the podium, you must document your status as a shareholder or proxy. You cannot refuse to be recorded if you choose to take the floor.

Your personal data will be collected based on our legitimate interest of being able to identify you as a shareholder or proxy so that you may exercise your rights at the general meeting, as well as to ensure transparency in the proceedings at the general meeting, in part so that shareholders who are unable to attend the general meeting in person have an opportunity to follow the general meeting through the recording.

2.6 Minutes of the General Meeting

After the general meeting, we will draw up minutes of the proceedings at the general meeting. In addition to the original collection and processing of your personal data further processing of your personal data may subsequently take place. The minutes must be prepared in accordance with the Danish Companies Act, and the processing will thus take place to comply with a statutory requirement.

If you submit a proposal for inclusion on the agenda, you cannot refuse to have your name appear in the notice convening the general meeting (or forms), nor can you refuse any mention thereof in the minutes.

When prepared, the minutes of the general meeting will be made available on our website and will remain generally available to shareholders and the general public for a period of ten years.

We may store the minutes of the general meeting until it is no longer necessary for us to store such information for the purpose of pursuing the interests of us and our shareholders, including for the purpose of documenting the proceedings and resolutions passed at the general meeting. See more under Appendix 1.

3 Transfers to Countries Outside the EU/EEA

Personal data is not transferred to third countries.

4 Your Rights

As a data subject you have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent and exercise your rights as stated below.
- You have the right to receive the personal data in a structured, commonly used, and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

Furthermore, you have the right to object to our processing of your personal data in the following circumstances:

- If our processing of your personal data is based on article 6(1)(e) (the public interest) or article 6(1)(f) (balancing of interests), see above regarding legal basis, you have the right to object, on grounds relating to your particular situation, at any time, to the processing of your personal data.
- Furthermore, where we process your personal data for direct marketing purposes, you have an unconditional right to object, at any time, to our processing of your personal data.

You can take steps to exercise your rights by contacting our DPO at gdpr@netcompany.com.

There may be conditions or limitations on your rights as a data subject. It is therefore not certain that you, for example, have the right to have your personal data erased in the specific case - this depends on the specific circumstances.

If you wish to contact us regarding our processing of your personal data, please do not hesitate to contact us via the contact details above.

This privacy policy was last updated February 2021

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Appendix 1 - Description of the processing

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
<p>Registration of shareholders in the register of shareholders and on the shareholder portal</p> <p>We process your personal data in order to maintain an updated, statutory register of shareholders.</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> • name • gender • email address • home address • telephone number • portfolio of shares • voting rights • date of acquisition, sale, or pledge of shares • username and password • account number with VP Securities • custodian bank • investor ID • investor group 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you, including when you provide information via our shareholder portal • VP Securities 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> • Article 6.1.c - necessary for us to comply with our legal obligations (Section 50 of the Danish Companies Act) • Article 6.1.f - necessary for the pursuit of our legitimate interest in being able to respond to your requests and to communicate with you 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers, including IT-suppliers • Computershare A/S • Nasdaq Copenhagen A/S • Public authorities, including the Danish Business Authority 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> • We retain your personal data for up to 5 years plus the current financial year after you no longer own shares in Netcompany Group A/S

<p>Convening and holding of general meetings</p> <p>We process your personal data for the purpose of convening you to general meetings and enabling you to exercise your rights at the general meetings as well as issue proxies and vote by correspondence. Furthermore, we use the information to issue voting and admission details to shareholders and advisers, if any. If you are an advisor to a shareholder, we will process your information in order for you to have access to the general meeting.</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> • name • email address • home address • attendance at the general meeting • advisor's attendance at the general meeting • proxies • votes cast, including written votes • portfolio of shares 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you, including when you provide information via our shareholder portal, see above • From shareholders (relevant for proxies and advisers) 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> • Article 6.1.c - necessary for us to comply with our legal obligations (Section 93 of the Danish Companies Act) • Article 6.1.f - necessary for the pursuit of our legitimate interest in being able to convene shareholders to - and to conduct - general meetings and to ensure that proxies and/or advisers are provided with admission details 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers, including IT-suppliers • Nasdaq Copenhagen A/S • Computershare A/S • Public authorities, including the Danish Business Authority 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> • We retain your personal data for up to 5 years plus the current financial year after you no longer own shares in Netcompany Group A/S • A notice to convene the general meeting with agenda and complete proposals as well as registrations, proxies and votes by correspondence are retained for 5 years plus the current financial year after the general meeting has taken place • Material that documents our history, decisions made, etc. is retained for as long as the we exist
<p>Handling of questions and proposals submitted prior to the general meeting, and exercising the right to speak at the general meeting as well as preparation of minutes of the general meeting</p> <p>We process your personal data for the purpose of handling questions and proposals submitted prior to the general meeting, questions and the right to speak during the general meeting and the preparation of minutes of the general meeting. If questions are answered in writing prior to the general meeting, we will process your information in order to be able to submit questions, answers and the name of the person who has put forward the question at the general meeting. If proposals are included on the agenda, we will process your personal data (your</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> • name • documentation of your status as a shareholder or proxy • the content of your question 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you, including when you provide information via our shareholder portal, see above • From shareholders (relevant for proxies and advisers) 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> • Article 6.1.c - necessary for us to comply with our legal obligations (Sections 78, 90 and 101 of the Danish Companies Act) • Article 6.1.f - necessary for the pursuit of our legitimate interest in being able to identify you as a shareholder or proxy so that you are able to exercise your rights during the general meeting 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers, including IT-suppliers • The public through publication on the website www.netcompany.com in accordance with the applicable rules in this respect • Nasdaq Copenhagen A/S 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> • We retain your personal data for up to 5 years plus the current financial year after you no longer own shares in Netcompany Group A/S • A notice to convene the general meeting with agenda and complete proposals as well as registrations, proxies and votes by correspondence are retained for 5 years plus the

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<p>name and proposal) provided on the forms for appointment of proxy or written voting as well as on the agenda. Forms, votes by correspondence and agenda, including complete proposals, are published on our website. Finally, we will process your personal data when preparing and issuing the minutes of the general meeting.</p>	<ul style="list-style-type: none"> the content of your proposal the content of your opinions expressed at the general meeting 			<ul style="list-style-type: none"> Public authorities, including the Danish Business Authority 	<p>current financial year after the general meeting has taken place</p> <ul style="list-style-type: none"> Material that documents our history, decisions made, etc. is retained for as long as we exist
<p>Visual and audio recordings to be used for webcast and the preparation of minutes</p> <p>Visual and audio recordings may take place during general meetings. The recordings include the general meeting podium and rostrum. If you are identifiable on the recording, your personal data will be processed by us. We use the recordings to webcast the general meeting and to prepare the minutes.</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> Visual and audio recordings, including the information included therein 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> Through recordings made during the general meeting 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> Article 6.1.f - necessary for the pursuit of our legitimate interest in being able to webcast the general meeting and to maintain what was stated at the general meeting for the purpose of preparing the minutes 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> Suppliers, including professional photographers etc. who was hired to make such recordings The public 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> We retain visual and audio recordings for five years after the general meeting has taken place
<p>Attending the general meeting electronically</p> <p>We process your personal data for the purpose of handling questions submitted during the general meeting through the Lumi website or Lumi AGM app and for the preparation of minutes of the general meeting. If questions are answered in writing prior to the general meeting, we will process your information in order to be able to submit questions, answers and the name of the person who has put forward the question at the general meeting.</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> name username e-mail voting rights technical information about your device 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> The Lumi website or Lumi AGM app 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> Article 6.1.f - necessary for the pursuit of our legitimate interest in being able to webcast the general meeting and to maintain what was stated at the general meeting for the purpose of preparing the minutes 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> Computershare A/S Suppliers, including IT-suppliers required to ensure the completion of an electronic general meeting The public 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> We retain visual and audio recordings for five years after the general meeting has taken place

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	<ul style="list-style-type: none">• information given to us if you ask questions during the general meeting				
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