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Privacy Policy

Simplicity safeguards the protection of your individual rights and your personal data. Our privacy policy describes how we collect, use, and store personal data.

1. Controller of Personal Data

Simplicity AB, Swedish corporate registration number 556611-4723 ("Simplicity", "we", "us"), is the controller of the personal data you provide to the company.

You can contact us in the following ways:

- Email: kundservice@simplicity.se
- Mail: Simplicity AB, Södra Hamnvägen 12, SE-432 44 Varberg.

2. Definitions

In this privacy policy, the following terms are defined as:

- **Personal data:** Any information that can be directly or indirectly linked to a living natural person, such as name, email address, telephone number, IP address, or customer number.
- **Processing:** Any action performed with personal data, such as collection, registration, storage, processing, transfer, or deletion.
- **Data subject:** The identifiable natural person to whom the personal data refers.
- **Data processor:** The organization or person who processes personal data on behalf of the data controller.

3. Processing of Personal Data

Below is an account of how we process personal data in different situations.

3.1 When you become or are a customer with us

To become a customer, we need to collect and process necessary personal data. This includes information required to identify and contact you, as well as to fulfill our obligations under the Swedish Act (2017:630) on measures against money laundering and terrorist financing.

The data we process includes:

If you are a private individual:

- Identification details: name, date of birth, and personal identity number.
- Contact information: address, telephone number, email address, and any other contact details.
- Financial information: information generated in connection with your investments in our funds, transaction information, and similar, as well as bank account details.
- Information required by law: tax residence, foreign tax identification number, information about any U.S. citizenship, and other information for customer due diligence under the anti-money laundering and terrorist financing legislation (including PEP status – "politically exposed person", occupation/function, and financial situation).

- Criminal records: information that may emerge from checks against sanction lists.

If the customer is a legal entity:

- Identification details: name, date of birth, and personal identity number regarding the contact person/representative of the customer.
- Contact information: address, telephone number, email address, and any other contact details.
- Financial information: information generated in connection with investments in our funds, transaction information, and similar, as well as bank account details.
- Information required by law: tax residence, information about any U.S. citizenship for the beneficial owner, and other information for customer due diligence (including PEP status, occupation/function, and financial situation).
- Criminal records: information that may emerge from checks against sanction lists.

Simplicity also collects information from third parties when necessary. Examples of sources we use to collect data include: Bisnode, Infotorg, Bolagsverket, Trapets, EU sanction lists, and the County Administrative Board.

Legal basis for processing:

The legal basis for processing personal data is legal obligation. The processing is carried out to fulfill our legal obligations under applicable legislation, other regulations, or authority decisions.

How long we store your data:

We store your data as long as you are a customer with us and thereafter for five years. In some cases, if requested by law enforcement authorities, we may retain the data for up to ten years.

Who we share your personal data with:

Your personal data is shared with relevant authorities when necessary. The data is stored with Simplicity or with the provider Sharpfin AB.

3.2 If you visit www.simplicity.

When you visit our website, we use cookies and similar technologies to ensure the website functions correctly, to improve your user experience, and, in some cases, to analyze traffic and user behavior.

A **cookie** is a small text file stored on your device (computer, tablet, or mobile phone) when you visit a website.

Some cookies are necessary for our website to function. Non-essential cookies are optional and will only be used if you give your consent. You can always withdraw your consent at any time.

The cookies used, as well as the option to withdraw consent for such technology, are listed in our "cookie policy."

3.3 If you participate in any of our events

When you participate in our events, whether physical or digital, we collect certain information to administer the event and follow up on participation.

We process the following personal data:

- Identification details: name.
- Contact details: email address, telephone number.

- Other information: workplace (if you represent a company or partner), as well as any photographs or videos from the event.

Legal basis for processing:

The legal basis for processing personal data is legitimate interest. Simplicity has an interest in marketing, informing, and spreading knowledge about our products and services. We always conduct a balancing test to ensure that this does not outweigh your right to privacy. You can notify us at any time if you do not wish to appear in photos or videos.

How long we store your data:

Participant lists are kept for up to 12 months after the event. Images and videos used in marketing may be stored longer if the purpose remains.

Who we share your personal data with:

The data is stored with Simplicity and/or Microsoft (storage within the EU). If necessary, it is shared with suppliers assisting with the event, e.g., venue providers.

3.4 If you interact with us on social media

When you interact with us via social media, such as LinkedIn, we may process certain personal data in order to respond to messages and maintain contact with you.

We process the following personal data:

- Identification details: name and profile picture.
- Other information: Other details that appear, such as employer via LinkedIn.

Legal basis for processing:

The legal basis for processing personal data is legitimate interest. We have an interest in being able to communicate with you and respond to questions or comments, while respecting your privacy. We only process information that you have shared with us yourself or that is publicly available.

How long we store your data:

The data is stored by the social media company according to their policy. We do not retain this data ourselves longer than necessary.

Who we share your personal data with:

The data is stored with the social media company. We do not share this data with other parties without your consent.

3.5 If you receive marketing from us

We process personal data in order to send relevant marketing via email, mail, or telephone.

We process the following personal data:

- Contact information: address, telephone number, email address, and any other contact details.
- Employer: Information about your employer if you represent, for example, a corporate client or partner, or if this is evident from your email address.

Legal basis for processing:

The legal basis for processing personal data is your consent, or legitimate interest. We use consent when required, for example for sending newsletters. You can withdraw your consent at any time or object to marketing based on legitimate interest.

How long we store your data:

Personal data is stored for up to 12 months after the last interaction. You can always request to be removed from our mailing lists, and this will be actioned within one business day.

Who we share your personal data with:

The data is stored with Simplicity and/or Microsoft, as well as with other providers who assist with the distribution of marketing. All providers comply with GDPR and handle the data according to agreements with Simplicity.

3.6 If you submit complaints about our services

If you submit complaints about our services, we process personal data in order to handle and respond to these.

We process the following personal data:

- Contact information: address, telephone number, email address, and any other contact details.
- Other information: Any other personal data related to the specific complaint.

Legal basis for processing:

The legal basis for processing personal data is legal obligation. As a fund management company, Simplicity is required by law to have procedures for handling complaints, which includes processing the personal data necessary to manage and respond to complaints.

How long we store your data:

Personal data and documents created in connection with complaints are stored for at least five years in accordance with legal requirements.

Who we share your personal data with:

The data is stored with Simplicity and/or with Microsoft.

3.7 If you apply for a job with us

We process personal data in order to evaluate you as a candidate and to contact you during the recruitment process.

We process the following personal data:

- Name, personal identity number, address, telephone number, email address.
- Any photo of you as an applicant.
- Information about education and previous work experience.
- Results of any background check.
- Contact details for any references provided by you as an applicant.

Simplicity only wishes to receive information relevant to the application. We do not want you to provide personal data about other individuals or sensitive information, such as ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information, or gender identity. Reference information is obtained if necessary.

Legal basis for processing:

The legal basis for processing is legitimate interest. We need this information to evaluate you as a candidate and to contact you.

How long we store your data:

We retain personal data during the recruitment process. For candidates not offered employment, the data is deleted after four (4) months. If you are of interest for future recruitment, we may retain your data for up to one year, but you can object to such future contact and request that your data be deleted at any time.

Who we share your personal data with:

The data is stored with Simplicity and/or with Microsoft. The data is shared internally within Simplicity with those involved in the recruitment process, or relevant persons in the case of unsolicited applications.

3.8 If you are a supplier, partner, or contractor

When you represent a supplier, partner, or contractor, we process your personal data to administer and maintain the relationship, fulfill our obligations, and manage deliveries.

We process the following personal data:

- Name, personal identity number, address, position, employer, email address.

Legal basis for processing:

The legal basis for our processing is the performance of a contract. We need this information to administer and fulfill our agreements with suppliers, partners, and contractors.

How long we store your data:

We retain data for as long as necessary to administer the agreement, exercise our rights, and fulfill our obligations. If your assignment or employment with the supplier, partner, or contractor ends, we will cease processing your personal data as soon as we are informed of this. Agreements containing your data are stored for ten years from the end of the business relationship, in accordance with the limitation period in the Swedish Limitations Act.

Who we share your personal data with:

The data is stored with Simplicity and/or with Microsoft.

4. What rights do you have?

Right of access

You have the right to obtain information about whether your personal data is being processed by Simplicity and, if so, to access the personal data.

Right to rectification

If the data is incorrect or incomplete, you have the right to request that the personal data be corrected or supplemented, subject to the limitations provided by law.

Right to erasure or restriction

You may request that we erase your personal data if there is no legal basis requiring continued processing, for example under the Accounting Act or the Anti-Money Laundering and Terrorist Financing Act. In cases where we cannot erase the data, you have the right to request that processing is limited to storage only.

Right to object to certain types of processing

You have the right to object at any time to the processing of your personal data if the legal basis for the processing is public interest or legitimate interest. Upon objection, we will assess whether our interest in processing your data outweighs your interest in not having your personal data processed.

You have the right to object at any time to your personal data being used for direct marketing. If you do so, we will cease such processing.

Right to withdraw consent

If you have given consent to the processing of personal data, you may withdraw it at any time. Please note that withdrawal does not affect the lawfulness of processing carried out before the consent was withdrawn.

Right to data portability

You have the right to receive your personal data in a structured, machine-readable format and, if technically possible, have it transferred to another data controller. This right applies to personal data that is only processed automatically and based on the legal grounds of “consent” or “fulfillment of a contract.”

5. Geographical area of processing

As a general rule, the processing of your personal data takes place within the EU/EEA, but in some cases your personal data may be transferred to and processed in countries outside the EU/EEA, so-called third countries.

The transfer of personal data to a third country may take place provided there is a legal basis and appropriate safeguards have been implemented. Transfer of personal data to a third country may only be carried out if (i) the European Commission has decided that the country ensures an adequate level of protection, or (ii) the EU Commission’s standard contractual clauses are used in combination with organizational and technical safeguards.

6. Questions or comments

If you are dissatisfied with how we have processed your personal data, we ask that you contact us—see section 1 for contact details. You also have the right to submit a complaint regarding our processing of personal data to the Swedish Authority for Privacy Protection (IMY).

Contact details for the Swedish Authority for Privacy Protection:

Phone number: 08-657 61 00

Email address: imy@imy.se

7. Updates and latest version

This privacy policy is revised as needed to ensure that it is always in line with applicable legislation and our actual procedures for handling personal data.

- **Last update:** 2025-09-15