

AQ GROUP AB'S PROCESS OF SHAREHOLDERS', SHAREHOLDERS' PROXYS' AND REPRESENTATIVES' PERSONAL DATA

1. INTRODUCTION

- 1.1. This personal data policy describes how AQ Group AB (publ) reg. no. 556281-8830, ("AQ") or ("we") processes personal data about you if you are a shareholder, contact person with shareholders, proxy, or representative of the shareholder for the administration and implementation of general meetings, handling of the share register and shareholder data and when communicating with you. Furthermore, those rights you have according to the General Data Protection Regulation ("GDPR") are described.¹

2. DATA CONTROLLER, ETC.

- 2.1. AQ is the data controller for the processing of personal data in accordance with this policy.
- 2.2. Euroclear Sweden AB ("**Euroclear**") is responsible for keeping the share register in AQ and is the data controller for the processing that takes place in connection with it. In order to produce a share register, your name, address and information about your holding are usually needed. If you would like to know more about how Euroclear processes your personal data, please contact Euroclear.
- 2.3. We receive the personal data from you who are a shareholder or a proxy/representative and from Euroclear and the recipient of the personal data is AQ. AQ processes the personal data with the utmost certainty with the aim of protecting the data against unauthorized or unauthorized processing, loss or destruction.

3. PERSONAL DATA WE PROCESS, PURPOSE AND BASIS

- 3.1. AQ processes personal data when communicating with you such as name and contact details in order to do this. We process your personal data only if our interests outweigh yours and when the processing is necessary for us to inform you about news within AQ. The legal basis is balancing of interests.
- 3.2. AQ processes personal data about your shareholding (personal identity number, address, number of shares and share class) in order to preserve the share register and draw up the voting list and the necessary documentation at a general meeting. The legal basis is the obligation of law.
- 3.3. If you choose to have a proxy/representative represent you at a general meeting, we process their personal data such as name, personal identity number, address and telephone number. In the event of a postal vote at a general meeting in AQ, we process personal data about you such as name, personal identity number, contact details and how you have voted at the general meeting. The legal basis is the obligation of law.
- 3.4. AQ may also save your personal data such as names in board and meeting minutes. The legal basis is the obligation of law.

¹Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data and repealing Directive 95/46/EC (General Data Protection Regulation) and national legislation introduced under the Regulation.

4. STORAGE TIME AND PROVISION OF PERSONAL DATA

- 4.1. Personal data when contacting you is stored as long as there is a legitimate interest in it. We have a legal obligation to keep the share register for as long as the company remains and for at least ten years after the company's dissolution. At a general meeting, the personal data about you and a possible proxy/representative is saved for as long as it is necessary to be able to carry out and administer the general meeting. However, certain data must be stored for a longer period of time by law, including corporate, stock, securities and tax law legislation.
- 4.2. There is no requirement for you to provide personal data to AQ. If you do not provide us with your name, social security number and contact information, we cannot communicate with you nor fulfil our legal obligations such as drawing up a voting list in connection with general meetings. If we do not receive information about a possible representative who will represent you at a general meeting, we will not be able to process your data at this.

5. SHARING OF PERSONAL DATA

- 5.1. Your personal data may be shared with other companies within the group or to third parties such as IT service providers or when you choose to subscribe to our press releases with Cision's subscription service. When we share your personal data in connection with this, it is done according to AQ's instructions and only on our behalf.
- 5.2. Certain personal data, such as names, may be published on AQ's website and become public information, for example when we are required by law to publish minutes of general meetings. At a general meeting, we may share your personal data with actors (consultants, advisors, law firms or security personnel) who are involved in the arrangement of the general meeting so that we can carry it out and it is only done on our behalf and in accordance with our instructions.
- 5.3. Your personal data may also be shared with companies within and outside the group, located in a country outside the EU or EEA, as AQ's operations are conducted worldwide. For such a transfer, we have taken security measures where the recipient or recipient country ensures an adequate level of protection or ensures privacy protection, for example by acceding to accepted privacy protection arrangements, adopting approved codes of conduct, binding corporate regulations, certification according to harmonised standards and/or entering standard contractual clauses with the data controller.

6. RIGHTS IN THE PROCESSING OF PERSONAL DATA

- 6.1. You have the following rights under GDPR in relation to AQ when we process your personal data:

Right of access. You have the right to know if we process your personal data and, if so, how we process it by having the information compiled in a register extract.

Right to correction of incorrect or incomplete personal data. You have the right to have incorrect personal data corrected. You also have the right to supplement incomplete data by providing information to AQ.

Right to erasure. You have the right to have your data deleted at AQ if your personal data is no longer needed for the purpose for which it has been processed. If you have given consent for AQ to process your personal data, you have the right to withdraw the consent.

Right to limited treatment. Under certain conditions, you have the right to restrict AQ's processing of your personal data, for example if you do not think that the data, we have about you are correct. While this is being investigated, AQ's access to the data is limited if you request this.

Right to data portability. Under certain conditions, you have the right to obtain your personal data that you have provided to AQ in a structured, widely used and machine-readable format and you have the right to transfer this personal data to another data controller. If it is technically possible, you have the right to ask us to transfer the personal data directly from us to another data controller.

Right to objections. You have the right to object to AQ's processing of personal data regarding personal data we process about you if AQ's basis for this is our legitimate interest.

- 6.2. If you have any comments on how we process your personal data or would like further information about how your personal data is processed, please contact us at ir@aqg.com. You have the right to lodge a complaint about AQ's processing of your personal data with the supervisory authority in Sweden: the Swedish Privacy Protection Authority, www.imy.se.