

FIRST Fondene Privacy policy

Personal data is information that can be linked to you as an individual. It can be a name, a phone number or a rating.

For FIRST Fondene ("FIRST", "us", "we") it is important that you know what information we collect and how we safeguard your privacy. This privacy statement describes how we collect and use personal data.

What information we have about you

Information provided by you. When you use our services, we typically collect the following information about you:

Contact information, such as name, place of residence, email address and telephone number.

Identity information, such as personal identity number, age and identification documents.

Information on family matters, such as marital status and family situation.

Work situation and education, such as work experience, current employer, education and investment knowledge and investment experience.

Financial information, such as information on wealth, debt, annual income, and information on the origin of the funds.

Information about investment objectives, such as information on the purpose of the investment, investment horizon, risk tolerance and risk profile.

Information about affiliates, i.e. about people affected by the contractual relationship we have with you, e.g. manager.

Communication, f. ex. when you contact us and have a dialogue with us.

Information we collect about you. By using our services, we typically collect the following information about you:

Technical information, such as type of PC / mobile, internet connection, operating system, browser and IP address. We collect this information using cookies (see our cookie policy).

Warnings, i.e. warnings given to you that the investment service or product purchased is considered unsuitable or warnings that sufficient information has not been provided to perform a suitability assessment. We collect this information as our employees prepare warnings.

Investment history, i.e. information about what investments we have made on your behalf. We store this history.

Credit information, such as information on income, tax, ownership, business interests and defaults on payments. We collect this information from credit bureaus.

Anti-money laundering information, i.e. information on political exposure and sanctions that we collect from PEP (Politically Exposed Person) and sanction lists.

Audio recordings, i.e. recordings of conversations you have with our employees.

How we use personal data

1. To verify your identity

For this purpose we use contact information and identity information.

2. Anti-money laundering

We will process personal data for the purpose of preventing, detecting, resolving and handling fraud and other criminal offenses and to fulfill the duty of investigation and reporting for suspicious transactions. For this purpose, we use identity information and anti-money laundering information.

3. To conduct suitability tests and risk classification

For this purpose, we use contact details, identity information, work situation and education, financial information, investment goals information and credit information.

4. To provide investment services and other services

For this purpose, we use contact details, identity information, financial information, information about investment objectives, investment history and information about affiliates.

5. To manage your customer relationship

For this purpose, we use contact details, financial information, investment target information and investment history.

6. To document our investment services and fund management

For this purpose we use communication and audio recordings. We will also record information about persons with whom we have refused to enter into an agreement with for documentation purposes.

7. For accounting purposes

For this purpose, we use investment history.

8. To improve your user experience on our platforms

For this purpose we use technical information and usage information.

9. To send you monthly reports

For this purpose we use contact details and investment history.

10. Prospecting and custom marketing and information

We use information we collect about you to contact you to provide advice and services tailored to your financial situation and send you invitations to our seminars, etc. For this purpose, we use contact details, financial information, work situation and education and investment history.

The legal basis for Purposes 1, 2, 3, 4, and 5 is that it is necessary to fulfill our agreement with you and to fulfill our legal obligations (such as the AIF law, the applicable Securities Trading law that is completed by the MiFID II Regulation and MiFIR Regulation, the Money Laundering law and the Bookkeeping law).

The legal basis for Objective 6 is to comply with our investment services obligations in the current securities trading law that is complemented by the MiFID II and MiFIR Regulations and our legitimate interest in documenting our fund management.

The legal basis for purpose 7 is that it is necessary to fulfill our legal obligations under the Accounting law.

The legal basis for purpose 8 is our legitimate interest in driving product development. The legal basis for purpose 9 is because it is necessary to comply with our agreement with you and our legitimate interest in providing you with a monthly overview of your investments. We will not send these reports to anyone other than customers who have an established customer relationship with the company.

The legal basis for purpose 10 is our legitimate interest in providing you with customized offers and information. We have the right to send you marketing about our services like the services the customer relationship is based on if we have an existing customer relationship with you. In connection with marketing to existing customers, we have the right to use neutral information such as contact details, date of birth and information about which products and services you have entered. If we do not have an existing customer relationship with you, we will not send you electronic marketing unless you have consented to it.

You may withdraw your consent at any time. You can also let us know that you do not want us to use your information for prospecting or choose to receive general marketing and information.

With whom do we share personal data

FIRST shares personal information with our suppliers to the extent necessary to provide our service to you. This includes Oslo Market Solutions (our supplier of infrastructure development and maintenance on the website), BYTE (operating supplier of www.firstfondene.no), Intility (which is our supplier of IT operations etc.) and Super Office (which is our supplier of CRM system).

Data processing agreements have been signed between FIRST and the suppliers that regulate what information the supplier has access to and how it should be processed.

We may disclose personal information to public authorities and other outsiders if we are required to do so.

For how long do we store the information

We only store the information for as long as necessary. This typically means that we delete:

Contact details, five years after the end of the customer relationship.

Identity information, five years after the end of the customer relationship.

Family relationship information, five years after the end of the customer relationship.

Work situation and education, five years after the end of the customer relationship.

Financial information, five years after the end of the customer relationship.

Information on investment objectives, five years after the end of the customer relationship.

Information on affiliates, five years after the end of the customer relationship.

Communication, five years after the end of the customer relationship if the communication relates to the provision of investment services or investment activities, unless the Financial Supervisory Authority has imposed a longer retention period. Other communications are stored for three years.

Technical information, within 6 months.

Warnings, within five years.

Investment history, five years after the end of the customer relationship.

Credit information, five years after the end of the customer relationship.

Anti-money laundering information, five years after the customer relationship has ended or the transaction has been completed.

Sound recording, after five years if the recordings are related to the provision of investment services or investment activities, unless the Financial Supervisory Authority has imposed a longer retention period, and within (x) days / months if the recordings relate to other types of services.

In any case, we will store information for as long as it is required by law and where there is a special need, e.g. by complaints or claims directed against us or by us.

Your privacy rights

You have several privacy rights. You can avail these by contacting our compliance officer. The contact information can be found at the end of this document. Your rights include:

Information. Further information on how we process information about you.

Transparency. Copy of information we have about you.

Correction. Correct and supplementing information about you.

Deletion. Request deletion of information that we no longer have grounds for retaining.

Restriction. Ask that we limit the use of your information.

Data portability. Ask for your information to be transferred to you or to another company in a structured, commonly used and machine-readable format.

Objection. Ask to oppose our use of your information for marketing, including profiling. You can also object to being subject to individual judicial decisions that are solely automated.

Reservation. If you do not want an offer from us, you can reserve yourself from such offers. You can choose to opt out of all marketing or only marketing from specific channels such as telephone or email. In addition, you can control which notifications you receive by e-mail and SMS in your online bank.

Shielding Right. You can apply for that only a limited number of FIRST employees are to have access to your customer information. Please note that the screening will significantly reduce FIRST's

availability to you as a customer, so you must take this into consideration very carefully. Only a few employees will be able to serve you.

Please note that these rights are subject to restrictions provided by law. We will respond to your inquiry as soon as possible, and typically within one month.

If you believe that we process personal data unlawfully, you have the right to appeal to the Data Inspectorate. We hope you first contact us so that we can assess your objections and resolve any misunderstandings.

Suspicion of unauthorized access

You must consult with one of our advisors if you suspect that unauthorized access has been made by one of our employees. The advisor will assist you in making an inquiry. If it is revealed that your suspicion is justified, you will be notified. You will receive information that the case is being handled by FIRST and that it is reported to the Data Inspectorate.

Changes to the Privacy Statement

We may update the Privacy Statement from time to time. You will be notified of significant changes. You will always find the latest version of our privacy statement on the website.

Cookies

Cookies are small text files that are placed on your computer when you download a web page. See [here](#) for a more detailed description of how FIRST Funds use cookies.

Contact

Feel free to contact us if you have any questions, comments or would like to make use of your rights. You can use the following contact information:

Contact person: Tom Tusvik

Phone number: 22 01 55 00

E-mail address: compliance@firstfondene.no

Address:

Munkedamsveien 45E,

0250 Oslo,

Norway