

## **PRIVACY POLICY OF UAB “DOVRE FORVALTNING”**

The present Privacy Policy (hereinafter the **Policy**) shall provide the basic information about the processing of personal data of the visitors of the website of UAB “Dovre Forvaltning” (hereinafter the **Dovre Forvaltning**), subscribers to the newsletter, clients, their representatives and beneficiaries of Dovre Forvaltning as well as the persons wishing to join the Dovre Forvaltning team.

The controller of your data is Dovre Forvaltning, i.e. UAB “Dovre Forvaltning”, legal entity registration number 302589746, registered office address: Konstitucijos pr. 7, Vilnius, tel. +370 5 26 83 459, e-mail: [info@dovreforvaltning.no](mailto:info@dovreforvaltning.no).

If you have any questions regarding the present Policy or protection of your data, please contact Dovre Forvaltning by the abovementioned contact details.

Please be notified that the present Policy may be reviewed. In any case, the updated version of the present Policy shall be available on the website of Dovre Forvaltning.

### **I. PROCESSING OF PERSONAL DATA WHEN SENDING NEWSLETTERS**

If you have subscribed to Dovre Forvaltning newsletters, which are sent by e-mail, Dovre Forvaltning shall process your personal data for the purposes of direct marketing, i.e. for the purposes of sending the newsletters. The newsletters of Dovre Forvaltning provide an overview of economic and financial trends on the market.

When sending its newsletters, Dovre Forvaltning shall process the personal data on the basis of the consent provided by you, i.e. at the time of subscription to the newsletters on the website of Dovre Forvaltning. For the said purpose Dovre Forvaltning shall process the following personal data: your name, surname, e-mail address, telephone number.

Your personal data, which shall be processed for the purposes of direct marketing, shall be stored for a term of 3 years from the date of your consent unless you revoke your consent before the expiry of the said term. After the expiry of the said term or in the event you revoke your consent, Dovre Forvaltning shall discontinue the processing of your personal data.

You have the right to unsubscribe from the newsletters sent to you at any time. You can do this by clicking on the unsubscribe reference presented at the bottom of the newsletter or by notifying Dovre Forvaltning in writing (for example, by e-mail).

### **II. PROCESSING OF PERSONAL DATA WHEN SUBMITTING ENQUIRIES**

Dovre Forvaltning shall process your personal data when you contact us by e-mail, submit enquiries on the website of Dovre Forvaltning, on the social network accounts of Dovre Forvaltning or by any other means.

When you submit an enquiry, the data received shall be processed by Dovre Forvaltning for the purposes of the proper administration of the said enquiries, ensuring the quality of the services provided, where necessary, performance of any legal claims and defence of the legitimate interests of Dovre Forvaltning. For the said purpose Dovre Forvaltning shall process the personal data on the basis of the consent provided by you, i.e. when you actually contact Dovre Forvaltning.

We request to comply with at least the minimum personal data protection requirements when submitting an enquiry: if a certain purpose (for the development of an enquiry, complaint, letter, and request) does not require disclosure of certain personal data, such redundant data should be left undisclosed.

The personal data specified in your enquiry shall be stored for a term of up to 3 years depending on the type of the personal data received and other circumstances. Whenever necessary for the purposes of defence of the rights and legitimate interest of Dovre Forvaltning (or any other persons), proper administration of enquiries, examination of a complaint or resolution of a dispute

as well as in other cases specified in the legal acts, your personal data may be stored for a longer period of time.

### III. VISITING THE WEBSITE

When you visit the website of Dovre Forvaltning, Dovre Forvaltning may process your IP address, also other network data if you provide them. Such data shall be collected with the help of cookies and (or) similar technological solutions on the basis of the consent granted by the user.

Cookies are small files that are sent to a web browser and stored on your device. Cookies are transferred to your computer the first time you visit Dovre Forvaltning website. The cookie is intended to ensure a comfortable and safe operation of the website, as well as to analyse the behaviour of website visitors. This allows you to better tailor the website to the visitors' needs. Some types of cookies (minimum and analytical cookies) are needed for the proper functioning of the website, so refusal to accept the cookies may result in the loss of functionality of the website.

The website of Dovre Forvaltning uses the following cookies:

Cookie	Description and type	Moment of creation	Validity term	Data used
_ga	Used for the distinction of users. Analytical cookie	At the time of entrance to the site	2 years	Unique identifier
_gid	Used for the distinction of users. Analytical cookie	At the time of entrance to the site	24 hours	Unique identifier
_gat_UA-35594876	Limits the number of requests which must be performed. Analytical cookie	At the time of entrance to the site	1 minute	Does not store any visitor data
has_js	Checks whether JavaScript support is enabled in the browser	At the time of entrance to the site	Until the closure of the website window	1
_PCCID	Used for the distinction of users. Analytical cookie	At the time of entrance to the site	5 years	Unique identifier
_PCCSID_202016	Used for the distinction of users. Analytical cookie	At the time of entrance to the site	20 minutes	Unique identifier

You can control the use of cookies by modifying your browser settings. For more information about the cookies and their control and removal, please visit the website address <http://www.allaboutcookies.org>.

### IV. PROCESSING OF THE PERSONAL DATA OF THE CLIENTS, THEIR REPRESENTATIVES AND BENEFICIARIES

#### Provision of the services of the management company

Dovre Forvaltning is a management company, which performs its activities on the basis of the license issued by the Bank of Lithuania. When providing its services, Dovre Forvaltning follows the provisions of the Republic of Lithuania Law on Collective Investment Undertakings and other legal acts.

Dovre Forvaltning shall process the personal data of its clients (their representatives) for the purposes of provision of the respective services of the management company when performing the agreements entered into with the clients. Dovre Forvaltning may process the following data of the clients (their representatives):

- personal data (names, surnames, occupations, companies represented and positions, data about the citizenship, personal ID numbers, etc.);
- contact details (residence addresses, e-mail addresses, telephone numbers, etc.);
- data about the client's knowledge of and experience in the area of investment;
- financial data (bank account numbers, data about the acquired fund units, etc.);
- other data provided and required for the provision of the respective services of the management company.

In any case Dovre Forvaltning shall process the personal data of its clients (their representatives) only to such an extent which is necessary for ensuring the proper provision of the services of the management company and implementation of the legal obligations binding Dovre Forvaltning.

Dovre Forvaltning shall store the personal data of its clients for a term of 10 years from the date of adoption of the investment decision, performance of the transaction, submission of the respective application or performance of the transaction, except for the cases when the legal acts provide for a longer term of storage of such data.

### **Access to the individual account of the client**

Each client of Dovre Forvaltning shall have a possibility to access his/her own account. Clients shall log in to their accounts on the website of Dovre Forvaltning with the help of unique login data granted to them.

In order to ensure the proper administration of the said system Dovre Forvaltning shall also process the personal data of its clients, including also user IDs, login passwords, data provided in the applications or in the agreements, data about the transactions performed by the client, the investment units held and other data. Dovre Forvaltning shall process the said personal data when performing the agreements concluded with the clients.

During the administration of the system of individual client accounts, the personal data of the clients shall be stored for the abovementioned period of time, i.e. for a term of 10 years from the date of adoption of the investment decision, performance of the transaction, submission of the respective application or performance of the transaction, except for the cases what the legal acts provide for a longer term of storage of such data.

### **Prevention of money laundering and terrorism financing**

Dovre Forvaltning shall process the personal data of its clients, their representatives or beneficiaries while acting in compliance with the requirements set in the provisions of the Republic of Lithuania Law on Prevention of Money Laundering and Terrorism Financing (hereinafter the **Law**). Before starting any business relations, Dovre Forvaltning must establish the identity of its clients, their representatives and beneficiaries. Thus, the processing of your personal data is mandatory for the said purpose so that Dovre Forvaltning could comply with the legal obligation laid down in the Law.

The personal data which are required under the Law, are usually provided to us directly by you, nevertheless, Dovre Forvaltning shall also have the right to establish the identity of the client, the representative or the beneficiary without their direct involvement by receiving the required information in accordance with the procedure laid down in the Law from other financial institutions and authorized entities.

Your personal data shall be stored by Dovre Forvaltning in compliance with the requirements of the Law, i.e. for a term of 8 years from the date of completion of transactions or expiry of business relations with the client. In certain cases laid down by the Law, certain personal data shall be stored for a shorter period of time (for example, correspondence pertaining to business relations with the clients shall be stored for a term of 5 years).

## **V. PROCESSING OF PERSONAL DATA FOR THE PURPOSES OF RECRUITMENT OF THE PERSONNEL**

Dovre Forvaltning may process your personal data for the purposes of recruitment of the personnel, if you provide information about yourself (for example, your CV, letter of motivation) as

a candidate to a job position. For the purposes of selection of the personnel, Dovre Forvaltning may process your personal data on the basis of your consent expressed at the time of provision of such data.

The term of storage of the personal data provided by you shall depend on the term of performance of the specific personnel recruitment procedure. After the completion of the selection procedure, Dovre Forvaltning shall stop processing your personal data unless you express your separate consent with regard to this.

Please note that if you send your CV, letter of motivation or any other personal data to the e-mail address specified on our website when we have not announced any selection procedure, we shall have the right to store your data for a longer period of time and use them during any subsequent personnel selection procedures for a term of up to 1 year.

You are requested to comply with at least the minimum data protection requirements and refrain from providing us with any redundant information not pertaining to your candidacy.

## **VI. RECIPIENTS OF PERSONAL DATA**

Dovre Forvaltning may use certain data processors (i.e. certain providers of services) for the processing of your personal data. Such data processors could include the entities engaged in the provision of data storage services, in the development and maintenance of software, in the provision of communication services, in the performance of the website activity analysis, and other providers of services. Your personal data may be disclosed to the data processors used by Dovre Forvaltning only to the extent which is necessary for the provision of respective services.

In addition to this, please note that the provider of the real-time interaction service for the submission of enquiries on our website is *Pure Chat, Inc.*, an enterprise established in the United States of America (USA). The processing of personal data in the countries outside the European Economic Area (EEA) may require less protection than in the Member States of the EEA. The EU-US Privacy Shield, which is currently applied across the entire European Union (EU), does not cover all enterprises established in the USA (including the abovementioned provider of services). Besides, the abovementioned provider of services is not subject to the appropriate safeguards within the meaning of the General Data Protection Regulation (No 2016/679). Therefore, the website visitors, who do not want their personal data to be processed with the help of the abovementioned provider of services, should not use the real-time interaction platform (Pure Chat) and contact us by any other means acceptable to them (for example, by e-mail, telephone).

During the provision of the services of the management company, Dovre Forvaltning may transfer certain personal data of the clients to other recipients of such data, for example, to the depository, Bank of Lithuania, persons engaged in the provision of auditing services, etc. Finally, for the purposes of prevention of money laundering and terrorism financing and in accordance with the procedure and in the cases laid down in the Law, Dovre Forvaltning may transfer the personal data of the clients, their representatives and (or) beneficiaries to the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania, to other institutions within and outside the EEA. In any case, Dovre Forvaltning shall make every reasonable effort in order to ensure that the personal data of the clients, their representatives and (or) beneficiaries are not lost or used unlawfully while acting in compliance with the requirements of the Law.

## **VII. YOUR RIGHTS AS THE DATA SUBJECT**

As regards your personal data, you have the following rights:

- The right to have access to your personal data and know the manner of the processing. You have the right to require Dovre Forvaltning to confirm that your personal data are processed by Dovre Forvaltning, also the right to have access to your personal data, which are processed, as well as to any other related information.
- The right to demand rectification of the incorrect, inaccurate or incomplete data. If you believe that the information about you which is processed by Dovre Forvaltning is inaccurate or incorrect, you have the right to demand replacement, adjustment or correction of such information.

- The right to demand erasure of your personal data. Under certain circumstances specified in the legal acts (unlawful processing of personal data, expiry of the grounds for the processing of the data, etc.), you have the right to request that Dovre Forvaltning erases your personal data.
- The right to demand restriction of the processing of your personal data. Under certain circumstances specified in the legal acts (unlawful processing of personal data, you contest the accuracy of the data, you object to the processing of the data by Dovre Forvaltning on the basis of the legal grounds, etc.), you also have the right to request that the Controller restricts processing of your data.
- The right to require transfer of your personal data to another data controller or provision of your personal data directly to you in a form suitable to you. You have the right to transfer the data the processing whereof is carried out by Dovre Forvaltning on the basis of your consent and using automated tools to another data controller.
- The right to object to the processing of your personal data when they are processed on the basis of the legal grounds, except the cases when there are legitimate grounds for such processing or for the purposes of filing, complying with or defending the legal claims.
- In the event the processing of your personal data is carried out on the basis of a separate consent, you have the right to revoke your consent for the processing of personal data at any time. In such a case, the processing of the data on the basis of such consent shall be discontinued.

If you wish to exercise any of the abovementioned rights, or have any other questions regarding the processing of the data, please contact Dovre Forvaltning by using the contact details specified in the present Policy above. If you believe that the processing of your personal data is unlawful or is in violation of your rights related with the processing of personal data, you have the right to address the State Data Protection Inspectorate and file a complaint. Nevertheless, before submitting any official complaint to the supervisory authority, it is always recommended to first contact Dovre Forvaltning.