INNARGI

GENERAL DATA PRIVACY POLICY - INNARGI A/S

At Innargi, ("we", "us" and "our") confidentiality and data protection is a high priority. This privacy policy (the "**Privacy Policy**") applies to Innargi Holding A/S and its subsidiaries. It explains and sets out the guidelines for our processing of your personal data, and provides you with information according to applicable data protection law.

1.1 Data controller

The entity responsible for the processing of your personal information is:

Innargi A/S
Amerika Plads 29
2100 Copenhagen Ø
CVR no. 39183056

1.2 Contact

You are welcome to direct any questions regarding our Privacy Policy to privacy@innargi.com.

1.3 Description of our processing

In Innargi, we process personal data for nine purposes. Below, we describe the nature of personal data and how we process it in more detail for each of these purposes:

1. *Communication with you*
   In order to communicate with you, we process the following ordinary personal data: your name, email address, telephone number and other contact information. The data is collected either a) directly from you or b) from third parties. Consequently, we may base the processing on either the performance of a contract in accordance with art. 6 (1)(b) of the GDPR (necessary for the performance of the contract between you and Innargi) and/or art. 6 (1)(f) of the GDPR if necessary for the pursuit of legitimate interests, e.g., Innargi's legitimate interest in being able to effectively communicate with business partners, third parties and other persons. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions) and b) other group-entities. We will store personal data as long as it is necessary to fulfil the purposes mentioned.

2. *Third party arrangements*
   To enter into contracts, deals and other agreements, business partnerships, consultancy agreements etc. and fulfilling such agreements, including subsequent invoicing, board presentations, etc. we process ordinary personal data such as your name, contact information and personal identification number. The data is collected either a) directly from you, b) from the business we enter into an agreement with (normally your employer) or c) from other group-entities or subsidiaries, and the data is processed based on Article 6 (1)(b) of the GDPR (necessary for the performance of the contract between you and Innargi), Article 6, (1)(c) of the GDPR (necessary for us to comply with a legal obligation, e.g. relevant bookkeeping and tax laws), Article 6 (1)(f) (necessary for the pursuit of legitimate interests, e.g., our legitimate interest in being able to communicate with people outside the company, and enter contracts with other businesses) and/or Section 11 (2) of the Danish Data Protection Act. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities. We will only store personal data as long as it is necessary to fulfil the purposes mentioned. In general, contact information will be kept as part of the contractual documentation and be deleted in accordance with the Danish Bookkeeping Act, unless the contractual documentation is kept for historical and/or documentation purposes.

3. *Due diligence and screenings*
   In order to perform due diligence and screen potential counterparties, incl. advisors, we process the following ordinary personal data: your name, gender, birth date, personal identification number (CPR-no.), CV, educational information, financial profile, marital status, nationality, next of kin information, performance history

and scores, personality traits, contact information, position, duration of employment, and photos. For due diligence in relation to specific transactions, we also process ordinary personal data such as employee salaries and human resource-files, payroll data and home address. We also process information about criminal convictions and offences such as violations of laws subject to criminal liability as found on international sanctions and screening databases. The data is collected either a) directly from you, b) from the company we enter into an agreement with (normally your employer), c) from other group-entities or subsidiaries, d) from the companies that are part of a transaction, e) from third parties and service providers, including providers of screening-services, f) from public authorities or g) from public sources, such as social media profiles, search engines and various other media. The data is processed based on Article 6 (1)(f) of the GDPR (necessary for the pursuit of legitimate interests, e.g. Innargi's legitimate interest in performing due diligences and screenings as part of transactions and/or engagement with counterparties), Article 9 (2)(e) of the GDPR (the information has manifestly been made public by the data subject), Section 8 (3) (as our processing clearly overrides the interests of the data subject) and/or Section 11 (2) of the Danish Data Protection Act. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions) and b) other group-entities. We will store personal data as long as it is necessary to fulfil the purposes mentioned. Personal data kept as part of due diligence reports and screenings will be deleted when no longer needed, which means a) once the project is no longer in the pipeline and/or has been abandoned, or b) no longer than 5 years after the project has been executed (following exit). Some information may be kept for a longer period of time in specific cases, e.g., when we need to retain data to document certain decisions etc.

4. *Compliance*
   In order to comply with legal and other requirements related to bookkeeping, tax, reporting etc and to meet requests from government or other public/regulatory authorities, we process three categories of ordinary personal data: a) payment/money transfer data (bank account and credit card number, payment of invoices, transfer of money), b) personal details and contact information (e.g. name and surname, gender, date of birth, e-mail and telephone details, home address, personal identification number (CPR-no.) etc.) and c) KYC-information (e.g., driver license number, passport number, information on who the owners of the company are etc.). The data is collected either a) directly from you, b) from the business we enter into an agreement with (normally your employer) or c) from other group-entities or subsidiaries. It is processed based on Article 6 (1)(c) of the GDPR (necessary for Innargi to comply with a legal obligation, including the EU Regulation on Market Abuse, the Danish Bookkeeping Act and applicable tax legislation), Article 6 (1)(f) of the GDPR (necessary for the pursuit of legitimate interests of Innargi A/S, e.g. our legitimate interest in ensuring compliance with applicable laws) and/or Section 11 (2) of the Danish Data Protection Act. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities such as the Danish Financial Supervisory Authority and the Danish tax authorities (SKAT). We will store personal data as long as it is necessary to fulfil the purposes mentioned and to fulfil any legal requirements. Bookkeeping records will be kept for 5 years + running financial year as required under the Danish Bookkeeping Act. KYC-information will be kept for 5-10 years.

5. *Monitoring*
   In order to monitor compliance with internal policies or applicable laws, we process two categories of ordinary personal data: a) payment/money transfer data (bank account and credit card number, payment of invoices, transfer of money) and b) personal details and contact information (e.g. name and surname, gender, date of birth, e-mail and telephone details, home address, copy of passport including personal identification number (CPR-no.) etc.). The data is collected either a) directly from you or b) from other group-entities or subsidiaries, and processed based on Article 6 (1)(b) of the GDPR (necessary for the performance of the contract between you and Innargi), Article 6 (1)(c) of the GDPR (necessary for Innargi to comply with a legal obligation), Article 6 (1)(f) of the GDPR (necessary for the pursuit of legitimate interests of Innargi , e.g. our legitimate interest in monitoring compliance with internal policies and laws) and/or Section 11 (2) of the Danish Data Protection Act. We share the data with a) suppliers, vendors and other third parties that we work with to assist our company (meaning service providers, technical support, supply services, and financial institutions), b) other group-entities and c) public authorities. We will store personal data as long as it is necessary to fulfil the purposes

mentioned and fulfil any legal requirements. Bookkeeping records will be kept for 5 years + running financial year as required under the Danish Bookkeeping Act. KYC-information will be kept for 5-10 years.

6. *Video surveillance*
   Innargi's offices are within a building, which has installed video surveillance in certain targeted areas of its business premises such as at the front entrance. The surveillance areas are clearly marked with signs. Imagery is processed as part of the video surveillance.

   The primary tenant in the building with whom Innargi shares common areas is responsible for the video surveillance. The entity responsible for processing the surveillance data is:

   JEUDAN A/S
   Bredgade 30
   1260 København K
   CVR no. 14246045

   If you have any questions about the video surveillance, please contact:
   AP29 Reception, AP29Reception@compass-group.dk

   The purpose of video surveillance is prevention of crime to ensure safety and compliance with applicable requirements and is processed in accordance with Article 6(1)(f) of the GDPR and Section 8 (3) of the Danish Data Protection Act. Recordings will only be shared with Innargi in case of suspicion of criminal actions, violations of internal guidelines or internal/external audits.

   The recordings may be disclosed to the police for criminal investigations if the personal data are disclosed for the purpose of safeguarding public or private interests which clearly override the interests of secrecy, cf. Section 8 (4) of the Danish Data Protection Act or if the disclosure is otherwise required by law. If disclosure is necessary for other purposes than the above mentioned, we will ask you to consent to such disclosure if you are part of the recordings.

   Recordings from video surveillance are deleted or anonymized no later than 30 days after the recording has taken place, unless is it necessary to keep the recordings for the purpose of dealing with a specific dispute, e.g., in relation to solving crime.

7. *Whistleblower scheme*
   Your personal data may be processed as part of our report processing under our whistleblower scheme. Such processing will take place in accordance with our Whistleblower Data Privacy Policy here.

8. *Recruitment*
   We will also process your personal data when you apply for a job at Innargi. Such processing will take place in accordance with our Privacy Policy for job applicants here.

9. *Marketing*
   In various contexts, including corporate events such as press events, conferences, fairs, receptions etc. we will take pictures to be used for marketing purposes, including on social media. Our basis for such processing of personal data is Article 6 (1)(f) of the GDPR (necessary for the pursuit of legitimate interests). Our primary aim is to use only pictures that depict those persons central to promoting our business, but other persons may be identifiable as well in such photos.

1.4 Transfers to countries outside the EU/EEA

We may transfer personal data to countries outside the EU/EEA. Such transfers will only take place for the specific purposes mentioned in this policy, and we will always ensure that appropriate safeguards are in place for such transfer.

If transfers occur to countries outside EU/EEA that do not ensure an adequate level of data protection, such transfer will be based on the EU Commission's standard contractual clauses together with any supplementary measures assessed as necessary, or any other contractual agreement approved by the competent authorities.

You may obtain a copy of the contract/agreement by contacting us at privacy@innargi.com.

1.5 Your rights

In relation to our processing of your personal data, you have the right to:

- Request access to and rectification or erasure of your personal data
- Object to the processing of your personal data and have the processing of your personal data restricted
- Object to the processing of your personal data for direct marketing purposes
- Withdraw your consent at any time, if our processing of your personal information is based on your consent. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent by sending a request to privacy@innargi.com
- Receive your personal information 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 (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, e-mail dt@datatilsynet.dk.

You can take steps to exercise your rights by sending an email to privacy@innargi.com.

The rights listed above are subject to certain conditions and limitation as set out by law.

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This policy has been approved by the board of directors of Innargi A/S in November 2025.
The policy is reviewed by the board when needed, however, at least once a year.