

PRIVACY POLICY

Version 1, 18 July 2025

1. INTRODUCTION

Redeye Capital is committed to protecting your privacy. This Privacy Policy explains how we process and safeguard your personal data when you visit our website [redeye.se], use our services, or engage with us in any way. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it.

The information in this document is addressed to all persons whose personal data is processed by Redeye Capital AB.

Redeye Capital protects personal privacy. Redeye Capital processes personal data in accordance with the provisions of the General Data Protection Regulation (*GDPR*). Redeye Capital is also obliged to comply with rules and regulations, as a financial institution, under supervision from the Swedish Financial Supervisory Authority (*Sw. Finansinspektionen*). Redeye Capital has an obligation to retain customer information, and in some cases, in addition to what is stated in Redeye Capital's *Record of Processing Activities, Appendix A*, have an obligation to disclose personal data to authorities.

In this document, we explain which personal data we process and why. We also clarify how you can exercise your rights under law and how to contact us if you have questions regarding the processing of your personal data.

2. DEFINITIONS

In this Privacy Policy, we use the following defined terms:

Site Visitors include visitors to redeyecapital.se.

Customers include customers who have an agreement with Redeye Capital for the provision of services for compensation.

Prospects include persons who have been identified as prospective customers.

3. PERSONAL DATA WE PROCESS

Site Visitors

Redeye Capital only processes personal data that has been provided by or collected from the User. Examples of personal data processed include behavioral data.

Customers

Redeye Capital processes personal data about its customers that has either been provided by or collected from the User, or is available in public databases. Examples of personal data processed includes names and contact details for customer representatives, recordings of phone calls, e-mail messages sent, and copies of identity documents provided as a part of a KYC process. In some cases we may also process personal data about close relations as a part of our KYC process.

Prospects

Redeye Capital processes personal data about prospective customers that has either been provided by or collected from the Prospect, or is available in public databases. Examples of personal data processed includes names and contact details for representatives of the prospective customer.

Employees

Redeye Capital processes personal data about employees. The personal data has either been provided by the employee themselves (e.g. contact information) or have been generated by Redeye Capital (e.g. information on vacation days or sick leave).

Others

Redeye Capital may also process personal data about persons who do not belong to any of the above group, if for example, they send e-mail to Redeye Capital or call Redeye Capital.

For detailed information on which personal data is processed, its purpose and legal basis, where the personal data comes from, how long the personal data is saved, and with whom we share your personal data, see *Appendix A, Record of Processing Activities*.

4. PURPOSE FOR PROCESSING PERSONAL DATA

To summarize, we process personal data for the following purposes:

4.1 To Provide and Improve Our Services

- To provide portfolio management services
- To improve our products and services
- To operate and maintain our website
- To understand and analyze how you use our website

4.2 To Communicate With You

- To respond to your inquiries and provide customer support
- To receive and respond to customer complaints
- To send you promotional materials, newsletters, and other information that may be of interest to you

4.3 For Legal and Security Purposes

- To comply with legislation preventing money laundering and financing of terrorism
- To comply with legal obligations regarding financial book keeping
- To enforce our terms and conditions
- To protect the security and integrity of our website and services
- To comply with other legal obligations

4.4 For Administrative Purposes

- To handle administrative duties including but not limited to paying salaries, administering pensions, maintaining a list of emergency contacts and other personnel duties

5. HOW WE SHARE YOUR PERSONAL DATA

We may share your personal data with third parties in the following circumstances:

5.1 Service Providers

We may share your personal data with third-party vendors, service providers, and contractors who perform services on our behalf. In all such circumstances, the such sharing is reflected in *Appendix A, Record of Processing Activities*

5.2 Legal Requirements

We may disclose your personal data if required to do so by law or in response to valid requests by public authorities.

6. YOUR CHOICES

6.1 Your rights

You have the right to receive information once per calendar year free of charge about which personal data Redeye Capital has about you and how these are processed. You also have the right to request rectification if Redeye Capital has incorrect or incomplete information about you.

You have the right to have your personal data deleted, unless we have a legitimate reason and a legal basis for not doing so. In some cases, you also have the right to request that we restrict processing of personal data, or to object to our processing of your personal data. Deletion, restriction, or objections are processed without undue delay.

In all cases where your consent forms the legal basis for our processing of your personal data, you have a right to withdraw your consent.

You also have a right to data portability, i.e. to receive some or all of your personal data in a structured, commonly used, machine-readable format.

A written application for notification, correction, deletion, restriction, objection, withdrawal of consent and/or data portability request is sent to: Redeye Capital AB, Data Protection Officer, Box 7141, 103 87 Stockholm or to info@redeyecapital.se.

6.2 Cookies

When visiting the web site for the first time, you will get a choice of which cookies to accept. You can also change your cookie settings on the web site. Please note that some cookies are strictly necessary, and as such cannot be disabled using the cookie settings feature. Disabling those cookies, e.g. by setting your browser to refuse them, may render the website non-functional.

7. SECURITY OF YOUR PERSONAL DATA

We use administrative, technical, and physical security measures to protect your personal data. While we have taken reasonable steps to secure the personal data we process, please be aware that no security measures are perfect or impenetrable. In cases where the personal data is transferred outside of the EEA, Redeye Capital ensures there is a legal basis for the transfer. Primarily Redeye Capital relies on adequacy decisions by the European Commission, but may alternatively rely on Standard Contractual Clauses, Binding Corporate Rules, or other

appropriate safeguards, supplemented by adequate technical and organizational measures to protect personal data.

Appendix A, Record of Processing Activities, reflects the basis upon which such a transfer is permitted, including, when applicable, which technical and organizational measures have been implemented to protect the personal data.

8. RETENTION OF YOUR PERSONAL DATA

We will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy, and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

9. CHILDREN'S PRIVACY

Our services are not intended for individuals under the age of 16. We do not knowingly collect personal data from children under 16. If we become aware that we have collected personal data from a child under 16, we will take steps to delete such information from our files as soon as possible.

10. SUPERVISORY AUTHORITY

In Sweden, the competent supervisory authority is the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten, IMY). You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data infringes data protection law.

Contact details:

- Website: www.imy.se
- Address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm
- Phone: +46 (0)8 657 61 00
- Email: imy@imy.se

You can submit a complaint to IMY online through their website or by post. You also have the right to lodge a complaint with the supervisory authority in the EU country where you habitually reside, work, or where the alleged infringement occurred.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes.

12. CONTACT US

If you have any questions about this Privacy Policy, please contact us at:

Company name: Redeye Capital AB ("Redeye Capital")
Organization number: 556795-1040
Address: Mäster Samuelsgatan 42, Box 7141, 103 87 Stockholm
Telephone: +46 (0)8 545 013 30
Email: info@redeyecapital.se
Website: www.redeyecapital.se

By using our website or services, you consent to this Privacy Policy.



Record of Processing Activities

| | |
|--------------|-------------------|
| Generated by | Magnus Nordlander |
| Date | July 18, 2025 |

Preface

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Table of contents

1. Fund Marketing
2. Portfolio management marketing
3. Redeye Capital General Administration
4. Redeye Capital HR Management



Fund Marketing

| | |
|------------------|------------------|
| Labels | Redeye Capital |
| Created | July 11, 2025 |
| Status | Completed |
| Owner | Viktor Westman |
| Approved | July 18, 2025 |
| Next review date | January 18, 2026 |

1. Activity info

1.1. Data subjects

Prospective investors

1.2. Business unit

Redeye Capital

1.3. Purpose of processing

To promote and market AIF funds to prospective investors, including identifying potential investors, providing fund information and documentation, and maintaining records of marketing activities and investor interactions in compliance with financial services regulations.

1.4. Data role

Controller

1.5. Data retention policy

The company never stores personal data longer than necessary with regards to the purpose of processing. Personal data is deleted on a regular basis when it is no longer needed. Personal data related to marketing is kept for at most 6 months after a finished marketing campaign.

1.6. Parties with access

Internal

Redeye Capital Employees

1.7. Legal basis for data processing





Legitimate interests pursued by the controller or by a third party

1.8. Cross-border transfer mechanism

EU-U.S. Data Privacy Framework, Adequacy Decision

2. Data sources

2.1. What data sources process or store data used in this activity?

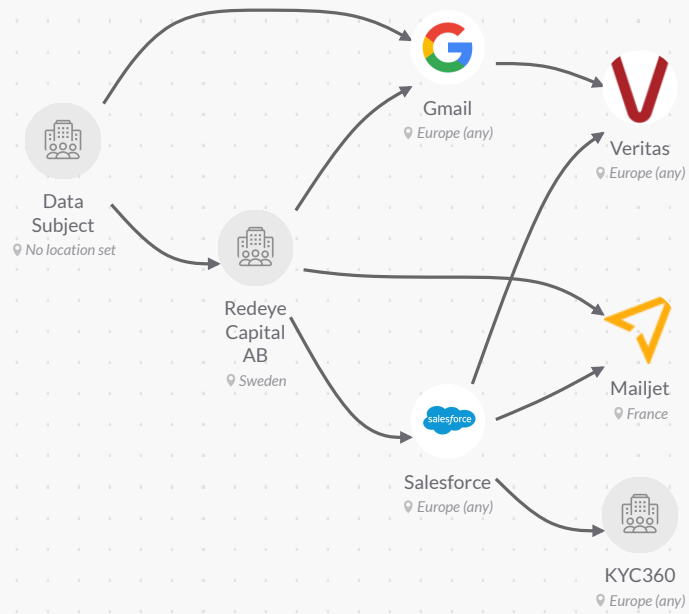
| | |
|--|-----------------|
|  Salesforce | salesforce.com |
|  Mailjet | mailjet.com |
|  Gmail | mail.google.com |
|  Veritas | veritas.com |
|  KYC360 | |

2.2. What data types/categories are used in this activity?

| | |
|-----------------------|-------------------------------------|
| Name | Salesforce, Mailjet, Veritas |
| Contact info (any) | Salesforce, Mailjet, Gmail, Veritas |
| Employment info (any) | Salesforce, Gmail, Veritas |

3. Data flow

3.1. Describe the data flow in this assessment





Portfolio management marketing

| | |
|------------------|------------------|
| Labels | Redeye Capital |
| Created | July 11, 2025 |
| Status | Completed |
| Owner | Viktor Westman |
| Approved | July 18, 2025 |
| Next review date | January 18, 2026 |

1. Activity info

1.1. Data subjects

Professional Investors, Prospective investors

1.2. Business unit

Redeye Capital

1.3. Purpose of processing

To market discretionary portfolio management services to prospective clients, including lead generation, client prospecting, conducting initial suitability and appropriateness assessments, providing service information and proposals, and maintaining records of marketing communications and client interactions for regulatory compliance purposes.

1.4. Data role

Controller

1.5. Data retention policy

The company never stores personal data longer than necessary with regards to the purpose of processing. Personal data is deleted on a regular basis when it is no longer needed. Personal data related to marketing is kept for at most 6 months after a finished marketing campaign.

1.6. Parties with access

Internal

Redeye Capital employees

1.7. Legal basis for data processing






Legitimate interests pursued by the controller or by a third party

1.8. Cross-border transfer mechanism

EU-U.S. Data Privacy Framework, Adequacy Decision

2. Data sources

2.1. What data sources process or store data used in this activity?

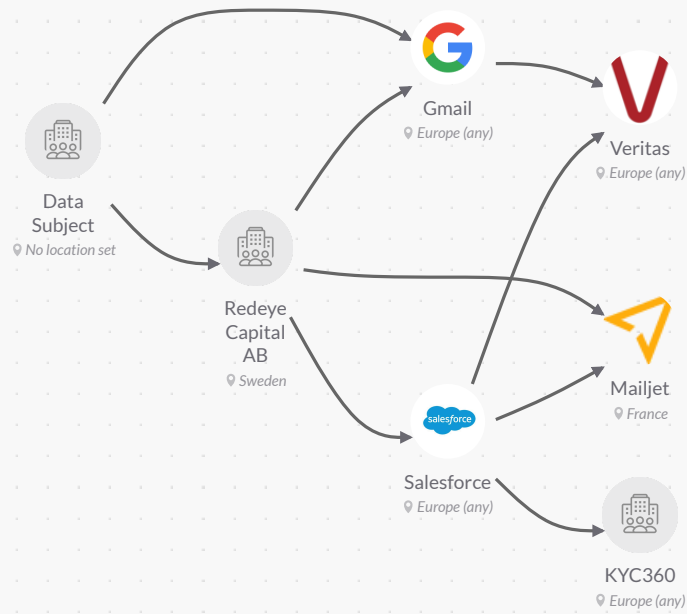
| | |
|--|-----------------|
|  Salesforce | salesforce.com |
|  Mailjet | mailjet.com |
|  Gmail | mail.google.com |
|  Veritas | veritas.com |
|  KYC360 | |

2.2. What data types/categories are used in this activity?

| | |
|-----------------------|----------------------------|
| Contact info (any) | Salesforce, Mailjet, Gmail |
| Employment info (any) | Salesforce, Gmail |

3. Data flow

3.1. Describe the data flow in this assessment





Redeye Capital General Administration

| | |
|------------------|------------------|
| Labels | Redeye Capital |
| Created | July 11, 2025 |
| Status | Completed |
| Owner | Viktor Westman |
| Approved | July 18, 2025 |
| Next review date | January 18, 2026 |

1. Activity info

1.1. Data subjects

Suppliers, Employees, Prospective investors, Professional Investors, Non-professional investors

1.2. Business unit

Redeye Capital

1.3. Purpose of processing

Personal data may be processed for general administrative purposes such as responding to inquiries, establishing, asserting and defending legal claims, e.g. to handle complaints and in connection with legal disputes, managing, protecting and developing our systems and services, managing contracts and agreements with vendors, and to fulfill legal obligations, e.g. accounting rules.

1.4. Data role

Controller

1.5. Parties with access

External

Redeye Capital Employees, accounting subcontractor

1.6. Legal basis for data processing

Legitimate interests pursued by the controller or by a third party, Compliance with a legal obligation or/and internal regulation

1.7. Cross-border transfer mechanism




EU-U.S. Data Privacy Framework

1.8. Data Retention Policy

The Company never stores data longer than necessary with regard to the purposes of the processing. The Company therefore conducts regular deletions among stored personal data and removes data that is no longer needed. The Company stores documentation to respond to inquiries for 12 months from when the inquiry was received. In case of legal claims and similar matters, the Company applies applicable limitation periods. When handling, protecting and developing our systems and services, the Company stores the data for 12 months from the time of the log event. When fulfilling legal obligations, for example under the Accounting Act, the Company stores data for 7 years from the end of the calendar year in which the relevant financial year was concluded.

2. Data sources

2.1. What data sources process or store data used in this activity?

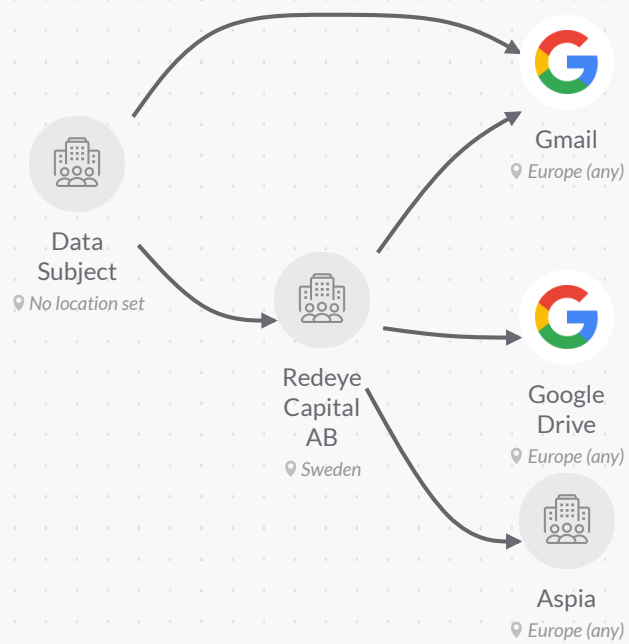
| | |
|--|------------------|
|  Gmail | mail.google.com |
|  Google Drive | drive.google.com |
|  Aspia | |

2.2. What data types/categories are used in this activity?

| | |
|--------------------|---------------------|
| Contact info (any) | Gmail, Google Drive |
|--------------------|---------------------|

3. Data flow

3.1. Describe the data flow in this assessment





Redeye Capital HR Management

| | |
|------------------|------------------|
| Labels | Redeye Capital |
| Created | July 15, 2025 |
| Status | Completed |
| Owner | Viktor Westman |
| Approved | July 18, 2025 |
| Next review date | January 18, 2026 |

1. Activity info

1.1. Data subjects

Employees

1.2. Business unit

Redeye Capital

1.3. Purpose of processing

The employee's personal data is required for purposes including: salary payments and compensation, personnel administration, time and absence reporting, emergency planning, contacting relatives during incidents, providing occupational health services, administering employment benefits (pensions, insurance, etc.), maintaining sick leave records and rehabilitation processes, performance evaluations and development discussions, and ensuring compliance with legal obligations including tax, social insurance, and employment law requirements such as termination procedures and employer certificates.

1.4. Data role

Controller

1.5. Data retention policy

The Company never stores data longer than necessary with regard to the purposes of the processing. The Company therefore conducts regular purges of personal data and removes data that is no longer needed. When employment ends, there is in principle no reason to save the former employee's personal data. This includes the employee's email account and information about the employee on the Company's website. In such cases, purging should take place as soon as possible after the end of employment. However, there are important exceptions to this. To fulfill its obligations in accordance with labor law, tax law, and social insurance law legislation, the Company needs to save certain information about the employee even for a period after the end of employment. For example, data must be saved to fulfill legal obligations regarding taxation or accounting, obligations concerning the employee's right of priority for re-employment under the Employment Protection Act (1982:80), and to handle legal claims that may be directed against the Company. It is also sometimes required that data be preserved for payment of, for example, pensions or severance pay. In these exceptional cases, data is stored for 2 years and 10 years respectively (regarding accounting, taxation, and limitation periods). For certain pension obligations, data must be stored significantly longer than that.

1.6. Parties with access

External

Redeye Capital Employees, as well as subcontractors in charge of administering payments

1.7. Project owners

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1.8. Legal basis for data processing

Legitimate interests pursued by the controller or by a third party, Performance of a contract with the data subject, Compliance with a legal obligation or/and internal regulation

1.9. Cross-border transfer mechanism

EU-U.S. Data Privacy Framework

2. Data sources

2.1. What data sources process or store data used in this activity?

 Aspia

 Google Drive

drive.google.com

2.2. What data types/categories are used in this activity?

| | |
|-----------------------|-------------|
| Contact info (any) | All sources |
| Identifiers (any) | Aspia |
| Demographics (any) | Aspia |
| Employment info (any) | Aspia |
| Financial info (any) | Aspia |
| Location (any) | Aspia |
| Health (any) | Aspia |

3. DPIA

3.1. Do you want to assess data protection risk for this activity?

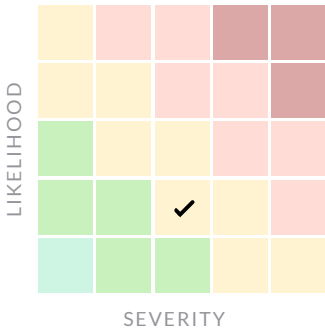
Yes

3.2. Comment

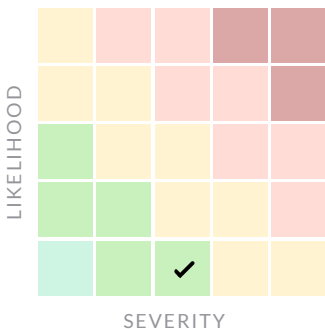
There is some sensitive information being processed, including information on general health (e.g sick leave).

3.3. Risks

3.3.1. Internal breach

| Risk analysis | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--------|--------|----------|---------|----------|---------|------|--------|-----|-----|-----|-----|--------|--------|--------|-----|-----|-----|-----|-------|--------|--------|-----|-----|-----|-------|-------|--------|--------|-----|-----|-------|-------|-------|--------|--------|
|  <p>A 5x5 risk matrix with 'LIKELIHOOD' on the y-axis and 'SEVERITY' on the x-axis. The matrix is color-coded: green for low risk, yellow for medium, and red for high. A checkmark is in the cell at (3, 3).</p> <table border="1"><thead><tr><th></th><th>Low</th><th>Medium</th><th>High</th><th>Critical</th><th>Extreme</th></tr></thead><tbody><tr><th>High</th><td>Yellow</td><td>Red</td><td>Red</td><td>Red</td><td>Red</td></tr><tr><th>Medium</th><td>Yellow</td><td>Yellow</td><td>Red</td><td>Red</td><td>Red</td></tr><tr><th>Low</th><td>Green</td><td>Yellow</td><td>Yellow</td><td>Red</td><td>Red</td></tr><tr><th>Low</th><td>Green</td><td>Green</td><td>Yellow</td><td>Yellow</td><td>Red</td></tr><tr><th>Low</th><td>Green</td><td>Green</td><td>Green</td><td>Yellow</td><td>Yellow</td></tr></tbody></table> | | | Low | Medium | High | Critical | Extreme | High | Yellow | Red | Red | Red | Red | Medium | Yellow | Yellow | Red | Red | Red | Low | Green | Yellow | Yellow | Red | Red | Low | Green | Green | Yellow | Yellow | Red | Low | Green | Green | Green | Yellow | Yellow |
| | Low | Medium | High | Critical | Extreme | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High | Yellow | Red | Red | Red | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Medium | Yellow | Yellow | Red | Red | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Low | Green | Yellow | Yellow | Red | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Low | Green | Green | Yellow | Yellow | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Low | Green | Green | Green | Yellow | Yellow | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Calculated risk | ● Medium | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Does your company accept this risk? | true | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Comment | Access to sensitive information is restricted to a handful of employees, NDAs are in place, subcontractors have equivalent processes. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

3.3.2. External breach

| Risk analysis | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--------|--------|----------|---------|----------|---------|------|--------|-----|-----|-----|-----|--------|--------|--------|-----|-----|-----|-----|-------|--------|--------|-----|-----|-----|-------|-------|--------|--------|-----|-----|-------|-------|-------|--------|--------|
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| | Low | Medium | High | Critical | Extreme | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High | Yellow | Red | Red | Red | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Medium | Yellow | Yellow | Red | Red | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Low | Green | Yellow | Yellow | Red | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Low | Green | Green | Yellow | Yellow | Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Low | Green | Green | Green | Yellow | Yellow | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Calculated risk | ● Medium | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Does your company accept this risk? | true | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Comment | Subcontractors storing sensitive information are ISO27001 certified. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

3.4. Estimated risk

Low

3.5. Linked assessments

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4. Data flow

4.1. Describe the data flow in this assessment

