

**Who is the responsible person?**

This privacy policy applies to the processing of personal data by Adaptive Hedge Fund Management AB, organization number 556899-7315 (hereinafter jointly "Adaptive", "we"). Adaptive acts as a "responsible person" within the meaning of the EU General Data Protection Regulation. You are always welcome to contact us at info@adaptive.com.

On what legal grounds do Adaptive process your personal data?

Adaptive may process your personal data in the following cases:

- If it follows from an agreement,
- If you have consented to the treatment,
- If the treatment is within our legitimate interests and does not infringe your rights,
- To ensure compliance with law.

What personal data does Adaptive process?

- Identity information: name and social security number.
- Contact information: address, e-mail address, telephone number and customer number.
- Payment and transaction information: Bank account details, requested withdrawals or deposits made.
- Investor profile: Whether you belong to the professional or non-professional investor category.
- Device information: IP number and other information from cookies.

For what purposes do Adaptive process your personal data?

Personal data is stored for the purpose of carrying out the obligations that follow from an agreement, and to provide good customer service. We also process personal data in order to manage our accounting and financial reporting. Additionally, we process data in order to contact potential and existing customers, including for marketing purposes, and to develop systems, products and offers to our customers. Finally, we process personal



data to ensure that we comply with the applicable laws and regulations that apply to our company.

How long we store your personal data

Personal data attributable to an agreement is processed as long as they belong to an active customer. A customer is active if it has an investment account that currently carries a placement. Personal data attributable to inactive investment accounts is deleted every six months.

Who processes your personal information?

We will not sell, exchange or license any personal data about you to third parties. However, we may need to transfer personal data to external parties who process the data for their own purposes. Such recipients include, for example, the Swedish Tax Agency.

Your rights under GDPR

By law you have the right to:

- Get access to and get copies of the personal data we have concerning you;
- Demand that we cease processing your personal data if the processing involves injury or inconvenience;
- Require that we not send you marketing information;
- Require that we delete your personal data;
- Demand that we limit our data processing activities;
- Receive from us the personal data we have concerning you that you have provided us with;
- Demand that we correct the personal data we have concerning you if they are incorrect.

To request information about what personal data we have stored, you can contact the responsible person at info@adaptivehedge.com. Please note that the rights above are not absolute, and that we may have the right to deny your request if exceptions are applicable. Should you have any complaints regarding our processing of your personal data, you have the right to submit a complaint to the Swedish Data Inspection Authority.

**Security measures to protect your data**

We use commercially viable methods to protect your personal data, and regularly review those methods so that they conform with our current technical process'. However, no method of transmitting information over the Internet or for data storage is 100% secure, why we cannot guarantee absolute security of your personal data.

Cookies

Cookies are small text files that are stored in your computer which allow us to recognize your computer on your next visit.

When you visit our website, we process certain information in an automated way (through for example, cookies and the server log). This information includes, for example, your IP address, network location, browser information, device characteristics, operating systems, referring URLs, information about what actions you have taken on our site, and the time and date of visits to the website.

When you log in on our website, we save a cookie that identifies the user and enables login and authentication.

You can prevent cookies from being saved by selecting the appropriate settings in your browser. Note, however, that if you do so, some features of the site may not be fully available.

Changes to our privacy policy

Adaptive reserves the right to make changes or additions to this privacy policy. This could be the case if, for example, the applicable law changes or if we change our services in a way that affects our processing of your personal data.

Information about any changes or additions will be communicated to you in an appropriate manner depending on the extent and significance of the changes for you as a customer or visitor of our website. Updated information can eg. be submitted by e-mail, via My Pages, in connection with other communication with you, on our website or via another suitable channel.