

# matas

May 2019

Privacy Policy - Shareholders

Matas A/S

## Introduction

- 1.1 As part of handling investor relations Matas A/S will be processing personal data about its shareholders, proxies and advisors. This privacy policy sets out how and why we process personal data in connection with administration of our relationship with our shareholders, proxies and advisors, including registration in the register of shareholders and when providing notice of and holding general meetings.
  - 1.2 Matas A/S is the data controller for the processing activities set out in this privacy policy (also referred to as “we”, “our” in this privacy policy).
- 2 How and why we collect personal data**
- 2.1 Below, it is listed what type of personal data we collect about our shareholders, proxies and advisors and for which purposes we use the personal data.

Purpose	Personal Data Processing Activity	Legal Basis
Identifying shareholders and maintaining our register of shareholders	In order to identify shareholders and maintain the register of shareholders, we process information about shareholders of Matas A/S, including name, address, e-mail address, dates of acquisition/sales, shareholding, voting rights, and pledges.	<p>We process the personal data to comply with our legal obligation set out in the Danish Companies Act.</p> <p>The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection c.</p> <p>We keep the personal data as long as you are a shareholder and for a period of 12 months after becoming aware that you are no longer a shareholder.</p>

Purpose	Personal Data Processing Activity	Legal Basis
Notice of general meetings	<p data-bbox="701 667 1464 783">Notice of a general meeting in Matas A/S will be distributed based on the information registered in the register of shareholders, including name, address and email address.</p> <p data-bbox="701 826 1464 1018">We will in this respect process personal data for the purpose of forwarding the notice of the general meeting to shareholders having requested to receive a copy of the notice, including to enable the shareholders to exercise their administrative rights at the general meeting.</p>	<p data-bbox="1487 432 2074 660">If you have requested that we register your name as a shareholder we keep your personal data as long as you are a shareholder and for a period of the current year + 3 years after becoming aware that you are no longer a shareholder.</p> <p data-bbox="1487 671 2074 783">We process the personal data to comply with our legal obligation set out in the Danish Companies Act.</p> <p data-bbox="1487 826 2074 938">The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection c.</p>

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Notification of participation, granting proxy and voting by correspondence

When a shareholder provide notification of the shareholder's or an advisor's participation at the general meeting or grant a proxy to a third party, we will issue an admission card (potentially with voting cards), which will contain personal data about the shareholder, any proxy holder and/or advisor representing the shareholder, including name, address, email address and shareholding.

We process the personal data to comply with our legal obligation and shareholder's rights as set out in the Danish Companies Act.

The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection c.

Notification of the shareholder's participation implies that we will process personal data based on the information registered about the shareholder in the register of shareholders or provided in connection with notification of participation. Processing of the personal data also takes place in connection with granting proxy to a third party, proxy to the board of directors or voting by correspondence. Similarly, processing of the personal data will take place in order to manage the voting process, if the shareholder vote at the general meeting (in writing or electronically), including to provide confirmation of an electronic vote.

If the shareholder grant proxy to a third party and/or register attendance of an advisor, we will collect and process personal data about such persons (name and address).

Collecting and processing data takes place for the purpose of ensuring that the relevant persons are granted access

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Purpose	Personal Data Processing Activity	Legal Basis
<p>Submitting questions prior to the general meeting</p>	<p>to Matas A/S' general meeting and ensuring that they can exercise their rights.</p> <p>When submitting written questions prior to the general meeting, shareholders must document status as a shareholder or a proxy holder and in this respect collection and processing of the personal data will take place.</p> <p>If questions are replied to in writing, the questions, including the shareholder's name, and our replies will be made available upon request and may be presented at the general meeting.</p>	<p>Collection and processing of personal data will in such event be based on our legitimate interests in being able to identify the shareholder, in order for the shareholder to be able to exercise its rights as a shareholder to submit questions.</p> <p>The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection f.</p> <p>We keep personal data received through written questions prior to a general meeting for a period of the current year + 2 years after the year the general meeting in question was held.</p>
<p>Submission of proposals prior to the general meeting</p>	<p>In connection with a request for a specific issue to be included on the agenda for the general meeting, the personal data and the contents of the proposal will be collected and processed by Matas A/S.</p>	<p>The personal data will in this respect be collected based on our legitimate interests in being able to identify the shareholder in order to enable the shareholder to exercise its right to submit proposals to be included on the agenda.</p>

Purpose	Personal Data Processing Activity	Legal Basis
	<p>If the request fulfils the requirements, the proposal and the shareholder’s name will be included (i) on the agenda, in the notice to convene and in the complete proposals, (ii) on the forms for granting proxy or voting by correspondence, which will subsequently be published in accordance with the rules in this respect, and (iii) in the minutes of the general meeting.</p>	<p>The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection f.</p>
<p>The right to speak and pose questions at the general meeting</p>	<p>If a shareholder choose to speak at the general meeting, e.g. in order to pose questions to the board of directors’ report or the annual report, the shareholder will be requested to document status as a shareholder, a proxy holder or an advisor.</p> <p>The statement and name will be included in the minutes of the general meeting.</p>	<p>In this respect, the personal data will be collected and processed based on our legitimate interests in being able to identify the shareholder in order for the shareholder to exercise its right to speak and potentially pose questions at the general meeting.</p> <p>The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection f.</p>

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Minutes of meeting from the general meeting

After the general meeting, Matas A/S will prepare minutes of the general meeting, and therefore personal data may, in addition to the initial collection and processing of personal data, e.g. when submitting proposals or exercising the right to speak at the general meeting, be processed in this respect.

The minutes are required to be prepared pursuant to the Danish Companies Act, and the processing of shareholders personal data thus takes place in order for us to comply with our legal obligation.

The legal basis for the processing is EU General Data Protection Regulation (GDPR) Article 6, Section 1, Subsection c.

When submitting a proposal to be included on the agenda or when making statements at the general meeting, it is not possible to refuse having the name of the shareholders, proxy holders or advisors, as applicable, stated in the minutes.

The minutes of the general meeting are made available on Matas A/S' headquarter in Allerød, Denmark, for a period up to 1 year from the date of the meeting. The minutes will be available in Allerød to shareholders and to the general public during this period.

We may store the minutes of the general meeting until it is no longer necessary for

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Purpose	Personal Data Processing Activity	Legal Basis
		<p>Matas A/S to store the information for the purpose of protecting Matas A/S' and the shareholders' interests, including for the purpose of documenting the deliberations and resolutions passed at the general meeting. This implies that minutes will never be deleted.</p>

### 3 Third parties with whom we share personal data

3.1 We may share the personal data about shareholders, proxies and advisors with relevant employees of Matas A/S and Matas Operations A/S – a fully owned subsidiary of Matas A/S and with relevant third party advisors and service providers (data processors). Computershare is our service provider and we have entered into a data processing agreement with Computershare. We may also share the personal data with public authorities as well as the general public through publication on our website in accordance with applicable law. Some of these parties may be located in countries outside of the EU/EEA. Please be informed that the level of data protection as currently applied and enforced in some countries outside the European Union does not conform to the level of data protection for personal data currently applied and enforced within the European Union. If personal data is being processed outside of the EU/EEA, such transfer of personal data will either be subject to the EU-U.S. Privacy Shield or the European Commission's standard contractual clauses. You can request a copy of the agreement covering the transfer of personal data by sending an e-mail to [investor@matas.dk](mailto:investor@matas.dk).

### 4 How long will we store the personal data

4.1 We will only store the personal data for as long as is necessary to fulfil the purposes outlined on this policy. With respect to information about shareholders, proxies and advisors, unless stated otherwise above, we will generally be keeping the personal data for the current year + 3 years after the end of the financial year in which the shareholder no longer own shares in Matas A/S.

## 5 Your rights as a data subject

- 5.1 **Right to information.** You can obtain further information on the personal data which we stores and processes about you by sending an e-mail to [investor@matas.dk](mailto:investor@matas.dk) stating this request.
- 5.2 **Right to object.** You may object to your personal data being processed. If you wish to object to your personal data being processed, please send an e-mail to [investor@matas.dk](mailto:investor@matas.dk) stating this request.
- 5.3 **Right to rectification and restriction of processing.** You may request that your personal data is rectified or restrict the processing of your personal data. If you wish to have your data rectified or restrict the processing, please send an e-mail to [investor@matas.dk](mailto:investor@matas.dk) stating this request.
- 5.4 **Right to a copy of your personal data.** You may be entitled to obtain a copy of your personal data in a structured, commonly used and machine-readable format by sending an e-mail to [investor@matas.dk](mailto:investor@matas.dk) stating this request. If technically feasible, you may request that the personal data is transmitted directly to another company or person acting as a data controller.
- 5.5 **Right to make a compliant.** If you have any complaints about our processing of your personal data, you may contact the Danish Data Protection Agency via their homepage [www.datatilsynet.dk](http://www.datatilsynet.dk).

## 6 Changes to this policy

- 6.1 We may change this privacy policy from time to time by issuing a new version on our website. This document was last updated on 7<sup>th</sup> May 2019.

## 7 Contact details

### 7.1 Our contact details are:

Matas A/S,  
Company registration number: 27 52 84 06  
Rørmosevej 1  
DK-3450 Allerød  
Denmark  
Phone (+45) 48 16 55 44  
E-mail: [investor@matas.dk](mailto:investor@matas.dk)