

# matas

May 2020

Privacy Policy - Shareholders

Matas A/S

## 1 Introduction

- 1.1 As part of its investor relations activities, Matas A/S processes personal data about its shareholders, proxies and advisors. This privacy policy sets out how and why we process personal data in connection with the management of our relationships with shareholders, proxies and advisors, including the registration of data in the register of shareholders and the calling and holding of general meetings.
- 1.2 Matas A/S is the data controller with respect to the processing of personal data as set out in this privacy policy (also referred to as “we” and “our” in this privacy policy).

## 2 How and why we process personal data

- 2.1 The types of personal data we collect about our shareholders, proxies and advisors and the purposes of our processing of the personal data are listed below.

Purpose	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 acquisitions/sales, shareholding, voting rights and pledges.	<p>We process the personal data for the purpose of complying with our legal obligations under the Danish Companies Act.</p> <p>The <u>legal basis</u> for the processing is point (c) of Article 6(1) of the EU General Data Protection Regulation (GDPR).</p> <p>We retain personal data about non-registered shareholders for a period of 12 months after becoming aware that the person in question is no longer a shareholder.</p>

Purpose	Data Processing Activity	Legal Basis
		<p>If a shareholder has requested to be registered, we retain the information for a period of the current year plus three years after becoming aware that the person in question is no longer a shareholder.</p>
<p>Notices convening general meetings</p>	<p>Notices convening general meetings of Matas A/S are distributed based on the information registered in the register of shareholders, including name, address and e-mail address.</p> <p>In this connection, we process personal data for the purpose of summoning shareholders having requested to receive a copy of the notice for the general meeting, including to enable the shareholders to exercise their fundamental administrative rights at the general meeting.</p>	<p>We process the personal data for the purpose of complying with our legal obligations under the Danish Companies Act.</p> <p>The <u>legal basis</u> for the processing is point (c) of Article 6(1) of the EU General Data Protection Regulation (GDPR).</p> <p>We retain information relating to general meetings for a period of the current year plus two years from the date of the general meeting.</p>

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Notice of attendance, appointment of proxy and voting by correspondence

Where a shareholder gives notice of his/her and, where relevant, an advisor's attendance at the general meeting or appoints a proxy, we will issue an admission card (possibly with voting cards), which will contain certain personal data about the shareholder and any proxy and/or advisor representing the shareholder, including name, address, e-mail address and shareholding.

Where a shareholder gives notice of attendance, we will process his/her personal data based on the information registered in the register of shareholders or provided in connection with the notice of attendance. We will also process personal data in connection with the appointment of a third party or the board of directors as proxy and in connection with voting by correspondence. Similarly, we process personal data in order to manage the voting process if the shareholder votes at the general meeting (in writing or electronically), including to provide confirmation of an electronic vote.

Where a shareholder appoints a third party as proxy and/or registers the attendance of an advisor, we will collect and process personal data about such persons (name and address).

Data are collected and processed for the purpose of giving the relevant persons access to Matas A/S' general meeting and enabling them to exercise their relevant rights.

We process the personal data for the purpose of complying with our legal obligations under the rules on shareholder rights as set out in the Danish Companies Act.

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

We retain information relating to general meetings for a period of the current year plus two years from the date of the general meeting.

Purpose	Data Processing Activity	Legal Basis
<p>Submission of questions prior to the general meeting</p>	<p>Shareholders submitting written questions prior to the general meeting must document their status as a shareholder or a proxy, in which connection personal data will be collected and processed.</p> <p>If the question is replied to in writing, the question, the shareholder's name and our reply will be presented at the general meeting.</p>	<p>In this connection, the collection and processing of personal data is based on Matas A/S' legitimate interest in being able to identify the shareholder in order that he/she may exercise his/her right as a shareholder to submit questions.</p> <p>The <u>legal basis</u> for the processing is point (f) of Article 6(1) of the EU General Data Protection Regulation (GDPR).</p> <p>We retain information obtained through written questions submitted prior to a general meeting for a period of the current year plus two years after the date of the general meeting.</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, Matas A/S will collect and process the personal data of the person making the request and the contents of the proposal.</p>	<p>In this connection, personal data are collected based on Matas A/S' legitimate interest in being able to identify the shareholder in order that he/she may exercise his/her right to submit proposals to be included on the agenda.</p>

Purpose	Data Processing Activity	Legal Basis
	<p>If the request meets the relevant requirements, the proposal and the shareholder’s name will be included (i) on the agenda and in the complete proposals, (ii) on the forms used for appointing a proxy or voting by correspondence, which will subsequently be published in accordance with the relevant rules, and (iii) in the minutes of the general meeting.</p>	<p>The <u>legal basis</u> for the processing is point (f) of Article 6(1) of the EU General Data Protection Regulation (GDPR).</p> <p>We retain information relating to general meetings for a period of the current year plus two years from the date of the general meeting.</p>
<p>The right to speak and ask questions at the general meeting</p>	<p>If a shareholder chooses to speak at the general meeting, for instance in order to ask questions of the board of directors or on the annual report, the shareholder will be requested to document his/her status as a shareholder, a proxy or an advisor.</p> <p>The shareholder’s statement and name will be included in the minutes of the general meeting.</p>	<p>In this connection, personal data are collected and processed based on our legitimate interest in being able to identify the shareholder in order that he/she may exercise his/her right to speak and ask questions at the general meeting.</p> <p>The <u>legal basis</u> for the processing is point (f) of Article 6(1) of the EU General Data Protection Regulation (GDPR).</p> <p>We retain information relating to general meetings for a period of the current year plus two years from the date of the general meeting.</p>

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Minutes of the general meeting

After the general meeting, Matas A/S will draw up minutes of the general meeting, and in addition to the initial collection and processing of your personal data, for instance if you submit proposals or exercise your right to speak at the general meeting, further processing of your personal data may take place in that connection.

Minutes of the general meeting must be prepared pursuant to the Danish Companies Act, and the processing of personal data concerning our shareholders is necessary for us to comply with our legal obligations.

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

A shareholder submitting a proposal to be included on the agenda or speaking at the general meeting cannot insist on not having the names of shareholders, proxies or advisors, as applicable, stated in the minutes.

The minutes of the general meeting are available to shareholders and the general public at Matas A/S' head office in Allerød, Denmark, for a period of up to one year from the date of the general meeting.

Purpose	Data Processing Activity	Legal Basis
		<p>We may retain the minutes of the general meeting until it is no longer necessary for Matas A/S to store such information for the purpose of pursuing the interests of Matas A/S and its shareholders, including for the purpose of documenting the proceedings and resolutions passed at the general meeting.</p> <p>This means that minutes will not be deleted.</p>

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

3.1 We may share personal data about shareholders, proxies and advisors with relevant employees of Matas A/S and Matas Operations A/S – a wholly-owned subsidiary of Matas A/S – and with relevant third-party advisors and service providers (data processors). Computershare acts as a data processor and a service provider to Matas A/S, and we have entered into a data processing agreement with Computershare. We may also share personal data with public authorities and the general public through publication on our website in accordance with applicable law. Some of these parties may be domiciled in countries outside the EU/EEA. Please be advised that the level of data protection 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. Where personal data are processed outside the EU/EEA, such transfer of personal data will be subject to the EU-U.S. Privacy Shield or the standard contractual clauses adopted by the European Commission. You can request a copy of the agreement applicable to the transfer of personal data by sending an e-mail to [investor@matas.dk](mailto:investor@matas.dk).

### 4 How long do we store personal data?

4.1 We will only store personal data for as long as is necessary to fulfil the purposes outlined on this policy. As regards information concerning shareholders, proxies and advisors, we will generally, unless otherwise stated above, retain personal data for the current year plus three years after the end of the financial year in which the shareholder ceases to own shares in Matas A/S.

## 5 Your rights as a data subject

5.1 **Right of access.** For more information about your personal data stored and processed by Matas A/S, please send an e-mail to [investor@matas.dk](mailto:investor@matas.dk) stating this request.

5.2 **Right to object.** You can object to our processing of your personal data. To object to our processing of your personal data, 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 be rectified or that the processing of your personal data be restricted. If you wish to have your data rectified or to restrict the processing, please send an e-mail to [investor@matas.dk](mailto:investor@matas.dk) stating this request.

5.4 **Right to data portability.** 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 be transmitted directly to another company or person acting as a data controller.

5.5 **Right to complain.** If you wish to complain about our processing of your personal data, you may contact the Danish Data Protection Agency via their website, [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 publishing a new version on our website. This version was last updated on 22 May 2020.

## 7 Contact details

### 7.1 Our contact details are:

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