

PRIVACY POLICY OF MOMENTUM GROUP

We process your personal data as part of our work at Momentum Group. Your integrity is important to us and we are committed to being transparent with the information we process about you and why. We have therefore prepared this privacy policy which describes our processing of your personal data.

1. Personal Data Controller

Momentum Group AB, corporate identity number 559072-1352 ("Momentum Group", "we", "us", "our") with postal address PO Box 5900, SE-102 40 Stockholm Sweden is the controller of the processing of your personal data.

2. Personal data that we process about you

In your contact with Momentum Group you will provide us with information such as name and contact information. Your personal data has been collected either directly from you or from your employer in connection with the business relationship between us and your employer.

We can also collect personal data from other sources. For example, we collect registers of shareholders from Euroclear Sweden AB (reg.nr 556112-8074) in connection with general meetings of shareholders.

3. Purpose and legal bases for the processing of your personal data

3.1 Generally

We process your personal data in order to communicate with you and to send you marketing information. This communication covers information regarding Momentum Group (such as press releases, financial reports, newsletters, invitations to various events and lectures) and answering questions from you (for example when you contact us or ask us a question via the forms we provide on our website or email). The processing is based on our legitimate interest of providing the information that you have requested from us, maintaining our business relationship with you or your employer and/or provide any with material and/or communicate with you in your profession regarding information and events that we offer and that we believe may be of interest to you. You are welcome to contact us if you wish to know more about how we have done the balance of interests. If you have given us your consent we will instead process your information for the above purposes with the based on your consent.

In case you have access to insider information, we process your personal data for the purpose of keeping a list (a so-called logbook) in order to fulfil our legal obligation according to the Market Abuse Regulation (EU) 596/2014.

We offer a so called whistleblower service on our website in accordance with applicable laws. The service enables people to report a suspicion of a serious misconduct. As a reporter you can be completely anonymous when using the service. In case of processing of your personal data, such processing is based on our legitimate interest to enable reports of suspected serious misconducts within the Momentum Group. The whistleblower service is an important channel in order to maintain good corporate governance and uphold the trust of the public and our customers. Reports containing personal data regarding suspicions of violations of the law are treated solely regarding key personnel or senior executives, in accordance with the guidelines from The Swedish Authority for Privacy Protection.

The processing of your personal data is in some cases a statutory or contractual requirement. To the extent that you do not provide your personal data to us, it may have an effect on our possibility to fulfill our commitments made to you and our obligation to comply with the legal requirements are subjected to in relation to you.

3.2 Specifically for you as a shareholder or an employee of a shareholder (including representatives of a shareholder such as agents, counsels and trustees)

In addition to the general information set out in section 3.1 we process your personal data as a shareholder or employee of a shareholder (including representatives of shareholders such as agents, counsels and trustees) if applicable as follows.

For the following purposes, we process your personal data for the performance of a contract or in order to take steps at your request prior to entering into a contract:

- In your contact with us as a shareholder, as well as when using our services and when purchasing our products, we will process your personal data to administrate and fulfill our obligations towards you.
- Dividend.

We process your personal data for the following purposes, based on a legal obligation:

- Fulfill our obligations as a listed company, for instance to establish share registers, establish protocols, administer calls to general meetings of shareholders, manage voting rights and registration.
- Comply with our accounting obligations according to the Accounting Act (1999: 1078).

We process your personal data for the following purposes based on a legitimate interest:

- Publishing information in accordance with regulations and guidelines for listed companies that are not legally binding or decisions based on legislation for the purpose of increasing insight and transparency into our organisation.
- Internal and external publishing of certain shareholders' names and information about these in news notifications.
- Publication of information on the website regarding shareholding.
- Publication of information about members of the nomination committee on the website.
- Your personal information as an employee of a shareholder of Momentum Group will be processed in accordance with the agreement for the purposes administration and fulfilment of our agreement with the shareholder (your employer). The legitimate interest of Momentum Group is to be able to administer the agreement and fulfill our obligations towards the shareholder (your employer).
- Publication of information on the website from the register of the Swedish Financial Supervisory Authority regarding insider transactions.

Our legitimate interest is to be able to publish information about Momentum Group in accordance with guidelines for listed companies that are not governed by law, for example Swedish Code of Corporate Governance. We also have a legitimate interest of internal and external communication needed in order for Momentum Group to provide good service, answer questions or to facilitate external contacts.

What is stated above under section 3.2 shall apply as applicable to shareholders' representatives, such as agents, counsels or trustees.

3.3 Specifically for you as a customer or an employee of a customer

In addition to the general information set out in section 3.1, we process your personal data as a customer or employee of a customer if applicable as follows.

We process your personal data for the following purposes for the performance of a contract or in order to take steps at your request prior to entering into a contract:

- In your contact with us as a customer as well as when using our services and when purchasing our products, we will process your personal data to administrate and in order to fulfill our agreement with you.

We process your personal data for the following purposes, based on a legal obligation:

- Comply with our accounting obligations according to the Accounting Act (1999: 1078).
- We process personal data about you and your purchases according with our obligations according to applicable consumer sales- and sales legislation.

We process your personal data for the following purposes based on our legitimate interest:

- Your personal data as an employee of a customer of Momentum Group will be processed in accordance with the agreement between Momentum Group and the customer for the purpose of administrating and fulfilling the agreement with our customer (your employer). The legitimate interest of Momentum Group is to administer the agreement and fulfill our agreements to our customer (your employer).

3.4 Specifically for you as an employee of a supplier

3.4.1 Generally

In addition to the general information set out in section 3.1, we process your personal data as an employee of a supplier if applicable as follows.

We process your personal data for the following purposes in order to fulfill a legal obligation:

- Comply with our accounting obligations according to the Accounting Act (1999: 1078).

We process your personal data for the following purposes based on our legitimate interest:

- Your personal data as employee to a supplier to us is processed in accordance with the agreement with the supplier for administration and performance of the contractual relationship. Our legitimate interest is to be able to administer the agreement and fulfill our obligations to our supplier (your employer).

3.4.2 Specifically for you as an employee of our auditing company

In addition to the general information set out in section 3.1 and 3.4.1, we process your personal data as an employees of our auditing company if applicable as follows.

We process your personal data for the following purposes in order to fulfill a legal obligation:

- Fulfill our other obligations as a listed company, for instance to administer accounts, annual reports, audit reports, registering auditors with the authority, protocols or other purposes, as stated in law, inter alia the Companies Act (2005:551).

We process your personal data for the following purposes based on our legitimate interest:

- Internal and external publication of the name of the auditor. Our legitimate interest is to increase the insight and transparency of our business.

3.5 Specifically for you as an analyst

In addition to the general information set out in section 3.1, we process your personal data as an analyst if applicable as follows.

We process your personal data for the following purposes based on our legitimate interest:

- Internal and external publication of the names of the analysts. Our legitimate interest in processing your personal data is to publish information about the company in accordance with guidelines for listed companies that follow by law, such as the Swedish Code of Corporate Governance, and provide insight and transparency into our organisation, as well as providing information about the review and analysis that Momentum Group is subjected to.

3.6 Our use of cookies

We process your personal data for the following purposes based on our legitimate interest:

- When using our website we may process your personal data in forms of for example IP addresses through cookies. Our legitimate interest of processing your personal data is to provide you with a good user experience of our website and our commercial interest in obtaining information about the visitors on our website. Read more about our cookies on <https://www.momentum.group/en/site-services/cookie-policy>.

4. How we share your personal data

Your personal data will be shared with recipients who process personal data on our behalf, so-called processors. Our processors are for example Investis Sweden AB (corporate identity number 556601-6217) and Pulsen Production (corporate identity number 556192-0025).

We will also transfer your personal data to recipients who are not processors, such as certain authorities, debt collection companies and WhistleB Whistleblowing Center AB (corporate identity number 556873-2753). These recipients are controllers for their processing of your personal data.

If necessary, we will disclose personal data to other companies within Momentum Group.

5. Transfer of personal data to a third country

Momentum Group, our suppliers and partners will as a main principle only process your personal data within the EU/EEA. In case personal data processes outside of the EU/EEA there is either a decision from the commission ensuring that the third country in question has an adequate level of protection or appropriate safeguards in the form of standard contractual clauses, binding corporate rules or Privacy Shield, which ensures that your rights are protected. Contact us if you wish to have a copy of the protection measures that we have taken or information about where these has been made available.

6. How long we will store your personal data

6.1 Generally

We will never process your personal data for a longer period than permitted by applicable law, regulation, case law or government decision. The personal data that we process in order to fulfill our agreement with you is processed during the time necessary for us to administer the contractual relationship, exercise your rights and fulfill our commitments to you. In order to fulfill legal requirements, because you have given your consent or because we are entitled to process personal data based on a legitimate interest, we may however, save your personal data for a longer period as stated below.

- Processing of personal data in order to fulfil our obligation to keep a list of persons who have access to insider information (so called logbook) is stored in accordance with the Market Abuse Regulation.
- Your personal data that we process based on your consent will be processed until you withdraw your consent.
- Your personal data that we process based on our legitimate interest with the purpose to communicate with you to answer questions or publish information about Momentum Group and our business, will be processed as long as the matter is in progress or the purpose remains.
- Personal data that we process based on our legitimate interest for the marketing purposes is processed in accordance with applicable national laws and case law and varies depending on your relationship to Momentum Group a) if you subscribe to our newsletters we will process your personal data until you inform us that you no longer wish to receive the information b) if you have a customer relationship with us, and do not subscribe to any of our information, we will process your personal data for a maximum of one (1) year after your customer relationship has ended or until you announce that you no longer wish to receive our newsletters c) if you are not an active customer of ours or a subscriber of our newsletters we will process your personal data for a maximum of three (3) months or until you announce that you no longer wish to receive our newsletters.
- Information, pictures and newsletters that we publish on our website based on our legitimate interest will be processed for as long as there is a news value in the information published and the purpose remains. For example, continued processing may be necessary to inform the public and investors.

6.2 Specifically for you as a shareholder or an employee of a shareholder (including representatives of a shareholder such as agents, counsels and trustees)

In addition to the general retention periods set out in section 6.1, we save your personal data as a shareholder or employee of shareholders (including shareholders' representatives such as agents, counsels and trustees), if applicable, as follows.

- Personal data that we process in order to fulfill our agreement with you/your employer will as a main principle be processed during the time necessary to administer the contractual relationship, exercise our rights and fulfill our commitments to you/your employer. If your employment ends we will terminate our processing of your personal data as soon as we receive such information from you/the shareholder. Inactive agreements containing your personal data will be stored for ten (10) years due to general limitation rules under the Limitations Act (1981:130).
- Personal data processed for dividends or other purposes required by the Accounting Act (1999:1078) will be processed for seven (7) years in accordance with the Swedish Accounting Act (1999:1078).
- Your personal data as an employee of a shareholder will be processed for as long as you remain employed by the shareholder and the purpose of the process remains. If you are no longer employed by the shareholder or are no longer a contact person, the processing will stop as soon as we are informed.

6.3 Specifically for you as a customer or an employee of a customer

In addition to the general retention periods set out in section 6.1, we save your personal data as a customer or an employee of a customer, if applicable, as follows.

- Personal data that we process in order to fulfill our agreement with you/ your employer is as a main principle processed for the time that we are required in order to administrate the contractual relationship, exercise our rights and fulfill our commitments to you/ your employer. If your employment ends we will terminate our processing of your personal data as soon as we receive such information from you/the shareholder. Inactive agreements containing your personal data will be stored for ten (10) years due to general limitation rules under the Limitations Act (1981:130).
- Personal data processed for purposes required by the Accounting Act (1999:1078) will be processed for seven (7) years in accordance with the Accounting Act (1999:1078).
- Your personal data as an employee of a customer will be processed for as long as you remain employed by the customer and the purpose of the process remains. If you are no longer employed by the customer or are no longer a contact person, the processing will stop as soon as we are informed.
- Your personal data which we process based on applicable consumer sales- and sales legislation is processed in accordance with such legislation.

6.4 Specific information for employees of a supplier

6.4.1 Generally

In addition to the general retention periods set out in section 6.1, we save your personal data as an employee of a supplier, if applicable, as follows.

- Personal data that we process in order to fulfill our agreement with you/ your employer is as a main principle processed for the time that we are required in order to administrate the contractual relationship, exercise our rights and fulfill our commitments to you/ your employer. If your employment ends we will terminate our processing of your personal data as soon as we receive such information from you/the supplier. Inactive agreements containing your personal data will be stored for ten (10) years due to general limitation rules under the Limitations Act (1981:130).
- Personal data processed for purposes required by the Accounting Act (1999:1078) will be processed for seven (7) years in accordance with the Accounting Act (1999:1078).

6.4.2 Specifically for you as an employee of our auditing company

In addition to the general retention periods set out in section 6.1 and 6.4.1, we save your personal data as an employee of our auditing company, if applicable, as follows.

- Processing of such information that is necessary for us to fulfill our other obligations as a listed company for example processing of accounts, drawing up annual reports, drawing up audit reports, registering auditors with authority, making minutes or other purposes based on the Companies Act (2005:551) will be processed as long as required by law or general limitation rules under the Limitations Act (1981:130).

6.5 Specifically for you as an analyst

In addition to the general retention periods set out in section 6.1, we save your personal data as an analyst, if applicable, as follows.

- Your personal data as an analyst will be processed for as long as you are an analyst for Momentum Group and the purpose the processing remains.

6.6 Cookies

Erasure of personal data retained through cookies are specified by our cookie policy that you can read on <https://www.momentum.group/en/site-services/cookie-policy>.

7. Your rights

In accordance with current data protection laws, you have the right to access information about what personal data we are processing about you and the right to request a rectification of your personal information.

Under certain conditions, for example if the processing is no longer necessary for the stated purposes or if you withdraw your consent, you have the right to request that we erase your personal data. In some cases, you also have the right to request that we restrict our processing of your personal data. You have the right to object to our processing of your personal data for example direct marketing purposes or profiling, or if the processing is based on our legitimate interest.

You also have the right, under certain circumstances, to obtain the personal data that relates to you, as provided to us, in a structured, widely used and machine-readable format and may transfer them to another controller.

You are entitled to revoke all or part of a given consent for processing personal data at any time with effect from the date of withdrawal, unless further processing is required by law. You also have the right to object to processing of personal data for the purposes of profiling and direct marketing.

If you have any complaints regarding our processing of your personal data, you have the right to lodge a complaint with The Swedish Authority for Privacy Protection or other competent supervisory authority that supervises our processing of personal data.

8. Our contact details

If you wish to exercise your rights as above or wish to get in contact with us regarding our processing of your personal data, you can do this by contacting us by telephone +46 10 454 54 70 or by e-mail info@momentum.group.

*This information on the processing of personal data was established by Momentum Group AB
on 15 May 2018.*