

# PRIVACY POLICY

Last updated 14 May 2020

We respect your right to privacy. We have in place appropriate procedures and security measures to protect and manage your personal data in accordance with applicable data privacy regulations and principles.

This Privacy Policy sets out how We manage your personal data in the context of your business relationship with Betsson AB, referred to as "We", "Us" or "Our" in this Policy.

## 1. Who We are

The data controller of your personal data, pursuant to applicable data privacy regulations, is Betsson AB, a company registered in Sweden with company registration number 556090-4251, whose registered address is at Regeringsgatan 28, SE- 111 53 Stockholm.

The principles set out in this Privacy Policy apply to all instances in which Betsson AB processes your personal data as a data controller for the purposes set out in this Policy.

## 2. What information do We collect from you, for which purposes and what is Our legal ground to do so?

We need to collect and process personal data provided to Us directly by you or by the organisation that you represent in order to:

- prepare for and manage the attendance and voting procedures for the shareholder's annual general meeting (AGM);
- pay dividends and other distributions to Betsson AB shareholders and/or holders of other Betsson AB securities;
- maintain an insider list including a list of persons who by virtue of their respective function or office, have access to inside information; and
- administer various matters relating to Our underlying business arrangement.

Personal data may be provided by yourself or your representative, but can also be obtained from other sources, such as publicly available registers and the central securities depository (Euroclear Sweden AB) amongst others, in relation to Betsson

AB's investments in companies or corporate governance, nomination or other appointment processes. Please note that the Euroclear Sweden AB, is responsible for keeping the share register of Betsson AB and is the data controller for data processed in the central securities depository register. If you would like to know more about how Euroclear processes your personal data, we kindly ask you to contact Euroclear or refer to the privacy policy available on their website.

This processing is necessary for the purpose of:

- fulfilling Our obligations set forth in the Articles of Association relating to you as a shareholder;
- complying with Our legal obligations including but not limited to the Swedish Companies Act (Sw. Aktiebolagslagen) e.g. administration and notice of AGM, as well as other applicable laws;
- maintaining security during Our shareholder meetings in Our legitimate interests. Provided that these interests do not override your own privacy rights and interests. Betsson AB endeavours to maintain a fair balance between its need to process your personal data and the safeguarding of your privacy rights and freedoms.

The type of information we collect includes:

- Identification data: full name, date of birth, national identification number, nationality;
- Company name, company registration number;
- Contact details: address, e-mail address, telephone number;
- Information regarding the shares held by you: e.g. number and type of shares;
- If a proxy is appointed, information on who you are representing or are represented by;
- Information on how you have voted may be processed;
- Minutes noted during meetings; and
- Visual images (photos and videos) captured during events.

When you wish to subscribe to 'Alert ME' for financial information from Betsson AB, including press releases, interim and annual reports, We ask you to provide such personal data as is required to fulfil the particular service. The information is collected with your consent and is used for the sole purpose of communicating with you as a subscriber and/or shareholder relevant information about which you need to be informed. However, given that this information is public, any interested party can subscribe to these as well. Please note that you may unsubscribe from Our subscription service at any time. Examples of the categories of personal data that We collect and process include:

- Identification data: full name, position;
- Contact details: e-mail address, mobile number;
- Details of the company or organization that you represent.

For security purposes, We have installed camera surveillance systems to monitor the public areas of Our building. The surveillance system is only accessible to authorised personnel and images may only be accessed in specific cases, with special approvals (e.g. in the case of a serious complaint or incident) and relying on the four eyes principle. The images recorded by the surveillance system shall not be kept for longer than is necessary for the purposes for which they were obtained.

Please note that We also collect certain information about visitors of Our websites via cookies. All information about cookies that We use is in Our [Cookies Policy](#).

### **3. With whom might We share your information?**

We will disclose your personal data only as described in this Policy, as may be updated from time to time:

We share your personal data with Our business partners (recipients) in order to provide the services detailed above. In general, these partners are Our data processors that act only based upon Our instructions and may include IT service providers and providers assisting in the organisation of shareholders' meetings. Please note that the Website is managed by Investis Limited ("Investis"), a company registered in England and Wales with company registration number 03930926, whose registered address is at 24 Fashion Street, London E1 6PX, on behalf of Betsson AB. Please note that we share your personal data with all these partners only upon executing appropriate safeguards such as data processing agreements. In some cases, these partners can act as joint/separate controllers, such as social media platforms.

Minutes and the voting register for general meetings of shareholders may be disclosed to shareholders present at such general meeting, the Swedish Companies Registration Office (Sw. Bolagsverket), legal counsels and auditors in accordance with law, or at Betsson AB's discretion, if such disclosure is deemed necessary.

Information regarding major shareholders may be disclosed to authorities, advisors, and the public in connection with drafting of prospectuses, information memorandums, and financial reports.

Where required by law, your personal data may be disclosed to an applicable governmental, regulatory or enforcement authority for the purpose of prevention and detection of different type of crimes or in response to any court subpoena, order or similar official request.

We may disclose information to investigate, prevent and take action against illegal activities, violations of our policies or as otherwise required by law, as well as to establish, exercise, or defend against legal claims.

We may share some or all of your personal data with any subsequent owner, co-owner or operator of the business and their advisors in connection with a corporate merger, consolidation, restructuring, the sale of substantially all Our stock and/or assets, or in connection with bankruptcy proceedings, or other corporate reorganization. Alternatively, We may seek to acquire other businesses or merge with them. In the event of a change to Our business, We will inform you in accordance with applicable law.

#### **4. Links to other Websites**

Please note that this Privacy Policy does not apply to and does not cover how any third-party website processes your personal information. In order to find out more about processing of your personal data by these third-party websites, We encourage you to carefully read their privacy policies and the terms of use before using their services.

#### **5. International transfers**

Please note that at this point all Our internal processing operations are conducted within the EU/EEA. As for Our recipients, service providers or partners who are located outside the EEA, in a third country, territory or sector that has not been found to provide for an adequate level of data protection by the European Commission (see [here](#) the list of third countries offering an adequate level of data protection as per the European Commission), We ensured that the data transfers are subject to appropriate safeguards, such as [Standard Contractual Clauses](#).

#### **6. How long do We retain your information?**

We will retain your information only for as long as is necessary for the purposes set out in this Policy, in accordance with Our legal obligations including but not limited

to, company, securities and tax legislation as well as to resolve any potential legal disputes. Where your information is no longer required by Us, We will either securely delete or anonymise the personal data in question.

The criteria we follow in determining what is ‘necessary’ depends on the nature of data; the purpose of processing; the legal basis in place including but not limited to consent; whether there are any applicable statutory obligations or industry codes of practice; and other relevant circumstances.

For further information about data retention terms, please contact Our data privacy team at [dataprivacy@betssongroup.com](mailto:dataprivacy@betssongroup.com).

## 7. Your rights:

You as the data subject have certain rights with respect to the personal data, We hold on you. These include the following:

- Right to obtain confirmation that We are processing your data and have access to or obtain a copy of the same. Kindly observe that this right may be restricted e.g. if making the information available would reveal personal information about another person; if this would negatively affect other rights; or if We are legally prevented from disclosing such information;
- Right to request correction or completion of your incorrect or incomplete personal data to the extent allowed by law;
- Right to erasure where:
  - i. Your personal data are no longer necessary for the purposes which they were collected;
  - ii. The lawful basis for processing is consent and you withdraw your consent;
  - iii. You object to processing based on legitimate interests and there is no overriding interest to continue processing;
  - iv. Data processing is done for direct marketing purposes and you object to such processing;
  - v. Data processing is unlawful; or
  - vi. Personal data must be erased for compliance with a legal obligation.

Kindly note that right to deletion is not absolute and may be limited e.g. due to Our legal obligations, or for the establishment, exercise or defence of legal claims (meaning We will not be able to exercise this right in relation to the data that We need to keep based on these retention periods for their duration);

- Right to restrict processing where:
  - i. You have asked Us to rectify your data and We are in the process of verifying the accuracy of such data;

- ii. Personal data processing has been unlawful, and you ask for restriction instead of deletion;
- iii. Your personal data is no longer needed but you request Us to retain it in order to establish, exercise or defend a legal claim; or
- iv. You have objected to Our processing of your data based on legitimate interest and We are evaluating whether Our legitimate interests override yours.

Kindly observe that your data will be stored for the time of restriction and shall be processed only if you gave your consent or in order to establish, exercise or defend legal claims, protect the rights of another natural or legal person and for the reasons of important public interest;

- Right to data portability i.e. right to transmit personal data you have provided Us with in a structured, commonly used and machine-readable format to another controller where the processing is based on consent or contract and carried out by automated means;
- Right to object where processing is based on legitimate interests, tasks carried in public interest and/or where your personal data are processed when you subscribe to 'Alert ME'. Whilst the latter is an absolute right, the first one will require a balance assessment of your interests, rights and freedoms against Our legitimate interests;
- Please note that we do not use profiling and automatic decision making when processing your personal data in accordance with this Policy.

We will respond to any of your requests about your rights within one month at the latest (this period may be further extended in line with applicable law).

Finally, please note that you have a right to lodge a complaint to a supervisory authority in the Member State of your habitual residence, place of work or place of alleged infringement. You can also lodge a complaint to the Swedish Data Protection Authority (Sw. Datainspektionen). Further instructions in this regard are available on the Authority's website available [here](#).

## **8. Failure to provide your personal data**

Failure to provide Us with the required personal data will prevent Us from fulfilling Our legal duties and contractual obligations relating to you as a shareholder. As a result, you will be prohibited from exercising your rights as a shareholder including participation and voting in the shareholders' meetings; receipt of the requested services; or receipt of information on our services.

## **9. How to contact Us:**

The data controller responsible for your personal information for the purposes of the

applicable European Union data protection law is:

Betsson AB (publ), Regeringsgatan 28, SE- 111 53 Stockholm

Stockholm office: +46 (0) 8 506 403 00

Email: [info@betssonab.com](mailto:info@betssonab.com)

## **10. Changes to the terms of this Privacy Policy**

We will occasionally make changes and corrections to this Privacy Policy and We will inform you by posting the changes on this site and sending you an email or message about the changes. Any change will be effective immediately.