

PRIVACY NOTICE

ABG Sundal Collier Group

May 2026



1 Introduction

ABG Sundal Collier Group are committed to your right to privacy and will process your personal data in a secure and lawful manner, in accordance with applicable data protection legislation. ABGSC maintain procedures for the collecting, using, securing, and sharing of personal and/or non-public information. All ABGSC staff are bound by statutory duty of confidentiality, and you can be assured that ABGSC are committed to protecting your privacy at all times.

This Privacy Notice applies to all legal entities directly or indirectly controlled by ABG Sundal Collier Holding ASA, including tied agents, collectively referred to as “**ABGSC**”. The data controller is the legal entity with which you have a professional relationship or with which you otherwise engage in interactions involving personal data.

2 Who ABGSC process personal data about

As part of ABGSC business activities, ABGSC process personal data about the following individuals:

- Current, former and prospective clients
- Individual at or otherwise connected to ABGSC business clients, suppliers or other business partners
- Users of ABGSC websites and social media pages
- Other people with whom ABGSC may interact
- Employees

3 How long ABGSC keep your personal data for

ABGSC will keep your personal data for as long as necessary to fulfil the purposes for which the data is collected and processed. When ABGSC no longer have a legitimate basis for retaining the personal data, ABGSC will delete the data from ABGSC’s systems. An overview of the retention periods applicable to specific categories of personal data processed by ABGSC is set out in **Appendix 1** to this notice.

It is important to emphasize that special situations may lead to longer or shorter retention periods than the ones described in Appendix 1. ABGSC will in any case retain information for as long as required to comply with applicable legal obligations. Personal data may also be retained for longer periods where necessary, for example in connection with complaints, disputes or claims made by or against ABGSC.

4 How ABGSC process your personal data

To provide the best services to you, ABGSC needs to gather certain information about you. ABGSC only asks for details that will help ABGSC to help you, such as your name, job title, email address and contact details. An overview of the purposes for which personal data is processed, the types of personal data processed by ABGSC, the legal basis the processing is relied upon, and the storage period is available in Annex 1 to this Privacy Notice.

5 How ABGSC safeguards your personal data

ABGSC are committed to taking all reasonable and appropriate steps to protect your data from misuse, loss or unauthorized access, and ABGSC maintain procedures and technology designed for this purpose. In particular:

- ABGSC only allow for access to your personal data on a strict need to know-basis
- All ABGSC staff are bound by statutory duty of confidentiality
- ABGSC have procedures for handling data breaches
- ABGSC do not sell your personal data
- ABGSC do not disclose your personal data to third parties for marketing purposes without your consent
- ABGSC do not use your personal data to your unfair advantage

ABGSC's commitment to privacy will remain for former clients (with whom the relationship with ABGSC has been terminated) and also applies to prospective clients.

6 How ABGSC share information about you

Your information is expected to be shared amongst ABGSC's affiliates solely in the normal course of business.

Where appropriate and in accordance with local laws and requirements, ABGSC may share your personal data, in various ways and for various reasons, with the following categories of people:

- Third party service providers who perform functions on ABGSC's behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on ABGSC's business technology systems);
- Third party outsourced IT and document storage providers where ABGSC have an appropriate processing agreement (or similar protections) in place;
- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Financial regulators, tax, audit, or other authorities, when ABGSC believe in good faith that the law or other regulation requires ABGSC to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- In the case of prospective members of Staff's referees: third parties who ABGSC have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If ABGSC merge with or are acquired by another business or company in the future, (or are in meaningful discussions about such a possibility) ABGSC may share your personal data with the (prospective) new owners of the business or company.

In certain circumstances ABGSC may transfer your personal data to companies or organisations outside the European Economic Area (EEA). ABGSC will only transfer data outside of EEA if compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- transferring your data to a country with an adequacy decision by the European Commission in respect of that country's levels of data protection via its legislation;
- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission; or
- where it is necessary for the conclusion or performance of a contract between ABGSC and a third party and the transfer is in your interests for the purposes of that contract; or
- where you have consented to the data transfer.

7 Cookies

To the extent you access ABGSC websites, ABGSC will also collect certain data from you. ABGSC uses cookies to various extents to support the operation of its websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor's computer or mobile device and may e.g. be used to enable automatic login and to keep you logged in, as well as to collect and save information about your activities, including date and time of visits, pages viewed and amount of time spent on ABGSC's sites. For information about ABGSC's use of cookies, please refer to the Cookie information in the relevant website.

8 Social media

ABGSC has pages on social media where ABGSC provides information about ABGSC's services and interacts with the users, including Instagram, LinkedIn and X. On such social media pages, ABGSC may receive anonymized insight, such as statistics about age, sex and location of the users. ABGSC may also receive information that you decide to share with ABGSC, such as chat, comments and likes. Your experience on social media sites will be governed by the privacy and other policies of those sites.

As ABGSC are joint controllers with the social media for data processed from your use of social media tools or links on ABGSC's site, and for aggregated insight that ABGSC get from your use of ABGSC's pages on social media, you may also contact ABGSC if you would like to have more information, or if you want to exercise your privacy rights. However, please note that ABGSC may not be able to respond to all requests, and that ABGSC may have to refer you to social media for further information.

9 How you can exercise your rights related to your personal data

Your rights related to your personal data is protected and clarified by the General Data Protection Regulation (GDPR)¹ and are described in more detail below.

Right of access

You may ask ABGSC to provide further information on how ABGSC processes your personal data and to provide you with a copy of your personal data. ABGSC may ask you to verify your identity and request more information before ABGSC meets such a request. If ABGSC provides you with access to the information ABGSC holds about you, ABGSC will not charge you unless your request is manifestly unfounded or excessive. If you request further copies of this information from us, ABGSC may charge you a reasonable administrative cost where legally permissible. Where ABGSC is legally permitted to do so, ABGSC may refuse your request. If ABGSC refuses your request ABGSC will always tell you the reasons for doing so.

Right to restrict processing

You have the right to request that ABGSC restricts its processing of your personal data in the following circumstances:

- where you dispute the accuracy of the personal data that ABGSC is processing about you. In this case, ABGSC's processing of your personal data will be restricted for the period during which the accuracy of the data is verified.
- where you object to ABGSC's processing of your personal data for ABGSC's legitimate interests. You can request that the data be restricted while ABGSC verifies its grounds for processing your personal data.
- where ABGSC's processing of your data is unlawful, but you would prefer ABGSC to restrict its processing of it rather than erasing it; and
- where ABGSC has no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

This means that ABGSC can only continue to store your data and will not be able to carry out any further processing activities until either: one of the circumstances listed above is resolved, you consent, or further processing is necessary for either the establishment, exercise or defense of legal claims, the protection of the rights of another individual, or reasons of important public interest.

If ABGSC has shared your personal data with third parties, ABGSC will notify them about the restricted processing unless this is impossible or involves a disproportionate effort. ABGSC will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification

You also have the right to request that ABGSC rectify any inaccurate or incomplete personal data that ABGSC holds about you. If ABGSC has shared this personal data with third parties, ABGSC will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, ABGSC will also tell you which third parties ABGSC have disclosed the inaccurate or incomplete personal data to. Where ABGSC believes it is reasonable for ABGSC not to comply with your request, ABGSC will explain its reasons for this decision.

Right to data portability

You have the right to ask ABGSC to transfer your personal data to other controllers. To allow you to do so, ABGSC will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another data controller. Alternatively, ABGSC may directly transfer the data on your behalf.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Right to erasure (“Right to be forgotten”)

You have the right to request that ABGSC erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data is no longer necessary for the purpose for which ABGSC originally collected and/or processed them.
- where previously given, you have withdrawn your consent to ABGSC processing your data, and there is no other valid reason for us to continue processing.
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR).
- it is necessary for the data to be erased in order for ABGSC to comply with ABGSC’s legal obligations as a data controller; or
- if ABGSC processes the data because ABGSC believes it necessary to do so for its legitimate interests, you object to the processing and ABGSC are unable to demonstrate overriding legitimate grounds for its continued processing.

When complying with a valid request for the erasure of data ABGSC will take all reasonably practicable steps to delete the relevant data, however ABGSC are entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information.
- to comply with legal obligations or for the performance of a task of public interest or exercise of official authority.
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

Right to object

You have the right to object to ABGSC’s processing your personal data where ABGSC do so for one of the following four reasons: (i) ABGSC’s legitimate interests; (ii) to enable ABGSC to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply. If your objection relates to ABGSC processing your personal data because ABGSC deems it necessary for your legitimate interests, ABGSC must act on your objection by ceasing the activity in question unless:

- ABGSC can show that ABGSC has compelling legitimate grounds for processing which override your interests; or
- ABGSC is processing your data for the establishment, exercise or defense of a legal claim.

If your objection relates to direct marketing, ABGSC must act on your objection by ceasing this activity.

Right to complain to a supervisory authority

You also have the right to file a complaint with the competent Data Protection Authority. The relevant authority for the ABGSC Group is the Norwegian Data Protection Authority. Contact details are available at www.datatilsynet.no/en/.

10 Where is your personal data processed

For the processing of personal data carried out within ABGSC, personal data is primarily processed within the European Union (EU) and the European Economic Area (EEA). However, in certain cases, your personal data may be transferred to and processed in countries outside the EU/EEA, i.e., third countries.

The transfer of personal data to a third country may take place provided there is a legal basis, and appropriate safeguards have been implemented. In cases where personal data is transferred to a country outside the EU/EEA, such transfer will only occur if:

- The European Commission has decided that the country ensures an adequate level of protection, or
- ABGSC AB has implemented appropriate safeguards, for example by using standard contractual clauses approved by the European Commission.

Data subjects have the right, upon request, to obtain a copy of the safeguards applied to transfers to third countries. Such requests can be directed to ABGSC using the contact details provided below in this policy.

11 Changes to this Privacy Notice

ABGSC may update this Privacy Notice from time to time to reflect changes in its legal obligations, business practices, or the way we process personal data. You will always find the latest version of this Privacy Notice on ABGSC's website.

12 Contact

To get in touch about your rights in respect of your data, please contact ABGSC at dataprotection@abgsc.com. ABGSC will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which ABGSC are lawfully entitled). Please note that ABGSC may keep a record of your communications to help ABGSC resolve any issues which you raise.

It is important that the personal data ABGSC holds about you is accurate and current. Please keep ABGSC informed if your personal information changes during the period for which ABGSC holds your data.

ANNEX 1 - How ABGSC process your personal data

As stated in section 4 of ABGSC’s Privacy Notice, ABGSC needs to gather certain information about you to provide services to you. ABGSC only asks for details that will help ABGSC to help you, such as your name, job title, email address and contact details. An overview of the purposes for which personal data is processed, the types of personal data processed by ABGSC, the legal basis the processing is relied upon, and the storage period is available below.

Please note that the list below of categories of personal data ABGSC may collect is not exhaustive, and that the information described below is in addition to any personal data ABGSC is required by law to process in any given situation. It is important to emphasize that special situations may lead to longer or shorter retention periods than the ones described below. ABGSC will in any case retain information as long as required subject to legal requirements, and in case special needs arise, e.g. by complaints or claims made against ABGSC or by ABGSC.

ABGSC may also occasionally collect or receive other types of data if required to fulfil the purposes listed below. On a case-by-case basis, ABGSC may also use your personal data for certain purposes that are not incompatible with the purpose for which the data was originally collected or received, such as audits, analytics, reporting, innovation, dispute resolution and mergers and acquisitions.

Investment Banking

This section describes the purposes for which personal data is processed within the Investment Banking department. The categories of data subjects whose personal data may be processed within the Investment Banking department include, but are not limited to:

- clients and potential clients
- representatives of corporate clients
- counterparties and business partners
- employees and consultants involved in transactions, and
- beneficial owners and politically exposed persons (PEP).

Investment Banking				
Purpose	Types of data	Source	Legal basis	Storage period
For the purpose of verifying identity and authorization prior to entering into a contract	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Know your customer, KYC 	From the data subject, ABGSC’s clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship
For the purpose of documenting, administering and fulfilling the agreement	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication - Know your customer, KYC 	From the data subject, ABGSC’s clients, suppliers, or business partners	Performance of a contract	The personal data is stored for ten years after the end of the business relationship

For the purpose of communicating with the customer	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication 	From the data subject	Performance of a contract	The personal data is stored for ten years after the end of the business relationship
For the purpose of managing relationships with business clients, suppliers, and other business partners	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname, job title) - Contact details (e.g. email address, phone number) 	From the data subject, ABGSC's clients, suppliers, or business partners	ABGSC's legitimate interest in purchase, sale and business administration	The personal data is stored for ten years after the end of the business relationship
For the purpose of executing the purchase and sale of securities, managing the securities portfolio and providing investment advice upon request	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication - Financial information 	From the data subject, ABGSC's clients, suppliers, or business partners	Performance of a contract	The personal data is stored for ten years after the end of the business relationship
For the purpose of taking measures to carry out customer due diligence, KYC	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname, date of birth) - Contact details (e.g. email address, phone number) - Communication - Financial information, KYC 	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship
For the purpose of recording and storing telephone conversations between ABGSC and the customer regarding the transaction	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication (e.g. telephone conversation recordings) 	From the data subject	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship

For the purpose of establishing an insider list, with individual who come into contact with inside information	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname, social security number) - Contact details (e.g. email address, phone number) - Date and time when the person gained access to inside information and the reason why the individual is on the list 	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored for five years
For the purpose of conducting checks regarding PEP status and sanctions lists	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - KYC 	From the data subject, ABGSC's clients, suppliers, or business partners. Information from sanctions lists	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship
For the purpose of reviewing and monitoring transactions to prevent ABGSC's Investment Banking operations from being used for the financing of terrorism or money laundering	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - KYC - Financial information 	From the data subject, ABGSC's clients, suppliers, or business partners Information from sanctions lists or international organizations to prevent money laundering	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship

Research

This section describes the purposes for which personal data is processed within the Research department. The categories of data subjects whose personal data may be processed within the Research department include, but are not limited to:

- clients and potential clients
- contact people at analyzed companies
- recipients of research reports
- third parties and experts, and
- investors and shareholders.

Research				
Purpose	Types of data	Source	Legal basis	Storage period
For the purpose of verifying identity and authorization prior to entering into a contract	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Know your customer, KYC 	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship
For the purpose of producing and publishing financial analyses and reports	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) 	From the data subject, ABGSC's clients, suppliers, business partners, public sources	Performance of a contract (commissioned research), legitimate interest to produce research (independent research)	
For the purpose of managing subscriptions and distributing research materials	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) 	From the data subject, ABGSC's clients, suppliers, or business partners	Performance of a contract	The personal data is stored for ten years after the end of the business relationship
For the purpose of analyzing usage and interest in research content	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) 	From the data subject, ABGSC's clients, suppliers, or business partners	ABGSC's legitimate interest	The personal data is stored for ten years after the end of the business relationship
For the purpose of managing relationships with business clients, suppliers, and other business partners	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname, job title) - Contact details (e.g. email address, phone number) 	From the data subject, ABGSC's clients, suppliers, or business partners	ABGSC's legitimate interest in purchase, sale and business administration	The personal data is stored for ten years after the end of the business relationship
For the purpose of operating	<ul style="list-style-type: none"> - Technical data, cookies 	From cookies	ABGSC's legitimate interest in carrying out	Depending on the type of cookie. See more information

<p>ABGSC's Research Website</p> <p>See more information about cookies on ABGSC's Research Website</p>			<p>research and analyse your activities</p>	<p>about cookies on ABGSC's Research Website</p>
<p>For the purpose of conducting checks regarding PEP status and sanctions lists</p>	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - KYC 	<p>From the data subject, ABGSC's clients, suppliers, or business partners</p> <p>Information from sanctions lists</p>	<p>Compliance with a legal obligation</p>	<p>The personal data is stored for ten years after the end of the business relationship</p>
<p>For the purpose of reviewing and monitoring transactions to prevent ABGSC's research operations from being used for the financing of terrorism or money laundering</p>	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - KYC - Financial information 	<p>From the data subject, ABGSC's clients, suppliers, or business partners</p> <p>Information from sanctions lists or international organizations to prevent money laundering</p>	<p>Compliance with a legal obligation</p>	<p>The personal data is stored for ten years after the end of the business relationship</p>

Sales

This section describes the purposes for which personal data is processed within the Sales department. The categories of data subjects whose personal data may be processed within the Sales department include, but are not limited to:

- clients and potential clients
- representatives of corporate clients
- counterparties and business partners, and
- event participants and leads.

Sales				
Purpose	Types of data	Source	Legal basis	Storage period
<p>For the purpose of verifying identity and authorization prior to entering into a contract</p>	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Know your customer, KYC 	<p>From the data subject, ABGSC's clients, suppliers, or business partners</p>	<p>Compliance with a legal obligation</p>	<p>The personal data is stored for ten years after the end of the business relationship</p>

For the purpose of documenting, administering and fulfilling the agreement	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Know your customer, KYC 	From the data subject, ABGSC's clients, suppliers, or business partners	Performance of a contract	The personal data is stored for ten years after the end of the business relationship
For the purpose of communicating with the customer	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication 	From the data subject	Performance of a contract	The personal data is stored for ten years after the end of the business relationship
For the purpose of executing the purchase and sale of securities, providing investment advice, and managing client relationships in connection with financial products and services	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication - Financial information 	From the data subject, ABGSC's clients, suppliers, or business partners	Performance of a contract	The personal data is stored for ten years after the end of the business relationship
For the purpose of recording and storing telephone conversations between ABGSC and the customer regarding the transaction	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication 	From the data subject	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship
For the purpose of conducting checks regarding PEP status and sanctions lists	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - KYC 	From the data subject, ABGSC's clients, suppliers, or business partners Information from sanctions lists	Compliance with a legal obligation	The personal data is stored for five years after the end of the business relationship
For the purpose of reviewing and monitoring transactions to prevent ABGSC's Sales operations	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - KYC 	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship

from being used for the financing of terrorism or money laundering	- Financial information	Information from sanctions lists or international organizations to prevent money laundering		
For the purpose of monitoring and reviewing transactions in order to prevent, detect, and report market abuse, suspicious orders or transactions, such as insider trading and market manipulation	- Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Financial information - Company information	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored for five years after the end of the business relationship

Human Resources, (“HR”)

This section describes the purposes for which personal data is processed within the HR department. The categories of data subjects whose personal data may be processed within the HR department include employees. The processing of personal data within the HR department before an individual is employed by ABGSC is governed by the privacy policy for Teamtailor.

HR				
Purpose	Types of data	Source	Legal basis	Storage period
For the purpose of administering the employment relationship, including the registration of contact details, personal identity numbers, and bank account information	- Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number)	From the data subject	ABGSC's legitimate interest in administering the employment relationship	Personal data will be retained for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements
For the purpose of managing salary payments, pensions, insurance other employment-related benefits	- Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number)	From the data subject	Performance of a contract, or compliance with a legal obligation	Salary payments are stored for ten years after employment ends. Personal data about pension is stored until pension is fully paid out. Personal data about insurance is stored as long as the insurance is valid. Personal data about employment related benefit is stored

				during the employment and can be stored for a longer time depending on the benefit
For the purpose of planning and monitoring the employment relationship, including scheduling working hours, managing vacation, leave of absence, and sick leave, as well as evaluating performance and conducting development reviews	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Communication 	From the data subject	Performance of a contract, or ABGSC's legitimate interest	The personal data is stored during the employment and up to two years after termination
For the purpose of contacting, you in the event of an accident or emergency (emergency contact)	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname,) - Contact details (e.g. email address, phone number) 	From the employee	ABGSC's legitimate interest in contacting you in the event of an accident or emergency involving ABGSC's staff	The personal data is stored during the employment
For the purpose of training and professional development, including documenting participation in courses and certifications	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) 	From the data subject	ABGSC's legitimate interest	The personal data is stored during the employment
For the purpose of managing access and authorization controls, including handling logins, access cards, and IT permissions	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) 	From the data subject	ABGSC's legitimate interest	The personal data is stored during the employment
For the purpose of ensuring security and regulatory compliance, including fulfilling obligations under labor law, financial	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email) 	From the data subject	Compliance with a legal obligation	Personal data will be retained for as long as necessary to fulfil the purposes for which it was collected

legislation, and internal security procedures	address, phone number) - Other personal data may be included depending on the situation			
---	--	--	--	--

Office visitors

This section describes the purposes for which personal data is processed for individuals who visit ABGSC’s offices.

Office visitors				
Purpose	Types of data	Source	Legal basis	Storage period
For the purpose of maintaining security and preventing and investigating offences, camera surveillance is conducted in certain limited areas around ABGSC’s offices	- Technical data (e.g. video)	From camera surveillance	ABGSC’s legitimate interest in maintaining security and preventing and investigating criminal activity in connection with its office premises	The recorded material is retained for a maximum of seven days, unless it is required for an ongoing investigation, in which case it will be deleted upon the conclusion of that investigation
For the purpose of receiving and registering clients and other data subjects at the offices of ABGSC	- Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Food preferences	From the data subject	ABGSC’s legitimate interest in receiving and registering clients and other data subjects at its office premises	The personal data is stored for ten years after the end of the business relationship

Website visitors - www.abgsc.com

This section describes the purposes for which personal data is processed for individuals who visit ABGSC’s website.

Website visitors				
Purpose	Types of data	Source	Legal basis	Storage period
For the purpose of operating ABGSC’s website www.abgsc.com See more information about cookies on ABGSC’s Research Website	- Technical data, cookies	From cookies	ABGSC’s legitimate interest in carrying out research and analyse your activities	Depending on the type of cookie. See more information about cookies on ABGSC’s website www.abgsc.com

Other personal data processing

Other personal data processing				
Purpose	Types of data	Source	Legal basis	Storage period
For the purpose of marketing ABGSC's products and services	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Job title, company name - Dates, times and the frequency ABGSC interact with you 	From the data subject, the data subject's references or public sources	ABGSC's legitimate interest in sending out marketing content.	The information is stored as long as ABGSC has an ongoing customer relationship with you or the company that you work for
For the purpose of conducting customer satisfaction surveys	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address) 	Form the data subject	ABGSC's legitimate interest in improving ABGSC's services and receiving feedback	Personal data is stored until the survey has ended. After the completion of the survey any personal data will be anonymized and aggregated
For the purpose of developing, streamlining, monitoring, and quality-assuring ABGSC's processes and tools, as well as performing statistical analyses and compilations	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Financial information - KYC 	From the data subject, ABGSC's clients, suppliers, or business partners	ABGSC's legitimate interest in evaluating and improving its operations	The personal data is stored for ten years after the end of the business relationship
For the purpose of investigating incidents, responding to claims, and providing requested information to supervisory authorities in the event of an inspection	Depends on the categories of data subjects and the types of personal data involved in the incidents and supervisory activities	Depends on the categories of data subjects and the types of personal data involved in the incidents and supervisory activities	Compliance with a legal obligation	Personal data is saved for as long as the incident or supervision continues and for up to two years thereafter
For the purpose of protecting ABGSC's interests	The categories of data subjects and personal data that	Depends on type of dispute	ABGSC's legitimate interest in safeguarding its	Personal data is normally stored for ten years after the

in the event of a dispute	are necessary with regard to the dispute and the parties involved		rights and interests in the event of a dispute	business relationship has ended, or for as long as a dispute is ongoing and ten years thereafter
For the purpose of fulfilling your request to exercise any of your data protection rights	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Contact details (e.g. email address, phone number) - Other information about you that you provide in your request for your rights and that is necessary to comply with your request 	From the data subject	Compliance with a legal obligation	The personal data is stored for ten years after the end of the business relationship
For the purpose of storing accounting information	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Financial information 	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	The personal data is stored up to and including the seventh year after the end of the calendar year in which the fiscal year ended
Perform calculations due to legal obligations regarding capital adequacy	<ul style="list-style-type: none"> - Identification details (e.g. first name, surname) - Financial information 	From the data subject, ABGSC's clients, suppliers, or business partners	Compliance with a legal obligation	Personal data is stored until the seventh year after the end of the year in which the data was collected
For the purpose of managing ABGSC's social media pages	<ul style="list-style-type: none"> - Anonymised statistics - Communication (e.g. chat, comments and likes) 	From the data subject and from the relevant social media platform	ABGSC's legitimate interest in interacting with you via social media and to gain insight into your interaction	Personal data is stored as long as necessary for the purpose, typically for one to two years