

PRIVACY STATEMENT

Anchora Management AS

Anchora Management AS is committed to protecting your privacy. Under GDPR article 13 and 14, Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under GDPR, cf. also the GDPR article 5. This Privacy Statement outlines how we collect, use, and protect your personal information across various interactions, including our website and other business activities.

What are personal data?

Personal data refers to any information relating to an identified or identifiable individual. This includes details such as name, identification number, contact information, or any other data that can directly or indirectly identify a person.

Data Controllers

The following entities are data controllers:

- **Anchora Capital AS (the Fund)**, a Norwegian Alternative Investment Fund (AIF), org. nr. 929 170 407, Parkveien 57, 0256 Oslo, Norway
- **Anchora Management AS (the Manager)**, a Norwegian Alternative Investment Fund Manager, org. nr. 830 106 812, Parkveien 57, 0256 Oslo, Norway

Purpose of Processing Personal Data

The primary purpose of processing personal data is to deliver the services agreed upon under the customer agreement, as well as to provide accurate information and effective communication to ensure appropriate customer follow-up. In addition, it is necessary to process personal data to comply with legal requirements applicable in Norway.

Information We Collect

We may collect different types of personal information depending on your interaction with us. This may include:

- **Contact Information:** such as your name, email address, and phone number.
- **Other Information:** relevant to customer surveys or customer insight.
- **Customer Due Diligence Information:** collected in accordance with the Anti-Money Laundering Act, including identification documents, citizenship, whether you are a politically exposed person, and details about your relationship with the company you represent or any company in which you are a beneficial owner, where applicable.
- **Regular Updates:** In accordance with the Anti-Money Laundering Act, we are required to regularly update information collected under the “Know Your Customer” principle when the customer relationship was established.

- **Data Accuracy and Compliance:** To ensure the accuracy of customer data and comply with legal requirements, we may supplement the information you provide with data from private or public registers, such as the National Population Register and the Norwegian Tax Administration.

How We Use Your Information

We use your personal information for various purposes, including but not limited to:

- Responding to your inquiries and offering customer support.
- Conducting analysis to improve our products, services, and user experience.
- Communicating with you through updates, newsletters, or promotional materials (if you opt in).
- Communicating for active ownership purposes via third parties (with possibilities to opt out).
- To verify identity: For this purpose, we use contact information and identification details.
- To prevent money laundering and criminal activities: We process personal data to prevent, detect, investigate, and manage fraud and other criminal acts, and fulfill our obligations to investigate and report suspicious transactions. For this purpose, we use identification details and anti-money laundering information (including data on political exposure and sanctions from PEP and sanctions lists, as well as information from other financial institutions and banks).
- To provide investment services: For this purpose, we use contact information, identification details, financial data, investment objectives, and investment history.
- To manage your customer relationship: For this purpose, we use contact information, identification details, financial data, investment objectives, and investment history.
- For accounting purposes: For this purpose, we use investment history.

Retention period

We store personal data for as long as the customer relationship exists. The data will be deleted when it is no longer necessary to fulfill the purpose for which it was collected, but will be kept long enough to comply with statutory retention obligations.

Data Sharing

We may share personal data with third parties in the following situations:

- When sharing is necessary for the operation of our IT systems.
- When we need to share personal data with third parties, such as subcontractors, to fulfill our agreement with you.
- When sharing is necessary to protect our interests in connection with a legal dispute
- When we are legally required to share information, for example, reporting suspicious transactions to Økokrim.

Transfer of Personal Data to Other Countries

Some of our subcontractors are located outside the EU/EEA. This means that your personal data may be transferred to and processed in so-called third countries. We only transfer personal data to countries outside the EU/EEA that the European Commission has deemed to provide an adequate level of

protection, or to subcontractors that have committed to safeguarding your personal data through the EU's Standard Contractual Clauses. Where necessary, we have implemented additional technical and organizational measures to ensure an appropriate level of protection.

Your Rights

You have the right to:

- Access and review the personal information we hold about you.
- Correct inaccuracies in your personal information.
- Request the deletion of your personal information.
- Right to Restriction: You have the right to request the restriction of processing of your personal data.
- Right to Withdraw Consent: You may withdraw your consent at any time.
- Right to Data Portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit those data to another controller.
- Right to File a Complaint: If you believe that our processing of personal data is in violation of the law, you have the right to file a complaint with the Norwegian Data Protection Authority (Datatilsynet). Contact information and instructions for submitting a complaint are available on Datatilsynet's website: www.datatilsynet.no.

Security

We employ reasonable measures to protect your personal information from unauthorized access, disclosure, alteration, and destruction.

Privacy Beyond the Website

Before Company collects or receives any personal data, the concerned Individuals should be provided with certain mandatory minimum information regarding the processing of their personal data, in a concise, transparent, intelligible, easily accessible way and in clear and plain language. As a general rule, Company complies with these requirements by providing information;

- to employees via the respective contract of employment; and
- to investors in the Anchora Capital as a part of the subscription form. This Privacy Statement extends to our offline interactions such as customer service inquiries. We are committed to protecting your privacy across all touchpoints of our business.

Changes to this Privacy Statement

We may update this Privacy Statement periodically. Any changes will be communicated by posting the updated statement on our website.

Cookies and Tracking

We do not utilise cookies and similar tracking technologies on our website.

Contact Us

If you have any questions or concerns about our privacy practices, please contact us at arne@anchora.capital

Last Updated

3 December 2025