

Intervalor Privacy Statement

This Privacy Statement was published on 26 February 2024.

At Intervalor AB (hereafter Intervalor) we are committed to protect and respect your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679, dated 27 April 2016. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

This Privacy Statement applies to the use of our products and to our marketing and customer contract fulfilment activities on behalf of Intervalor, our branch office in Finland and the asset managers we represent in the Nordics and Baltic regions. It also applies to employees and individuals seeking a job at Intervalor.

Who are we?

Intervalor offers exclusive representation for selected international asset management companies in the Nordics and Baltic regions, promoting their products and services to investors. We assist the managers with the marketing of their funds and segregated accounts, and help servicing their clients, acting as an extension of the managers' marketing and client service teams.

Our company's headquarters is located in Stockholm, Sweden, with a branch office in Helsinki, Finland. The headquarters' registered office address is Kungsgatan 10, 111 43 Stockholm, Sweden.

Intervalor AB is the data controller and can be contacted by email: gdpr@intervalor.com

When do we collect personal data about you?

- When you interact with us in person, through correspondence, by phone, by social media, or through our website.
- When we collect personal information from other legitimate sources, such as the asset managers we represent, public sources or social networks, we will only use this data if you have given your consent to them to share your personal data with others.
- We may collect personal data if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected, we make sure an assessment is made, ensuring that there is an established mutual interest between you and Intervalor.

Why do we collect and use personal data?

We collect and use personal data mainly to perform marketing and client service activities. We also collect data about suppliers, partners and persons seeking a job or working in our company. We may use your information for the following purposes:

- Send you marketing communication. This may include information about our products and services, events, activities, and promotions as well as those of the asset managers we represent. (hereafter referred to as “Our Asset Managers”). Part of this communication is subscription based and requires your consent. Part of it is based on legitimate and mutual interest.
- Send you information about the products and services of Our Asset Managers, that you are invested in and where this information is not provided directly from Our Asset Managers.
- Perform direct marketing activities in cases where legitimate and mutual interest is established.
- Provide you content and venue details on a webinar or event you signed up for.
- Respond to web forms you have completed on intervalor.com (e.g. to download material or sign up for mailings)
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Perform contractual obligations such as invoices, reminders, and similar. Either based on a contract with Intervalor directly or with Our Asset Managers.
- Notify you about any disruptions to our services (system messages).
- Contact you to conduct surveys about your opinion on our products and services.
- Process a work position application.

Our legal basis for collecting personal data

Collecting personal data based on consents

The collection of personal data based on consent from the data subject will be done by using a standardised format that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our CRM system.

Collecting personal data based on contracts

We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners, and suppliers.

Collecting personal data based on legitimate interest

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between Intervalor and the individual person has been identified. This legal basis is primarily related to our marketing purposes. We will always inform individuals about their privacy rights and the purpose for collecting personal data.

What type of personal data is collected?

We collect information such as name, phone numbers, skype contact details, title and email address, in addition to your company's name and contact information. We may also collect feedback, comments and questions received from you in service-related communication and activities, such as meetings, phone calls, documents, and emails. From our websites we may collect IP-address and actions taken on the site.

If you apply for a job at Intervalor, we collect the data you provide during the application process.

Intervalor does not collect or process any special categories of personal data, such as sensitive personal data.

How long do we keep your personal data?

We store personal data for as long as we find it necessary to fulfill the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve possible problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data for a reasonable period after your last interaction with us. When the personal data that we have collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

Your rights to your personal data

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data that Intervalor holds about you.
- The right to request that Intervalor corrects your personal data if inaccurate or out of date.
- The right to request that your personal data is deleted when it is no longer necessary for Intervalor to retain such data.
- The right to request that Intervalor provides you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
- The right to object to the processing of personal data in case data processing has been based on legitimate interest and/or direct marketing.
- The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communication:
 - If you want to withdraw your consent to e-marketing, please make use of the link to manage your preferences included in our communication. Please note that you may still receive system messages and administrative communications from Intervalor.

Any query about your Privacy Rights should be sent to gdpr@intervalor.com

How we will provide personal data

Our CRM system will allow Intervalor to search and deliver personal data following written requests within the stipulated 72h time frame.

The use of cookies and beacons

We may use cookies and web beacons ('Website Navigational Information') to collect information as you navigate the company's websites. Website Navigational Information includes standard information from your web browser, such as browser type and browser language; your Internet Protocol ("IP") address; and the actions you take on the company's websites, such as the web pages viewed, and the links clicked.

This information is used to make websites work more efficiently, as well as to provide business and marketing information to the owners of the site, and to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purposes of understanding how visitors use a website. Cookies and similar technologies help us tailor our website to your needs, as well as to detect and prevent security threats and abuse. If used alone, cookies and web beacons do not personally identify you.

Do we share your data with anyone?

We do not share, sell, rent, or trade your information with any third parties without your consent, except from what is described below:

Third-party Service Providers working on our behalf:

We may pass your information on to our sub-contractors and other associated organisations with the purpose of them providing services to you on our behalf. In such case, the providers should sign necessary agreements to ensure that your privacy rights remain intact.

Third-party Product Providers we work in association with:

We work closely with Our Asset Managers to bring you a range of products and services designed to meet your needs related to asset management. When you enquire about these products and services, the relevant asset manager may use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, Our Asset Managers will be acting as data processors of your information and, therefore, we advise you to read their Privacy Policy and sign a Data Processing Agreement. Details regarding where to find such policies can be provided by Intervalor upon request. Our Asset Managers may share your information with us, which we will use in accordance with this Privacy Statement.

If required by law:

We will disclose your personal information if required by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

Use of sub-contractors

We may use sub-contractors to process personal data on our behalf, we are responsible for making sure they commit themselves to adhere to this Privacy Policy and applicable data protection legislation by signing a Data Processing Agreement.

If the sub-contractor processes Personal Data outside the EU/EEA area, such processing must be in accordance with the EU Privacy Shield Framework, EU Standard Contractual Clauses for transfer to third countries, or another specifically stated lawful basis for the transfer of personal data to a third country.

Safeguarding of information

We have technological and operational procedures in place to protect your personal data from loss, misuse, alteration or unintentional destruction through our centralized CRM system. Our personnel who have access to the data have been informed of the confidentiality of such information.

If you have questions or comments about our administration of your personal information or would like to opt out of receiving any marketing material from us, please contact us at gdpr@intervalor.com. You may also use this address to communicate any concerns you may have regarding compliance with this Privacy Policy.

Changes to this Privacy Statement

Intervalor reserves the right to amend this Privacy Statement at any time. The applicable version will always be found on our websites. We encourage you to check this Privacy Statement occasionally to ensure that you are happy with any changes.

If we make changes that significantly alter our privacy practices, we will notify you by email or post a notice on our websites prior to the change taking effect.

Your right to complain with a supervisory authority

If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact gdpr@intervalor.com. If you remain dissatisfied, then you have the right to apply directly to your national supervisory authority for a decision. The supervisory authorities can be contacted at:

Norway: Datatilsynet www.datatilsynet.no

Sweden: Datainspektionen www.datainspektionen.se

Denmark: Datatilsynet www.datatilsynet.dk

Finland: Office of the Data Protection Ombudsman www.tietosuoja.fi/en/

[Please find a complete list of supervisory authorities here](#)