

Privacy Policy

Privacy Policy

It is important to us that you feel safe when you use any of our services or have contact with us. That's why we have gathered all the information about how we use your personal data in this privacy policy.

To help you easily find the sections that interest you, we have organized them under a number of headings. You can click on each heading in the list below to go directly to a section.

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1. Data controller

Lannebo Kapitalförvaltning AB, company registration number 556050-3020, ("Lannebo", "we" or "us"), is the data controller for the processing of personal data described in this policy. Contact us and our data protection officer Anna Cumzelius, Harvest Advokatbyrå AB, by send an e-mail or letter to the address below for questions regarding our processing of personal data. The same applies if you wish to exercise your rights under [section 6](#) below.

Lannebo Kapitalförvaltning AB
Att. DPO
Box 7837
103 98 Stockholm

dataskydd@lannebo.se

2. Terminology and definitions

This policy uses the following terms and definitions:

Personal data refers to all kinds of information that can be directly or indirectly attributed to a living natural person. Such information includes images and sound recordings that are processed electronically regarding which no names need to be mentioned. Encrypted information and various forms of electronic identification (e.g., IP numbers) are deemed as personal information if they can be linked to natural persons.

Processing of personal data refers to any operation regarding personal data. Every operation undertaken with regard to personal data constitutes a processing; irrespective of whether it is performed automatically or not. Examples of common operations are collection, registration, organization, structuring, storage, processing or rectification, transfer and deletion.

The data subject refers to the person to whom a personal data refers, i.e., we will continually refer to the data subject as "you" and "your" in this privacy policy.

Sensitive data refers to personal data regarding racial or ethnic origin, personal opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, and data concerning a natural person's sex life or sexual orientation.

Rights refer to the rights of the data subject under the GDPR. Your rights are listed below in [section 6](#). These rights are also described in more detail on the [Swedish Authority for Privacy Protection website](#).

3. Information about our processing of personal data

This privacy policy provides information on how we process your personal data in the following situations:

1. [When you are a new or existing customer in the context of customer due diligence.](#)
2. [When you receive discretionary portfolio management.](#)
3. [When you receive investment advice.](#)
4. [When you receive fund management.](#)
5. [If you want to make a complaint about our services.](#)
6. [If you want to report wrongdoing \("whistleblowing"\).](#)
7. [When you receive marketing about our services.](#)
8. [When you attend seminars, webinars and other events.](#)
9. [When you interact with us via our social media accounts.](#)
10. [When you are a consultant or supplier to us.](#)
11. [When you apply for a job.](#)

To inform you about how our processing of personal data takes place in the different situations described above, we have described this in more detail in sections 4-5 below.

Lannebo and Schibsted Norge AS ("Schibsted") have entered a joint controllership with the purpose of reaching out with relevant information to target groups for which there is a legitimate interest and/or consent. Each party is the sole data controller for its own collected data. The joint personal data responsibility is exercised when matching Lannebo's data with Schibsted's data and when creating customer segments for marketing. The legal bases are legitimate interest (in the balancing of interests we have taken into account that it is targeted marketing) and consent.¹

¹ Schibsted and Lannebo have entered into a data sharing agreement (mutual arrangement). Anyone with questions or wishing to exercise their rights can contact both companies. Contact details can be found in the privacy statements published on the websites www.schibsted.com and www.lannebo.se. The privacy statements also contain information on the rights of the data subject.

4. Personal data processing related to our services

4.1. When you are a new or existing customer in the context of customer due diligence

4.1.1. Introduction

The Act (2017:630) on Measures against Money Laundering and Terrorist Financing states that we must obtain customer due diligence on our/funds' customers in order to enable the review of transactions and identify those that may constitute money laundering and terrorist financing. KYC shall be obtained before the establishment of a business relationship, in case of uncertainty on previously received information, in case of changes in the customer or in the customer's use of the product and services and in case of suspicion of money laundering and terrorist financing.

4.1.2. 4.1.2 Purpose and legal basis

The purpose of obtaining customer due diligence is to fulfil obligations that exist in law, other regulations or decisions by authorities regarding customer due diligence. Thus, the basis for the customer due diligence measures carried out by us, in which personal data is processed, is a legal obligation.

This processing constitutes profiling and automated decision-making. For more information on profiling and automated decision-making, see [section 7](#).

4.1.3. 4.1.3 Categories of personal data

In the context of our customer due diligence activities, we process the following categories of personal data.

When the customer is a natural person:

- Name, social security number, telephone number, e-mail address, address including tax residence and information on possible US citizenship (if identification with BankID), and in the event that identification with BankID is not possible, we obtain a copy of the driving licence, passport or identity card which, in addition to the name and social security number, contains information on nationality, gender and in some cases length,
- financial information,
- PEP status, if any, including occupation/function, and

- information on offences may be present in hits against sanctions lists.
- When the customer is a legal person:
 - Name, personal identification number and address including tax residence of the contact person/representative (in case of identification with BankID), and in case identification with BankID is not possible, we obtain a copy of your driving licence, passport or identity card of the client's contact person/representative containing, in addition to the name and social security number, information on nationality, sex and, in some cases, length,
 - Name, social security number, address including tax residence and information on any US citizenship of the beneficial owner or alternative beneficial owner,
 - the PEP status of the beneficial owner, if any, including profession/function, and
 - information on offences relating to the beneficial owner may be found when searching against sanctions lists.

We may also obtain information about you from Bisonde, Trapets, Infotorg and the EU and UN sanctions lists. In the case of legal entities, we also obtain information from the Swedish Companies Registration Office and the County Administrative Board.

4.1.4. 4.1.4 Recipients of personal data

The data is stored in Lime Technologies Sweden AB ("Lime") cloud-based CRM systems. Data that we process in connection with our customer due diligence measures is also stored in ISEC's shareholder register Secura Fund. We may also share data with the Financial Police if such disclosure is required by law.

4.1.5. 4.1.5 Storage of personal data

The personal data collected in the context of our customer due diligence activities will be retained for the duration of the customer relationship and thereafter for five years from the end of the customer relationship (up to ten years if requested by law enforcement authorities).

4.2. When you receive discretionary portfolio management

4.2.1. Introduction

In discretionary portfolio management, the capital is managed in accordance with a management agreement and associated investment regulations that are unique to each client. In order to provide you with the service, we need to process personal data about you.

4.2.2. Purpose and legal basis

We process your personal data for the purpose of preparing and concluding a contract and administering that contract with you. The legal basis for this treatment consists of the agreement. The provision of your personal data is not a statutory requirement; however, it is a requirement that is necessary in order to enter into an agreement with us. If you do not provide your personal information to us, we will be able to neither fulfil our agreement nor our obligations in relation to you.

We also process your personal data by recording telephone conversations in order to fulfil legal requirements such as the obligation to document securities transactions. The legal basis for the processing is a legal obligation. Recordings may also be made for security and educational purposes and to prepare, provide and administer our products and services to you. The legal basis for this processing is legitimate interest. In the balancing of interests, we have assessed our interest in improving our services and that you as a customer also have an interest in having your contact with us quality reviewed.

According to the rules for the securities market, Lannebo must, in order to carry out discretionary portfolio management, carry out a suitability assessment. Suitability assessment involves obtaining and assessing the client's knowledge, experience, finances and investment objectives. Legal basis for processing is legal obligation.

4.2.3. Categories of personal data

When the customer is a natural person:

- name, social security number, address, telephone number, e-mail address, marital status,
- type of employment, occupation,
- financial information, previous experience with financial instruments, investment objectives, sustainability preferences,
- communication data (emails, call documentation and history),
- if necessary, bank account details, and
- where applicable, records of telephone conversations.

When the customer is a legal person:

- name, address, telephone number and previous experience in financial instruments of the representative,
- communication data (emails, call documentation and history), and
- where applicable, records of telephone conversations.

4.2.4. Recipients of personal data

The data is stored in Nordnet's (the custodian bank) system Nordnet Client Manager, Lime's CRM system, ISEC's portfolio system Secura Portfolio and Telavox AB.

4.2.5. Storage of personal data

We normally keep personal data for the duration of the contract and thereafter for a maximum of 10 years due to statute of limitations rules.

4.3. When you receive investment advice

4.3.1. Introduction

Investment advice is personalised to you as a client and is continuously developed. In order to provide you with the service, we need to process personal data about you.

4.3.2. Purpose and legal basis

We process your personal data for the purpose of entering into an agreement and administering that contract with you. The legal basis for this treatment consists of the agreement. The provision of your personal data is not a statutory requirement; however, it is a requirement that is necessary in order to enter into an agreement with us. If you do not provide your personal information to us, we will be able to neither fulfil our agreement nor our obligations in relation to you.

We also process your personal data by recording telephone conversations in order to fulfil legal requirements such as the obligation to document securities transactions. The legal basis for the processing is a legal obligation. Recordings may also be made for security and educational purposes and to prepare, provide and administer our products and services to you. The legal basis for this processing is legitimate interest. In the balancing of interests, we have assessed our interest in improving our services and that you as a customer also have an interest in having your contact with us quality reviewed.

According to the rules for the securities market, Lannebo must conduct a suitability assessment when providing investment advice. Suitability assessment means obtaining and assessing the client's knowledge, experience, finances and investment objectives. In order to comply with the rules on financial advice, we are required to collect and document information about the client and the advice situation. The documentation is kept in a secure and permanent way. The legal basis for this is legal obligation.

4.3.3. Categories of personal data

When the customer is a natural person:

- name, social security number, address, telephone number, e-mail address, marital status,
- type of employment, occupation,
- financial information, bank account details, previous experience with financial instruments, investment objectives, sustainability preferences,
- communication data (emails, call documentation and history),
- details of the counselling situation, such as general information on what was discussed with the customer, as well as the products or services presented, the advice given to the customer and the reasons behind it, and
- where applicable, records of telephone conversations.

When the customer is a legal person:

- name, address, telephone number and previous experience in financial instruments of the representative,
- details of the counselling situation, such as general information on what was discussed with the customer, as well as the products or services presented, the advice given to the customer and the reasons behind it, and
- where applicable, records of telephone conversations.

4.3.4. Recipients of personal data

The data is stored in Nordnet's (the custodian bank) system Nordnet Client Manager, Lime's CRM system, ISEC's portfolio system Secura Portfolio and Telavox AB.

4.3.5. Storage of personal data

We normally keep personal data for the duration of the contract and thereafter for a maximum of 10 years due to statute of limitations rules.

4.4. When you receive fund management

4.4.1. Introduction

Our fund management activities consist of the management, sale and redemption of units in investment funds and related administrative activities. In order to provide fund management services, we need to process personal data about you.

4.4.2. Purpose and legal basis

We process your personal data for the purpose of entering into an agreement and administering that contract with you. The legal basis for this treatment consists of the agreement. The provision of your personal data is not a statutory requirement; however, it is a requirement that is necessary in order to enter into an agreement with us. If you do not provide your personal information to us, we will be able to neither fulfil our agreement nor our obligations in relation to you.

4.4.3. Categories of personal data

When the customer is a natural person:

- Name, social security number, address, telephone number, e-mail address, marital status,
- type of employment, occupation,
- financial information, bank account details, previous experience with financial instruments, investment objectives, sustainability preferences,
- communication data (emails, call records and history).

When the customer is a legal person:

- Name, address, telephone number and previous experience in financial instruments of the representative.

4.4.4. Recipients of personal data

The data is stored in Nordnet Bank AB's (the custodian bank) system Nordnet Client Manager, Lime's CRM system and ISEC's shareholder register Secura Fund and portfolio system Secura Portfolio.

4.4.5. Storage of personal data

Personal data used for the contractual relationship between you and Lannebo is normally saved for as long as the contract is valid and thereafter for a maximum of 10 years due to rules on limitation.

4.5. If you want to make a complaint about our services

4.5.1. Introduction

In order to manage and respond to complaints received in relation to our service, we need to process personal data.

4.5.2. Purpose and legal basis

As a fund management company, we are required to have a complaint handling procedure where customers can submit any complaints related to our service. In connection with this, we process the personal data required to handle and respond to the complaint. The legal basis for the processing is legal obligation.

It is not a requirement that you provide us with personal data, but it may be necessary for us to respond to and handle the complaint. If you do not provide us with your personal data, we will not be able to respond to your complaint.

4.5.3. Categories of personal data

We process the name, telephone number, e-mail address and any other data related to the description of the complaint provided by the complainant.

4.5.4. Recipients of personal data

In some cases, the data is stored on SharePoint (Microsoft 365).

4.5.5. Storage of personal data

Personal data resulting from complaints and documents drawn up in connection with the handling of complaints are kept for a period of at least five years in accordance with legal requirements.

4.6. If you want to report wrongdoing ('whistleblowing')

4.6.1. Introduction

If you wish to report suspected misconduct, we will process your personal data.

4.6.2. Purpose and legal basis

We process the data upon receipt of reports of suspicious misconduct. The legal basis for such processing is legal obligation.

It may also be necessary to process personal data in the case of possible actions and to provide feedback to the reporter. The legal basis for our processing in this case is our legitimate interest in following up the case and providing feedback to the person who reported. In the balancing of interests, we have assessed that the person submitting the report has an interest in us following up the case.

4.6.3. Categories of personal data

The personal data we will process will depend on the content of the report and the information deemed relevant to the investigation.

4.6.4. Recipients of personal data

The personal data collected and assessed will only be accessible to selected employees of the Company. If a report is received by other than the Company's reporting channel and is received by an employee who is not authorised the documents will be forwarded to the authorised recipient as soon as possible. The data is stored at Whistleblowing Solutions AB.

4.6.5. Storage of personal data

Documentation in connection with a report will be handled and stored for two years after the case is closed, with the exception of suspicions of violations of the money laundering regulations, in which case the documentation is handled and stored for five or ten years.

4.7. You who receive marketing about our services

4.7.1. Introduction

We may send newsletters, emails and post to customers and other stakeholders, customer employees or other contact persons specified by the customer. We may also contact you by telephone.

4.7.2. Purpose and legal basis

We process your personal data in order to send out marketing communications to you. The legal basis for the processing of personal data is your consent or legitimate interest (in the balancing of

interests, we have taken into account our interest in marketing our business and that you can benefit from the content in a professional context).

You can contact us to request to be blocked from direct marketing by sending an email to us at dpo@lannebo.se.

4.7.3. Categories of personal data

We process data on name, e-mail, telephone number and address.

We may collect information about you from Retriever Sverige AB, Mergermarket Limited and Eivora AB.

4.7.4. Recipients of personal data

The data is stored in the CRM system and the Lime marketing module provided by Lime. When we use printers, the data is also shared with them.

4.7.5. Storage of personal data

To facilitate future mailings, we keep mailing lists. We are continuously culling mailing lists and if you have declined further mailings. Personal data on leads (potential customers) is stored for a period of six months.

4.8. Participants in our seminars, webinars and other events

4.8.1. Introduction

We arrange seminars, webinars and other events where invitations are sent out to customers and other stakeholders, partly for marketing purposes, partly for the purpose of informing. We process your personal data as described below.

4.8.2. Purpose and legal basis

We process personal data in order to invite you to and organize events.

The legal basis in these cases is a legitimate interest (in the balancing of interests, we have taken into account our interest in providing seminars, webinars and other events to inform and market our activities whilst the attendees benefit from the content from a professional perspective).

We process photographs and films to inform about and promote our activities on our website and social media. We process the data based on a balance of interests (in the balancing of interests we have taken into account our interest in marketing our business).

4.8.3. Categories of personal data

The personal data processed consists the name and e-mail address of the customer and other stakeholders, the customer's employee or other contact person specified by the customer.

In cases where we photograph and/or film at our seminars and other events, we also process information about you in the form of photos and recorded material.

When we organize webinars and other digital training activities, the name, photo and sound may occur. When registering for an event, information on age, telephone number and food preferences may also be processed.

4.8.4. Recipients of personal data

The data is stored in the Lime CRM system and marketing module.

We may use Confetti Technology AB's tools at events. When registering for our events, data may therefore also be stored at Confetti Technology AB.

When we conduct webinars and targeted external training programs or similar, we use Teams (Microsoft 365).

4.8.5. Storage of personal data

To facilitate future mailings, we maintain mailing lists. We continuously erase data from mailing lists and in the event that you request to no longer receive more mailings. Photographs and films are saved so that we can use them for our marketing purposes. Data erasure is also performed on an ongoing basis, and upon your request.

5. Other personal data processing operations that occur in our business

5.1. If you interact with us via our social media accounts

5.1.1. Introduction

When you interact, for example by sending us private messages via, or liking, commenting or forwarding posts on, our social media accounts such as X (formerly Twitter), LinkedIn and Instagram, your personal data will be processed by us and the relevant channel.

5.1.2. Purpose and legal basis

When you interact with us via social media, we will process personal data about you. We process your personal data on the basis of our legitimate interest (in the balancing interests, we have assessed that we have a legitimate interest in processing the data you have shared with us and that the protection of your personal data in this particular context does not outweigh this).

If you do not want your personal data to be on our social media accounts and cannot remove it yourself, please contact us and tell us in which post it is located and we will do our best to delete it.

5.1.3. Categories of personal data

We process your name and any profile picture when you interact with us on social media.

5.1.4. Recipients of personal data

If you contact us via social media such as X (formerly Twitter), LinkedIn and

Instagram, your personal data will also be collected and processed by these social media companies, in accordance with their data protection information.

5.1.5. Storage of personal data

The social media company store your personal data.

5.1.6. Other

For some of Lannebo's social media accounts, there are functions that enable us to access statistics and other data in anonymised form about visitors to our accounts. Visitor statistics refer to such things as audience, content and activity for the account and our posts, such as the number of "likes" and corresponding reactions, number of comments, number of people who have seen the post, number of times the post has been viewed, number of times a post has been reported as spam or similar. The information provided to us about visitors to our social media accounts is anonymised and we cannot link it to a specific person. However, this does not necessarily mean that the processing by the social media platform has been anonymised. For more information on the processing of personal data by the platforms, please refer to the privacy policy of each social media platform.

5.2. If you are employed by one of our suppliers, partners or contractors

5.2.1. Introduction

We have business relationships, and as these business relationships are with legal entities, our personal data processing relates to you as a contact person or employee of the legal entity (supplier, partner or contractor). We process your personal data as described below.

5.2.2. Purpose and legal basis

We process personal data in order to administer the contractual relationship we have with our suppliers, partners and contractors. The personal data processing regarding contact persons/representatives at suppliers/partners/contractors that take place are intended to enable us to administer the contract, fulfil our obligations towards our suppliers/partners/contractors, manage deliveries and to be able to have contact and communicate with suppliers/partners/contractors.

The legal basis for our processing in these cases is our legitimate interest in being able to administer and fulfil our contracts with our suppliers/partners/contractors. In the balancing of interests, we have assessed that the contact person/representative has an interest in the fulfilment of our obligations towards our suppliers/partners/contractors. Kategorier av personuppgifter

Vi behandlar namn, telefonnummer, e-postadress och befattning avseende kontaktperson/företrädare för leverantörer/samarbetspartners/uppdragstagare med vilka vi har ett affärsförhållande.

5.2.3. Categories of personal data

We process the name, telephone number, e-mail address and job title of contact person/representative of suppliers/partners/contractors with whom we have a business relationship.

5.2.4. Recipients of personal data

Data is stored in Outlook (Microsoft 365).

5.2.5. Storage of personal data

We store personal data in order to fulfil our contract with each individual supplier/partner/contractor. Data on the contact person/representative is therefore processed as a starting point for the time necessary for us to administer the contractual relationship, exercise our rights and fulfil our obligations in relation to each individual supplier/partner/contractor. In the event that your employment or assignment with the supplier/partner ends, we will terminate our processing of your personal data as soon as we receive such information. Contracts containing your personal data are stored for ten years from the termination of our business relationship due to the limitation period in the Limitation Act.

5.3. If you are applying for a job

5.3.1. Introduction

If you apply for a job, we process your personal data as described below.

5.3.2. Purpose and legal basis

We collect and process personal data in order for us to be able to handle applications, interview, and make decisions in a recruitment process. The overall purpose of a recruitment process is that we should be able to employ people with the right skillset for a vacancy. The legal basis for the processing consists of entering into an agreement and our legitimate interest in being able to receive and handle an application for employment. In the balancing of interests, we have assessed that the data subject has an interest in being able to apply for employment.

It is not a requirement to provide us with your personal data. However, without this data, we will not be able to fulfil our obligations to you in the performance of our recruitment process.

5.3.3. Categories of personal data

We process the following categories of personal data:

- name, social security number, address, e-mail address and telephone number of the applicant,
- where applicable, a photograph of the applicant,
- information about the applicant's previous work experience,
- education and education certification,
- the outcome of the background check, and
- contact information for any references provided by the applicant.

It is important that you do not provide information that is not relevant to the application. When applying, you do not need to provide sensitive personal data relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information and gender information. You, as a jobseeker, need only provide personal information about yourself in the form of a personal letter. If we collect references about you, we will share and receive personal information regarding the reference.

5.3.4. Recipients of personal data

The personal data collected and processed will only be accessible to selected employees.

5.3.5. Storage of personal data

We retain personal information during the recruitment process. Erasure of information received from unsuccessful applicants takes place after four (4) months.

We may also save applications from candidates who are interested in a future recruitment process. In such cases, the data is stored for a maximum of one year. However, you always have the opportunity not to be contacted in the future by declining the processing.

6. The data subject's rights

6.1. The right to access

You are entitled to be informed about the processing that we perform regarding you. This should include a description of the purposes and legal basis of the processing, which categories of personal data it concerns and who receives the personal data. We have compiled this information as outlined above for your ease of reference. An extract from the register can provide you with an overview of processing operations so that you may understand if, and for what purpose, your personal data is processed.

It should be highlighted, however, that the right of access to data does not apply to such information that Lannebo is not permitted to disclose by law. As a result, we may refuse a request from a data subject to exercise the above rights.

6.2. Right to rectification, erasure or restriction

If you believe that we have processed your personal data incorrectly, or that it may need to be rectified, you have the right to request that we correct the data, and, if you do not want us to continue processing personal data, you have the right to request that we erase the data. We will rectify or delete the personal data if it is possible in respect to our purpose of the processing and the legal requirements that we are under a duty to follow.

If you believe the personal data we hold about you is inaccurate, that our processing is illegal or that we do not need the data for a specific purpose, you have the right to request that we restrict our processing of your personal data. You can also request that we shall restrict the process your personal data while we investigate whether your request to exercise any other rights can be granted.

However, it should be noted that the right to rectification or erasure may be limited in some cases, as we as a fund management company have an obligation to preserve certain personal data about you during the time you are a client of ours, and also thereafter, for example, to fulfil a legal obligation or deal with legal claims.

6.3. Right to object in certain circumstances

You have the right to object at any time to the processing of your personal data if the legal basis for the processing consists of the performance of a task in the public interest, or a balancing of

interests. If you object, we will examine whether our interest in processing your data outweighs your interest in not having your personal data processed.

You also have the right to object at any time to the processing of your personal data on the grounds of direct marketing.

6.4. The right to data portability

You have the right to retain the personal data that have been provided to us and have the right to transfer this data to another personal data controller. This requires that it is being technically feasible and the legal basis for the processing consists of consent, or that the process was necessary for the fulfilment of an agreement.

6.5. The right to withdraw consent

If the processing of personal data is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

6.6. Automated decision-making/profiling

You have the right to not be the subject of a decision that is only based on some form of automated decision-making, including profiling, if the decision involves legal consequences or constitutes a decision which similarly significantly affect you. See [section 7](#) on how we use automated decisions.

6.7. The right to lodge a complaint regarding the processing of personal data

You always have the right to contact the e Swedish Authority for Privacy Protection in order to lodge a complaint linked to our processing of personal data. Below you will find the contact information for the Swedish Authority for Privacy Protection.

Telephone number: 08-657 61 00

Email address: imy@imy.se

If you, as a data subject, wish to exercise your rights or have a response to other questions, you can find our contact details in [section 1](#) above. You have the right to contact us as an alternative to contacting the Swedish Authority for Privacy Protection.

7. Profiling and automated decision-making

7.1. Lannebos profiling

Lannebo carries out profiling. "Profiling" means the automated processing of personal data used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict, for example, his or her economic situation, personal preferences, interests and location.

Profiling is used by Lannebo in risk assessment and transaction monitoring, in both cases with the aim of reducing the risk of Lannebo's services being used for money laundering or terrorist financing. The legal basis for profiling in these cases is to comply with applicable legislation.

Furthermore, the profiling of Lannebo is used in the design of marketing measures targeted at visitors to Lannebo's website. The legal basis for profiling in this case is balancing of interests, whereby Lannebo has made the assessment that Lannebo has a legitimate interest in processing personal data from persons who have provided their data to Lannebo when visiting the website in order to be able to target offers and communication based on the visitor's interests.

7.2. Lannebos automated decisions

In the context of the profiling used for risk assessment and transaction monitoring for the prevention of money laundering and terrorist financing, Lannebo uses automated decision-making regarding risk level, identifying any PEPs and/or sanctioned persons and selecting which transactions to scrutinize more closely.

You always have the right to object to an automated decision with legal consequences or decisions that similarly significantly affect you. Information on the right to object to automated decisions is set out in [section 6](#).

8. How is your personal data protected?

We use IT systems to protect the confidentiality, privacy and access to personal data. We have taken special security measures to protect your personal data against illegal or unauthorized processing (illegal access, loss, destruction, or damage). Access is granted only to those persons that need to process your personal data in order for us to fulfil the purposes set forth herein.

9. Transfer of personal data to third parties

We may, from time to time, disclose information to relevant third parties (including, but not limited to, situations where we have a legal obligation to do so). In order to ensure that personal data is processed in a safe and secure manner in each case, we routinely draw up data processing agreements with each external party that processes personal data on our behalf. The sharing of personal data with third parties is described in sections 4 and 5.

10. Transfer to third countries

We always aim to only process personal data within the EU/EEA. Where appropriate, we may share personal data with a third party in a country outside the EU/EEA, so-called third country. In the event of a transfer to a third country, we will ensure that such transfers is made in accordance with applicable data protection legislation, either by (i) basing the transfer on an adequacy decision by the European Commission, (ii) by using the European U Commission's standard contractual clauses in combination with organizational and technical safeguards, or (iii) if any derogations for specific situations in the GDPR is applicable.

11. Changes to this privacy policy

We reserve the right to amend and update the privacy policy. We will provide information in an appropriate manner in the event of material changes to the privacy policy, or if existing data is to be processed in another way than stipulated herein.