

Guidelines for disclosure of Client Information for

Capital Four Management Fondsmæglerselskab A/S

1. Introduction and purpose

- 1.1 These guidelines (the "Guidelines") for disclosure of client information have been issued by Capital Four Management Fondsmæglerselskab A/S ("the Company") to ensure compliance with Section 119 of The Danish Investment Firms Act ("the Act"). The Company must ensure that clients of the Company can submit confidential information to the Company being confident that the Company will not disclose such confidential information without having a legitimate for doing so. Hence, the purpose of these Guidelines is to inform Clients when and to what extent the Company may disclose client information.
- 1.2 The Company is subject to the secrecy obligation stipulated in the Act section 114 whereby members of the Board of Directors, the Management Board, and other employees of the Company may not without due course disclose or use confidential information obtained as part of the performance of services. However, usual information about customers may be disclosed in order to perform administrative tasks.

2. Disclosure of information

- 2.1 The Company may disclose confidential information to third parties in the following situation:
- a) Third parties engaged by the Company where disclosure is part of the administration of the client relationship, e.g., custodian banks, and related to the administration of agreements with clients.
 - b) IT suppliers, cloud service providers, IT support.
 - c) The Danish FSA, other supervisory authorities, and the tax authorities, where regulatory requirements entitle such authorities to receive otherwise confidential information.
 - d) External auditors, consultants, and advisers.
 - e) Other situations due to regulatory requirements or where there is a specific legal ground for such disclosure.
 - f) When the client has given consent to disclosure.

The information can be but is not limited to name of the client and other identification of the client, AuM, information about service providers of a client, etc. When information is disclosed to third parties the Company has an obligation not to disclose further information than is necessary for performing the relevant administrative task.

Last update: 22 November 2023