

# Information regarding Follicum AB's compliance with the General Data Protection Regulation (GDPR)

Below it is briefly described what Follicum AB, org. No. 556851–4532, are doing do to comply with the General Data Protection Regulation (GDPR).

#### Introduction

In our various roles as employer, customer, and supplier, Follicum AB continuously works to ensure, the privacy of individuals by striving for all personal data to be processed in accordance with the legal requirements of the General Data Protection Regulation (GDPR).

Follicum AB has taken organisational and technical measures to protect personal data from unauthorised access and to ensure that the data are accessible and not lost or altered unintentionally or by unauthorised persons. We continuously adapt our policies, routines and security measures as operations and technology change.

## **Background**

The Swedish Personal Data Act (PUL) is based on the EU Data Protection Directive and have been in effect in Sweden since 1998. Other EU countries have had similar data protection laws. The purpose is to protect people against privacy breaches in connection with processing of personal data. The General Data Protection Regulation (GDPR) replaced the Data Protection Directive and any national law (such as PUL) in all EU countries as of May 25, 2018. GDPR is similar to PUL, but has a number of important adjustments, primarily introducing financial sanctions.

### **GDPR Policy**

A GDPR Policy has been established regarding how Follicum AB in its operations and delivered services will process and protect personal data. The policy consists of an introduction to GDPR, Personal Data Policy, GDPR IT Security Policy, Contact Information.

#### **IT Security**

Follicum AB continuously works to improve its IT security so that personal data in information processing systems, IT equipment and portable media are protected in a professional manner.

# Storage and deletion of personal data

Follicum AB does not store personal data longer than necessary to fulfil the purpose of the processing. Personal data which are no longer relevant to the purposes for which they have been collected are regularly deleted or anonymised.

## Countries where personal data are stored and processed

Personal data shared with Follicum AB are processed and stored only within EU/EEA, they are not transferred to or processed in any third country.





#### **Employees**

Employees who may come in contact with personal data have received basic information about GDPR and how to process personal data.

#### **Suppliers**

With data processing agreements Follicum AB ensures the responsibility of our suppliers regarding their processing of personal data and their compliance with GDPR.

### **Customers/Shareholders**

Personal data of shareholders is handled by Euroclear Sweden. In capacity of Securities Depository, Euroclear Sweden is according to Swedish law, data processor for all processing of personal data done by Euroclear Sweden, e.g. when Euroclear's Sweden keeps a register of shares on behalf of Follicum AB. For all processing of personal data, Euroclear Sweden complies with the legislation regarding processing of personal data.

In other cases, customers/shareholders are informed through signing agreements and information letters etc., of their rights and what Follicum AB does to comply with GDPR and how to ensure the integrity of individuals, as well as relevant contact information.

#### Controller

The Controller and the one who determines the purposes and methods of processing the personal data and ultimately responsible for the processing being in accordance with applicable personal data regulations for Follicum AB, is:

Follicum AB, org. Nr. 556851-4532.

Follicum AB Scheelevägen 22 SE-223 63 Lund

For further information regarding our processing of personal data, please contact us at:

E-mail: info@follicum.com