

# PRIVACY NOTICE



## We care about your privacy

Viaplay Group ('we', and/or 'us', and/or 'our') is committed to protecting your privacy and personal data. This Privacy Notice is intended to help you understand what data we collect, why we collect it, and what we do with it when you attend and participate in our annual general meeting (AGM) as a shareholder or any other individual.

You will also find information about your personal data rights under the General Data Protection Regulation (GDPR) and any supplementary data protection regulations.

## Let's start with some definitions

**Personal data** means any information or combination of information that, directly or indirectly, identifies you.

**Processing** means any action taken in relation to personal data, including collection, use, disclosure, retention, deletion.

**Data controller** is the party responsible for deciding what personal data is collected about you and how it is processed.

## Responsibility for the use of your personal data

Viaplay Group AB (registration number 559124-6847, Box 17104, 104 62 Stockholm, Sweden) is responsible data controller for the use of your personal data as described in this Privacy Notice, unless otherwise stated. You are welcome to address any questions regarding this Privacy Notice to [dpo@viaplaygroup.com](mailto:dpo@viaplaygroup.com).

We have appointed **Euroclear Sweden AB** (registration number 556112-8074, Klarabergsviadukten 63, 101 23 Stockholm, Sweden) to facilitate our AGMs and provide related services. As a result, when you provide personal data to Euroclear Sweden AB, they are responsible for processing it as a separate data controller. For any questions about that processing of your data, please reach out to [es.dpo@euroclear.com](mailto:es.dpo@euroclear.com).

## Information we collect about you

We collect and use different categories of personal data about you, depending on your role and how you participate in our AGM.

The categories of personal data that we collect, and use, include:

- **Identification information** (full name, personal identification number).
- **Contact information** (address, telephone number, e-mail address).
- **Financial information** (voting rights, information regarding holdings and entitlements connected to the holdings).
- **Representation information** (proxy's identification information, assistant's information, company you're representing).
- **Voting information** (information on how you have voted, e.g., in case of postal voting, if voting devices are used, vote counting is carried out as well as through publication of the vote results).
- **Communication information** (dissenting opinions as part of the notes in the minutes from the AGM, or when exercising the right as shareholder to propose business at the AGM, make statements or ask questions).

## Where we collect your data from

We collect your personal data mainly directly from you, e.g., when you send us personal data via forms, e-forms, e-mails, telephone or during the AGM either at the meeting venue or remotely by participating online.

We may also receive your personal data through information received from public records, information received from the central securities depository (Euroclear Sweden AB) or other third-party service providers in connection with the AGM (such as legal advisors), or the shareholder you represent or your proxy (if relevant).

## Purposes for collecting and using your data

We use the information we collect for several purposes, and the same categories of data may be used differently for different purpose. These purposes, the legal basis for use, and the length of time we keep your personal data are all explained below.

Purpose	Categories of personal data
Carry out and manage our annual general meetings.	Identification information, financial information, representation information, voting information.
Legal basis	Storage
<b>Legal obligation - Article 6.1(c) GDPR</b> The use of your personal data is necessary to comply with our legal obligation under applicable laws.	For as long as necessary to meet our legal obligations under applicable laws but not longer than 10 years after the AGM.

Purpose	Categories of personal data
Handle communication initiated by shareholders or a contact person.	Identification information, contact information, communication information.
Legal basis	Storage
<p><b>Legitimate interests - Article 6.1(f) GDPR</b></p> <p>The use of your personal data is necessary to satisfy our legitimate interest of responding to questions that you have. We believe that our legitimate interest outweighs your interest in not having your personal data processed for this purpose, especially since you have contacted us.</p>	<p>Personal data is stored for this purpose for a period of eighteen (18) months calculated from the date of the last communication in the same matter.</p>

## Sharing of your personal data

Your personal data is primarily processed by us as the data controller. In certain cases, we may transfer your personal data to:

- **Affiliated entities or business partners** to the extent necessary in connection with the AGM. We take precautions to allow access to personal data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the personal data for any other purpose.
- **Competent law enforcement body, regulatory, government agency, court** or other third party such as but not limited to, the police, the financial supervisory authorities, the tax agency, or the Swedish companies' registration office, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.
- **Third-party vendors, service providers and partners** who provide services to us (e.g., third party consultants working with the AGM, law firms/advisors, security agents or providers of services to conduct the AGM digitally if such services are used at the meeting), which are or will be involved in providing services in connection with the AGM or who otherwise process personal data for purposes that are described in this privacy notice or as notified to you when we collect your personal data.
- **Our auditors, advisors, legal representatives, and similar agents** as may be necessary in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the personal data for any other purpose.

- **Other recipients**, such as participants in the AGM if they request the list of notices of attendance (which contains names of shareholders together with information regarding their number of shares and votes, and information on their respective proxy and/or assistant(s), if any) as the basis for determining the voting list at the AGM. We may also disclose personal data to other shareholders who request a copy of the minutes from the AGM.

## Where we process your personal data

We generally process and store your data within the European Economic Area (EEA). Because our Group companies and third-party contractors and consultants operate both within and outside the EEA, your personal data may be occasionally processed outside the EEA. However, we have taken appropriate safeguards to require that your personal data remains protected in accordance with this Privacy Notice. These measures include, where applicable, implementing EU standard contractual clauses with our third-party contractors.

A uniform level of data protection is ensured by means of internal data protection regulations and/or corresponding contractual agreements.

## Your data protection rights

You have the following data protection rights, under certain conditions:

- access and obtain a copy of your personal data,
- rectify/change incorrect or incomplete personal data,
- delete/erase your personal data,
- restrict the processing of your personal data,
- request your personal data in a portable format,
- object to the processing of your personal data.

If you would like to exercise any of your rights, please contact our DPO at [dpo@viaplaygroup.com](mailto:dpo@viaplaygroup.com). We normally respond to your request within one month following the date we received your request. If your request is complicated, or if you have submitted several requests, we may need additional time to handle your request. In any case, you will be notified for the reasons of the delay within one month following the date we received your request.

If you believe that Viaplay Group has not complied with your data protection rights, you can contact the supervisory authority in the country where you feel most secure, or you can contact the Swedish Data Protection Authority ([Integritetsskyddsmyndigheten](https://www.integritetsskyddsmyndigheten.se)) at [imy@imy.se](mailto:imy@imy.se) or call at 08-657 61 00.

## Updates to this Privacy Notice

We regularly update this Privacy Notice. Our use of personal data may change, for example we may collect personal data for new purposes, collect additional

categories of personal data or share your data with other recipients than outlined in this Privacy Notice.

We reserve the right to change this Privacy Notice at any time. This Privacy Notice is effective from April 25, 2023.

## Contact us

Questions, comments, and requests regarding this Privacy Notice should be addressed to our DPO at [dpo@viaplaygroup.com](mailto:dpo@viaplaygroup.com) or in writing to Viaplay Group AB, Box 17104, 104 62 Stockholm, Sweden.