

Privacy notice for shareholders in Danske Bank A/S

Effective from 19 February 2021

1. Introduction

This privacy notice applies to the processing of personal data by Danske Bank A/S (Danske Bank) in Denmark. Danske Bank is the data controller for the processing of the personal data described in this privacy notice. Contact details: Danske Bank A/S, CVR no. 61126228, Holmens Kanal 2-12, DK-1092 Copenhagen.

This privacy notice applies to shareholders in Danske Bank, as well as their proxies and advisors.

This privacy notice sets out how and why Danske Bank processes shareholders', proxies' and advisors' personal data and protects its privacy rights.

2. What personal data do we process?

We process different kinds of personal data, including:

- Personal details and contact information registered in Danske Bank's register of shareholders such as your name, address and email address.
- Details on your shareholding registered in Danske Bank's register of shareholders, including the account number, depository bank, classes of shares, voting rights and transaction history.

- Name, address and email address of your proxies and advisors.
- Your username and password for the InvestorPortal.
- Information in relation to your attendance in general meetings, including:
 - your registration of attendance,
 - the votes you cast for agenda items addressed and any questions you submit during or prior to a general meeting,
 - your proposals for the agenda, if any,
 - statements made during general meetings, and,
 - Sound- and/or video recordings of you if you choose to make a statement during a general meeting, which is being webcasted.
- Any personal details that you provide through your communications with us.

We may process other personal data as necessary or if we are required by law to do so.

3. What we use your personal data for

We process personal data for the following purposes:

- Your name, contact information and details regarding your shareholding are processed in order to identify you as a shareholder and maintain our register of shareholders.
- Your name and contact information are processed in order to send you notices for general meetings and annual reports, if you have opted-in to receive it, and to enable the shareholders to exercise their shareholder rights.
- Your registration of attendance for general meetings and your submitted proposals and questions for general meetings are processed in order to prepare general meetings.
- Your name and details about your shares are processed to manage voting processes and to verify your status as a shareholder, proxy or advisor.
- Statements and questions made by you during a general meeting, including video- and/or sound recordings, are processed to draft and publish minutes of general meetings.

- We process your personal data in order to communicate with you.
- To comply with applicable law and for other regulatory and administrative purposes, including identification and verification.

4. What is our legal basis for processing your personal data?

We must have a legal basis (lawful reason) to process your personal data. The legal basis will be one of the following:

- You have given us consent to use your personal data for a specific purpose, cf. the GDPR, art. 6.1(a).
- To comply with a legal obligation, cf. the GDPR, art. 6.1(c), for example in accordance with the Danish Companies Act (*selskabsloven*) and the Danish Capital Markets Act (*lov om kapitalmarkeder*).
- It is necessary to pursue a legitimate interest of Danske Bank, cf. the GDPR, art. 6.1(f). We will do so only if our legitimate interest in each case is not outweighed by your interests or rights and freedoms.

5. Sensitive personal data

To a limited extent, special categories of data (such as, but not limited to information about your health, trade union membership or information about political opinions) may be processed about you. Such processing will only take place in situations in which you have provided us with the information and if it is relevant to your status as a shareholder, particularly in relation to your participation in general meetings, or in order to comply with legal requirements.

When we process sensitive personal data about you, the legal bases are one of the following:

- your explicit consent, cf. the GDPR, art. 6.1(a) and 9.2(a),
- the establishment, exercise or defence of legal claims, cf. the GDPR, art 6.1(f) and 9.2(f), or
- substantial public interest, cf. the GDPR, art. 6.1(c) or 6.1(f) and art. 9.2(g)

6. How do we collect the information we have about you?

Personal data collected from you

We collect information directly from you, including when you

- Communicate with us via Danske Bank's InvestorPortal, letter or digital means, including e-mails,
- register for attending general meetings, and
- participate in a general meeting, including casting votes, asking questions or making statements.

Personal data collected from third parties

If we do not receive information directly from you, we receive and collect personal information and details regarding your shareholdings from third parties, including from:

- VP Securities A/S, and intermediaries, such as other depository banks, which are holding your shares.

7. Third parties that we share your personal data with

We will keep your information confidential but we may share it with the following third parties (who also have to keep it secure and confidential):

- Other entities of the Danske Bank Group if existing legislation allows or requires us to share the information, for example if it is necessary to comply

with group-based management, control and/or reporting requirements established by law.

- In relation to general meetings, your personal data may be made public or shared with third parties in the following situations:
 - Sound- and/or video recordings of you if you choose to make a statement during a general meeting, which is being webcasted on Danske Bank's InvestorPortal/GeneralMeetingsPortal,
 - Questions, statements and proposals submitted by you prior to or during a general meeting will be included in the final minutes, along with your name, and made public on Danske Bank's website.
- Individuals holding a power of attorney, lawyers, accountants or others you have authorised us to share the information with.
- Our suppliers, including lawyers, accountants and consultants and courier services.
- Data processors, including VP Securities A/S in relation to our register of shareholders and IT service providers who may be located outside the EU and the EEA, such as Danske Bank India.
- GetVisual A/S as provider of the webcast of general meetings.
- Nasdaq Copenhagen A/S.
- Public authorities, as required by law or according to court orders or requests, in Denmark and other countries, including countries outside the EU and the EEA, in connection with their duties.
- For social and economic research or statistics purposes, where it is in the public interest.

8. Transfers outside the EU and the EEA and international organisations

Some third parties that we share personal data with may be located outside the EU and the EEA, including in Australia, Canada and India.

When Danske Bank transfers your personal data to third parties outside the EU and the EEA, we ensure that your personal data and data protection rights are subject to appropriate safeguarding by

- ensuring that there is an adequacy decision by the European Commission
- using standard contracts approved by the European Commission or the Danish Data Protection Agency

You can get a copy of the standard contract by contacting us (see contact details in section 12).

9. For how long do we store your personal data?

We keep your data only for as long as it is needed for the purpose for which your data was registered and used.

We keep information in the register of shareholders up to 5 years plus the current financial year from the date when you no longer are a shareholder.

In order to prepare minutes for a general meeting, Danske Bank will process a sound recording from the general meeting. The sound recording will be deleted once the minutes are approved and published.

Materials that document the history of Danske Bank, including notices and minutes of general meetings, are kept for as long as Danske Bank exists.

10. Your rights

Your rights in relation to personal data are described below. To exercise your rights, you can

- make a request by email to dpofunction@danskebank.com or via the InvestorPortal
- contact us on our main telephone number (+45 70 12 34 56)

Right to access your personal data

You may request access to the personal data we process and information about where it comes from and what we use it for. You can obtain information about the period for which we store your data and about who receives data about you, to the extent that we disclose data in Denmark and abroad. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of access.

Right to object

In certain circumstances, you have the right to object to the processing of your personal information. This is the case, for example, when the processing is based on our legitimate interests.

Right to rectification of your data

If data is inaccurate, you are entitled to have the data rectified. If data is incomplete, you are entitled to have the data completed, including by means of providing us with a supplementary statement.

Right to erasure ('right to be forgotten')

You are entitled to have your data erased, if the data is no longer necessary in relation to the purposes for which it was collected.

However, in the following cases, we may or are required to keep your data:

- For compliance with a legal obligation, for instance if we are obliged by law to hold your data for a certain period of time. In such situations, we cannot erase your data until that time has passed.
- For the performance of a task carried out in the public interest.
- For establishment, exercise or defence of legal claims.

Restriction of use

If you believe that the data we have registered about you is incorrect, or if you have objected to the use of the data, you may demand that we restrict the use of the data to storage. Use will be restricted to storage only until the correctness of the data can be verified, or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have the data we have about you erased, you may instead request us to restrict the use of the data to storage. If we need to use the data solely to assert a legal claim, you may also demand that other use of the data be restricted to storage. We may, however, be entitled to use the data for other purposes, for instance to assert a legal claim or if you have granted your consent to this.

11. Changes to this privacy notice

We may change or update this privacy notice on a regular basis. In case of a change, the “effective from” date at the top of this document will be amended. If changes to how your personal data is processed will have a significant effect on you personally, we will take reasonable steps to notify you of the changes to allow you to exercise your rights (for example to object to the processing).

12. Contact details and how to complain

You are always welcome to contact us if you have questions about your privacy rights and how we process personal data.

You can contact us on our main telephone number (+45 70 12 34 56).

You can contact our Data Protection Officer by email at dpofunction@danskebank.com.

You can also lodge a complaint with the Danish Data Protection Agency: Datatilsynet, Carl Jacobsens Vej 35, DK-2500 Valby, email: dt@datatilsynet.dk.