

Document owner:	CEO
Document Holder:	CEO
Approval:	CEO (the "Company" or "Virtune")
Date of approval:	2025-05-21

## **Privacy Policy**

### **Virtune AB**

## **Appendix**

Appendix: Cookie Policy

## Privacy Policy - Information regarding processing of your personal data

Virtune AB, reg. no. 559175-2067, Kungsgatan 26, 111 35 Stockholm, Sweden (“**Virtune**”, “**we**”, “**our**” or “**us**”) offers securities in the form of Exchange Traded Products providing exposure to the crypto market.

This policy describes how Virtune collects and processes personal data for which Virtune is the data controller. Should you have any questions regarding our processing of your personal data, please contact us at [data@virtune.com](mailto:data@virtune.com) or via the contact details in section 7.

We process your personal data in different ways depending on the context in which you come in contact with us and in which capacity you act (please note that “process” in this context is a generic term used in the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) for actions taken in relation to your personal data). This policy is therefore divided into different sections, to make it easier for you to find the information you are looking for. The different sections are based on which of our services that you use, for example if you apply for a job. You can read about how your personal data is processed under each of these categories.

These different sections are followed by multiple sections where information that is universal for all types of services is described. These sections include information about who we share your personal data with, where we process your personal data, what rights you have vis-à-vis us and how you can get in touch with us. Below, you can click yourself to each section.

1. [Which personal data are used for what, on which legal basis and for how long?](#)
2. [With whom do we share your personal data?](#)
3. [Where do we process your personal data?](#)
4. [What rights you have vis-à-vis us](#)
5. [Cookies and other tracking technologies](#)
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7. [How you get in touch with us](#)

It is important to us that you feel safe with what types of personal data we collect and even more importantly how we process it. Thus, this policy covers the necessary information about this, which is why we think it is important that you read and understand the information.

# 1 Which personal data are used for what, on which legal basis and for how long?

## 1.1 Marketing

<b>For what purposes we process your personal data, i.e. what we do and why</b>	<b>What personal data we process and where we collect such personal data</b>	<b>What is the legal basis for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
In relation to investors (existing and potential), we collect and store personal data through subscriptions about you as a representative and use them to contact you by e- mail to market our products.	<b>From you:</b> <ul style="list-style-type: none"> <li>● your name;</li> <li>● your e-mail;</li> <li>● your message;</li> <li>●</li> </ul>	Our legitimate interest in being able to market our products and maintain a valuable relationship with our investors.	We remove this personal data as soon as we have fulfilled the purpose with the processing or until we receive a request to delete the data.

## 1.2 Investor proaction.

<b>For what purposes we process your personal data, i.e. what we do and why</b>	<b>What personal data we process and where they come from</b>	<b>What is the legal basis for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
As a representative of our investors, we will collect your personal data, either by you sending us an e-mail conversation with you. The data you provide will be used for the purpose of providing investor support,	<b>From you:</b> <ul style="list-style-type: none"> <li>● your name;</li> <li>● your e-mail;</li> <li>● your message;</li> <li>●</li> </ul>	To be able to fulfill our obligations and help you with your errand/request.	For as long as the case for which your errand/request is operative.

including any complaints.			
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1.3 **Job application**

<b>For what purposes we process your personal data, i.e. what we do and why</b>	<b>What personal data we process and where they come from</b>	<b>What is the legal basis for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
If you apply for a job with Virtune, we collect your personal data and use them to carry out a recruitment process.	<b>From you:</b> <ul style="list-style-type: none"> <li>● your name;</li> <li>● your social security number;</li> <li>● your e-mail;</li> <li>● your phone number;</li> <li>● your address;</li> <li>● criminal record</li> <li>● work history; and</li> <li>● any other personal data that you provide in your resumé or personal letter.</li> </ul>	Our legitimate interest in conducting a recruitment process.	This process takes place during the recruitment process and for a period of two years thereafter, in order for us to be able to defend ourselves against any legal claims.

## 1.4 Website visitors

For what purposes we process your personal data, i.e. what we do and why	What personal data we process and where they come from	What is the legal basis for our processing?	For how long do we process your personal data for the specific purpose?
We collect your personal data when you visit our website in order to optimise your experience of the website.	From other sources: <ul style="list-style-type: none"> <li>● Technical information generated through your use of the website;</li> <li>● information about your internet device, such as IP address, language settings, browser settings, operating system;</li> <li>● time and date of the visit of the website.</li> </ul>	Our legitimate interest in being able to provide our website.  For certain parts of our processing, we rely on your consent. Please see our cookie policy on our website for further information about this.	This processing will go on during your visit to the website and is stored for 12 months thereafter.

## 1.5 Potential automated decision making / Profiling based on the personal data

Once a decision has been made through automated decision-making, you will be informed about this as well as about your ability to contest the decision. You also have the right to have the decision reviewed by a real person.

## 1.6 How have we performed the assessment of the balance of interests when the legal basis for processing your personal data is our legitimate interest?

For certain purposes, we rely on our legitimate interest as the legal basis for the processing of your personal data. In assessing our legitimate interest, we rely on a balancing of interests test by which we have determined that our legitimate interests of the processing override your interest and your fundamental right not to have your personal data processed. We have expressed our legitimate interest in the tables above. Please contact us if you want to read more about how this test has been performed. Our contact details can be found in section [7](#).

## 2 With whom do we share your personal data?

When we share your personal data, we ensure that the recipient processes them in accordance with this privacy notice, by, e.g. entering into Data Transfer Agreements or Personal Data Processing

Agreements with the recipients. The agreements ensure that your data are processed in accordance with the GDPR and this privacy policy. We would like to emphasize that we do not sell your personal data to any third party.

## **2.1 Categories of recipients with whom we may share your personal data**

### **2.1.1 *Partners outside Virtune***

*Personal data shared with the recipient:* According to 1.1, 1.3, 1.4, 1.5 and 1.6

*Recipients:* Partners within Sweden, for example our legal partners.

*Purpose and legal basis:* The partners with whom we work closely may gain access to your personal data to the extent necessary in order for us to fulfill our obligations under the contract with you. Thus, sharing with partners outside the Group can take place on the legal basis of performance of contract.

### **2.1.2 *Suppliers and subcontractors***

*Categories of persons whose personal data may be shared with the recipient:* Representatives of our investor, web visitors and job applicants.

*Personal data shared with the recipient:* According to 1.1, 1.3, 1.4, 1.5 and 1.6

*Recipients:*

#### *Google Cloud*

Our databases with personal data are stored on our servers in the Google Cloud Platform. Google does not have access to the servers and thus do not have the right to use any information. It is only Virtune that can access the servers and data.

#### *Hubspot*

Hubspot is the hub which collects subscribers from the website and these lists are used for marketing promotion emails to our investors and therefore your email address is stored with them.

#### *EmailJS*

EmailJS is used as a tool to handle messages coming from the contact form on the website which is then sent to the email address [hello@virtune.com](mailto:hello@virtune.com) for further communication with the investor for future communication. The data stored are the message and contact info

#### *Google Analytics*

Google Analytics is used to analyze the usage behavior of our web visitors. Data is anonymized and aggregated as a general rule after collection, and we do not follow up how each individual visitors use Virtune's services.

*Purpose and legal basis:* We sometimes need to use the services of other companies in order to run our business. In such cases, we have a legitimate interest in being able to use these services. If the sharing of your personal data is necessary to fulfill that interest, and that interest overrides your right not to have your data processed, sharing may take place on the legal basis of legitimate interest.

### 2.1.3 *Third party in corporate transaction*

If we, or a significant part of our business, were to be sold to or integrated with a third party, all of the personal data that we have collected about you may be shared with our advisor, potential buyer and their advisor and then passed on to the new owner of the business. This applies regardless of under which of the above-mentioned services that we have collected your personal data. In such cases, we have a legitimate interest in being able to provide the potential buyer(s) with sufficient information about our business, in order to perform the transaction. If the sharing of your personal data is necessary to fulfill that interest, and that interest overrides your right not to have your data processed, sharing may take place on the legal basis of legitimate interest.

## 2.2 **Objections to the sharing of your personal data**

You have the right to object to the sharing of your personal data, based on the circumstances in your individual case. More information about your right to object can be found in section [4.5](#).

## 3 **Where do we process your personal data?**

The transfers described above may be made to recipients in member states of the EU/EEA as well as to third countries whose legislation may differ from the rules for data protection within the EU/EEA. In the case of transfers to such third countries, we will take appropriate measures to ensure that your personal data is adequately protected.

We will ensure that appropriate safeguards are put in place by ensuring that at least one of the following conditions is met in each such transfer.

<b>Safeguard and description thereof</b>	<b>Which countries we transfer personal data to on the basis of the specified safeguard</b>
<b>Adequate level of protection according to art. 45 GDPR</b> The European Commission has decided that certain countries outside the EU/EEA have a sufficiently high level of security. This means that personal data can be transferred there without any further action having to be taken with regard to the transfer itself (beyond what applies under the GDPR in general).  A list of which countries are included can be found <a href="#">here</a> .	United Kingdom
<b>Standard Contractual Clauses according to art. 46.2 GDPR</b> Since only a few countries are considered to have an adequate level of protection, a common measure to ensure sufficient protection in the event of a transfer outside the EU/EEA is to enter into the European Commission's Standard Contractual Clauses pursuant to Implementing Decisions 2001/497/EC,	United States of America

**2010/87/EU or 2021/914/EU, without any changes or amendments in conflict with the clauses.**

**If you want to read them in their entirety, you can download them via the European Commission's [website](#) (under the heading *Standard contractual clauses for international transfers (Word)*).**

**Right to obtain a copy** – If you would like to receive further information about transfers to countries outside the EU/EEA, or if you would like to receive a copy of the safeguard we have used, you can contact us by using the contact details set out in section [7](#) below.

## **4 What rights you have vis-à-vis us**

According to current legislation, you have the right to exercise certain rights against us when we process your personal data. Below we describe each right, and what it means for you in relation to the personal data that we process. If you want to read more about what the Swedish Authority for Privacy Protection (Sw. *Integritetskyddsmyndigheten*) writes about these rights, there are links under each section to the relevant page on the Swedish Authority for Privacy Protection's [website](#).

If you want to exercise any of these rights, want to know more or have questions, please feel free to contact us at [data@virtune.com](mailto:data@virtune.com) or by using the contact details set out in section [7](#) below.

### **4.1 Right to information**

You have the right to be informed about how we process your personal data. In this privacy policy, we generally describe what personal data is processed by us in different contexts. If you want to know more about whether we process your personal data, and to what extent it is done, you can contact us as described above and request information about what personal data we process.

If you want to read more about the right to information – please see [here](#) (in Swedish: [here](#)).

### **4.2 Right to access your personal data (register extract)**

We can also provide you with a copy, a so-called register extract, of the personal data processed by us. In the register extract, we provide information about e.g. which categories of personal data are processed, what the personal data are used for, how long the data will be stored, with whom the personal data has been shared and where the data come from.

If you want to read more about the right of access – please see [here](#) (in Swedish: [here](#)).

### **4.3 Right to rectification**

We strive to always have accurate personal data about you and to update them when necessary. If you discover that we process inaccurate data about you, you have the right to contact us as described above to have these corrected. You also have the right to ask us to complete incomplete data if this

is relevant based on the purposes for which your data are processed, by providing us with additional information.

If you want to read more about the right to rectification – please see [here](#) (in Swedish: [here](#)).

#### 4.4 **Right to erasure (right to be forgotten)**

You have the right to request the erasure of your personal data. However, this right is not absolute. Certain conditions must be at hand in order for us to erase your data. For example, you may have the right to have data erased if they are no longer necessary for the purposes for which they were collected, if you withdraw your consent or if you object to us using your data for direct marketing.

The right to erasure is also limited in the event that an exception applies to the data in question. For example, we have the right to retain the data if it is necessary for establishing, exercising or defending legal claims.

If you want to read more about the right to erasure – please see [here](#) (in Swedish: [here](#)).

#### 4.5 **Right to object**

You always have the right to object to our processing if the legal basis for the processing is that the processing is necessary for purposes relating to our legitimate interest (the legal basis is stated in the various processing operations above in section 1).

If you object, we do not have the right to process the data anymore, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or if it is needed for the establishment, exercise or defense of legal claims. If we consider that we have such legitimate grounds, or if the data are needed for the establishment, exercise or defense of legal claims, we will notify you of this, and the reasons for such assessment.

You can also object to your personal data being processed for marketing purposes (including profiling if this is included as part of this). If you do so, we will cease the processing for these purposes.

If you want to read more about the right to object – please see [here](#) (in Swedish: [here](#)).

#### 4.6 **Right to restriction**

You can request that the processing of your personal data should be restricted, for example if you do not think that the information we have about you is correct or if you believe that the processing is unlawful. Such request can also be made during the time we investigate whether our legitimate interests override your interest of privacy when you object to the processing (see more about this under right to object above).

If you want to read more about the right to restriction – please see [here](#) (in Swedish: [here](#)).

#### **4.7 Right to transmit personal data (data portability)**

You have the right to receive your personal data that you have provided to us (in case the legal basis for our processing is consent or performance of an agreement), in a structured, commonly used and machine-readable format. However, this presupposes that the processing takes place by automated means (i.e. not in physical form on paper). If technically possible, and you wish to do so, we may also transmit such personal data to another data controller.

If you want to read more about the right to transmit personal data (data portability) – please see [here](#) (in Swedish: [here](#)).

#### **4.8 Right to withdraw your consent**

You can withdraw the whole or part of the consent you have given at any time, with effect as from the withdrawal (i.e. the processing of personal data that we have carried out before the withdrawal will not be affected). In the case of direct marketing via e-mail, a withdrawal can be carried out through a link attached in each such e-mail.

#### **4.9 Right to lodge a complaint with the competent supervisory authority**

You can lodge a complaint to the Swedish Authority for Privacy Protection (or with another supervisory authority) if you believe that our processing of your personal data is not in accordance with applicable legislation.

If you want to read more about the right to lodge a complaint – please see [here](#) (in Swedish: [here](#)).

#### **4.10 Requirements for exercising your rights**

To protect your privacy, we may (if necessary) require you to prove your identity when you contact us to exercise your rights.

We handle your request to exercise your rights promptly. Your request will normally be answered within one month from the date the request was received by us. Only in the case of an unusually complicated request, or if we have received a large number of requests, the response time may be extended by up to two months. If an extension of the response time is decided upon, you will be notified of it.

### **5 Cookies and other tracking technologies**

In order for us to deliver our services with the highest possible quality, we use so-called cookies and similar tracking technologies on our website.

When you visit our website, you will be asked if you consent to our use of cookies (with the exception of such necessary cookies that do not require your consent). You can delete cookies from your browser or adjust your settings for the use of cookies, at any time. You can read more about this in our cookie policy. In the cookie policy, we describe e.g. what types of cookies we use, what they are used for and for how long they are valid.

## **6 Changes and updates to this Privacy Policy**

We may make changes to this privacy policy. All such changes are available here on the website in our latest version of the privacy policy, which is why you should review the privacy policy at regular intervals and each time you use our services.

## **7 How you get in touch with us**

If you have any questions or comments regarding the processing of your personal data, you can contact us via the e-mail address below.

### **VIRTUNE AB**

**Address:** Kungsgatan 26, 111 35 Stockholm,  
Sweden

**E-mail:** [data@virtune.com](mailto:data@virtune.com)