

PRIVACY POLICY FOR SHAREHOLDERS ETC.

BRØDRENE HARTMANN A/S

This Privacy Policy explains how Brødrene Hartmann A/S ("we" or "us") processes personal data about shareholders, proxies and advisers in connection with registration in the register of shareholders and convening and holding of general meetings.

1 DATA CONTROLLER

The legal entity responsible for the processing of your personal data is:

Brødrene Hartmann A/S

CVR no. 63 04 96 11

Ørnegårdsvej 18

2820 Gentofte

Email: bh@hartmann-packaging.com

Phone: +45 45 97 00 00

2 DESCRIPTION OF THE PROCESSING

Purpose	Categories of personal data	Source of the personal data	Legal basis for the processing	Recipients	Data retention
<p>Registration of shareholders in the register of shareholders and on the shareholder portal</p> <p>We process your personal data in order to maintain an updated, statutory register of shareholders.</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> • name • gender • email address • home address • telephone number • portfolio of shares • voting rights • date of acquisition, sale or pledge of shares • user name and password • account number with VP Securities • custodian bank • investor ID • investor group 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you, including when you provide information via our shareholder portal • VP Securities 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> • GDPR article 6.1.c - necessary for us to comply with the legal obligation of Section 50 of the Danish Companies Act • GDPR article 6.1.f - necessary for the pursuit of our legitimate interest in being able to respond to your requests and to communicate with you 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers, including IT-suppliers, who assist in connection with registration in the register of shareholders and on the shareholder portal • The public via the Danish Business Authority's Register in accordance with the rules (shareholders holding at least 5 per cent of the shares or votes) • Nasdaq Copenhagen A/S • Public authorities, including the Danish Business Authority 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> • We retain your personal data for up to 5 years plus the current financial year after you no longer own shares in Brødrene Hartmann A/S.
<p>Convening and holding of general meetings</p> <p>We process your personal data for the purpose of convening you to general meetings and enabling you to exercise your</p>	<p>We process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> • name • email address 	<p>We collect your personal data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you, including when you provide information 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> • GDPR article 6.1.c - necessary for us to comply with the legal obligation of Section 93 of the Danish Companies Act 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers, including IT-suppliers, who assist in connection with registration in the reg- 	<p>We will retain personal data for as long as it is necessary for the purposes mentioned.</p> <ul style="list-style-type: none"> • We retain your personal data for up to 5 years plus the current financial year af-

rights at the general meetings as well as issue proxies and vote by post. Furthermore, we use the information to issue ballot papers and admission cards to shareholders and advisers, if any. If you are an advisor to a shareholder, we will process your information in order for you to have access to the general meeting.	<ul style="list-style-type: none"> • home address • attendance at the general meeting • advisor's attendance at the general meeting • proxies • votes cast, including written votes • portfolio of shares 	via our shareholder portal, see above	<ul style="list-style-type: none"> • GDPR article 6.1.f - necessary for the pursuit of our legitimate interest in being able to convene shareholders to - and to conduct - general meetings 	ister of shareholders and on the shareholder portal <ul style="list-style-type: none"> • Nasdaq Copenhagen A/S • Public authorities, including the Danish Business Authority 	ter you no longer own shares in Brødrene Hartmann A/S. <ul style="list-style-type: none"> • A notice to convene the general meeting with agenda and complete proposals as well as registrations, proxies and postal votes are retained for 5 years plus the current financial year after the general meeting has taken place. • Material that documents the company's history, decisions made, etc. is retained for as long as the company exists.
Handling of questions and proposals submitted prior to the general meeting, handling of questions and exercising the right to speak at the general meeting as well as preparation of minutes of the general meeting We process your personal data for the purpose of handling questions and proposals submitted prior to the general meeting, questions and the right to speak during the general meeting and the preparation of minutes of the general meeting. If questions are answered in writing prior to the general meeting, we will process your information in order to be able to submit questions, answers and the name of	We process the following categories of personal data about you: Ordinary personal data: <ul style="list-style-type: none"> • name • documentation of your status as a shareholder or proxy • the content of your question • the content of your proposal • the content of your opinions expressed at the general meeting 	We collect your personal data from the following sources: <ul style="list-style-type: none"> • Directly from you, including when you provide information via our shareholder portal, see above 	We process your personal data on the following legal basis: <ul style="list-style-type: none"> • GDPR article 6.1.c - necessary for us to comply with the legal obligations of Sections 78, 90 and 101 of the Danish Companies Act • GDPR article 6.1.f - necessary for the pursuit of our legitimate interest in being able to identify you as a shareholder or proxy so that you able to exercise your rights during the general meeting 	We may share your personal data with: <ul style="list-style-type: none"> • Suppliers, including IT-suppliers, who assist in convening and holding of general meetings • The public via the Danish Business Authority's Register in accordance with the rules (shareholders holding at least 5 per cent of the shares or votes) • Nasdaq Copenhagen A/S • Public authorities, including the Danish Business Authority 	We will retain personal data for as long as it is necessary for the purposes mentioned. <ul style="list-style-type: none"> • We retain your personal data for up to 5 years plus the current financial year after you no longer own shares in Brødrene Hartmann A/S. • A notice to convene the general meeting with agenda and complete proposals as well as registrations, proxies and postal votes are retained for 5 years plus the current financial year after the general meeting has taken place. • Material that documents the company's history, decisions made, etc. is retained for as

the person who has put forward the question at the general meeting. If proposals are included on the agenda, we will process your personal data (your name and proposal) provided on the forms for appointment of proxy or written voting as well as on the agenda. Forms, postal votes and agenda, including complete proposals, are published on our website. Finally, we will process your personal data when preparing and issuing the minutes of the general meeting.					long as the company exists.
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3 PERSONAL DATA ABOUT OTHER PARTIES

If you provide personal data about other parties - such as name and contact information on advisers and proxies - you must be sure that they agree and that you are allowed to provide such data to us. In addition, you must refer them to this privacy policy when you provide us with their personal data.

4 YOUR RIGHTS

You have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent and exercise your rights as stated below.
- You have the right to receive the personal data that you have provided yourself in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

Furthermore, you have the right to object to our processing of your personal data in the following circumstances:

- **If our processing of your personal data is based on article 6(1)(e) (the public interest) or article 6(1)(f) (balancing of interests), see above regarding legal basis, you have the right to object, on grounds relating to your particular situation, at any time, to the processing of your personal data.**
- **Furthermore, where we process your personal data for direct marketing purposes, you have an unconditional right to object, at any time, to our processing of your personal data.**

You can take steps to exercise your rights by contacting us on investor@hartmann-packaging.com.

There may be conditions or limitations on these rights. It is therefore not certain that you, for example, have the right to have your personal data erased in the specific case - this depends on the specific circumstances of the processing activities.

If you wish to contact Brødrene Hartmann A/S regarding our processing of your personal data, please do not hesitate to contact us via the contact details above.

This privacy policy was last updated: February 21 2019 (version 1.0)