

## SECURITY AND DATA PROTECTION POLICY

### 1. Introduction

ACRO Securities hf. (hereinafter "*the Company*"), ID no. 451294-2029, Skólavörðustígur 25, 101 Reykjavík, focuses on ensuring the reliability, confidentiality and security of personal data that is processed within the Company. A clear data protection policy, founded on honesty and transparency, enhances respect and trust for the Company. It is the Company's objective to ensure it enjoys trust when it comes to personal data protection.

The Company undertakes to handle personal information on its customers, employees and others in accordance with the Act on Data Protection and the Processing of Personal Data.

This Data Protection Policy is part of the Company's commitment to ensuring the security of personal information about customers, employees and others and is intended to inform them about what personal data the Company collects, how it uses such data, and who can access it.

### 2. Collection, handling and storage of personal data

The Company processes various types of personal data about its customers, employees and others, but processing refers to any kind of handling such as collection, registration, classification, storage, use and more. The main types of personal data that the Company works with are financial information as well as general demographic data. No personal data is processed without having legal authorisation which can, for example, be based on a client's consent, a contract, legal provisions or legitimate interests. Moreover, the Company does not process any personal data without having a necessary purpose, since the primary purpose of processing personal data is to provide customers with the services that are requested or which the Company offers.

The Company is legally obliged to store various types of personal identifiable data, such as on account of the provisions of the Act on Anti-Money Laundering, the provisions of the Accounting Act and disclosure obligations to supervisory authorities or other public bodies.

If the Company intends to process personal data for any other purpose than it was originally intended for, as stated above, the person concerned shall be informed, as appropriate, of this new purpose before such processing begins.

Information is stored in accordance with the law and for no longer than is necessary.

The Company's policy is to store and process as little personally identifiable information as possible to be able to provide the requested service at all times.

### 3. Dissemination to third parties

The Company will not, under any circumstances, sell or rent any personal or financial information to a third party.

The Company may pass on the personal information of customers, employees or others to third parties, such as in connection with their contractual relationship with the Company. The Company only hands over to third parties the personal information deemed necessary for the Company's operations, and a processing agreement is then concluded with that party. Under such

an agreement, conditions are set for the security and handling of data, and the third party is also bound by an obligation of confidentiality.

#### **4. Security of personal data**

The Company attaches the utmost importance to the security of the personal data of its customers, staff and others. The Company also strives to take appropriate technical and regulatory measures for the protection of personal data, with particular regard to their nature. These measures are designed to protect personal data from being accidentally lost or altered, and from unauthorised access, copying, use or dissemination. Examples of security measures taken by the Company include access controls in the Company's IT systems. The Company will also, if needed, evaluate the risk involved in processing certain types of personal data using risk assessment protocols, if the nature of the information requires it.

#### **5. Customers' rights regarding the personal data processed by the Company**

Individuals have the right to request access to their personal data and, under certain circumstances, to have it corrected, deleted or restricted in their processing. They also have the right to object to the processing and request that their data be transferred. A person also has the right to submit a complaint to the Data Protection Authority.

#### **6. Review**

The Company may amend this privacy policy in accordance with amendments in relevant laws or regulations, or due to changes in the Company's processing of personal data. The changes will take effect after publication on the Company's website: <http://www.acro.is>

#### **7. Legal obligations**

Notwithstanding the above, the Company reserves the right to deliver information to a third party in the following cases:

- The Company is required to by law.
- The Company is acquired by or merges with another company, but then only in accordance with the provisions of this data protection policy (so that the new company operates comparable services with the same terms).

#### **8. Questions**

If questions arise regarding this policy, please contact us at +354 532 8000 or send an e-mail to [acro@acro.is](mailto:acro@acro.is).

Approved by the Board of Directors of ACRO Securities hf. on 6 July 2023.

Revised and approved by the Board of Directors of Acro Securities hf. on 26 September 2024.

