

# Privacy notice

This privacy notice ("Notice") states:

- European Directories Group's contact details
- what are the purposes and the basis for the processing of personal data
- What are the rights of the data subjects
- What are the other purposes for use for personal data collected by European Directories Group
- How European Directories Group carries out the information security of its services
- How European Directories Group possibly discloses data
- Whether European Directories Group transfers data outside of the EU/EEA
- How European Directories Group may modify this Notice

The Notice also describes the principles and practices on how personal data is processed in European Directories Group, including European Directories Midco S.à r.l. as the parent company of the European Directories Group and European Directories BondCo S.C.A. as the Issuer of the Senior Secured Callable Floating Rate Bonds 2013/2018, ISIN: SE0005505831. Each group company is responsible for processing personal data in its own business according to the purposes and legal bases of this privacy statement. Each European Directories Group company has the right to disclose and utilize for the same purpose collected necessary personal information by other group companies, such as financial and other management, services, customer relations and business analysis and development.

Depending on the section, this Notice may apply to individuals, companies, or both.

European Directories Group complies with the data protection legislation in force for all processing of personal data, such as the European Union's General Data Protection Regulation (EU) 2016/679 and the act of 1 August 2018 on the organisation of the National Data Protection Commission and the general data protection framework ("Data protection legislation").

## Controller's details

European Directories Midco S.à r.l. (RCS B155418) and companies belonging to the same group  
Address: 46A, Avenue J.F. Kennedy, L-1855 Luxembourg

### Contact details:

European Directories Group  
46A, Avenue J.F. Kennedy, L-1855 Luxembourg  
[ir@europeandirectories.com](mailto:ir@europeandirectories.com)

# The purpose and basis for processing personal data

The personal data collected by European Directories Group, the purpose of processing of personal data, the legal grounds for processing and the disclosure of data are described register specific below.

## Subscriber database

European Directories Group's Subscriber Database contains personal data of those individuals who subscribe for press releases, interim reports and/or annual reports from European Directories Group's website ([www.europeandirectories.com/investors](http://www.europeandirectories.com/investors)). The basic information contained in the register are the subscriber's contact information, i.e. the name, company name and e-mail address.

If the subscriber wishes to remove his / her information from the service she/he can opt-out from the service by clicking the opt-out button included in the emails received from the service.

### **Purpose of the processing of personal data**

The processing of subscriber data is based on the data subject's consent and the information is used to establish and provide the service.

### **Legal basis for processing of personal data**

Processing of personal data contained in the subscriber database is based on the consent of the data subject. The consent can be withdrawn at any time.

### **Regulatory data sources**

European Directories Group receives subscriber data directly from the data subjects.

### **The recipients of the personal data**

European Directories Group does not disclose the data to third parties.

### **Retention period for personal data**

The personal data is included in the data base as long as the consent is valid and is deleted when the data subject opts-out from the service.

# Rights of the data subjects

The data subject can contact European Directories Group with questions concerning the usage of their rights or the processing of personal data.

European Directories Group  
46A, Avenue J.F. Kennedy, L-1855 Luxembourg  
[ir@europeandirectories.com](mailto:ir@europeandirectories.com)

To be able to fulfill some rights of the data subject (the right to access the data and request to delete the data) European Directories Group as the data controller, has to be able to identify and verify the identity of the data subject in accordance with the GDPR. The data subject shall provide European Directories Group with a copy of an ID (passport, driving license or identity card) together with the request to fulfill the rights of the data subject.

## **Right to inspection**

The data subject is entitled to know if data concerning him/her are being processed. If data concerning them are being processed, they also have the right to ask for a copy of the data being processed by European Directories Group.

The written request must be signed and addressed to:

European Directories Group  
46A, Avenue J.F. Kennedy, L-1855 Luxembourg  
or via email to: [ir@europeandirectories.com](mailto:ir@europeandirectories.com)

The content of the request (subscriber database):

- Name
- Email address
- Copy of an ID (passport, driving license or identity card)
- In which format do you want the data (by mail or digital)

Inquiries concerning the data being processed can also be presented in person at the address given above. European Directories Group will reply within 30 days from the day we received all the necessary information regarding the inquiry.

Inquiries concerning the data being processed are free of charge. If the data subject requests more than one copy of the data or presents a new request within six (6) months of the last inquiry, European Directories Group can charge a moderate fee based on the administrative expenses.

## **Right to correction**

The data subject is entitled to request the rectification of incorrect data.

## **Right to erase data**

The data subject has the right to request the erasure of data in situations, where data are no longer needed for the purposes they were originally collected for or the data are being processed in an unlawful manner.

### **Right to withdraw consent**

If the processing of data is based on consent, the data subject has the right to withdraw his/her consent. The processing of data is based on consent in European Directories Group's services and can be withdrawn by using the opt-out mechanism included in the emails received from the service.

### **Right to limit the processing of data**

The data subject has the right to limit the processing of data concerning him/her if:

- the data subject claims that the data being processed is incorrect
- the data are being processed in an unlawful manner and the data subject requests the limitation of the processing instead of the erasure of data
- the controller no longer needs the data for the purposes they were originally collected for, but the data subject needs the data to compose a legal claim or to present a legal claim or to defend against one.

### **Right to transfer data**

If European Directories Group is processing data by automated means based on consent or contract, the data subject has the right to request the transfer of data in accordance with the applicable data protection legislation.

### **Automated decisions and profiling**

The data subject has the right not to be subject to a decision that is based on automated processing, such as profiling, and which would have legal consequences for the data subject or otherwise affects the data subject in a similar meaningful manner.

European Directories Group does not use profiling as a part of its services.

### **Right to file a complaint to the supervisory authority**

Under the Ministry of Justice, the Data Protection Ombudsman acts as the national supervisory authority. The data subject has the right to file a complaint to the Data Protection Ombudsman if he/she perceives that the Data protection legislation is being breached during the processing of data concerning him/her.

## **Cookies**

More information about the cookies used by European Directories Group and its partners can be found in the "Learn more" link included on the [www.europeandirectories.com](http://www.europeandirectories.com) website.

# Information security

European Directories Group attends to its service's information security by using procedures that are in appropriate relation to the severity, technical sophistication and expenses of the perceived threats. Separately appointed individuals are responsible for both data protection and information security. European Directories Group's internal information security and data protection are achieved by, for example, applying proactive risk assessment practices when developing products and services as well as by training employees on issues concerning information security and data protection. Additionally, European Directories Group works constantly to maintain a default level of data protection and to implement built-in data protection in its business practices.

European Directories Group is constantly training its employees on matters of information security and its employees are bound by strict guidelines, which state that all data must be processed in accordance with the Data protection regulations.

## Disclosure of Data

European Directories Group disclose register specific data as described.

### **Disclosure of Data to group companies**

Each group company is responsible for processing personal data in its own business according to the purposes and legal bases of this privacy statement. Each European Directories Group company has the right to disclose and utilize for the same purpose collected necessary personal information by other group companies, such as financial and other management, services, customer relations and business analysis and development.

### **Disclosure of Data to subcontractors**

European Directories Group has the right to use subcontractors to provide its services, which include, for example, providers of ICT services. In this case, personal data may be transferred to subcontractors to the extent necessary for enabling the services. These subcontractors handle personal data for and on behalf of the data controller, in accordance with the instructions of the controller and this privacy statement.

If European Directories Group discloses data to a subcontractor, who is the processor of said data, European Directories Group will always enter into a Data Processing Agreement with the subcontractor to maintain control over the data and to ensure that the processor is processing the data in accordance with the applicable data protection regulation and in a secure manner.

## Processing of data outside of the EU/EEA

Personal data is not regularly transferred outside the EU or the EEA. However, if the transfer of data is necessary, e.g. to the United States, European Directories Group ensures that the EU Commission has approved the destination country to have adequate level of data protection or agrees to use the EU standard contractual clauses or Privacy Shield to the transfers.

## Changes to this notice

This privacy notice replaces all the previous versions. European Directories Group will update this notice as its operations and services develop. The updates can also be based on the changes in the applicable legislation. The updates can be seen on European Directories Group's website, where the latest Privacy notice will always be displayed. European Directories Group may also, if it finds it appropriate, notify the data subject of the changes in the Privacy notice via electronic notification.

Last update: 11.3.2019