AveNOR Equity Partners

Privacy Policy

AveNOR Equity Partners ApS

Last updated: 11 June 2026

1. INTRODUCTION

AveNOR Equity Partners ApS ("AveNOR", "we", "our" or "us") is committed to protecting personal data and respecting your privacy. This Privacy Policy explains how we collect, use, store, disclose and protect personal data when you interact with us, including via our website, in connection with investor relations, fund activities or other professional interactions.

AveNOR operates as a fund of funds, investing in venture, growth and buyout funds, and conducts related investment, investor-relations and advisory activities in connection with its fund management business. AveNOR is a registered alternative investment fund manager (AIFM) under Danish law.

This Privacy Policy is prepared in accordance with the EU General Data Protection Regulation (EU) 2016/679 ("GDPR") and applicable Danish data protection legislation.

2. DATA CONTROLLER

AveNOR Equity Partners ApS is the data controller responsible for the processing of personal data.

Company details
AveNOR Equity Partners ApS
Nybrogade 12
1203 Copenhagen K
Denmark
CVR: 46565541
Email: info@avenorep.dk

3. SCOPE AND CATEGORIES OF PERSONAL DATA

3.1 Categories of data subjects

We process personal data relating primarily to:

- Investors and potential investors
- Representatives of underlying fund managers (general partners and management teams)
- Co-investors and professional counterparties
- Business partners, advisors and service providers
- Visitors to our website

3.2 Categories of personal data

Depending on the nature of the interaction, we may process:

- Identification and contact details (e.g. name, job title, company, email, phone number)
- Professional and organisational information
- Information provided during investment discussions, due diligence or monitoring activities
- Communications and correspondence
- Technical data collected via our website (e.g. IP address, browser type, strictly necessary cookies, see section 8)
- Information required for compliance with anti-money laundering and counter-terrorist financing legislation, including identification data, ownership and control information and related documentation

3.3 Personal data obtained from third parties

In certain circumstances, AveNOR may collect personal data from third parties rather than directly from the data subject. This may include information obtained from underlying fund managers, co-investors, professional advisors, public registers, or third-party service providers engaged for compliance, screening or due diligence purposes.

Where personal data is obtained from third parties, AveNOR will ensure that such processing is carried out in accordance with applicable data protection legislation and that the data subject is provided with the required information under Articles 13 and 14 GDPR, unless an exemption applies.

4. Purposes and legal basis for processing

We process personal data for the following purposes and legal bases:

Purpose	Legal basis
Professional dialogue and response to enquiries	Legitimate interests (Art. 6(1)(f))
Investor relations and evaluation of potential investments	Legitimate interests (Art. 6(1)(f))

Evaluation, execution and monitoring of investments in underlying venture, growth and buyout funds	Legitimate interests (Art. 6(1)(f))
Performance of contractual obligations	Contract (Art. 6(1)(b))
Compliance with legal and regulatory obligations, including obligations under Danish and EU anti-money laundering and counter-terrorist financing legislation, which may require the collection, verification and retention of investor information and documentation	Legal obligation (Art. 6(1)(c))
Website functionality and security	Legitimate interests (Art. 6(1)(f))

Where processing is based on consent, consent may be withdrawn at any time.

Such processing does not involve the collection of special categories of personal data as defined in Article 9 GDPR.

Any processing potentially relating to personal data covered by Article 10 GDPR is carried out only to a very limited and indirect extent, where required to comply with applicable anti-money laundering legislation, and typically through third-party service providers.

5. DISCLOSURE AND RECIPIENTS

We may disclose personal data to:

- Underlying fund managers and related entities, where relevant for investment, monitoring or regulatory purposes
- External professional advisors (legal, tax, audit, compliance)
- IT, hosting and software providers
- Service providers supporting communication, website operation and data storage
- Public authorities, where disclosure is required by law

All processors act under appropriate data processing agreements and confidentiality obligations.

6. TRANSFERS TO THIRD COUNTRIES

Where personal data is transferred outside the EU/EEA, such transfers are carried out in accordance with GDPR Chapter V and subject to appropriate safeguards, including EU standard contractual clauses where required.

7. DATA RETENTION

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, including compliance with legal, regulatory, accounting or reporting obligations.

Retention periods are assessed on a case-by-case basis depending on the nature of the data, the relationship and applicable legal requirements.

8. COOKIES AND WEBSITE USE

Our website only uses cookies that are strictly necessary to ensure basic website functionality, security and technical operation.

We do not use cookies for analytics, tracking, marketing or similar purposes, and we do not place any non-essential cookies on users' devices. For this reason, user consent is not required and no cookie banner is displayed.

The essential cookies used on the website do not enable identification of individual users and are deleted in accordance with applicable technical requirements.

9. YOUR RIGHTS

You have the following rights under the GDPR:

- The right of access to your personal data
- The right to rectification of inaccurate or incomplete personal data
- The right to erasure of personal data, subject to applicable legal limitations
- The right to restriction of processing
- The right to data portability
- The right to object to processing based on legitimate interests
- The right to withdraw consent at any time, where processing is based on consent

Requests may be sent to: privacy@avenorep.dk

If you believe that AveNOR's processing of your personal data does not comply with applicable data protection legislation, you have the right to lodge a complaint with the Danish Data Protection Agency (Datatilsynet).

The Danish Data Protection Agency can be contacted at:

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby
Denmark
Website: www.datatilsynet.dk

Email: dt@datatilsynet.dk

We would, however, appreciate the opportunity to address your concerns directly before a complaint is submitted and encourage you to contact us in the first instance.

10. DATA PROTECTION OFFICER (DPO)

AveNOR Equity Partners ApS is not required to appoint a Data Protection Officer pursuant to Article 37 GDPR, as the company's processing activities do not involve regular and systematic monitoring of data subjects on a large scale nor large-scale processing of special categories of personal data.

11. SECURITY

We implement appropriate technical and organisational measures to safeguard personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

12. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be updated from time to time to reflect changes in processing activities or applicable law. The most recent version will always be available on our website.