

# Privacy Policy

*Version 5*

*Adopted December 30, 2025 by the CEO*



## PRIVACY POLICY

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Your privacy matters to us at Lyra. That is why we have established a Privacy Policy describing how we collect, process, and store your personal data. The Privacy Policy also states your rights and how you can exercise them.

If you have any questions regarding personal data, data protection, or privacy, please enquire using the details listed below.

### 1. ABOUT LYRA

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Lyra is an independent financial advisor registered in Sweden and authorised by the Swedish Financial Supervisory Authority (Finansinspektionen) to receive and transmit orders of one or multiple financial instruments, manage portfolios, and provide investment advice to clients.

Lyra provides independent investment advice to our clients. Through this Privacy Policy, we commit to respect and to protect your personal data and your privacy in accordance with applicable regulations, industry standards, and other relevant norms.

### 2. ABOUT OUR PROCESSING OF PERSONAL DATA

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#### a. WHAT IS PERSONAL DATA?

Personal data is information attributable to you as an individual. Personal data therefore includes things such as your name, address, email address, account and custody details, etc.

The personal data we process are your name, personal identity number, email address, account and custody number, address, telephone number, family relations, foreign tax number, ID, and other personal data you have chosen to share. For legal entities, we process information about representatives and owners of companies, contact persons and e-mail addresses.

#### b. WHAT IS PROCESSING OF PERSONAL DATA?

In this Privacy Policy, we use the term "processing of personal data" to mean everything we do with your personal data, such as collecting the information, registering it in our systems, analysing and verifying it, placing orders, transferring it to a bank, etc.

#### c. WHO ARE THE PERSONS CONCERNED?

Lyra processes personal data of customers and potential customers. Lyra also processes personal data of contact persons to suppliers.

#### d. HOW DO WE COLLECT PERSONAL DATA?

In essence, we collect data from you directly. We also verify that certain information is correct by checking it against public records.

#### e. WHY DO WE PROCESS PERSONAL DATA?

The main reason we process personal data about you is to perform asset management services and to establish your financial business plan.

For the performance of asset management services, Lyra is required by law to collect, analyse, process, and store personal data. As a result, the Client is obliged under their agreement with Lyra, and in connection with the conclusion of that agreement, to provide Lyra with personal data such as name, address, social security number and account details before the Company undertakes to carry out assignments on behalf of the Client. The Client is also obliged to provide accurate information about their knowledge of, and experience in, an investment area, financial situation, investment objective, and any other relevant information requested by Lyra, inter alia to fulfil the requirements of Act (2017:630) on measures against money laundering and terrorist financing. This information needs to be updated and analysed regularly for the Company to continuously perform asset management services. The information must be archived in accordance with legal provisions. We keep information on executed orders. For the preparation of the financial life plan, we collect information, which we process before preparing and presenting the plan to the Client.

We summarise the processing operations we carry out in the appendix to this Privacy Policy. You can obtain the appendix by contacting us at the address below.

#### **f. WHY IS THE PROCESSING NECESSARY?**

We have identified a legal basis for all the processing operations we carry out. We process personal data in the following cases:

- > Consent - where you have consented to the processing (consent can always be withdrawn).
- > Contract - to fulfil a contract you have entered with us.
- > Legal obligation - The Securities Market Act, the Accounting Act, and the Money Laundering Act require us to process personal data in certain cases. In these cases, we process personal data where there are legal requirements to do so.
- > Balancing of interests - In some situations, we have balanced the interests of processing personal data when we have assessed that our interest in processing the personal data goes against your integrity. For example, we use this basis before you become a client with us as when receiving your contact details for the first contact.

In the appendix to this Privacy Policy, we summarise the legal basis we have for each processing operation. This can be obtained upon request.

#### **g. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?**

At Lyra, we are restrictive about sharing your personal data with external parties.

In the following cases, we will share your information with external parties: Information to your custodian or bank when executing an order. We may also share information with any other advisers you have engaged yourself. However, we only share information when it is deemed necessary to do so, and any external party will only access the minimum information required in each instance.

To achieve efficient management, we have outsourced certain parts of our operations to external suppliers, who have access to some, but not all, of your personal data. Suppliers are mainly in IT and accounting. All suppliers have signed confidentiality agreements and have received guidelines on how to process personal data.

We seek not to distribute personal data outside the EU, but in cases where the Client has foreign contacts, personal data may be distributed to the extent necessary to fulfil the agreement between you and Lyra. Personal data may therefore also be distributed outside the EU.

### 3. HOW LONG DO WE KEEP PERSONAL DATA?

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The length of time we keep personal data varies across different processing operations. We never retain personal data longer than necessary for each processing procedure. In the majority of cases, the retention period is based on statutory retention periods such as the Securities Market Act (5 years), the Accounting Act (7 years), the Money Laundering Act (5 years), and the general limitation period (10 years). We present the retention periods we apply in the appendix, which can be obtained upon request.

### 4. SECURITY

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As part of our commitment to ensuring that information about you is not disclosed to unauthorised persons, we continuously carry out security-related work. We have adopted technical and organisational security measures to protect your personal data against, among other things, loss and unauthorised access.

We have also appointed a Data Protection Officer, whose tasks include monitoring compliance with the General Data Protection Regulation and acting as a contact person for the data protection authority.

### 5. YOUR RIGHTS

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The processing of personal data must always comply with the applicable law. The relevant law with respect to personal data is the General Data Protection Regulation (GDPR), a European regulation that applies throughout the EU. The GDPR gives you the following rights:

**Right to information:** You have the right to be informed when your personal data is processed. You will receive this information at the point of collection and at request. We provide this information free of charge upon request.

**Right to rectification:** We want the information we hold about you to be accurate. If any information has become inaccurate, you have the right to have any incomplete and/or incorrect information corrected.

**Right to deletion:** This right is not absolute, but has exceptions, such as cases in which our processing operations are required by law. The right to deletion is therefore limited. In the following cases, you have the right to have information about you erased:

- > Personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- > If you withdraw consent of collection or processing that is based solely on that consent.
- > If our basis for processing is the result of a balance of interests and you object to this processing with your reasons outweighing ours for processing.
- > If we are processing personal data in an unlawful manner.
- > If we are required by law or regulation to delete personal data.

**Right to restriction of processing:** In certain cases, you have the right to request that the processing of your personal data be restricted so that it is only processed for certain limited purposes in the future.

**Right to object:** You have the right to object to our processing of your personal data. For example, you can always object to your personal data being used for direct marketing. In the event of such an objection, we have no right to send you direct marketing.

Right to data portability: You have the right to ask us to provide the information we hold about you in a structured, machine-readable format and to have this information transferred to another controller. For this to be possible, the processing must be either consent-based, contract-based, or automated.

All the rights mentioned above have exceptions, and we can tell you more about these upon your request.

## 6. CONTACT DETAILS

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Lyra is responsible for the processing we carry out, i.e. we are the data controller and are therefore responsible for complying with the Data Protection Regulation.

Should you have any questions about our work with your personal data, or if you want to receive information about what personal data we process about you, have personal data corrected or deleted, we ask you in the first instance to contact us at [info@lyrafw.com](mailto:info@lyrafw.com). We also ask you to use this email address for any complaints. You can also contact our Data Protection Officer. We have outsourced this service to Advokat Helene Holm at Advokatfirma Helene Holm AB. Helene can be contacted at [Helene@advokatholm.se](mailto:Helene@advokatholm.se).

If you believe that we have processed your personal data in violation of the Data Protection Regulation, you can contact the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten) the contact details of which are available at [www.imy.se](http://www.imy.se).