

SHAREHOLDER PRIVACY NOTICE

1. Introduction
 - 1.1 As part of handling investor relations, Vitrolife AB (“Vitrolife Group”) will be processing personal data about its shareholders, proxies and advisors. This privacy notice sets out how and why we process personal data in connection with administration of our relationship with our shareholders, proxies and advisors, including registration in the register of shareholders and when providing notice of and holding general meetings.
 - 1.2 Vitrolife Group (also referred to as “we”, “our” in this privacy policy) is the data controller for the processing activities set out in this privacy notice.
2. How and why we collect personal data
 - 2.1 Below, it is listed what type of personal data we collect about our shareholders, proxies and advisors and for which purposes we use the personal data.

Purpose	Personal data processing activity	Legal basis
Identifying shareholders and maintaining our register of shareholders	In order to identify shareholders and maintain the register of shareholders, we will be collecting information about each shareholder, including name, address, e-mail address, dates of acquisition/sales, shareholding, voting rights, and pledges. Additionally, we may occasionally carry out shareholder identification exercises involving selected third-party service providers to identify shareholders keeping their shares through nominee and/or custodian structures.	We process the personal data to comply with our legal obligations and shareholder’s rights set out in the Swedish Companies Act. Shareholder identification exercises will be based on our legitimate interests in being able to identify our shareholders. For shareholders registered by name in our shareholder register, we keep the personal data as long as you are a shareholder and for a period of 3 years after becoming aware that you are no longer a shareholder. We will keep the personal data collected via the shareholder identification exercise for as long as you are a shareholder and for a period of 12 months

		after becoming aware that you are no longer a shareholder.
Notice of general meetings	<p>Notice of a general meeting in Vitrolife Group will be distributed based on the information registered in the register of shareholders, including name, address and email address.</p> <p>We will in this respect process personal data for the purpose of forwarding the notice of the general meeting to shareholders having requested to receive a copy of the notice, including to enable the shareholders to exercise their administrative rights at the general meeting.</p>	We process the personal data to comply with our legal obligation set out in the Swedish Companies Act.
Notification of participation, granting proxy and voting by correspondence	<p>When a shareholder provides notification of the shareholder's or an advisor's participation at the general meeting or grant a proxy to a third party, we will issue an admission card (potentially with voting cards), which will contain personal data about the shareholder, any proxy holder and/or advisor representing the shareholder, including name, address, email address and shareholding.</p> <p>Notification of the shareholder's participation implies that we will process personal data based on the information registered about the shareholder in the register of shareholders or provided in connection with the notification of participation. Processing</p>	We process the personal data to comply with our legal obligations and shareholder's rights as set out in the Swedish Companies Act.

	<p>of the personal data also takes place in connection with granting proxy to a third party, proxy to the board of directors or voting by correspondence.</p> <p>Similarly, processing of the personal data will take place in order to manage the voting process, if the shareholder vote at the general meeting (in writing or electronically), including to provide confirmation of an electronic vote.</p> <p>If the shareholder grant proxy to a third party and/or register attendance of an advisor, we will collect and process personal data about such persons (name and address).</p> <p>Collecting and processing data takes place for the purpose of ensuring that the relevant persons are granted access to Vitrolife Group's general meeting and ensuring that they can exercise their rights.</p>	
Submitting questions prior to the general meeting	<p>When submitting written questions prior to the general meeting, shareholders must document status as a shareholder or a proxy holder and in this respect collection and processing of the personal data will take place.</p> <p>If questions are replied to in writing, the questions, including the shareholder's name, and our replies will be made available upon request and may be presented at the general meeting.</p>	Collection and processing of personal data will in such event be based on our legitimate interests in being able to identify the shareholder, in order for the shareholder to be able to exercise its rights as a shareholder to submit questions.
The right to speak and pose questions at the general meeting	In connection with a request for a specific issue to be included on	In this respect, the personal data will be collected and processed

	<p>the agenda for the general meeting, the personal data and the contents of the proposal will be collected and processed by Vitrolife Group.</p> <p>If a shareholder chooses to speak at the general meeting, e.g. in order to pose questions to the board of directors' report or the annual report, the shareholder will be requested to document status as a shareholder, a proxy holder or an advisor.</p> <p>The statement and name will be included in the minutes of the general meeting.</p>	<p>based on our legitimate interests in being able to identify the shareholder in order for the shareholder to exercise its right to speak and potentially pose questions at the general meeting.</p>
<p>Minutes of meeting from the general meeting</p>	<p>After the general meeting, Vitrolife Group will prepare minutes of the general meeting, and therefore personal data may, in addition to the initial collection and processing of personal data, e.g. when submitting proposals or exercising the right to speak at the general meeting, be processed in this respect.</p>	<p>The minutes are required to be prepared pursuant to the Swedish Companies Act, and the processing of shareholders' personal data thus takes place in order for us to comply with our legal obligation.</p> <p>When submitting a proposal to be included on the agenda or when making statements at the general meeting, it is not possible to refuse to have the name of the shareholders, proxy holders or advisors, as applicable, stated in the minutes.</p> <p>The minutes will be available to shareholders and to the general public during this period.</p> <p>We may store the minutes of the general meeting until it is no longer necessary for Vitrolife Group to store the information for the purpose of protecting Vitrolife Group's and the shareholders' interests, including for</p>

		the purpose of documenting the deliberations and resolutions passed at the general meeting.
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3. Third parties with whom we share personal data

3.1 We may share the personal data about shareholders, proxies and advisors with relevant employees of Vitrolife Group and with relevant third-party advisors and service providers. We may also share the personal data with public authorities, Nasdaq Sweden as well as the general public through publication on our website in accordance with applicable law. Some of these parties may be located in countries outside of the EU/EEA. Please be informed that the level of data protection as currently applied and enforced in some countries outside the European Union does not conform to the level of data protection for personal data currently applied and enforced within the European Union. If personal data is being processed outside of the EU/EEA, such transfer of personal data will be subject to appropriate security measures such as European Commission's standard contractual clauses or measures subsequent to this level of security. You can request a copy of the agreement covering the transfer of personal data by sending an e-mail to dataprotection@vitrolife.com.

4. How long will we store the personal data

4.1 We will only store the personal data for as long as it is necessary to fulfill the purposes outlined in this privacy notice. With respect to information about shareholders, proxies and advisors, unless stated otherwise above, we will generally be keeping the personal data for 5 years after the end of the financial year in which the shareholder no longer owns shares in Vitrolife Group.

5. Your rights as a data subject

Right to information	You can obtain further information on the personal data which we store and process about you by sending an e-mail to dataprotection@vitrolife.com stating this request.
Right to object	You may object to your personal data being processed. If you wish to object to your personal data being processed, please send an e-mail to dataprotection@vitrolife.com stating this request.
Right to rectification and restriction of processing	You may request that your personal data is rectified or restrict the processing of your personal data. If you

	wish to have your data rectified or restrict the processing, please send an e-mail to dataprotection@vitrolife.com stating this request.
Right to a copy of your personal data	You may be entitled to obtain a copy of your personal data in a structured, commonly used and machine-readable format by sending an e-mail to dataprotection@vitrolife.com stating this request. If technically feasible, you may request that the personal data is transmitted directly to another company or person acting as a data controller.
Right to make a complaint	If you have any complaints about our processing of your personal data, you may contact the Swedish Data Protection Agency (<i>Sw. Integritetsskyddsmyndigheten</i>).

6. Changes to this privacy notice

6.1 We may change this privacy notice from time to time by issuing a new version on our website.

7. Contact us

If you wish to exercise one of your rights, please send an email to: dataprotection@vitrolife.com or a letter to:

Vitrolife Sweden AB
Group Legal
Gustaf Werners Gata, 421 32 GÖTEBORG, Sweden

We kindly inform you that Vitrolife Group may not always be obliged to comply with a request of deletion, restriction, objection or data portability. Assessment may be made on a case by case basis of our legal obligations and the exception to such rights.

Please note that we may require proof of your identity and full details of your request before processing it. The data will only be used to verify your identity and will not be stored for longer than needed for this purpose.

We will reply without delay, in accordance with the applicable regulations.

Appendix 1 List of data processors

Name of the processor	Contact information	Purpose of the data processing
Euroclear Sweden AB	Email:customer.relations@euroclear.com Phone: +468-402 90 00 Address: Klarabergsviadukten 63	Manage shareholder register
Modular Finance AB	info@modularfinance.se Döbelnsgatan24 SE-113 52 Stockholm	IRM Management