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TABLE OF CONTENT

PRIVACY STATEMENT	3
1. PURPOSE AND SCOPE OF THE STATEMENT	3
2. APPLICATION OF THIS STATEMENT	3
3. THE PERSONAL DATA WE PROCESS.....	5
4. WEBSITES AND COOKIES	7
5. HOW AND WHY WE PROCESS YOUR PERSONAL DATA	7
6. DISCLOSURE OF YOUR PERSONAL DATA.....	10
7. TRANSFER OF YOUR PERSONAL DATA	10
8. RETENTION OF YOUR PERSONAL DATA.....	11
9. SECURITY OF YOUR PERSONAL DATA.....	11
10. YOUR RIGHTS AND HOW TO EXERCISE THEM	12
11. APPLICANTS	14
11.1 THE PERSONAL DATA WE PROCESS.....	14
11.2 HOW AND WHY WE PROCESS YOUR PERSONAL DATA	16
11.3 DISCLOSURE OF YOUR PERSONAL DATA	17
11.4 RETENTION OF YOUR PERSONAL DATA	17
12. CHANGES TO THIS STATEMENT	18
13. QUESTIONS AND REQUESTS	18

PRIVACY STATEMENT

1. PURPOSE AND SCOPE OF THE STATEMENT

Euronext Securities Copenhagen (“**VP**”, “**ES-CPH**”, “**we**”, “**us**”) is strongly committed to protecting your personal data and upholding your right to privacy. This Privacy Statement describes how we collect and process your personal data and provides an overview of your rights in relation to your personal data. It applies to information which you may provide directly to us or via third parties.

Euronext Securities Copenhagen is part of the Euronext Group (“**Euronext**”) which consists of Euronext N.V, a Dutch holding company, located at Beursplein 5, 1012 JW, Amsterdam, the Netherlands, and its affiliated companies.

2. APPLICATION OF THIS STATEMENT

Euronext Securities Copenhagen holds a licence to operate as a central securities depository. As a central securities depository, we keep records of holders of the securities (for instance shares, bonds and investment fund units) issued by us, and we settle (i.e. transfer from one securities account to another) securities transactions.

Euronext Securities Copenhagen may assume different privacy roles depending on the activity.

Euronext Securities Copenhagen as a Data Controller

Euronext Securities Copenhagen is the data controller for the personal data that we receive in our capacity as a central securities depository and some of our ancillary services and as a company with many business partners.

Euronext Securities Copenhagen is the data controller for personal data collected through our website, including when you browse, communicate with us, or engage with our services. As the Data Controller, Euronext Securities Copenhagen determines the purposes and means of processing such personal data in accordance with applicable data protection laws, including the General Data Protection Regulation (“**GDPR**”) and the Danish Data Protection Act.

Euronext Securities Copenhagen as a Data Processor

In some cases, Euronext Securities Copenhagen may act as a Data Processor. This occurs when we process personal data on behalf of our customers or partners in accordance with contractual agreements. In these situations, the customer or partner is the Data Controller, meaning they determine the purposes and means of processing the data. Euronext Securities

Copenhagen processes the data strictly in accordance with their instructions and the applicable data processing agreements signed between the parties.

This Privacy Statement applies to the way we collect and process your personal data. Personal data will be collected and processed by us when you or a company with which you are connected engage with us and/or avail of our services, e.g.:

- via our websites or other selected domains, including any linked pages owned and operated by Euronext or any successors thereof, or any application made available by Euronext for use on a tablet, mobile phone or other mobile device (individually and collectively, the "**Euronext websites**"),
- in the framework of the execution of a contract with a company with which you are connected (e.g. when we have a contract with your employer and the latter provides us your contact data in the execution of that agreement)
- by participating to one of our events

We will collect personal data:

- **from you**: for example through Euronext websites, when you avail of our products and services, from your securities market activity via your chosen financial institute when you attend one of our events or an event hosted at our premises, when you correspond with us, and
- **from third party sources** such as but not limited to Euronext Securities Copenhagen vendors, Euronext Securities Copenhagen providers, and/or from publicly available resources (e.g. registration offices, newspapers and other publications).

If you provide personal data directly to us or via third parties, in the following cases, please refer directly to section 11 that provides the information relating to these specific cases ("**Applicant(s)**"):

- You participate in a Euronext Securities Copenhagen recruitment initiative.
- You voluntarily submit your resume to a representative of Euronext Securities Copenhagen on an ad hoc basis.
- You apply for an advertised job.
- A recruiter provides your resume or details to Euronext Securities Copenhagen
- Euronext Securities Copenhagen finds your CV / details in online searches e.g. LinkedIn.
- You are referred to an open position by an employee as part of the Euronext Referral Program.

This Statement applies to any and all job applications submitted and recruitment initiatives coordinated by Euronext Securities Copenhagen.

IMPORTANT: should you send your resume via a recruiter with whom you have engaged with, we encourage you to read the relevant recruiter's data protection Statement to understand how your Personal Data is processed by such a recruiter who is a controller of your Personal Data independently of Euronext's concerned entity.

3. THE PERSONAL DATA WE PROCESS

Personal data is information or assessments that can be linked to you as a person. The personal data we may process, which we may collect either directly from you or a company with which you are connected or from a third party, may include some or all of the following depending on the nature of the processing activity.

We do not process sensitive personal data such as health details.

DEVICE INFORMATION	We collect information about your computer/device browser via cookies used on Euronext websites. You can read more about our use of cookies in Section 4.
CONTACT AND COMPANY INFORMATION	Information that enables us to have a dialogue with you, such as your address, phone number, and email address.
IDENTITY INFORMATION	Information about your identity, such as name, social security number, citizenship. Proof of identity documentation, for example passport or driver's licence, including photo.

AML INFORMATION	<p>In certain cases, Euronext Securities Copenhagen processes personal data about individuals, who are related to existing or prospective customers to comply with current anti-money laundering legislation. This may include your position as a director, officer or beneficial owner of a company, copy documentation confirming your identity (such as your passport or identity card) and copy documentation showing proof of your address and information collected through AML software and screening tools. We may process publicly available sensitive personal data, for example about politically exposed persons.</p>
INFORMATION COLLECTED IN CONNECTION WITH LISTING ON AN EURONEXT MARKET	<p>This may include information about the issuer of the financial instruments, the board of directors, the management and the shareholders, collected from the documentation filed by the company or from other sources, such as information about criminal offences and convictions, as defined by the listing rules of the marketplace.</p>
MAR INFORMATION	<p>Euronext Securities Copenhagen assists specific persons working in complying with the EU Market Abuse Regulation. This may include general personal data about who you are such as your name, your contact details, your job title, identification number, position in a company and reason for being an insider as defined by law.</p>
MIFID II INFORMATION	<p>This includes all personal data this regulation requires Euronext to process.</p>
MIFIR INFORMATION	<p>This includes all personal data this regulation requires Euronext to process.</p>
CRM INFORMATION	<p>This may include your correspondence and communications with us and details of your connections with our staff and of your visits to our premises.</p>
SRDII INFORMATION	<p>This includes all personal data that this regulation requires Euronext Securities Copenhagen to process in line with the SRDII.</p>

PUBLICLY AVAILABLE INFORMATION	This may include information available: (i) on the websites or promotional material of companies or organizations with which you are connected; (ii) in news articles; or (iii) from registries such as the companies registration offices.
MARKET SURVEILLANCE DATA	In connection with trading of financial instruments, we may collect your personal data from issuers, members, securities registers and public authorities in order to fulfil our legal duties to monitor market activity.
INFORMATION IN CONNECTION WITH EURONEXT MEETINGS AND/OR EVENTS	We may collect specific information about you so that we may host you at our premises or at any event or seminar which we organize. We may also collect images (such as photographs and video footage) at IPO announcements and other Euronext events and CCTV footage when you visit our premises.
OTHER INFORMATION	We may also process any personal data which you or the company with which you are connected choose to provide us.

4. WEBSITES AND COOKIES

Euronext Securities Copenhagen website is part of the Euronext websites which use cookies to improve your browsing experience, please visit our [Euronext Websites Cookies Policy](#) for more information. For information regarding cookies specifically used in the Euronext Securities Copenhagen Customer Centre, please consult the dedicated [Cookie Policy](#).

5. HOW AND WHY WE PROCESS YOUR PERSONAL DATA

The following table details the legal basis ("**Legal Basis**") according to which and the reasons why ("**Purposes**") we obtain, collect and process your personal data.

LEGAL BASIS	PURPOSE
CONTRACT It is necessary to process your personal data to enter into and perform our contracts with you. If you do not wish to provide us with your personal data for these purposes, we will not be able to enter into or perform our contract(s) with you.	We obtain, collect and process your personal data: <ul style="list-style-type: none"> to process contract or application between Euronext Securities Copenhagen and you; to review and publish announcements; provide you with access to Euronext websites and to enable you to use



	<p>them;</p> <ul style="list-style-type: none"> • test and improve the effectiveness of Euronext websites and to monitor metrics such as numbers of visitors, traffic data and demographic patterns; • to process your application to participate in dedicated programs organized by Euronext Securities Copenhagen; and • for invoicing, billing and commercial purposes.
<p>LEGITIMATE INTERESTS</p> <p>We process certain of your personal data on the basis of our legitimate interests, such as in pursuit of our business or security interests or in the framework of the execution of a contract with a company with which you are connected.</p> <p>Where we process your personal data in pursuit of our legitimate interests we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. We will not process your personal data where our legitimate interests are outweighed by the impact on your rights and freedoms (unless otherwise required or permitted by law).</p>	<p>We obtain, collect and process your personal data in order to:</p> <ul style="list-style-type: none"> • to process contract or application between Euronext Securities Copenhagen and the company with which you are connected for Euronext Securities Copenhagen to provide with the services subscribed such as but not limited to: <ul style="list-style-type: none"> ○ applications from a company with which you are connected to become a Member of Euronext Securities Copenhagen; ○ applications from the company with which you are connected to list financial instruments (including debt, funds and equities) on Euronext Securities Copenhagen; • provide you with access to Euronext websites and to enable you to use them; • test and improve the effectiveness of Euronext websites and to monitor metrics such as numbers of visitors, traffic data and demographic patterns; • provide you with information (e.g. newsletters, reports, statements and other material which you sign up to



	<p>receive ...);</p> <ul style="list-style-type: none"> • respond to your enquiries; • maintain a list of our business contacts; • tailor our services to match your requirements; • create products or services that may meet your needs; • to process your job/candidate application including to contact you in relation to interviews and/or offer you a job after the interview stage or to process any references you provide to us in the context of recruitment; • maintain the security and integrity of our premises, infrastructure and systems, and the safety of our employees, by using security measures including CCTV cameras. • maintain our information systems, which may involve processing personal information in operation, debugging, troubleshooting, managing our IT systems and prevent system abuse.
<p>LEGAL AND REGULATORY OBLIGATIONS</p>	<p>Euronext Securities Copenhagen is governed by an EU regulation on central securities depositories and the Danish Capital Markets Act and competition regulation. Consequently, we have a legal obligation to process personal data by virtue of our activities as a central securities depository. Furthermore, Euronext Securities Copenhagen may be obligated to process information in accordance with other regulations, for instance tax regulation or anti-money laundering legislation.</p>
<p>CONSENT</p>	<p>Where applicable, we obtain, collect and process your personal data on the basis of consent for some specific marketing purposes (i.e. proposal of products & services, invitation to events, newsletter...). If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time.</p>

	If you withdraw your consent, it will not affect the lawfulness of our processing of your personal data based on your previous consent up until the time of the withdrawal. Thus, if you withdraw your consent, it will not be effective until the time of the withdrawal.
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6. DISCLOSURE OF YOUR PERSONAL DATA

We may disclose your personal data to other companies of the Euronext Group.

We may also disclose your personal data to third parties in relation with the purposes for which personal data are processed including:

- regulatory authorities and law enforcement agencies such as the Danish Financial Supervisory Authority, the tax authorities or the Danish State Prosecutor for Special Crime (SSK) if we are ordered by the courts to produce further documents or if the authorities / law enforcement agencies have a legal basis for obtaining the personal data.
- our trusted third party service providers and our IT service providers when, for example, we send investor notifications and when we distribute our newsletter 'News & Insights';
- third parties involved in financial market activities such as financial institutions which are the point of contact to the investors;
- third parties involved in hosting or organizing events or courses;
- professional advisors such as tax or legal advisors, consultants and accountants, and
- any prospective buyers of Euronext or the business of Euronext.

7. TRANSFER OF YOUR PERSONAL DATA

We store and process your personal data on servers located within the European Economic Area (the "EEA"). We only transfer your personal data outside the EEA where the European Commission has decided that the third country in question ensures an adequate level of protection in line with EEA data protection standards or where there are appropriate safeguards in place to protect your personal data.

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries (such as the U.S.), we will protect that information as described in this Privacy Policy and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries other than the one in which you provided the information.

If you are located in the European Union (and Iceland, Liechtenstein and Norway) (“**EU**”), United Kingdom (“**UK**”) or Switzerland, with respect to transfers of personal information to the U.S., Euronext US Inc. and its subsidiaries Euronext FX Inc., Euronext Markets Americas LLC, and Euronext Market Services LLC are certified under the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework administered by the U.S. Department of Commerce, the European Commission, the UK Information Commissioner’s Office and the Swiss Federal Data Protection and Information Commissioner, respectively, regarding the transfer of personal information from the EU, UK and Switzerland to the U.S. [Click here](#) to view our Data Privacy Framework Privacy Policy.

8. RETENTION OF YOUR PERSONAL DATA

Euronext Securities Copenhagen retains personal data as long as necessary and reasonable to fulfil the purpose for which the data are collected and processed.

Generally, as a central security depository, we shall retain your personal data for a period of ten years after the closure of your securities account. We store other personal data for five years in accordance with anti-money laundering legislation and the Danish Bookkeeping Act.

However to determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

9. SECURITY OF YOUR PERSONAL DATA

Your personal data are dealt with in confidence and Euronext Securities Copenhagen has taken appropriate technical and organizational security measures to protect your personal data against loss, misuse, alteration and/or destruction. These include, but are not limited to:

- Installing a firewall to prevent unauthorized access to our systems;
- Using secure servers;
- Ensuring the Personal Data are stored in physically secure accommodation.

Please be aware that the security measures mentioned above apply to systems under the control of Euronext, but that Euronext cannot ensure the security nor confidentiality of any information during its transmission when transmitted via means not under its control, notably the Internet, and that you are aware that data transmitted via such means may be intercepted by third parties.

If Euronext Securities Copenhagen becomes aware of any security breach which results in unauthorized access of your personal data, Euronext Securities Copenhagen will endeavour to inform you.

Euronext websites may provide hyperlinks to websites from other companies or persons. This policy does not apply to the use of such websites, and we are not responsible or liable for any processing of your personal data via these third party websites.

In addition, if you share content from the Euronext websites via social media, your personal data will be visible to those visiting your personal pages on these social media websites. Euronext Securities Copenhagen is not responsible or liable for any processing of your personal data via such media. This policy does not apply to the use of such social media.

10.YOUR RIGHTS AND HOW TO EXERCISE THEM

The table below sets out the rights which you have to address any concerns or queries with us about our processing of your personal data. Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

RIGHT	FURTHER INFORMATION
RIGHT TO BE INFORMED	You have the right to know your personal data is being processed by us, how we use your personal data and your rights in relation to your personal data.
RIGHT OF ACCESS	You have the right to ascertain what type of personal data Euronext holds about you and to a copy of this personal data.
RIGHT TO RECTIFICATION	You have the right to have any inaccurate personal data which we hold about you updated or corrected.
RIGHT TO ERASURE	In certain circumstances you may request that we delete the personal data that we hold on you. You have also the right to give post-mortem instructions regarding your personal data.

RIGHT TO RESTRICTION OF PROCESSING	<p>You have the right to request that we stop using your personal data in certain circumstances including if you believe that the personal data we hold about you is inaccurate or that our use of your personal data is unlawful. If you validly exercise this right, we will store your personal data and will not carry out any other processing until the issue is resolved.</p>
RIGHT TO OBJECT	<p>Where we rely on our legitimate interests to process your personal data, you have a right to object to this use. We will desist from processing your personal information unless we can demonstrate an overriding legitimate interest in the continued processing.</p>
RIGHT TO DATA PORTABILITY	<p>In case the processing is based on your consent or a contract conclude with you, you may request us to provide you with certain personal data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your personal data directly to another controller where this is technically feasible.</p>

You can read more about your rights in the Danish Data Protection Agency's guide to the rights of data subjects available by [clicking here](#).

You can exercise any of these rights in accordance with the "[Data Subject Rights Request Information Procedure](#)" by :

- submitting a request through the following [form](#)
- sending a request to us at dpo@euronext.com.
- By sending a letter to the following address:
 Euronext
 Compliance Department
 Data Protection Officer
 14, place des Reflets – CS30064
 92054 Paris la Défense.

Furthermore, you may also submit a complaint to the competent Data Supervisory Authority.

11. APPLICANTS

This section only applies to personal data which you may provide directly to us or via third parties, in the following cases :

- You participate in a Euronext recruitment initiative
- You voluntarily submit your resume to a representative of Euronext on an ad hoc basis
- You apply for an advertised job
- A recruiter provides your resume or details to Euronext
- Euronext finds your CV / details in online searches e.g. LinkedIn
- You are referred to an open position by an employee as part of the Euronext Referral Program.

This section applies:

- to any and all job applications submitted and recruitment initiatives co-ordinated by Euronext,
- up to the point at which we decide not to continue the recruitment process with you or when you start working for us (if applicable). On this latter case, the way we process your Personal Data will no longer be dealt with under this Statement, but will instead be governed by our Data Privacy Notice.

IMPORTANT: sections 4, 7, 9, 10, 12 and 13 of this Privacy Statement apply to Applicants.

11.1 THE PERSONAL DATA WE PROCESS

As part of the recruitment and job application process, we collect the Personal Data that you/your agency/your referrer submit to us, which may include:

PERSONAL DETAILS	This may include general Personal Data such as your name, gender, residential address, email address, contact telephone numbers, nationality, marital status, etc.
DETAILS ABOUT YOUR PREVIOUS EMPLOYMENT	Such as the former company names, length of service, business titles and details on your previous roles.
QUALIFICATIONS	Such as your skills, education, the languages you speak (including your level of proficiency), your eligibility to work in a particular country (e.g. minimum legal age to work, citizenship or visa details), your experience in the job you apply for and other industries, etc.

PREFERENCES	Such as positions you may be interested in, information about when you may be available to interview and/or start date for Euronext Securities Copenhagen or work on ongoing basis (e.g. full or part time or on weekends), whether you are open to relocation or working remotely, whether you are willing to travel for work and whether you have your own transport.
PUBLICLY AVAILABLE INFORMATION	Details about you which we gather from publicly available sources over the internet and your social media accounts where such searches are relevant to the job you have applied for within Euronext Securities Copenhagen.
OTHER INFORMATION	Details you may provide us in response to our queries or questions at interview stage (including information about you which we generate throughout the interview and/or recruitment process), at reference check stage, to complete psychometrics tests (where applicable) or details required where mandatory in the respect of local requirements laws.

If you apply for a position through the “Apply with LinkedIn” option, we may use the information you have previously provided to LinkedIn to populate your application. You are free to remove some details.

The main mandatory information we need to proceed with your recruitment is your resume. You may remove personal data from your resume.

It is necessary for us to process your Personal Data in order to assess your job application and/or include you in a recruitment initiative. Ultimately, it may also be necessary for us to process your Personal Data in order to take steps to offer and enter into a contract of employment with you. In the event that you do not wish to provide us with your Personal Data for the purposes outlined in this Statement, we will not be able to assess your job application and/or include you in a recruitment initiative and/or offer you a contract of employment.

Please note that should you include information you think is relevant to your job application or the recruitment initiative, including cover letters, references from your previous employers and other documents you see fit. For information containing Personal Data, we will hold and process any such Personal Data in accordance with the terms of this Statement.

11.2 HOW AND WHY WE PROCESS YOUR PERSONAL DATA

The following table details the key context for which ("**Legal Basis**") and why ("**Purposes**") we collect, obtain and process your Personal Data within Euronext. The third parties and those within Euronext with whom we may share your Personal Data ("**Recipients**") are detailed in section 6 (Disclosure of your Personal Data) of this Statement.

LEGAL BASIS	PURPOSE
<p>LEGITIMATE INTERESTS</p> <p>It is necessary to process your Personal Data where it is necessary for the purpose of initiate and facilitating the recruitment process.</p>	<p>We obtain, collect and process your Personal Data:</p> <ul style="list-style-type: none"> • to process your job application, including to contact you in relation to interviews and/or offer you a job after the interview stage ; • to assess your Personal Data against vacancies which we think may be suitable for you ; • to request information from third parties such as qualifications and references ; • to carry out background checks which aim to verify details you have provided to us. • to retain your information in order to contact you in relation to future vacancies within Euronext Group that may be of interest to you; • to collect feedback on and evaluate the recruitment process ; • to promote internal and external recruitment events such as job fairs, campus events... ;
<p>COMPLIANCE WITH A LEGAL OBLIGATION</p> <p>It is necessary to process your Personal Data in order to comply with legal obligations imposed on us as an employer under applicable Danish and European Union law.</p>	<p>We obtain, collect and process your Personal Data in order to comply with legal obligations, which may include:</p> <ul style="list-style-type: none"> • to comply with European Union employment, equality and health & safety law ; • to comply with European Union Tax Law ;



	<ul style="list-style-type: none"> • to comply with other applicable European Union laws ;
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IMPORTANT :

When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

We will only use your Personal Data for the purposes for which we collect it (as outlined in this section), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in accordance with section 10 of this Statement and we will explain the legal basis which allows us to do so.

11.3 DISCLOSURE OF YOUR PERSONAL DATA

We may disclose some or all of your Personal Data to the following parties :

- Internal business units such as Human Resources, IT, Finance/Payroll, Managers, system administrators, our trusted third party service providers and our IT service providers;
- Your previous employers when you have provided them as a reference third parties that may be contacted to provide additional information related to your previous work experiences;
- Recruitment agencies;
- Regulatory authorities;
- Outsourced service providers who assist Euronext with recruitment initiatives and campaigns such as recruitment agencies, technical test assessment, background check and health assessment companies (where applicable);etc.
- Professional advisors such as legal advisors, consultants and accountants.

11.4 RETENTION OF YOUR PERSONAL DATA

Where you are a successful job applicant, the Personal Data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your employment contract. Such Personal Data will be retained in accordance with our Data Privacy Notice and Retention Policy (which will be available to you when you commence employment).

Where you are an unsuccessful job applicant, we will retain your Personal Data for a period of up to 12 months after it is determined that your application has been unsuccessful for the purposes of both contacting you in relation to future vacancies within Euronext which we think

may be of interest to you and, for the purpose of defending any potential employment equality claims.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

12. CHANGES TO THIS STATEMENT

We may occasionally update this Privacy Statement to reflect changes in our business or to comply with applicable law and regulations. We therefore advise you to review this statement regularly to ensure that you are updated with any changes.

13. QUESTIONS AND REQUESTS

Should you have any questions or requests about this policy, please contact us via dpo@euronext.com.