

## **12. Instructions for to what extent client information may be disclosed from C WorldWide Asset Management Fondsmæglerselskab A/S**

### **Purpose**

Clients in C WorldWide Asset Management Fondsmæglerselskab A/S ("CWW AM") must be able to securely assign confidential information to CWW AM knowing for certain that such information is not without due course disclosed without the client's consent.

The purpose of these instructions is to inform clients and potential clients in CWW AM to what extent CWW AM discloses client information. The instructions have been prepared in accordance with section 119 of the Danish Investment Firms Act.

### **Disclosure of information**

Members of the Board of Directors, Members of the Board of Management, and other employees in CWW AM must not without due course disclose or use confidential information obtained of during their performance of duties. This information may, however, be disclosed if justified according to law.

CWW AM may disclose usual information on client matters for performance of administrative tasks. Usual information on client matters is defined in the Danish Order on usual information on client matters in financial undertakings.

### **Situations where CWW AM discloses information to third parties**

CWW AM discloses client information to the third parties listed below:

- Custodian banks and other third parties engaged by CWW AM's clients where disclosure is part of the administration of the client relationship.
- Management companies as part of the administration of agreements regarding clients' investments in units in collective investment schemes.
- Public authorities such as supervisory authorities and tax authorities that are entitled to receive information according to law.
- CWW AM's external auditors, consultants, and advisers such as attorneys.
- Suppliers of IT related services such as cloud services and IT support of CWW AM's administrative tasks.

CWW AM may in some other cases disclose client information to third parties, if CWW AM's disclosure is otherwise justified according to law.

### **Consent**

Unless disclosure is justified, information regarding private matters will not be disclosed without prior client consent.

Agreed upon at the board meeting on March 8, 2022.