# 1 Purpose and Scope

Allshares highly values the trust you place in our services. We are committed to maintaining the security and confidentiality of your Personal Data as our top priority.

This Privacy Policy explains our data collection, usage, and disclosure practices. By using or downloading Allshares websites (the "Site" www.allshares.com), benefiting from our Site's services or by participating in Allshares events, webinars or surveys, you agree to the terms outlined herein.

This policy primarily focuses on Personal Data collected from Site visitors. However, it also addresses Publicly sourced Personal Data and Personal Data of the representatives of our prospects, customers and suppliers.

Personal Data processed for customer services is outside the scope of this policy.

# 2 Definitions

**Personal Data**: Refers to any information relating to an identified or identifiable natural person in the meaning of:

- For data subjects residing within the territory of the European Economic Area (EEA), the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data;
- For data subjects residing in Switzerland, the Swiss Federal Act on Data Protection and related ordinances;
- For data subjects residing in the United Kingdom, the UK Data Protection Act 2018 and the UK GDPR (GDPR as it forms part of the law of England, Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018);
- For residents of California, "Personal Information" as defined under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

**Publicly sourced Personal Data**: Information gathered from company websites, minutes of general meetings, corporate governance notices, compensation policies, incentive reports, and annual reports.

**AI Navigation Assistant:** An automated, machine-learning-driven conversational interface deployed on the Site to assist visitors with finding public information and navigating website content. This tool processes user query inputs, which are retained for a limited duration solely to analyze aggregate search trends and improve Site functionality**.**

# 3 Collection and Use of Personal Data

## 3.1 Data Collection

### 3.1.1 Purpose

We collect your Personal Data to offer you our services, enhance the Site's features and content, manage your user account, and facilitate your navigation and enjoyment of the Site.

We request Personal Data when you contact us, or use a service through the Site. This may include data provided during registration, account administration, and personalization, or data supplied while using our services.

We gather and evaluate Publicly sourced Personal Data to prepare reports and conduct benchmark surveys regarding executive, director, and employee compensation across both public and private organizations.

### 3.1.2 Extent

Allshares collects Personal Data from various sources, including Site users, customer and potential customer representatives, and supplier and service provider representatives. This data may also be gathered from public sources.

The types of Personal Data collected include:

- **Contact Information:** Name, physical address, telephone number(s), email address, and company.
- **Transactional Information:** Details related to services purchased, downloaded, or inquired about, as well as information collected through AI Navigation Assistant, forms, contracts, or other documents provided in connection with service orders.
- **User Preferences:** Information such as service requirements, industry interests, newsletter subscriptions, community choices, and other data selected in the customer profile during Site registration or indicated by Site usage.
- **Technical Data:** Network routing information, browser type, equipment profiles, IP address, referring website, and date/time stamps.
- **Publicly Sourced Personal Data:** Information obtained from company websites, minutes of general meetings, corporate governance notices, compensation policies, incentive reports, and annual reports.

We may also supplement the information you provide with data received from third parties.

**Note on AI Navigation Assistant Inputs:** The AI Navigation Assistant does not intentionally collect or process Personal Data. Users are explicitly instructed not to enter personal, confidential, or sensitive identifying information into the assistant's input fields. Unstructured text strings entered into the assistant are categorized as temporary internet activity and are handled under the stateless protocols detailed below.

## 3.2 Data Use and AI Operations

Allshares utilizes Personal Data to deliver its services. The data you transmit to Allshares may be hosted by Allshares itself or a third-party of its choosing, as part of these services.

Your Personal Data is used for general business purposes, including fulfilling requests, managing relations, personalizing promotional content, and compiling aggregate usage statistics.

### 3.2.1 Stateless AI Operational Guarantees

Search queries submitted to our AI Navigation Assistant are processed dynamically and in real-time solely to optimize search outputs and website navigation. Allshares guarantees that conversational text inputs and logs are discarded after 90 days upon closing the session. No data footprints from the assistant are saved, stored, or processed for downstream artificial intelligence model training or profiling purposes.

### 3.2.2 Automated Decision-Making and Profiling

We do not use your Personal Data for automated decision-making or algorithmic profiling that produces legal or similarly significant effects. The AI assistant functions purely as a navigational guide.

## 3.3 Legal Requirements

Allshares may be required to retain or provide access to services data to comply with legally mandated reporting, disclosure or other legal process requirements.

## 3.4 Subcontractors

Your Personal Data may be transferred, accessed and stored as necessary for the uses stated in Section 3.2 and 3.3 above. While Allshares may share your personal information with agents and contractors to perform the functions listed in Sections 3.2 and 3.3, including order fulfilment and website management, we require that such agents and contractors treat your Personal Data, and limit its use, in accordance with the standards specified in this policy.

# 4 Electronic Communications Protocols and Cookies

## 4.1 In General

In addition to the information specified above, Allshares may collect information about your use of the Site through electronic communications protocols and cookies. As is true when you visit most websites, Allshares may automatically receive information from you as part of the communication connection itself, which often consists of network routing information (where you came from), equipment information (browser type), your IP address, referring website and date and time. Collecting this automatic information helps us customize your experience as a user. It allows us to

monitor and analyze the use of the Site and services and to increase the Site's functionality and user-friendliness.

Like many other websites, Allshares also uses cookies, embedded URLs and embedded pixels to capture additional information. Cookies are small data files, which are transferred to a computer's hard disk in order to memorize information like registration IDs and passwords.

We further utilize session ID cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by users. We will utilize cookies for identifying your language settings of your device, the promotional offers you subscribed to in and/or session cookies. Session cookies are, unlike persistent cookies, deleted from your computer when you log off from the Site and then close your browser.

Please note that you can always choose not to receive a cookie file by enabling your Web browser to refuse cookies or to prompt you before accepting a cookie. However, if you refuse cookies, you may not be able to use all portions of the Site or all functionality of the services.

We may re-associate the information provided by the technologies directly above with Personal Data.

## 4.2 First-Party and Third-Party Cookies

### 4.2.1 First-Party Cookies

Allsharess website has first-party cookies and allows third parties to place cookies on your device. The difference between a first-party cookie and a third-party cookie relates to who places the cookie on your device. First-party cookies are cookies that are specific to the website that created them. These cookies enable Allshares to operate an efficient service and to track patterns of user behavior to Allshares' website.

### 4.2.2 Third-Party Cookies

Third-party cookies are placed on your device by a third party (i.e., not by Allshares). While Allshares allows third parties to access Allshares' website to place a third-party cookie on your device, Allshares does not retain control over the information supplied by such cookies, nor does Allshares retain access to this information. This information is controlled wholly by that third party according to the respective privacy policy of the third party.

Details on first-party and third-party cookies are stated in the Cookie Notice.

# 5 AI Transparency Disclosure

In alignment with global privacy frameworks and transparency expectations, Users are explicitly notified whenever they are interacting with an automated AI System or Chatbot rather than a human representative. Because this assistant functions purely as a stateless, anonymous search interface, it operates independently of your client profiles or Personal Data pathways.

## 6 Security Control

Allshares is committed to the security of your Personal Data, and has in place technical and organizational measures designed to prevent unauthorized access to that information. These measures, which are aligned with the highest standards in the industry, govern all areas of security applicable to Services and apply to all Allshares employees.

In addition, Allshares uses standard security protocols and mechanisms to exchange the transmission of sensitive data. When you enter sensitive information on our site, we encrypt it using secure socket layer (SSL) technology.

Where your Personal Data information is acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, Allshares will promptly notify you of the breach by using an appropriate communication method.

## 7 International Transfer

By using the Site, you acknowledge and agree that Personal Data you submit to Allshares will be hosted by Allshares or a third party of its choice for an indefinite period of time.

You hereby agree that your Personal Data may be transferred outside EEA countries, the United Kingdom or Switzerland - and maintained on - computers located outside the EEA territory, the United Kingdom or Switzerland, where privacy laws may not be as protective as those in your jurisdiction.

Your consent to this Privacy Policy followed by your submission of Personal Data represents your explicit agreement to such transfer.

To the extent cross border transfer to third countries not benefiting from an adequacy decision is concerned, refer to section 11 hereunder.

## 8 Information Sharing, Sales, and Disclosure

Personal Data may be processed, disclosed or transferred between companies belonging to the Allshares group of companies within the limits set by law for the purposes described in this Privacy Policy.

We may share aggregated information that does not include Personal Data and we may otherwise disclose non-identifying information with third parties for analysis and other purposes. Any aggregated information shared in these contexts will not contain Personal Data.

Allshares explicitly states that it does not sell Personal Data to third parties for monetary compensation, nor does it share Personal Data with third parties for cross-context behavioral advertising purposes.

Under certain circumstances, Allshares may be required to disclose Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements. Allshares may disclose Personal Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency, or in the good faith belief that such action is necessary:

- To comply with a legal obligation,
- To protect or defend our rights, interests or property or that of third parties,
- To prevent or investigate possible wrongdoing in connection with the Site or our services,
- To act in urgent circumstances to protect the personal safety of users of the Site, our services or the public.

Where disclosure relates to your Personal Data, we will communicate to you any request for disclosure by public authorities (including those received for national security or law enforcement reasons) unless Allshares is prohibited by law to do so.

If we sell all or part of our business or otherwise reorganize our business or corporate structure, Personal Data may be disclosed to a limited extent to prospective buyers and/or their advisors in accordance with the legislation in force from time to time.

## 9 Right to Access, Correct or Delete your Personal Data

You have the right to request access to your Personal Data collected by Allshares, or to request its correction or erasure. You can also ask us to stop or limit the use of your Personal Data (e.g., if we lack a legal right to use it, or if the information is inaccurate).

Please send any such request in writing to:

Allshares Oy, Aleksanterinkatu 13, 3rd floor, 00100 Helsinki, Finland, or via email to [privacy@allshares.com].

Allshares has a Chief Privacy Officer. To exercise these rights, email [privacy@allshares.com]. We may need to verify your identity and may therefore request you to provide us with a copy of your identity card or passport for identification. We will respond in accordance with applicable law.

If you are not satisfied with how Allshares processes your Personal Data, please inform us, and we will investigate your concern. Additionally, you have the right to file a complaint with the competent data protection authority.

## 10 Retention Period of Personal Data

We regularly review the retention periods of the personal data we process.

We have a legal obligation to retain certain types of data for a specified period of time in order to fulfil our legal obligations. Such legal obligations define, for example, the retention period of personal data contained in accounting material or personal data processed for the purpose of

preventing money laundering and terrorist financing. Outside of specific legal obligations, we retain personal data for as long as the storage of the data is necessary for the purposes for which the personal data was collected.

Inputs submitted to the AI Navigation Assistant are completely temporary and are entirely discarded after 90 days upon session completion.

## 11 TRANSFER OUTSIDE EEA OR JURISDICTIONS WITHOUT EC ADEQUACY DECISION

Allshares have entered into EU standard contractual clauses as approved by the EU Commission, the standard contractual clauses for the transborder outsourcing of personal data processing approved by the Swiss Federal Data Protection and Information Commissioner, the standard contractual clauses approved by the UK Information Commissioner's Office, or reliance on a recognized certification mechanism prior to such transfer to ensure the required level of protection for the transferred Personal Data.

## 12 DATA CONTROLLER

Personal Data collected and processed by Allshares Oy along with its Group companies and subsidiaries falls under the scope of this policy. Depending on the context in which your Personal Data is collected and used, one or more Allshares Group entities will act as the Data Controller responsible for processing your Personal Data. The specific Group entity you directly interact or contract with generally acts as the Data Controller. For example, Allshares Oy acts as the Data Controller when you visit or interact with the Site or submit inquiries via the Site. A local Group subsidiary acts as the Data Controller when you negotiate or enter into a contract directly with that specific local entity or attend a regional physical event hosted by that local office.

Allshares Group entities and their locations are listed below:

- Allshares Oy, registered under business ID 1882491-3, Aleksanterinkatu 13, 3rd floor, 00100 Helsinki, Finland
- Allshares AB, registered under no. 556731-4546, Torsgatan 4, 111 23 Stockholm, Sweden
- Allshares Grow AB, registered under no. 559303-6436, c/o Allshares AB, Torsgatan 4, 111 23 Stockholm, Sweden
- AMALIA SAS, 165 Avenue de Bretagne, 59000 Lille, France
- Stock & Option Solutions, LLC, 3401 Mallory Lane, Ste 100, Franklin, TN 37067, United States
- Allshares Switzerland SA, registered under No. CHE-428.659.231, with offices at 5 Rue de Rive, 1260 Nyon, Switzerland

Regardless of which entity acts as the Data Controller for your Personal Data, you may exercise your data protection rights or submit any privacy-related inquiries centrally by contacting us at the address provided in Section 14.

## 13 Acceptance of the Policy

Allshares may update this Privacy Policy as needed, without prior notice. While users will be informed of a new policy, it is your responsibility to regularly review this policy for any changes. Your continued use of Allshares' services or the Site, or explicit acceptance of a new policy on the Site and/or through the services, signifies your agreement to such changes.

Allshares utilizes third-party service providers, such as Hubspot, for website visit analysis and marketing. These providers anonymously monitor visitor activities and, when visitors subscribe to marketing services, integrate this data with contact information gathered via Allshares forms using cookies.

## 14 Contacting us

Allshares has appointed a Chief Privacy Officer. If you believe your Personal Data has been used in a way that is not consistent with this policy, or if you have further questions related to this policy, please contact us at [privacy@allshares.com].

## 15 Validity and document management

The version is effective as of October2026.