
PROCESSING OF PERSONAL DATA IN CONNECTION WITH GENERAL MEETINGS IN PANDORA A/S

1. INTRODUCTION

The purpose of this fact sheet is to give you, as a shareholder, proxy or advisor, information about collecting, processing and storing of personal data in connection with general meetings in Pandora A/S, CVR no. 28 50 51 16, Havneholmen 17-19, DK-1561 Copenhagen V (the “Company”).

The Company is the data controller, which means that the Company is responsible for ensuring that your personal data is processed correctly.

The following sections contain a description of the information, which the Company can collect, process and store, and for which purpose and on which basis the processing is performed.

In sections 2 - 3, certain general information is provided about notice convening a general meeting, publication of documents, registration of attendance and issue of proxy statements and submission of postal votes, and sections 4 - 7 deal with a number of more specific matters, including the submission of questions before the general meeting, submission of proposals to be resolved by the general meeting, the right to speak and submit questions at the general meeting, and minutes of the general meeting. Finally, section 8 contains certain information about your rights as a data subject.

Note that general meetings can both take place physically and virtually. Certain processes might vary due to this difference as further outlined in the sections below.

2. NOTICE CONVENING A GENERAL MEETING

Notice convening a general meeting in the Company will be made based on the information registered about you in the register of shareholders, including information about name, address and any email address. In this connection, the Company processes your personal data for the purpose of convening the shareholders for the annual general meeting. This includes enabling the shareholders to exercise their basic administrative rights at the general meeting.

The notice of the general meeting will be published and sent in compliance with applicable legislation and the Company’s articles of association, and will thus be published as a company announcement through Nasdaq Copenhagen and the Company’s website, respectively, and sent by email to shareholders who have requested that.

In continuation of the publication of the notice of the general meeting, certain other documents of relevance to the general meeting, including forms for the purpose of issuance of a proxy statement or postal votes, will be published on the Company’s website.

The notice of the general meeting and the other documents will be accessible on the website for a period not exceeding 5 years.

The Company will keep the notice of the meeting, complete proposals and forms for the provision of a proxy statement or postal votes, until it is no longer necessary for the Company to store the information for the purpose of safeguarding the Company's and the shareholders' interests, but no longer than for a period of 5 years, after which it will be deleted.

3. REGISTRATION OF ATTENDANCE AND ISSUE OF A PROXY STATEMENT AND POSTAL VOTES

When you, as a shareholder, register your and any advisor's attendance at the general meeting or issue a proxy statement to a third party, the Company or its keeper of the register of shareholders will issue an access card (if relevant with voting papers) should the meeting be held physically. The access card will contain certain personal data about you, any proxy and/or advisor for you or the proxy, including name, address, email address and shareholding. The access card will be made available either electronically or sent by email or ordinary mail.

If the meeting is virtual, shareholders will receive a confirmation of the request to participate in the meeting, which will be accessible via smartphone app (iOS or Android) or desktop device with a web browser.

Registration of attendance entails the Company processing your personal data based on the information registered about you in the register of shareholders whether it being physical or virtual. Processing of personal data is further made in connection with the issue of a voting proxy, a proxy statement to the board of directors or a postal vote. Similarly, your personal data is processed if you vote at the general meeting.

If you give a proxy statement to a third party and/or register the attendance of an advisor, the Company will collect and process personal data about them (name and address). The collection and processing of information take place for the purpose of ensuring the access of the relevant persons to the Company's general meeting and to ensure that they can exercise their relevant rights.

The Company can retain information about registrations, proxy statements and postal votes, until it is no longer necessary for the Company to store the information for the purpose of safeguarding the Company's and the shareholders' interests, but for a minimum period of 5 years, after which it will be deleted.

4. SUBMISSION OF QUESTIONS BEFORE THE GENERAL MEETING

In the case of submission of written questions before the general meeting, you must document your status as a shareholder or proxy. In this context, collection and processing of your personal data will take place. In this context, the collection and processing of personal data are based on the Company's legitimate interest in being able to identify you, so that you can exercise your right as a shareholder to submit questions.

If questions are answered in writing, this, including information about your name and the Company's answer, will be presented at the general meeting.

The Company can keep information about questions raised, until it is no longer necessary for the Company to store the information for the purpose of safeguarding the Company's and the shareholders' interests, but for a minimum period of 5 years, after which it will be deleted.

Also see section 6 on the right to speak and questions raised at the general meeting.

5. SUBMISSION OF PROPOSALS

In connection with a request from you on inclusion of a certain item on the agenda of the general meeting, your personal data and the contents of the proposal will be collected and processed by the Company. In this context, the collection and processing of personal data are based on the Company's legitimate interest in being able to identify you, so that you can exercise your right to forward proposals for inclusion on the agenda.

If your request meets the requirements, both the proposal and your name will be included (i) on the agenda and (ii) on forms for the purpose of issuance of a proxy statement or postal vote, which will then be published according to the rules to that effect.

Also see section 2 regarding a notice convening general meeting and section 7 on the preparation of minutes of the general meeting.

6. RIGHT TO SPEAK AND SUBMIT QUESTIONS AT THE GENERAL MEETING

If you choose to take the floor, either physical or virtual, at the general meeting (e.g. to ask questions for the report of the board of directors or the annual report), you will be asked to prove that you are a shareholder or proxy. In that context your personal data will be collected and processed based on the Company's legitimate interest in being able to identify you, so that you can exercise your right to take the floor and perhaps ask questions at the general meeting.

Otherwise, reference is made to the sections below regarding the preparation of the minutes of the general meeting.

7. MINUTES OF THE GENERAL MEETING

After the general meeting, the chairman (on behalf of the Company) will prepare minutes of the discussions at the general meeting. Therefore, in continuation of the initial collection and processing of your personal data (e.g. in case of proposals made, see section 5), or the exercise of the right to take the floor, both physical and virtual, at the general meeting (see section 6), your personal data may be further processed. The minutes of a meeting must be prepared in accordance with the Danish Companies Act, and the processing is thus made to meet a legal requirement.

When submitting proposals for inclusion on the agenda, it is not possible to decline statement of a name in the notice (or forms) and accordingly no statement thereof in the minutes.

After preparation, the resolution minutes of the general meeting will be made accessible on the Company's website for a five-year period, meaning that during this period the minutes will be accessible both to shareholders and the general public.

The Company can retain the minutes of the general meeting until it is no longer necessary for the Company to keep the information, for the purpose of being able to safeguard both the Company's and the shareholders' interests. This includes the purpose of documenting the discussions and resolutions made at the general meeting. This entails the minutes not being deleted.

8. SHARING OF PERSONAL DATA

If explicitly required by law or court order, the Company may disclose your personal data to third parties. In addition, the Company employ service providers acting as data processors to process data on the Company's behalf. These services include shareholder registration services as well as services related to physical and virtual execution of meetings. These third parties are the Company's data processors and may only process personal data to the extent necessary in order to deliver their services. The data processors are contractually obliged to treat all information in the strictest

confidence and are prohibited from using the data in any other way than instructed by Company.

Some of our data processors are situated outside the EU/EAA. Consequently, we will share your personal data with countries outside the EU/EEA. However, we will only provide this information on the basis of the recipient fulfilling the applicable requirements for transfers set out in the General Data Protection Regulation (2016/679) such as e.g. the service provider's accession to the European Commission's Model Contracts for the transfer of personal data to third countries.

9. YOUR RIGHTS

You can access information about the personal data, which the Company keeps and processes about you, by contacting the Company at legal@pandora.net, marked "processing of personal data in connection with general meetings". Further, you can at any time object to the Company's processing of your personal data and request rectification or deletion of your personal data. If you want to object to the processing of your personal data, or if you want to have your personal data rectified, you can contact the Company at the above email address. If you want to file a complaint about the Company's processing of your personal data, you can contact the Danish Data Protection Agency (*Da: Datatilsynet*). See the Company's privacy policy, section 7 and 12 here: <https://uk.pandora.net/en/privacy-policy/privacy-policy.html> for more information about your rights in connection with the processing of your personal data.