



## PRIVACY POLICY

Trine AB, a company incorporated in Sweden with company number 559003-1463 whose registered office is at Kungstorget 7, 411 17 Gothenburg, Sweden (“**Trine/we/us**”) is committed to protecting your privacy. Under applicable data protection law Trine is what is known as a ‘controller’ for the purposes of the collection and use of personal information set out in this privacy policy. At all times we aim to respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy (the “**Policy**”) sets out Trine’s policies and your rights regarding the collection, use, disclosure and protection of your personal information (including through our website – [www.trine.com](http://www.trine.com) – the “**Website**”).

This Policy contains important information about your personal rights to privacy. Please read this Policy carefully before using the services provided through the Website or providing your personal information to Trine.

This Policy is a supplement to our [Terms of Service](#). In case of any contradiction between the provisions in this Policy and in our Terms of Service, the latter shall prevail. Unless otherwise defined in this Policy, terms used in the Policy shall be given the same meaning as in our Terms of Service that are accessible at [trine.com](http://trine.com).

### 1. How Trine collects personal information

Trine may collect personal information about you when:

- (a) You give it to Trine **directly**

For example, personal information that Trine will ask you to provide if you choose to use the Service or register to use the Website, that you give to us by filling in forms on the Website or by corresponding with us by phone, email or otherwise. It includes information you provide when you register to use the Website, subscribe to our services, search for a loan, subscribe to invest in a loan, make a payment, participate in discussion boards or other social media functions on our site (if available), authorise us to connect with your social media profile(s), enter a competition, promotion or survey, when you report a problem with the Website and when you communicate with us by email or other contact methods.

- (b) Trine obtains it **indirectly**

For example, your personal information might be shared with us by third parties such as our business partners and subcontractors. If connecting to the Service using Facebook, Trine will collect your authentication information, for example username and access credentials, and other information that may be available through social media channels.

- (c) It is available **publicly**

Your personal information may be available to us from external publicl@y available sources. For example your public social media profiles such as Facebook, LinkedIn and Twitter.

- (d) You use our **Website**

Trine may also collect certain information, including personal information, automatically. Such information may include information about your interactions with the Service and the Website, content you



post or upload to the Service as well as technical data such as your IP address, browser type etc. and other types of identifying information. Trine may use cookies and other similar technologies in order to collect the information described here.

2. In general, we may combine your personal information from these different sources for the purposes set out in this Policy. **Categories of personal information Trine collects**

Trine may collect, store and otherwise process the following kinds of personal information:

- (a) Your full name, information displayed on your proof of identity, date of birth and contact details, including postal address, telephone number and email address;
- (b) Social security number for tax information reporting;
- (c) Information about your investments and other payments, such as your transaction history
- (d) Information gathered from surveys in which you have participated;
- (e) Information you share with us when you contact us or engage with us;
- (f) Information about your computer/mobile device and your visits to and use of the Website, as set out at 1(d) above;
- (g) Information about our services which you use and we consider may be of interest to you, such as further investment opportunities;
- (h) Financial information, such as bank details and or credit/debit card details and details of payments made by you;
- (i) Content subscription preferences;
- (j) Social media profile information where it is available to us;
- (k) Information made available through your use of BankID;
- (l) Information about you available in Statens personadressregister (SPAR); and
- (m) Any other type of information shared with / obtained by us as listed in section 1 of this notice.

#### **Special category/ sensitive personal information**

The GDPR /EU data protection law recognises certain categories of personal information as sensitive and therefore requiring more protection (referred to as 'Special Category' data in the legislation). This includes information about individuals' health, ethnicity and political opinions.

Trine does not seek to collect sensitive personal information. Where Trine does process this type of special category/sensitive personal information, we will only do so if there is a valid reason and where lawful.



## 2.2 How and why personal information may be used

Your personal information, however provided to us, will be used for the purposes specified in this Policy. In particular we may use your personal information:

- (a) To provide you with the Service, and other services, products or information you have requested, such as facilitating investments made as part of the Service;
- (b) To provide you with further information and news about our activities, services or products, for example about new investment opportunities (Trine's goal is to provide you with relevant information, which can include, for example, newsletters though you may opt-out at any time through [www.trine.com/settings/emails](http://www.trine.com/settings/emails));
- (c) To answer your questions/requests and communicate with you in general, such as alerting you to updates to our Terms of Service and this Policy;
- (d) To process payments and investments on your behalf;
- (e) To send you news items which are relevant to your interests;
- (f) To manage our relationship with Trine's members and investors, including registering and personalising online accounts;
- (g) To confirm your identity in order to create your account and ensure that you are eligible to use the services provided on our Website;
- (h) To report on and measure the performance and effectiveness of our services, activities and products;
- (i) To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- (j) To make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.
- (k) To run and administer our Website, keep it safe and secure and ensure that content is presented in the most effective manner for you and your device;
- (l) To satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/ or law enforcement bodies with whom we may work (for example, when you invest through the Service, Trine has to collect some of your personal information to comply with applicable law, such as to update share ledgers with compulsory information – if you do not wish to share such information with Trine you will not be able to invest);
- (m) For the prevention of fraud or misuse of services, such as ensuring that your member account is used in accordance with our Terms of Service;
- (n) For the establishment, defence and/ or enforcement of legal claims; and/or



- (o) To further Trine's aims and functions as a for-profit, social and environmental impact company in general.

### 3. Lawful bases to use personal information

#### 3.1 Data protection law requires us to rely on one or more 'lawful bases' to use your personal information. We consider the grounds below to be relevant:

- (a) Where you have provided your **consent** for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you certain types of material by email, and we may ask for your explicit consent to collect special categories of your personal information).
- (b) Where necessary so that we can **comply with a legal obligation** to which we are subject (for example, to issue and hold note certificate ledgers following an investment made)
- (c) Where **necessary for the performance of a contract** to which you are a party or to take steps at your request prior to entering a contract.
- (d) Where there is a **legitimate interest** in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

In broad terms, our "legitimate interests" means the interests of running Trine as a for-profit social and environmental impact company, pursuing our aims and providing our products and services; for example, providing an investment service.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

### 4. **Sharing personal information with third parties**

4.1 Trine will only use your personal information for the purposes listed in this Policy. However, your personal information may be shared with third parties for the same purposes acting on Trine's behalf, such as to facilitate, provide and perform the Service or to assist Trine in analysing how the Service is used. In that case, Trine remains responsible for such third parties' processing of your personal information. Such third parties have access to your personal information only to perform tasks on Trine's behalf and are obligated not to disclose or use the information for any other purpose.

4.2 Non-exhaustively, those third parties may include:

- (a) Tax Authorities that require personal information for tax reporting purposes.



- (b) Members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Chapter 1 section 11 of the Companies Act (2005:551)
- (c) The relevant Solar Company if you choose to proceed with an investment in the particular loan. The Solar Company will hold and process such of your personal information, and to the extent, as is necessary to maintain the register of investors who have invested with the Solar Company;
- (d) Advertisers and advertising networks that require personal information to select and serve relevant adverts to you and others. We do not disclose personal information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a particular area of a country). We may make use of the personal information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience; and analytics and search engine providers that assist us in the improvement and optimisation of our site;
- (e) E-wallet providers;
- (f) Suppliers and subcontractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts or cloud storage providers;
- (g) Professional service providers such as accountants and lawyers;
- (h) Insurers;
- (i) Regulatory authorities, such as the Swedish Financial Supervisory Authority ;

4.3 In particular, we reserve the right to disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;
- If substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- If we are under any legal or regulatory duty to do so; and/or
- To protect the rights, property or safety of Trine, its personnel, users, visitors or others.

## 5. **International Data Transfers**

5.1 Given that our loans are international and because we use agencies and/ or suppliers to process personal information on our behalf, it is possible that personal information we collect from you will be transferred to and stored in a location outside the European Economic Area (“EEA”).

5.2 Please note that some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your



personal information is transferred, stored and/or otherwise processed outside the EEA in a country that does not offer an equivalent standard of protection to the EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Policy. If you have any questions about the transfer of your personal information, please contact us [hello@trine.com](mailto:hello@trine.com)

- 5.3 Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure – however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorised access.

## 6. Rights in respect of your personal information

- 6.1 Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing purposes or to unsubscribe from our email list at any time. You also have the following rights:

- (a) **Right of access** – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply. To exercise this right you may email Trine at [hello@jointrine.com](mailto:hello@jointrine.com) or send a written letter to Trine's registered address. You can also at all time access the information through your dashboard in the tab Settings if you are registered.
- (b) **Right of erasure** – at your request we will delete your personal information from our records as far as we are required to do so. In many cases we will suppress further communications with you, rather than delete it.
- (c) **Right of rectification** – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
- (d) **Right to restrict processing** – you have the right to ask for processing of your personal information to be restricted in some circumstances, such as where there is disagreement about your personal information's accuracy or legitimate usage.
- (e) **Right to object** – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests ground, (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.
- (f) **Right to data portability** – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us



to provide the personal information to you – or another service provider – in a machine-readable format.

- (g) **Rights related to automated decision-making** – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or Member State law to which Trine is subject (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

6.2 We may ask you for additional information to confirm your identity and for security purposes, before disclosing personal information requested to you.

6.3 Please note that some of these rights only apply in limited circumstances. For example, you are not entitled to demand that Trine erases personal information that Trine is under a legal obligation to keep, for example in share ledgers. For more information, we suggest that you contact us using the details below.

6.4 You are further entitled to make a complaint about us or the way we have processed your personal information to the data protection supervisory authority in your home country. In Sweden the protection authority is the Swedish Data Protection Agency, <https://www.datainspektionen.se/>. For further information on how to exercise this right, please contact us using the details below

## 7. **Retention of personal information**

7.1 If you are a registered member, Trine will retain your personal information, in accordance with this Policy for as long as you remain a registered member. You are free to deregister at any time. After such deregistration, Trine will only retain your personal information to the extent necessary and only for as long as it is required by Trine in accordance with applicable law or required by Trine in order to comply with undertakings towards you as a member.

## 8. **Cookies, server logs and tracking tools**

8.1 Trine uses cookies on the Website. Cookies are alphanumeric identifiers that are transferred to your device's hard drive through your web browser when using the Website and/or the Service. Trine collects cookies to be able to keep you logged in and thereby improve your experience when using the Service and/or Website. Furthermore, Trine collects cookies to, for example, retrieve user details for each visit in order to create statistics of your and other Members' use of the Website and the Services. Trine also uses cookies in order to collect personal information and other information as described in this Policy. You can command your browser either to notify you when you receive a cookie or to refuse cookies altogether. You are of course free to do so but then you may not be able to use all parts of our Website and/or Service.

8.2 When accessing the Website, Trine may log your IP address, access URL, time of access, browser type, and referral URL in order to obtain internal information regarding site traffic statistics. This information is used in an aggregated manner, and is never linked back to any personally identifiable information, unless to identify members who are using the Service for any activity that is deemed in conflict with our Terms of Service or Policy.



8.3 We use third party tracking tools to improve the performance and features of our website. These third party tracking tools are designed to collect only non-personal information about your use of our website.

## 9. **Security**

9.1 Trine is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your personal information. Even though Trine takes the security of your personal information seriously, please keep in mind that no method of transmission over the Internet, or method of electronic storage, is entirely secure. Trine strives to use commercially acceptable means to protect your personal information and to make sure your personal information is treated securely and in accordance with this Policy, such as ensuring your personal information is only accessible by appropriately trained staff and contractors and stored on secure servers with features enacted to prevent unauthorised access.

9.2 Trine shall not sell, rent or trade your personal information to any unaffiliated third party or third party that Trine does not commercially cooperate with, without your permission, unless we are under a duty to disclose or share your personal information in order to comply with a legal obligation.

## 10. **How to contact us**

[hello@trine.com](mailto:hello@trine.com)

TRINE AB  
Kungstorget 7, 411 17, Gothenburg, Sweden