

PARTECH

CONFLICT OF INTEREST POLICY

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I. General provisions

1. Context

The General Data Protection Regulation (GDPR) is a comprehensive data privacy and security framework implemented by the European Union in May 2018, to protect the personal data of its citizens. It establishes guidelines for the collection, processing, and storage of personal information, giving individuals greater control over their data. Partech, as a regulated Alternative Investment Fund Manager (AIFM), recognized the importance of GDPR compliance in handling sensitive information related to investors, clients, and other stakeholders. Creating a dedicated policy on GDPR ensures that Partech adheres to the legal requirements, safeguards data privacy, and maintains trust with its constituents.

2. Scope

This policy is intended to inform Partech's employees, investors, clients or other third parties about how their personal data are being used.

3. Objectives

The objective of a GDPR policy in a regulated Alternative Investment Fund Manager (AIFM) is to ensure compliance with the General Data Protection Regulation (GDPR) while handling personal data within the context of alternative investment fund management. This policy outlines the Data subject's rights, it describes the Scope and purpose of personal data processing, to whom they might be shared in the context of context of alternative investment fund management and how those are being stored by Partech.

II. General arrangement

1. Responsible controller, contact data for the data protection manager

Email: privacy@partechpartners.com

Data Protection Officer (DPO): The person concerned with personal data processing matters (the "Data Subject") may contact the DPO through the following email address: dpo@partechpartners.com.

2. Data subject's rights

If the processing of personal data is based on consent, the Data Subject is entitled to revoke her/his consent, though this will not affect the legality of processing up to the time at which consent is revoked.

The Data Subject may also send an email to the address privacy@partechpartners.com, with the Reference "Data Protection" to exercise the following rights:

- revoke consent granted,
- obtain confirmation about whether personal data concerning the Data Subject is being processed at Partech,
- access their personal details,
- rectify any inaccurate or incomplete data,
- request the deletion of their personal data when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
- request the portability of their data.

In the event of a breach of the applicable Personal Data protection laws and regulations by Partech the Data Subject may file a complaint with the French data protection supervisory authority:

Commission Nationale de l'Informatique et des Libertés (CNIL)
3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07
or
<https://www.cnil.fr/fr/plaintes>

3. Scope and purpose of personal data processing

a. Legal basis for personal data processing

Partech uses personal data only if and to the extent that at least one of the following lawful bases applies:

- Contractual obligation: the processing is necessary for the performance or preparation of a contract between the Data Subject and Partech
- Legal obligation: the processing is imposed by regulatory texts (such as the prevention of money laundering and terrorism financing or a reporting requirement under tax regulations in the jurisdictions in which Partech operates)
- Legitimate interests: the processing is necessary for the legitimate interests of Partech, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require the protection of Personal Data. The legitimate interests of Partech include but are not limited to managing relations with our existing and potential business partners, maintaining the security of our IT systems and security, and ensuring the efficient and secure running of both our business and premises.
- Consent: the Data Subject has given consent to the processing of his or her Data for one or more specific purposes

b. Type and sources of personal data

Partech primarily processes personal data it receives from clients or other third parties as permitted within the scope of a business relationship (for example, performing AML requirements, fulfill contracts, or based on consent). However, Partech also processes personal data that it accesses from public sources (for example, company, and association registers) to the extent permitted, and is authorized to process this data.

Relevant personal data refers to personal details (such as name, address, telecommunications data, date, and place of birth), identification data (for example ID, reporting data), contractual data, information regarding your financial situation, advertising and sales data, documentation data, registration data, and similar information.

c. Marketing and business information

One of the purposes for which Partech processes the Data Subject's data will be for the sending of information on financial products, through electronic and/or conventional means, with information concerning products, services, promoting events, or relevant news for the Data Subject. This includes Partech's newsletter, which the subscription to, is made voluntarily by the Data Subject. The newsletter is a regular B2B communication and typically comprises the Data Subject's surname, name, professional e-mail, and company.

Whenever any communication of this type is made, it will be sent solely and exclusively to those Data Subjects who have asked for or authorized its reception and/or who have not previously expressed their refusal to receive them.

To carry out the foregoing task, Partech may analyze the data obtained to create Data Subjects profiles that allow a more detailed definition of the products that may be of interest to them.

If the Data Subject wishes to stop receiving communications from Partech, he/she may request cancellation of the service by sending an email to the following email address: privacy@partechpartners.com. Concerning the newsletter, the Data Subject only needs to click on the “Unsubscribe” button in the newsletter, to stop receiving it.

Other purposes are linked to Partech’s contractual or legal obligation:

- As applicable, preventing, revealing, and investigating money laundering and terrorist financing as well as to bring under the relevant authorities’ investigation money laundering, terrorist financing, and/or criminal acts (by which the assets or benefit of crime have been received) and complying with other applicable laws and regulations (including obligations to report to tax authorities);
- In the case of representatives of investors, processing subscriptions of interests, drawdown notices, and payments of distributions to the holders of interests and more generally fulfilling the obligations under the fund agreement and providing services concerning the investor’s investment
- Ensuring the security of our services, risk management, as well as preventing and solving abuses and frauds

4. Rejection

Within the scope of Data Subjects’ business relationship with Partech, Data Subjects only have to provide the personal data necessary to enter into and execute a business relationship and any personal data that Partech is legally required to collect. Without this data, Partech is normally required to reject the conclusion of a contract or implementation of an order or to terminate the execution of an existing contract.

III. Recipients of personal data

Within Partech, the departments that need your data to fulfill our contractual and legal obligations receive access to your data. Service providers and agents employed by Partech (for instance those assisting Partech for regulatory and functional purposes, in addition to consultants and service providers such as lawyers, tax consultants, asset servicers, etc.) may also receive data for these purposes if they observe data protection.

Partech may only disclose information about Data Subjects to third parties if required to do so by law, if the Data Subjects have given their consent, or if Partech is authorized to provide such information for other reasons.

Under these conditions, recipients of personal data could include:

- public bodies and institutions (e.g., the AMF, the European Investment Fund (EIF), the European Investment Bank (EIB), financial authorities, and official bodies) in the event of a legal or official obligation
- other credit and financial services institutions or similar institutions to which Partech transfers personal data to manage its business relationship with the Data Subject (e.g., commercial banks depending on the contract)
- consultants who provide advisory services to Partech (such as lawyers and tax consultants) and service providers who process data on Partech's behalf (e.g., data centers and asset servicers)
- experts, to the extent that they are necessary for the business process

➤ Transmission of personal data to a third country outside the European Union

If Partech transfers personal data to offices outside of the EU, known as third countries, requirements stipulated in data privacy regulations are complied with.

IV. Information on retention periods and the deletion of personal data

Insofar as necessary, Partech processes your personal data for the duration of the business relationship, which can include the preparation and processing of a contract, for example.

If the processing of personal data is no longer necessary to this extent, Partech only stores this data for as long as required under various storage and documentation obligations arising from French law. The periods for retention and documentation stipulated in these laws are for a minimum of five years.

V. Security measures

Partech will process the Data Subject's data at all times in a confidential way and maintains the mandatory duty to secrecy concerning said data, in accordance with the provisions set out in applicable regulations; to this end, Partech has adopted measures of a technical and organizational nature, required to guarantee the security of the data and prevent them from being altered, lost, processed or accessed illegally, depending on the state of the technology, the nature of the stored data and the risks to which they are exposed.

To this end, Partech has established a classification of data according to 3 levels:

- Level 1 - Public Data: documents or information in the public domain, accessible to all, both internal and external, with no specific impact on the company
- Level 2 - Internal Data: documents that are accessible only to Partech employees and whose disclosure would have a moderate impact
- Level 3 - Confidential data: documents that are intended for a limited number of recipients, whose disclosure would have a significant impact and require special attention

In practice, the application of this classification within Partech is as follows:

Public data (Level 1)	Internal data (Level 2)	Confidential data (Level 3)
<p>Classification level not used much in practice, since documents are never shared publicly on our storage space</p>	<p><u>Partech:</u></p> <ul style="list-style-type: none"> ✓ Documents are in an open channel (General, etc.) of the Partech Team ✓ Access is defined at the Partech Team level ✓ Any Partech member has access <p><u>Broader team members:</u></p> <ul style="list-style-type: none"> ✓ Documents are in an open channel (General, etc.) of the team (e.g. "Legal Team") ✓ Access is defined at the level of the corresponding team (e.g. "Legal Team") ✓ Any team member has access, which typically includes all team members and collaborators (e.g. Legal, Finance, Accounting, etc.) <p><u>Team:</u></p> <ul style="list-style-type: none"> ✓ Documents are in a private team channel (e.g. "Legal Team - Partech Partners") ✓ Access is defined at the level of the corresponding private channel (e.g. "Legal Team - Partech Partners") ✓ Any member of the private channel has access, which typically includes restricted team members and collaborators (e.g. Legal and Finance team, etc.) 	<p><u>Accessible to a restricted group of collaborators:</u></p> <ul style="list-style-type: none"> ✓ Documents are in a private channel of the team (e.g. "Legal Team - Restricted") ✓ Access is defined at the level of the corresponding private channel (e.g. "Legal Team - Restricted") ✓ Any member of the channel has access, which typically includes only a restricted number of people