

PRIVACY NOTICE – Fund investors and clients

Previous update: January 2022

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's General Data Protection Regulation ("**GDPR**").

This Privacy Notice applies to personal data of the individuals who are our existing or prospective fund investors, wealth management and reporting services clients, their managers, representatives and contact persons, ultimate beneficial owners and politically exposed persons related to the aforesaid persons as well as other persons notified to us by fund investors in connection with our fund operations ("**you**").



1. Data controllers

The controller of your personal data is CapMan Plc and/or one or more of its group companies. Each CapMan group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this Privacy Notice and may use the necessary personal data collected by other group companies for the same purposes.

2. Contact

If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc
Privacy Matters
Ludviginkatu 6, 00130 Helsinki
Email privacy@capman.com

3. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Identification data such as name, social security number, date of birth or other similar identifier, nationality, copy of identification document
- Contact data such as residential and/or professional address, email address and telephone number

- Financial data such as bank account details, source of wealth, tax status, tax residency and other information necessary for tax reporting purposes (e.g. under FATCA and CRS regimes)
- Occupation, employer name, professional role or title, education
- Information on investor classification, investment preferences, risk appetite, investment knowledge, experience and activity, transaction history, nature of investment activities
- Information on your holdings in our funds and other products/financial instruments and payments to and from you
- Ultimate beneficial owner status, political exposure, applicable sanctions and sanction screening results
- Any other personal data that may be required in order for us to be able to provide our services or accept your subscription to our funds and to perform our functions, duties and obligations under various fund documents and to comply with any applicable laws and regulation and tax requirements
- Data on your participation in events we organize and information you give us in connection with event registration
- Your communication preferences

4. Why do we collect and process personal data?

We generally process your personal data for the following purposes:

- Administration of our relationship with you or the organisation you represent and the performance of the fund and asset management operations including asset management, reporting, investor communication, capital drawdowns and distributions

- Ensuring that we know you and your business, conducting KYC/AML checks, credit checks and sanction screenings
- Assessing your status as investor and suitability of products to you
- Reporting and communication to competent authorities including financial supervisory and tax authorities
- Providing information on the funds and their investor base to potential finance providers, their advisors and to auditors
- Providing you with access to certain IT services and portals and managing and ensuring security of our IT systems and portals
- Keeping you informed of us and our products and services and inviting you to events we organise
- Analysing our business relationship and enhancing the quality of our products and services
- Generally conducting our business and managing and administering our funds and other products as well as client relationships in accordance with contracts and regulations
- Organising investor and client events and tracking information on visitors to our premises and events

5. What is the legal basis for processing?

Under data protection laws, we need to have lawful grounds for processing your personal data. Sometimes more than one lawful ground applies. The legal basis for processing your personal data for the abovementioned purposes is primarily our contractual obligations relating to our relationship with you or the organisation you represent and our obligation to comply with applicable laws and regulations. Your personal data may also be processed based on our legitimate interest to conduct our administrative processes and our other

business appropriately and effectively. We may also base our data processing on your consent.

6. What are our information sources?

We collect personal data mainly from you or the organization you represent. Additional information sources include public registers such as trade registers and corresponding foreign registers. We may also obtain information on you from authorities, credit agencies, public domain and through sanctions screening tools. Information sources are used within the limits of the applicable laws, and your consent is requested when necessary.

7. How and with whom do we share personal data?

We may share your personal data between different entities within the Group. Further, we use services of various service providers and may transfer personal data to such third-party service providers. Such services may include e.g. fund administration and depositary services, IT services related to software systems and certain consultants and advisors. We may also need to share personal data with public authorities such as financial supervisory authorities or the police.

Sometimes we may need to transfer personal data outside the EU or EEA for instance because a service provider is based in a third country. Such transfer would only be made (i) to a country in which the level of data protection is adequate for safeguarding the transferred personal data according to the EU Commission; (ii) using appropriate safeguards such as the EU Commission's standard contractual clauses

in accordance with applicable data privacy laws and regulations; or (iii) if the transfer is specifically agreed upon with you.

8. How long is the personal data retained?

We store your personal data only for as long as it is necessary for the purposes for which the data was collected for. When personal data is no longer needed, it will be deleted or anonymized, unless we have a legal obligation to retain data for a longer period or unless retaining such data is necessary for the purposes of securing our rights and fulfilling our obligations and for handling possible claims. This means that the retention periods vary depending on the processing purpose, type of personal data, and local requirements. For example, anti-money laundering regulations require that client identification information is stored for the period of five years from the termination of the client relationship.

9. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan and of our third-party service providers are given access to personal data, and these employees and third-party service providers are required to treat this information strictly confidential.

10. What are your rights?

You are entitled to obtain information of your personal data that we process and have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing and request data portability, i.e. transfer of your personal data in a structured, commonly used machine-readable format to you or to another data controller.

You should be aware that certain information is strictly necessary for the performance of a contract or for compliance with our legal obligations, which may set limits to some of the rights listed above. In case the data processing is based on your consent, you may at any time contact us and revoke your consent. Withdrawal of consent does not affect the lawfulness of data processing before the withdrawal.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to privacy@capman.com. We will answer to your request within one month of receipt of your request unless there are justified reasons to extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

11. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.