

PRIVACY NOTICE – Fund operations

CapMan Plc (and the companies belonging to the same company group, hereinafter jointly referred to as "CapMan") is committed to keeping all personal data it collects and processes safe and secure and to inform the data subjects promptly of all its data processing activities and on the rights which data subjects have.

This Privacy Notice is one of CapMan's 4 public Privacy Notices. It answers the following questions:

- *What kind of personal data does CapMan collect and process?*
- *Why does CapMan collect and process personal data?*
- *What are CapMan's information sources?*
- *How and with whom may the personal data be shared?*
- *How long is the retention time?*
- *What are the rights of the data subject?*
- *Who to contact?*
- *How does CapMan secure personal data?*

This is a Privacy Notice, which aims to provide information regarding the processing of personal data at CapMan in connection to CapMan's Fund operations. Please note that the data controller within CapMan may also be one of CapMan's subsidiaries and as a result, the data subject may have a data controller – data subject relationship with one of the subsidiaries.

In this Privacy Notice, the data subjects, which are hereinafter jointly referred to as "**Data Subjects**", may be:

- Fund investors, their ultimate beneficial owners, legal representatives or contact persons;
- Members of the Investment Committees and Advisory Boards of each CapMan fund;
- Members of the management team or Board of Directors of the portfolio companies or other contact persons or representatives of these portfolio companies;
- Contact persons, representatives, management team or board members of the companies from which the portfolio companies or properties are purchased or to whom they are sold to;
- Tenants of the portfolio properties;
- Contact persons of external advisors, co-operation partners and service providers (such as administrators and depositaries);
- Prospective investors and persons who have participated in events organized by CapMan.



1. What kind of personal data does CapMan collect and process?

Information related to communication

Basic contact information of all Data Subjects such as name, position, title, address, email address, telephone number, employer data, and contact history data, such as correspondence and communication notes, participation details of events organized by CapMan, dietary restrictions and food allergies, and given consents and prohibitions for purposes of processing personal data.

Information related to fund investors

Bank account information, cash flow details, information on previous and current fund investments and investment appetite.

Information related to identification and legal requirements

In case personal data is processed due to mandatory legislative requirements, the register may also contain other personal data that Capman is obliged to collect under mandatory legislation. This information includes, but is not limited to, the following: date of birth, social security number, passport copy, citizenship, residence, tax residence, source of funds, financial status and role as a politically exposed person and/or connections to countries on sanction lists or asset freezing lists (if any).

2. Why does CapMan collect and process the personal data?

Communication & marketing

CapMan processes personal data in order to contact, maintain, develop and update CapMan's business relationships and by inviting stakeholders to events as well as by marketing its new products and services. Processing for this purpose is based on a consent given by the Data Subject or on a contract made between the Data Subject and CapMan.

Fund operations

Personal data is also processed for the purpose of fund operations of CapMan including legal due diligence, fund administration, reporting and decision-making. Processing for this purpose is based either on fulfilling the contractual obligations or legal requirements which CapMan as an alternative investment fund manager and/or as a general partner of the limited partnership must comply with.

Legal obligations

CapMan collects and processes personal data in order to fulfil its obligations under the mandatory legislation regarding e.g. alternative investment fund managers, anti-money laundering, limited partnerships. Based on these regulations, CapMan is obliged to process personal data when conducting for instance anti-money laundering checks, sanctions screening or maintaining a list



of limited partners and/or fund investors. In case a Data Subject refuses to provide CapMan with any obligatory information, CapMan may not be able to enter into a business relationship or to operate in normal course of business with the Data Subject.

Development of business operations

Personal data may be used for the development of business operations. Personal data may be processed in order to analyse the business relationship or to enhance the quality of CapMan's products and services. General visitor information of CapMan's website is tracked, and this information may be generalized and used to analyse the use of the website and to further develop the website. The basis for the processing is CapMan's legitimate interest to develop its operations and enhance the quality of its products and services provided to Data Subjects.

No other purposes

CapMan does not process the collected personal data for any other purposes without informing the Data Subject in advance of that other purpose. The collected data is not processed for automated decision-making (including profiling).

3. What are CapMan's information sources?

Personal data is mainly collected from the Data Subject himself/herself or from their employer entity.

Personal data can be also collected from publicly available or other sources such as official registers maintained by Patent and Registration Offices, the National Bureaus of Investigation and the Finnish Business Information System (YTJ). CapMan may also collect personal data from the registers of credit rating bureaus such as Suomen Asiakastieto Oy.

The information sources may vary depending the domicile and/or the citizenship of the Data Subject.

4. How and with whom may the personal data be shared?

CapMan may share personal data with others (e.g. third parties) such as the public authorities, suppliers and business partners who may, due to such sharing and depending on the situation in question, act as a data processor or become a controller of personal data.

Capman may fulfil an above mentioned transfer of personal data only under a contractual obligation or a legislative obligation to do so and only if it is necessary for processing personal data systematically and effectively, protecting CapMan's and/or the Data Subjects' safety or the safety of others, investigating fraud, or responding to a government request.



Personal data may also be shared with:

- **business partners and third party service providers**, such as administrators, depositaries and legal advisors for the purpose of co-operation in the context of fund management, administration, anti-money laundering and know your client and legal due diligence. CapMan only shares the information which is necessary to share in order to fulfill its legal obligations.
- **trusted IT service providers**, for the purposes of systematic and organised handling of personal data. However, at all times, these trusted service providers act on CapMan's behalf and CapMan is responsible for the processing of personal data;
- **competent public authorities** when permitted or required in order to comply with applicable mandatory laws or rules of a stock exchange, by order of a court or a request, which is made by a competent authority with legal rights to access such information. E.g. tax reporting information is annually transferred to tax authorities and the information regarding anti-money laundering is transferred to FIN-FSA upon request.

Transfer of personal data to third countries

Personal data may also be transferred to countries outside of the EU or EEA ("third countries"), but only during exceptional circumstances. Such transfer is conditional to the EU Commission assessing that the level of data protection is adequate in the target country, there are necessary standard contractual clauses in place to safeguard the transfer and/or the transfer is specifically agreed upon with the Data Subject.

CapMan also operates in Russia and, for this reason, certain personal data can be transferred to the CapMan Russia team. Some of the CapMan funds are located in Guernsey and, therefore, the personal data of investors and portfolio company management may be transferred to CapMan's local administrator in Guernsey.

5. How long is the retention time?

The basic rules for retention are that personal data is retained only for as long as necessary to fulfill the purpose of processing or as long as it is required by law.

Basic personal data will be retained only as long as necessary to manage the business relationship or other interaction with the Data Subject. The data will be deleted after a reasonable period of time has lapsed from the last contact between the Data Subject and CapMan.

Personal data collected under mandatory legislation purposes will be retained as long as required by law, for example anti-money laundering (5 years after a single transaction or 5 years



from the end of a customer relationship), bookkeeping or accounting (10 years from the end of the accounting year). Please note that the data retention times may differ since they are subject to local law.

6. What are the rights of the Data Subject?

A Data Subject is entitled to have access to personal data concerning him or her in the register, managed by CapMan, and to request CapMan to correct, update or remove personal data at any time. To the extent required by applicable data protection law, a Data Subject has a right to object or restrict data processing and request data portability, i.e. the right to receive the personal data in a structured, commonly used machine-readable format and transmit the personal data to another controller.

Data Subjects should acknowledge that certain information is strictly necessary for the performance of a contract or for compliance with a legal obligation of CapMan, which may restrict the Data Subject's rights listed above. In case the data processing is based on the consent given by the Data Subject, the Data Subject may at any time contact CapMan and cancel the consent for processing personal data, e.g. opt-out of receiving marketing messages.

6. Who to contact?

Controller and Controller's representative

Name: CapMan Plc

Business ID: 0922445-7

Address: Ludviginkatu 6, 00130 Helsinki

Phone: +358 207 207 500

Name: Antti Kiviluoto

Title: IT Director

Email: antti.kiviluoto@capman.com

Phone: +358 207 207 564

Competent authority

If the Data Subject finds violation to his or her legal rights, he or she has the right to file a complaint with the national Data Protection Authority or another Data Protection Authority within the EU or the EEA.

The Data Protection Ombudsman acts as the supervising authority in Finland. You can find the contact information of the Data Protection Ombudsman through this [link](#). Please send any requests regarding the above-mentioned rights to the contact person at CapMan whose contact details can be found above.

