



Privacy Notice

of

Lightrock LLP (**Lightrock**)

to

External Investment Managers or Advisers and Portfolio Companies

General Information

Lightrock cares about the protection of personal data. This Privacy Notice ("**Notice**") explains how and for what purposes we use personal data in the context of our investment management activities. Certain contents of the Notice, including data subject rights, may apply only where our processing of personal data falls within the scope of the UK General Data Protection Regulation ("**GDPR**").

For the purposes of the Notice, "**Data**" shall mean personal data, i.e. any information relating to an identifiable natural person. The terms "**you**" and "**your**" shall refer to the legal entity, partnership or other organization you represent and/or, as the case may be, to you as a natural person, e.g. as a representative, partner, principal, employee or other affiliate of an existing or potential external investment manager, portfolio company and their respective controlling sponsors. "**Lightrock**", "**we**", "**us**" or "**our**" shall mean Lightrock LLP and or Lightrock Holding Ltd., as applicable, and any direct or indirect subsidiary that is active in the business of impact investment advice (hereinafter collectively referred to as "**Lightrock Companies**", individually "**Lightrock Company**"). Lightrock Holding Ltd. is a limited company incorporated under the laws of the Principality of Liechtenstein with registered address at Herrengasse 12, 9400 Vaduz, Liechtenstein.

Important note

In the course of our dealings with you, we may process Data of persons related to you or to the company or other organization you may represent. Such persons may include, but are not limited to, directors, representatives, current and former employees, shareholders or other participants, business associates, service providers such as consultants, financiers, legal advisors or any other affiliates of you and/or the company or other organization you may represent ("**Affiliates**"). As we cannot possibly bring the Notice to the attention of all Affiliates, we kindly ask you to do so on our behalf.



Getting in touch

With regard to our use of your Data, you may contact our Data Protection Officer at:

Lightrock LLP
Data Protection Officer
1 St James's Market
London, SW1Y 4AH
Telephone: +44 (0) 207 484 2600
E-Mail: compliance@lightrock.com

If you are unsure as to which Lightrock Company controls your Data, please do not hesitate to contact us. If such Lightrock Company has its registered office outside of the United Kingdom or the European Economic Area ("EEA"), the company acting as representative in the United Kingdom is Lightrock LLP and in the EEA is Lightrock Holding Ltd.

The Data we collect and process

In connection with your dealings with Lightrock or a company, alternative investment fund manager or other entity or person advised by Lightrock, we may collect and process your Data. Depending on the circumstances, such Data may include: your name, email address, residential address, telephone number, nationalities, place and date of birth, passport or other identification document, former and current employers, job title, details concerning your compensation (e.g. salary, bonus, carry), educational background, previous industry experience, references of former employers, criminal record, information on past and pending litigations, regulatory proceedings and other investigations, ownership structure of your company, former employees of your company and the reason for their leaving, your role and time commitment in managing or advising on specific investments, your commitments to investment management, investment advice or other business activities outside of the affairs of the investments we are advising on or otherwise interested in, anticipated amounts of compensation to be received for such activities, ownership interests in other undertakings, board responsibilities for portfolio companies and non-portfolio companies including the number of meetings to attend per year and similar information as customary in the industry.

Purposes and legal basis for our use of your Data

When processing your Data, we do so based on our legitimate interest in running our business. Prior to advising on making an investment, we need to have a thorough understanding of you and your investment strategy. We may therefore process your Data for the purposes of assessing your business and investment strategy, in particular its inherent risks and opportunities, analyzing your business model and structure, conducting due diligence from a financial, operational, legal and tax perspective, screening key individuals of your company who substantially contribute to the evolution of the potential investment, particularly such individuals who are involved in the day-to-day management and investment process. Once an affiliate of us or other counterparty we are an investment advisor to has invested (hereinafter referred to as "**Investor**"), we have a legitimate interest to monitor the development of the investment. Therefore, we will continue to process your Data for the entire period of the Investor's investment. Furthermore, we may process your Data for the purpose of complying with legal and regulatory obligations we are subject to, e.g. in connection with Know-Your-Customer and Anti-Money Laundering rules, for the prevention of fraud, for legal, regulatory or tax reporting purposes, in response to legal requests or requests from regulatory, tax or other law enforcement authorities. Such use of your Data may occur prior to the Investor's investment and can take place



at any time during the investment. Where GDPR requires us to obtain your explicit consent for processing certain Data, we will contact you.

In the course of your dealings with Lightrock, we may transfer your Data to categories of recipients such as attorneys, auditors, prime brokers, consultants, providers of various services such as document storage, recordkeeping and background checks. We may also provide your Data to law enforcement authorities or other government entities based on a lawful disclosure request or to other parties as part of corporate business transactions such as mergers and acquisitions, joint ventures, financings or sales of company assets. We may further share your Data with any other subsidiary of Lightrock Holding Ltd., or LGT Venture Philanthropy Foundation, but in particular with other Lightrock Companies or relevant Investors.

Recipients may be located outside of the EEA in which case we will ensure that adequate safeguards with regard to data protection such as model contract clauses approved by the European Commission are in place.

Your rights

Under GDPR, you have the following rights regarding our use of your Data:

- the right to access your Data and to be informed of, inter alia, the purpose of our use of your Data, the categories of Data concerned and the recipients to whom we disclose your Data;
- the right to obtain from us without undue delay the rectification of inaccurate Data concerning you;
- under certain circumstances defined by GDPR, the right to obtain from us without undue delay the erasure of your Data. By way of example, you may request erasure if your Data are no longer necessary in relation to the purposes for which they were collected;
- under certain circumstances defined by GDPR, in particular if you contest the accuracy of the Data we use, the right to obtain from us restriction of our processing of your Data;
- where we rely on our legitimate interests to use your Data and provided that you can claim overriding interests, the right to object at any time to our use of your Data;
- where your consent for our use of your Data is required pursuant to GDPR, the right to withdraw your consent at any time;
- the right to data portability where processing is carried out by automated means and based on either the performance of a contract or, where applicable, your consent;
- the right to lodge a complaint with our lead supervisory authority in the United Kingdom:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
<https://ico.org.uk/make-a-complaint/>

You may also lodge a complaint to your local supervisory authority within the EEA.



For how long we store your Data

In order to monitor the development of the Investor's investment, it will be necessary for us to store and process your Data during the entire period of our ongoing investment advice to the Investor. Because we strive to build long-term relationships with our business partners, we may continue to use your Data beyond the period of our investment advice to the Investor in order to foster possible business opportunities. Furthermore, as the exact duration of the retention period depends on various elements including applicable laws and regulations, longer retention periods may be applicable. Possible legitimate interests of Lightrock or another Lightrock Company may also allow us to use your Data for a period exceeding the abovementioned term, particularly where our continued use of your Data is necessary for the establishment, exercise or defense of legal claims. In any case, you may at all times object to our use of your Data and we shall review such request without undue delay (see above "**Getting in touch**").

Failure to provide your Data

GDPR requires us to inform you of the consequences if you fail to provide your Data. If you choose not to provide us with Data which is required in order to prepare and maintain a business relationship with you, such relationship cannot be established and maintained.