

**Privacy Notice** 

of

Lightrock LLP (Lightrock)

to

# **Business Partners**

#### **General Information**

Lightrock cares about the protection of personal data. This Privacy Notice ("**Notice**") explains how and for what purposes we use personal data of business partners who are not covered by our notices to, investment managers or advisors and portfolio companies. 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, employee or other affiliate of an existing or potential business partner. "Lightrock", "we", "us" or "our" shall mean Lightrock LLP and/or Lightrock Holding Ltd., as applicable, and any other 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 directors, representatives, 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.

#### Who is concerned?

This Notice is addressed to business partners of Lightrock such as payroll providers, commercial banks, public relations or event agencies, recruiting agencies, insurance companies, catering businesses, cleaning companies, suppliers of,



inter alia, office material, food and beverages, office furniture, etc. If you have doubts whether or not you are concerned, please do not hesitate to contact us (see below "Getting in touch").

#### **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, due to legal, political or regulatory reasons, or otherwise 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, we may collect and process your Data. Depending on the circumstances, such Data may include your name, employer, email address, telephone number, nationalities, place and date of birth, job title and similar standard contact information we may be required to use in order to establish and maintain our business relationship.

#### Purposes and legal basis for our use of your Data

We primarily process your Data for the performance of the contract we entered into with you or in order to take steps prior to entering into a contract with you. In rare cases, we may also process your Data for the purpose of complying with legal and regulatory obligations we are subject to, in particular Anti-Money Laundering rules. 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 third parties that are typically involved in business relationships and transactions we enter into with you. Such recipients may include governmental institutions, commercial banks or insurance companies. We may further share your Data with any other affiliate or subsidiary of Lightrock Holding Ltd., LGT Venture Philanthropy Foundation but in particular with other Lightrock Companies. Lightrock operates throughout the world. Therefore, such 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 with your local supervisory authority within the EEA.

### For how long we store your Data

We may store your Data for a period of up to ten years after termination of our business relationship. 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 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 processing 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.