

**Privacy Notice** 

of

Lightrock LLP (Lightrock)

to

# **Existing and Potential Clients**

#### **General Information**

Lightrock cares about the protection of your personal data. This Privacy Notice ("**Notice**") explains how and for what purposes Lightrock uses your personal data. Certain contents of the Notice, including data subject rights, may apply only where our processing of your 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 you as a natural person, e.g. as representative, employee or other affiliate of a client or potential client of Lightrock, and/or to the legal entity or partnership you may represent. "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.

In the course of our dealings with you, it might be necessary for us to process Data of other persons related to you or to the company or other organization you represent such as employees, directors, representatives or other affiliates of such company or organization. If this is the case, the Notice has to be brought to the attention of the affected persons and we hereby kindly ask you to do so.

# **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: <a href="mailto:compliance@lightrock.com">compliance@lightrock.com</a>

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 our 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 Data such as your name, your employer or, if not identical, the company or other organization you represent, your email address, telephone number, job title, information on our discussions regarding previous, current and potential investments, names and contact details of persons related to you such as employees, directors, representatives or other affiliates of the company or other organization you represent.

## The purposes we use your Data for

We may process your Data for the purpose of sending you reports, brochures, newsletters and other publications concerning possible investments advised by Lightrock and/or general industry related subjects. We may use your Data for the purpose of inviting you to business related events or webinars. For the stated purposes, we may also contact you by other means such as telephone calls. You may rest assured that we will only provide you with information that we deem to be in accordance with your specific needs and investment strategy. In particular, we do not send bulk emails. If you do not wish to receive further information from us, please let us know (see above "Getting in touch").

### Legal basis for our use of your Data

When processing your Data, we do so based on our legitimate interest in running our business. Since we will only process your Data in order to identify your specific needs and our mutual interests and, if you wish, conclude business transactions, we deem our interests to be in line with yours. If you disagree, you can contact us at any time and we shall thereupon cease to use your Data. Should we enter into a transaction with you, it will also be necessary to process your Data for the purpose of carrying out such engagement and to comply with the regulatory and legal obligations we are subject to. In such cases, you will receive a separate notice concerning you as an investor. 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 administrators or custodians. We may further share your Data with any other affiliate or direct or indirect subsidiary of Lightrock Holding Ltd., but in particular with other Lightrock Companies. 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

Lightrock strives to build long-term relationships with its clients. We therefore may retain your Data for a period of up to ten years or, as the case may be, for as long as our relationship lasts. In any case, you may at all times object to our processing of your Data (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 our business relationship with you, such relationship cannot be established and maintained.