

## Data Privacy Policy

In the course of its operations, InfraVia Capital Partners collects and uses personal data.

This Privacy Policy explains the personal data that we might collect from you, the purposes, legal basis and manner of such personal data processing, and your rights with respect to your personal data.

The policy applied by InfraVia Capital Partners when processing personal data is set out below.

### **WHAT TYPES OF PERSONAL DATA ARE COLLECTED, FOR WHAT PURPOSES AND FOR HOW LONG THE DATA WILL BE RETAINED?**

#### **I. You are: an investor or a potential investor<sup>1</sup>**

##### *1/ What personal data do we or are we likely to collect?*

We may collect or collect:

- your name, your personal and professional contact information;
- information relating to your marital and family status;
- information relating to your financial situation, and your bank account details;
- information relating to your investment knowledge;
- tax information (including your tax identification number);
- information relating to your professional functions, in particular with the aim of verifying whether you are a politically exposed person;
- identification documents;
- and information collected in due diligence forms.

In order to comply with our anti-money laundering obligations, we may also obtain certain information from third party providers which help to identify whether you have the status of a politically exposed person or whether your status presents any risks under anti-terrorism, organised crime, and money laundering regulations.

##### *2 / What is the purpose and legal basis for such personal data processing?*

We need the information set out above in order to:

- Offer you our products or services;
- Communicate with you regarding these products and services;
- Carry out operations and transactions related to these products and services;
- Perform due diligence to comply with our legal, regulatory and tax obligations under the laws and regulations that we consider applicable; and
- If necessary, defend our interests or those of the investment vehicles we manage or advise, in particular in the context of litigation or at the pre-litigation stage.

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<sup>1</sup> This section also applies to you if you are a legal representative, a direct or indirect affiliate of that investor or a legal representative of that affiliate or generally a person related to that investor or affiliate

This information is collected, as the case may be, in the pursuit of InfraVia Capital Partners' legitimate interests, for the conclusion of a contract to which you are party or for compliance with legal, regulatory or tax obligations.

### *3/ Who do we share personal data with?*

Given the size of our company, your personal data is accessible to all our employees.

Your personal data may also be transmitted to:

- our service providers acting as data processors, in particular those in charge of carrying out communication, marketing and distribution operations for the products and services we offer, as well as those in charge of providing IT systems and tools and IT services;
- third parties when necessary for the performance of the services contracted by our company or the investment vehicles we manage or advise (in particular law firms, audit and consulting firms, custodians, account holders and statutory auditors, banks); and
- judicial, tax or regulatory authorities acting in the performance of their duties and the exercise of their powers.

### *4/ How long do we keep such personal data?*

We only keep your personal data for as long as is necessary for the purposes set forth above, and according to the following criteria:

- for the duration of our contractual relationship;
- for the purpose of complying with document retention obligations under the regulations applicable to InfraVia Capital Partners as well as applicable money laundering requirements;
- in the event of a dispute, your data will be stored for the duration of the relevant procedure and until a final decision is rendered or the expiry of the time limit to lodge an appeal.

At the end of these periods, your data will be stored until the expiry of the applicable statute of limitation and in accordance with the regulations in force.

## **II. You are: a person involved (or likely to be involved) in transactions with us or with our investment vehicles<sup>2</sup>**

### *1/ What personal data do we or are we likely to collect?*

We may collect or collect:

- your name, your personal and professional contact information;
- information relating to your financial situation, and your bank account details;
- tax information (including your tax identification number);
- information relating to your professional functions, in particular with the aim of verifying whether you are a politically exposed person;
- identification documents;
- and information collected in due diligence forms.

In order to comply with our anti-money laundering obligations, we may also obtain certain personal data, including information available from third party providers which help to identify whether you

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<sup>2</sup> This section also applies to you if you are a direct or indirect affiliate of that person or a legal representative of that person or generally a person related to that person or to that affiliate

have the status of a politically exposed person or on whether your status presents any risks under anti-terrorism, organised crime, and money laundering regulations.

*2/ What is the purpose and legal basis for such personal data processing?*

We need the information above-mentioned in order to:

- Communicate with you regarding our products and services;
- Carry out operations and transactions related to these products and services;
- Perform due diligence to comply with our legal, regulatory and tax obligations under the laws and regulations that we consider applicable; and
- If necessary, defend our interests or those of the investment vehicles we manage or advise, in particular in the context of litigation or at the pre-litigation stage.

This information is collected, as the case may be, in the pursuit of InfraVia Capital Partners' legitimate interests, for the conclusion of a contract to which you are party or for compliance with legal, regulatory or tax obligations.

*3/ Who do we share personal data with?*

Given the size of our company, your personal data is accessible to all our employees.

Your personal data can also be transmitted to:

- our service providers, acting as data processors, in particular those in charge of providing IT systems and tools and IT services;
- third parties when necessary for the performance of the services contracted by our company or the investment vehicles we manage or advise (in particular law firms, audit and consulting firms, custodians, account holders and statutory auditors, banks); and
- judicial, tax or regulatory authorities in the performance of their duties and the exercise of their powers.

*4/ How long do we keep such personal data?*

We only keep your personal data for as long as is necessary for the purposes set forth above, and according to the following criteria:

- for the duration of our contractual relationship;
- for the purpose of complying with document retention obligations under the regulations applicable to InfraVia Capital Partners as well as applicable money laundering requirements;
- in the event of a dispute, your data will be stored for the duration of the relevant procedure and until a final decision is rendered or the expiry of the time limit to lodge an appeal.

At the end of these periods, your data will be stored until the expiry of the applicable statute of limitation and in accordance with the regulations in force.

**III. You are: an employee, agent or holder of an investment (or one of its subsidiaries) in which we invest (or are likely to invest) directly or through an investment vehicle**

*1/ What personal data do we or are we likely to collect?*

We may collect or collect:

- your identification data: your name, your personal and professional contact information and the type, number and copy of the document equivalent to a work permit (if applicable);
- information contained in your employment contract and/or pay slip if this information is provided to us during due diligence or the holding period of the investment; and
- your photograph.

In order to comply with our anti-money laundering obligations, we may also obtain certain information available from third party providers which help to identify whether you have the status of a politically exposed person or whether your status presents any risks under anti-terrorism, organised crime, and money laundering regulations.

*2/ What is the purpose and legal basis for such personal data processing?*

We need the information above-mentioned in order to:

- Perform due diligence relating to our investment or carry out our duties in relation to this investment;
- Communicate with you in the context of investment or the management of the investment;
- Perform due diligence to comply with our legal, regulatory and tax obligations under the laws and regulations that we consider applicable; and
- If necessary, defend our interests or those of the investment vehicles we manage or advise, in particular in the context of litigation or at the pre-litigation stage.

This information is collected, as the case may be, in the pursuit of InfraVia Capital Partners' legitimate interests, or the compliance with legal, regulatory or tax obligations.

*3/ Who do we share personal data with?*

Given the size of our company, your personal data is accessible to all our employees.

Your personal data can also be transmitted to:

- our service providers, acting as data processors, in particular those in charge of providing IT systems and tools and IT services;
- third parties when necessary for the performance of the services contracted by our company or the investment vehicles we manage or advise (in particular law firms, audit and consulting firms); and
- judicial, tax or regulatory authorities in the performance of their duties and the exercise of their powers.

*4/ How long do we keep such personal data?*

We only keep your personal data for as long as is necessary for the purposes set forth above, and according to the following criteria:

- for the purpose of complying with document retention obligations under the regulations applicable to InfraVia Capital Partners, as well as applicable money laundering requirements;
- in the event of a dispute, your data will be stored for the duration of the relevant procedure and until a final decision is rendered or the expiry of the time limit to lodge an appeal.

At the end of these periods, your data will be stored until the expiry of the applicable statute of limitation and in accordance with the regulations in force.

**IV. You are: a supplier or service provider of our company or one of our investment vehicles or their respective subsidiaries or a legal representative or employee of such supplier or service providers**

*1/ What personal data do we or are we likely to collect?*

We collect your name and contact information. We may also collect your bank account details and, in certain cases, professional information (CVs, diplomas).

*2/ What is the purpose and legal basis for such personal data processing?*

We need the information above-mentioned in order to:

- Allow us to select/appoint you (or your company);
- Communicate with you as part of our current or potential business relationship;
- Enable you to carry out the duties for which you or your company has been appointed;
- Perform due diligence to comply with our legal, regulatory and tax obligations under the laws and regulations that we consider applicable; and
- If necessary, defend our interests or those of the investment vehicles we manage or advise, in particular in the context of litigation or at the pre-litigation stage.

This information is collected, as the case may be, in the pursuit of InfraVia Capital Partners' legitimate interests, the conclusion of a contract to which you are party or the compliance with legal, regulatory or tax obligations.

*3/ Who do we share personal data with?*

Given the size of our company, your personal data is accessible to all our employees.

Your personal data can also be transmitted to:

- our service providers, acting as data processors of InfraVia Capital Partners (and in particular IT service providers) when necessary to provide their services;
- third parties when the data processing is necessary for the performance of their services (law firms, audit and consulting firms, and statutory auditors, banks); and
- judicial or regulatory authorities, in the performance of their duties and the exercise of their powers.

*4/ How long do we keep such personal data?*

We only keep your personal data for the duration of the relationship between the company for which you work for and InfraVia Capital Partners.

Your data will then be stored until the expiry of the applicable statute of limitation and in accordance with the regulations in force.

In the event of a dispute, your data will be stored for the duration of the relevant procedure and until a final decision is rendered or the expiry of the time limit to lodge an appeal

## **V. You are: a job applicant**

### *1/ What personal data do we or are we likely to collect?*

We collect your name, contact information and professional information (CV, cover letter, diplomas, remuneration).

We can also collect this data from recruitment agencies, together with job profile and the results of the tests conducted by these agencies.

### *2/ What is the purpose and legal basis for such personal data processing?*

We need your contact information for the purposes of communicating with you during the application process.

We use this information to confirm your suitability for the relevant position. The legal basis is the company's legitimate business interests in managing its recruitment process.

If we retain your application, we may use this information to take the necessary steps prior to the conclusion of your employment contract.

### *3/ Who do we share personal data with?*

Your personal data is only accessible to the authorised personnel within our company, namely the management team, members of the team you may join, the company's administrative staff and personnel in charge of human resources.

Your personal data may be shared with:

- our service providers, acting as data processors of InfraVia Capital Partners (and in particular IT service providers);
- third party service providers when the data processing is necessary for the performance of their services (for instance recruitment agencies).
- judicial or regulatory authorities, in the performance of their duties and the exercise of their powers.

### *4/ How long do we keep such personal data?*

Your personal data will be stored for as long as necessary for the review of your application, and for a maximum of two years from the date of your last contact with us.

You may request the deletion of your data at any time, under the conditions described in the section "What are your rights" below.

## **HOW DO WE ENSURE PERSONAL DATA SECURITY?**

We are committed to keeping your personal data secure, and have implemented appropriate technical and organizational security measures to protect your personal data from loss, misuse or unauthorized disclosure.

## **WHAT ARE YOUR RIGHTS?**

You have a right to be informed about how we process your personal data. You have a right to access, oppose, rectify, erase and restrict the processing of such personal data to the extent permitted by applicable law.

In certain circumstances, you have the right to request the deletion of your data (unless InfraVia Capital Partners has a legal obligation to keep such data) or the restriction of their processing.

When the processing is justified by the performance of a contract we have concluded with you, you have the right to exercise your right to data portability.

In certain circumstances, you can exercise your right to object to the processing of your personal data on grounds relating to your specific situation.

You also have the right to define advance directives concerning the fate of your personal data.

You may exercise such rights by sending a request in writing to the person in charge of personal data protection issues within InfraVia Capital Partners by email at [lferaud@infraviacapital.com](mailto:lferaud@infraviacapital.com) or by post at the following address: 22, rue Vernier 75017 Paris, to the attention of Laëtitia FERAUD.

If you are not happy with the way we handled your personal information or any privacy query that you have raised with us or if you disagree with our Privacy Policy, you have a right to lodge a complaint with the *Commission Nationale de l'Informatique et des Libertés* (CNIL) at <https://www.cnil.fr/en/home>.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update and change it from time to time to reflect any changes in the law or in our internal process of personal data.