



Data Privacy Notice¹

In the course of its activities, **InfraVia Capital Partners**, and its relevant affiliates (hereinafter the "**Group Companies**" [or the "**Group**"], excluding any portfolio companies) collect and use personal data.

This Privacy Notice explains the types of personal data that may be collected, the purposes of processing, the legal bases, the methods of processing, as well as the rights of the individuals concerned ("**Data Subjects**").

It applies to any natural person whose personal data is processed by a Group Company or by its service providers on its behalf. The categories of data collected and processed may vary depending on the nature of the relationship or interaction with the Data Subject.

1. Categories of Data Subjects, Types of Data Collected, and Purposes

Theme	Purposes of Processing	Categories of Processed Data	Legal Basis
Personnel Management	Recruitment (employees and interns) Development of a professional network or ecosystem (including	<u>Identification:</u> name, date of birth, personal address and email, position, military service, criminal record extract (where legally authorised), copies of diplomas and work certificates, bank details (RIB/IBAN), photographs, video footage, employee securities accounts, participation schemes, commuting information for ESG reporting.	Compliance with legal, regulatory, or tax obligations.

¹ In the event of any discrepancy between this English version and the original French version, the French version shall prevail.

Theme	Purposes of Processing	Categories of Processed Data	Legal Basis
	<p>potential consultants/advisors)</p> <p>Administrative and payroll management</p> <p>Security of premises</p> <p>Provision and management of IT tools</p> <p>Organisation of work</p> <p>Health and safety obligations</p>	<p>Career/Training: position history, CV, professional certifications (e.g., AMF-certified market actor certifications), professional training completed, ongoing or requested.</p> <p>Health: national health insurance details, emergency contacts, insurance/mutual fund data, medical visits (dates and fitness for duty assessments), sick leave, work accident and occupational illness declarations.</p> <p>Recruitment: identification data, CV, academic and professional background, previous experience.</p> <p>Reputation: criminal convictions, adverse media, political exposure (PEP status), where relevant.</p> <p>Remuneration: remuneration (fixed, bonus, participation schemes), tax details, bank details.</p> <p>IT Systems: network logs, list of applications installed on professional devices, access to professional email accounts, and physical access rights to premises.</p>	<p>Legitimate interest in managing recruitment and personnel.</p> <p>Consent of candidates and staff.</p>
Suppliers	<p>Identification/Evaluation of suppliers.</p> <p>Invoicing, payment, and administrative management.</p>	<p>Identification: Name/Company name, address, phone, email, SIREN number, recommendations, references, experiences, evaluations.</p> <p>Invoicing: Bank details, accounting codes, payments, terms/conditions (discounts, deposits), credit conditions, unpaid debts, receipts</p>	<p>Execution of a contract.</p> <p>Pre-contractual measures.</p> <p>Legitimate interest in effective supplier selection.</p>
Contact	<p>Website operations.</p> <p>Investor relations.</p>	<p>Website: Name, email, cookies, investor account credentials.</p> <p>Investor Relations: Contact details, professional background, KYC, event photos, mailing lists.</p>	<p>Legitimate interest in business development and communication with investors.</p>

Theme	Purposes of Processing	Categories of Processed Data	Legal Basis
	<p>Recruitment of portfolio company executives and "Senior Advisors."</p> <p>Supplier's hiring.</p>	<p>Executives of portfolio companies: identification data, professional contact details, remuneration/fees, bank details, CV, shareholding or participation levels (where applicable), mandates held in other entities.</p> <p>Senior advisors: identification data, contact details, role, fees, bank details, CV, mandates/roles in other companies and other professional activities.</p> <p>Executives/Advisors: Contact details, remuneration/fees, bank details, CV, other mandates/professional activities.</p> <p>Suppliers of Portfolio companies: Name, address, phone, SIREN, recommendations, evaluations</p>	<p>Execution of a contract.</p> <p>Pre-contractual measures.</p> <p>Consent of the contact.</p>
Onboarding	<p>KYC diligence for counterparties.</p> <p>Fundraising KYC.</p> <p>Acquisition process.</p>	<p>Representatives of legal entities: name, surname, position, address, date of birth, ID copy, reputation-related information.</p> <p>Individuals: proof of financial capacity, ID documents, proof of address, FATCA/CRS forms, tax notices, bank letters, bank statements.</p> <p>Acquisition processes: personal data of target company management, shareholders, sellers or co-investors (identification, address, ID, bank details, professional background, remuneration, shareholding levels), and information allowing the assessment of skills and reputation.</p>	<p>Compliance with legal, regulatory, or tax obligations.</p> <p>Legitimate interest in protecting rights and verifying reputation of targets/counterparties.</p>

2. Data Sharing and Recipients

Personal data is accessible to the staff of the Group Companies using this data. Data may also be transmitted to third parties:

- **Service providers** acting (depending on their role) as data controllers or processors (communication, marketing, IT systems/services).
- **Third parties necessary for contract execution** (law firms, audit/consultancy firms, custodians, account keepers, auditors, banks).
- **Public, judicial, tax, or regulatory authorities** in the performance of their duties.

3. Data Retention

Data retention is limited to what is necessary for the purposes. Applied criteria include:

- **Contractual duration:** For the duration of the contract or relationship.
- **Legal obligations:** As long as necessary for document retention under applicable regulations, including AML-CFT legislation.
- **Litigation:** In the event of a dispute, data is kept for the duration of the procedure until all remedies are exhausted.
- **Candidates:** Kept for two years from the last contact, unless otherwise instructed .

4. Data Security

The Group implements appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access or disclosure.

5. Rights of Data Subjects

To the extent permitted by law, Data Subjects have the following rights:

- Rights to information, access, rectification, and objection to processing.
- Rights to erasure and restriction of processing (except where legal retention is required).
- Right to data portability (for processing based on a contract).
- Right to set advance directives regarding the fate of their data.
- Right to withdraw or modify consent at any time.

To exercise these rights, please send a written request to the person in charge of data protection at **privacy@infraviacapital.com** or by post to **42, rue Washington, 75008 Paris, France**.

If you are unsatisfied with the processing of your information, you have the right to file a complaint with the **CNIL** (French Data Protection Authority) at <https://www.cnil.fr/en/home>

Modifications:

The Group reserves the right to update or modify this policy at any time to reflect legal developments or internal policy changes.