

## **INVESTOR PRIVACY NOTICE**

This privacy notice is issued by Quilvest Luxembourg Services S.A. (**QLS**). QLS is a professional of the financial sector subject to the ongoing supervision of the *Commission de Surveillance du Secteur Financier* in Luxembourg. QLS acts as administrative agent of all the investment vehicles sponsored by Quilvest & Partners and its affiliates (the **Funds**).

QLS recognizes and respects your right to privacy. We are providing this notice to you so that you will know what kinds of information we collect about you, the purposes for which information is intended to be processed and the circumstances in which that information may be disclosed to third parties. By submitting subscription documents to QLS, you have acknowledged and consented that we may collect, use, disclose and share your Personal Data on the terms described in this notice.

Defined terms shall have the meaning ascribed to them in Schedule 1, and stem from the Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (**GDPR**).

### **Who is covered by this Privacy Notice?**

This Privacy Notice applies to Data Subjects who are:

- investors in the Funds;
- beneficial owners of investors in the Funds; and
- directors and other authorized representatives of investors in the Funds (each such person, **you**).

Personal Data may be collected from you by us through a variety of channels, including in your subscription documentation, as well as through ongoing communications by mail, e-mail or telephone.

### **Collection of Personal Data**

You have provided us with Personal Data (including your address, tax identification number, and information about your personal wealth) in connection with and for the purposes of the administration of the Funds, including:

- our acceptance, administration and management of your investment in the Funds;
- administration and management of the Funds, including purchase, transfer, disposal or other transactions relating to any of the shares or interests of the funds, or any interest in any of the assets which may be acquired by the Funds, the management thereof, enabling or facilitating the such management's and QLS's performance of their respective functions in connection with the Funds, and all purposes incidental thereto;
- monitoring or recording any communications between you on the one part and the QLS and the Funds' management on the other part including telephone calls, for the purpose of verifying instructions, analysing, assessing and improving services, training and quality purposes, security and the prevention and detection of crime, or submitted in evidence in any proceeding to which your subscription document for investment in any of the Funds may

relate or may be relevant for, and you hereby warrant that you have procured the consent of all of your directors, officers, employees and agents to the collection, use, disclosure, processing or retention of such recording for such purposes;

- verification and background checks, including Know-Your-Customer checks, customer due diligence, and such other checks as may be necessary in compliance with applicable laws;
- archival of documents and records in both electronic and physical form for record keeping purposes, maintaining records of customer instructions, whether through phone recordings, hard copy documents, soft copy documents, instructions given via electronic means or SMS instructions;
- conducting financial reporting and analysis related to the Funds' operations;
- complying with the Funds' policies and procedures;
- preventing, detecting and investigating crime, including fraud and any form of financial crime, and analysing and managing other commercial risks;
- compliance with any applicable rules, laws and regulations, codes of practice or guidelines, including, without limitation, compliance with laws and regulations (local and foreign) which may apply to the Funds, their management or QLS, or to assist in law enforcement and investigations by relevant authorities, including but not limited to cross-border tax reporting; and
- subject to applicable law, any other purposes set out in your subscription document

(collectively referred to as the **Purposes**).

To the extent that the Personal Data of any Data Subject is disclosed by you to us in your subscription document for the purposes of subscribing to any of the Funds, you hereby warrant and undertake that the relevant consents required under all applicable data protection legislation (including without limitation GDPR) have been obtained for the disclosure of their Personal Data to the Funds and the subsequent use and disclosure of their Personal Data by the Funds for the purposes set out in this Privacy Notice.

### **Disclosure of Personal Data**

We disclose Personal Data to third parties for the Purposes, including, Affiliates of the general partner, management company or AIFM of the Funds (as the case may be), QLS, and as may be required by law or for everyday business purposes, such as to process transactions, maintain account(s), for the purposes of administering the Funds, or to respond to court orders and legal investigations. We also provide such information to our attorneys, banks, auditors, any person to whom the Funds are under an obligation to make disclosure to under the requirements of any law binding on the Funds or under and for the purposes of any guidelines issued by any regulatory or other authorities with which the Funds are expected to comply and service providers which provide services to the general partner, management company or AIFM of the Funds (as the case may be) and/or QLS, such as telecommunications, information technology, payment, data processing, training, storage, archival, trade execution or other services as may be necessary to facilitate the acceptance, management and administration of your investment in the Funds and to enable them to perform services on our behalf.

In the event of any actual or prospective restructuring, sale or acquisition of any company or assets of the Funds, we may also disclose Personal Data to any third party in connection with any such restructuring, sale or acquisition, actual or prospective.

Disclosure is always made in compliance with the professional secrecy and confidentiality obligations stemming from article 41 of the Luxembourg law of 5 April 1993 on the financial sector, as amended.

### **Security of Personal Data**

We take our responsibility to protect the privacy and confidentiality of your Personal Data very seriously. We maintain physical, electronic and procedural safeguards to store and secure information about you from unauthorized access, alteration and destruction. Our control policies, for example, authorize access to investor information only by individuals who need such access for the purposes of their function.

### **Rights of Data Subjects regarding their Personal Data**

All Data Subjects have the right to:

- access to their Personal Data;
- update and/or rectify their Personal Data;
- object to the Processing of their Personal Data;
- restrict the Processing of their Personal Data;
- obtain a copy of their Personal Data in a commonly-used machine-readable format; and
- request that their Personal Data be erased.

All requests shall be addressed to the DPO in writing.

### **Data Protection Officer**

The data protection officer (**DPO**) of QLS is Thomas Ségal or such other person as may be designated by QLS and notified to you from time to time. You may contact the DPO in respect of any questions, feedback or requests relating to the Processing of Personal Data on +352 47 38 85 20 or such other telephone number as notified to you from time to time, or by email at [tsegal@quilvest.com](mailto:tsegal@quilvest.com).

**Schedule 1**  
**Definitions**

<b>Data Subject</b>	<p>An identified or identifiable individual who is either a citizen or a resident of a Member State of the European Union.</p> <p>An identifiable individual is an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person</p>
<b>Personal Data</b>	<p>Any information relating to a Data Subject, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person</p>
<b>Sensitive Data</b>	<p>Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or data concerning an individual's sex life or sexual orientation.</p>
<b>Processing</b>	<p>Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as:</p> <ul style="list-style-type: none"> <li>• collection</li> <li>• recording</li> <li>• organization</li> <li>• structuring</li> <li>• storage</li> <li>• adaptation</li> <li>• alteration</li> <li>• retrieval</li> <li>• consultation</li> <li>• use</li> <li>• disclosure by transmission, dissemination or otherwise making available</li> <li>• alignment or combination</li> <li>• restriction</li> <li>• erasure or destruction</li> </ul>