AnaCap Privacy Policy

1 Introduction

1.1 This privacy policy relates to the processing of personal information by AnaCap Financial Partners Limited and various other group entities located in the UK and EEA. The group includes, among others, AnaCap Financial Partners Limited, AnaCap Members LLP and AnaCap Advisory FP Italy S.r.l. (**AnaCap/we/us/our**). We are committed to safeguarding your personal and financial information when you visit our websites, including www.anacap.com (collectively, **websites**) and/or in relation to any services that we provide to you. This Privacy Policy sets out our personal information collection and sharing practices for our websites, and that apply to personal information collected during our relationships with our clients, investors, prospective investors and their representatives, individuals connected with our actual and prospective portfolio companies, and our other business contacts (either via websites, in person or over the phone).

1.2 Further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you.

1.3 This Privacy Policy is intended to explain our privacy practices and covers the following areas:

- Personal information we may collect about you
- How we use your personal information and who we may disclose it to
- Transmission, storage and security of your personal information
- Your rights, complaints and contacting us
- Our Cookies policy
- Third Party Websites
- Changes to our Privacy Policy

1.4 Who is responsible for your personal information: Each of AnaCap Financial Partners Limited, AnaCap Members LLP and AnaCap Advisory FP Italy S.r.l. may act as a controller of your personal information, depending on the circumstances. You can contact us as set out in section 5.3.

1.5 Who this Privacy Policy applies to: This Privacy Policy applies to individuals whose personal information we process in connection with our business, including investors and prospective investors in the AnaCap Funds, representatives of institutional

investors and counterparties, owners, directors and senior management of our actual and prospective portfolio companies, advisers and service providers, visitors to our websites and offices, and other business contacts. It does not apply to our partners, employees, workers or job applicants, who are provided with separate privacy notices.

1.6 Fund administrators and other independent controllers: Investors in the AnaCap Funds are required to provide personal information to the relevant fund administrator, which acts as a separate controller of that information and is responsible for its own compliance with data protection laws. We recommend that you read the administrator's privacy notice. Where we receive your personal information, whether from you or from an administrator, we are a controller of the information we hold.

2 Personal information we may collect about you

2.1 We may collect and process the following personal information about you:

(a) **Information you provide to us** ► personal information that you provide to us, for example during the onboarding and investor account activation processes and your use of the websites, including your name, email address (and/or proof of address), other contact details, work-related information, verification information, tax-related information, and financial information (some of this information may also be provided by parties connected to you or connected to us, e.g. administrators, financial institutions);

(b) **Our correspondence** ► information about any correspondence that we may have with you, including when you contact us via the "contact us" links on the websites;

(c) **Survey information** ► where we ask you to complete surveys that we use for research purpose, the information provided by you in the completed survey;

(d) **Your transactions** ► details of transactions and investments you carry out through our websites, password protected investor sites or through other channels and of the fulfilment of the other services that we provide;

(e) **Website and communication usage** ► details of your visits to the websites and information collected through server logs and similar technical means etc. including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, electronic communications, and notes of meetings and the resources that you access.

(f) **Information from third parties** ► information about you that we receive from other sources, as described in section 2.2;

(g) **Due diligence and screening information** ► information obtained through know-your-customer, anti-money laundering, sanctions, politically exposed person, adverse media and background checks and other due diligence on investors, counterparties and individuals connected with actual or prospective portfolio companies (including owners, directors and senior management), including identification documents, date of birth, nationality and source of wealth or funds, which may include special category personal data and criminal offence data (see section 2.3);

2.2 Where we obtain your personal information from: As well as information you give us directly, we obtain personal information about you from: (a) your employer, the organisation you represent or invest through, and your professional advisers; (b) fund administrators, banks, other financial institutions and other service providers; (c) AnaCap group entities and our actual and prospective portfolio companies (for example, in connection with due diligence, reporting or management incentive arrangements); (d) publicly available sources, such as company registers, sanctions lists and online and media sources; and (e) third-party screening and data providers used for anti-money laundering, sanctions, politically exposed person and adverse media checks.

2.3 Special category personal data and criminal offence data: In some cases, particularly in the course of due diligence and anti-money laundering, sanctions and politically exposed person screening, we may process special category personal data (for example, information revealing political opinions, health, racial or ethnic origin or religious beliefs) and information about criminal convictions, offences, allegations or related security measures. We only do this where it is necessary and permitted by law, as described in section 3.

2.5 If you do not provide certain personal data then we may not be able to provide all or part of our services to you, or your use of our websites may be more limited. In some cases we are required by law (for example, under anti-money laundering legislation) to collect certain information and, if you do not provide it, we may be unable to establish or continue our relationship with you.

3 How we use your personal information and who we may disclose it to

3.1 Under UK and EU data protection laws (if applicable), we must establish and inform you of the legal basis or “ground” for our use of your personal information.

Use of personal information under UK and EU data protection laws must be based on one of a number of legal "grounds". The principal legal grounds that may apply to our use of your information are:

- Consent: where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use. You may withdraw your consent at any time as described in section 5.
- Contract performance: where your information is necessary to enter into or perform our contract with you.
- Legal obligation: where we need to use your information to comply with our legal obligations.
- Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

Where we process special category personal data, we may also rely upon the following legal grounds:

- Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.
- Explicit consent: where you have explicitly consented to our use of your information.

3.2 For each use of personal information mentioned below, we note the purpose for which we use and disclose it, who we may disclose it to, and the legal grounds we use as a basis for our use ("**Use basis**").

(a) **To provide our services and conduct our business** ► to provide our services, as adviser to the AnaCap Funds and to carry out obligations arising from any agreements entered into between you and AnaCap (including AnaCap Funds), which may include passing your data to third parties such as administrators, agents or contractors or to our advisors (e.g. legal, financial, business or other advisors);

Use basis: contract performance, legitimate interests (to enable us to perform our obligations and provide our services to you)

(b) **In relation to fraud prevention** ► we and other organisations may access and use certain information to prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

Use basis: legal obligations, legitimate interests (to ensure that you fall within our acceptable risk profile and to assist with the prevention of crime and fraud), consent/explicit consent (where this includes health data, or data relating to ethnic or racial origin, political affiliations)

(c) **To provide you with investor material** ► to provide you investor material where you have chosen or are required to receive these.

Use basis: legal obligations, contract performance, consent, explicit consent.

(d) **For research and development purposes** ► to analyse your personal information in order to better understand our investors' needs and to develop our business. This may involve transferring your personal information to third party service providers;

Use basis: legitimate interests (to ensure that we are continuing to develop our business and meeting investors' needs)

(e) **To monitor certain activities and carry out certain checks** ► to monitor calls and transactions to meet regulatory obligations, compliance with procedures and to combat fraud (including "know-your-counterparty", anti-money laundering, anti-bribery and corruption and other legal requirements, policies and procedures which are aimed at detecting and preventing financial crime). This may include disclosing your personal information to third parties such as administrators, agents or contractors, identity or credit reference checking agencies or to our advisors. We may also be required to monitor certain communications that you have with us in order to comply with our legal obligations;

Use basis: legal obligations, legal claims, legitimate interests (where this is not strictly required by law given we are a regulated business we still need to take certain steps to ensure we honour our regulatory obligations)

(f) **To inform you of changes** ► to notify you about changes;

Use basis: legitimate interests (in order to provide you with relevant updates)

(g) **To ensure website content is relevant** ► to ensure that content from our websites is presented in the most effective manner for you and for your device;

Use basis: consent, contract performance, legitimate interests (to assist users of our website)

(h) **To reorganise or make changes to our business** ► In the event that we are: (i) subject to negotiations for the sale of our business or part thereof to a third party; (ii) sold to, or merged with, a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process or transferred to that re-organised entity or third party and used for the same purposes as set out in this policy or for the purpose of analysing any proposed sale or re-organisation.

Use basis: legitimate interests (in order to allow us to change our business)

(i) **In connection with legal or regulatory obligations** ► We may process your personal information to comply with our regulatory requirements, including tax reporting obligations (such as FATCA), or in connection with dialogue with our regulators as applicable, which may include disclosing your personal information to third-parties (including advisors), the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world;

Use basis: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

(j) **To carry out due diligence on investments and counterparties** ► to carry out / review the outputs of due diligence, background, reputational, sanctions, politically exposed person and adverse media checks on actual and prospective portfolio companies, counterparties and the individuals connected with them (including owners, directors and senior management), and to administer, review or advise in relation to any management incentive arrangements. This may involve sharing information with screening and due diligence providers and our advisers;

Use basis: legitimate interests (to assess and manage investment, regulatory and reputational risk), legal obligations, contract performance (for any incentive arrangements)

(k) **To manage investor relations and communicate with you** ► to manage our relationship with you, to send you information about the AnaCap Funds and our activities, news and events that we think may be of interest, and to respond to your enquiries;

Use basis: legitimate interests (to maintain relationships with investors and business contacts and to promote our business) and consent (where required under electronic marketing rules, for example for email marketing to individuals). You can opt out of marketing at any time (see section 5)

(l) **To handle enquiries and complaints** ► to deal with your queries, requests and complaints (including data protection requests and complaints) and to keep records of them;

Use basis: legal obligations, legitimate interests (to respond to and resolve enquiries and complaints and to improve our processes)

(m) **To keep our premises, systems and information secure** ► to protect our systems, networks and information from unauthorised access, loss or misuse.

Use basis: legitimate interests (to protect our people, premises, systems and information), legal obligations

We do not make decisions about you based solely on automated processing (including profiling) which have legal or similarly significant effects on you.

3.3 Who we may share your personal information with: In addition to the disclosures described above, we may share your personal information with: (a) other entities in the AnaCap group; (b) fund administrators, registrars, custodians, banks and other financial institutions; (c) our professional advisers, including lawyers, accountants, auditors and tax advisers, and other advisers to the AnaCap Funds; (d) IT, cloud, data room, communications and other service providers that support our business; (e) identity verification, screening, due diligence and background-check providers; (f) actual and prospective portfolio companies, co-investors, lenders, placement agents and other transaction counterparties and their advisers, where relevant to an investment or fundraising; (g) regulators, tax authorities (including HM Revenue & Customs and, where required, overseas tax authorities for the purposes of e.g. FATCA), courts, law enforcement and other public bodies; and (h) a prospective seller or buyer of any business or assets, as described in section 3.2(h). We require service providers that process personal information on our behalf to protect it and to use it only in accordance with our instructions. We do not sell your personal information.

4 Transmission, storage and security of your personal information

Security over the internet

4.1 No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain appropriate technical, organisational, physical and procedural safeguards to protect your personal information in accordance with data protection laws. All information you provide to us is stored on secure servers in the UK or EEA and accessed and used subject to our security policies and standards.

4.2 Where we or a fund administrator have given you (or where you have chosen) a password which enables you to access certain parts of our websites (e.g. our investor pages), you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

4.3 We use appropriate technical and organisational measures to protect personal information. If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will notify the relevant regulator and, where required, affected individuals, in accordance with data protection laws.

Export outside the UK/EEA

4.4 Given AnaCap's group structure, personal information may be shared and transferred to other entities within the AnaCap group or to other third parties both within the UK and EEA as well as to other countries outside of the UK and EEA whose data protection laws may not offer the same level of protection as those of the UK or EEA.

4.5 When we do so, we will use appropriate safeguards to protect the personal information that we transfer. We will only make such transfers where permitted by data protection laws, for example where the recipient is in a country covered by an adequacy decision or adequacy regulations (as applicable), or where we have put in place appropriate safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses (for transfers from the UK) or the EU Standard Contractual Clauses (for transfers from the EEA).

4.6 Please contact us if you would like further information on the specific safeguards we apply in relation to the export of your personal information.

Storage limits

4.7 We will retain your personal information for as long as is necessary for the purposes for which they were collected and any other permitted linked purposes. So if personal information is used for two purposes, we will retain it until the purpose with

the longest retention period expires; but we will stop using it for the purpose with a shorter retention period once that shorter period has expired.

4.8 We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and legal and regulatory requirements (including anti-money laundering and financial services record-keeping rules). Information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.

4.9 As a guide, we expect to keep personal information for the following periods, which may be longer where required by law or where necessary for the establishment, exercise or defence of legal claims: (a) anti-money laundering and identification records: five years after the end of our relationship with you; (b) investor records and transaction records: five years after the end of our relationship with you; (c) call recordings and electronic communications: five years after the end of our relationship with you; (d) due diligence records relating to unsuccessful or abandoned investments five years; and (e) website enquiries and marketing contact details: five years or until you ask us to stop.

5 Your rights, complaints & contacting us

5.1 Data protection legislation gives you certain rights in relation to your personal information, subject to some exceptions. These are summarised below.

If you have any questions in relation to our use of your personal information, you should first contact us.

If you are situated in the UK or EU, you may have the following rights, subject to certain conditions and in certain circumstances:

(a) **Subject Access:** You can ask us to provide you with further details on how we make use of your personal information and a copy of the personal information that we hold about you. We will respond within one month of receiving your request (or, if later, of receiving any information we reasonably need to confirm your identity or clarify your request). We may extend this period by up to two further months where your request is complex or you have made a number of requests, in which case we will tell you within the first month. We will carry out reasonable and proportionate searches for the

information. We do not normally charge a fee, but we may do so or refuse to act where a request is manifestly unfounded or excessive.

(b) **Rectification:** You can ask us to update any inaccuracies in the personal information that we hold.

(c) **Erasure:** You can ask us to erase your personal information that we no longer have lawful grounds to use.

(d) **Withdrawal of consent:** Where processing is based on consent, you can withdraw your consent to processing so that we stop that particular processing.

(e) **Object and Restriction:** You can object to or restrict how we use your personal information in certain circumstances.

(f) **Portability:** You can ask us to transmit the personal information that you have provided to us to a third party.

(g) **Object to direct marketing**: You can object at any time to our use of your personal information for direct marketing, including profiling related to direct marketing.

(h) **Automated decisions**: Where we make a decision about you based solely on automated processing which has legal or similarly significant effects on you, you have the right to be informed, to make representations, to obtain human intervention and to contest the decision.

(i) **Raise a complaint:** You can complain to us directly (see section 5.4). You also have the right to complain to the data protection regulator in your jurisdiction, for example the Information Commissioner's Office (or any successor body) in the UK.

To exercise any of these rights, please contact us using the details in section 5.3. We may need to ask you for information to confirm your identity before we can act on your request. These rights are not absolute and apply only in certain circumstances. In some cases we may be entitled or required by law to refuse a request, in which case we will explain why and tell you about your right to complain to us and to the regulator.

5.2 We will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by contacting us.

5.3 If you have any questions in relation to this Privacy Policy or how we handle your personal information, please contact us.

5.4 If you are unhappy with how we have collected, used or shared your personal information, or with how we have handled a request from you, you can make a complaint to us by telephone on +44 207 070 5250 or by post at: AnaCap, 22 Percy Street, Met Building. London, W1T 2BU. We will acknowledge your complaint within 30 days of receiving it, investigate it without undue delay and keep you informed of progress and the outcome. We encourage you to contact us first so that we can try to resolve the matter.

5.5 You also have the right to complain to the data protection regulator in your jurisdiction. In the UK, this is the Information Commissioner's Office (www.ico.org.uk).

6 Cookies Policy

We do not use Cookies on our website.

7 Third party websites

Our websites may contain links to other third-party websites. If you follow a link to any of those third-party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third-party websites.

8 Changes to our Privacy Policy

8.1 We may change the content of our websites and how we use cookies without notice, and consequently our Privacy Policy may change from time to time in the future. We therefore encourage you to review them when you visit the website from time to time to stay informed of how we are using personal information.