

# **Privacy Notice**



# Privacy Notice of LGT Capital Partners to External Investment Managers and Portfolio Companies

# **General Information**

LGT Capital Partners cares about the protection of your personal data. This Privacy Notice ("**Notice**") explains how and for what purposes LGT Capital Partners 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 specific data protection laws (in particular GDPR).

For the purposes of the Notice, "**Data**" shall mean personal data, i.e. any information relating to an identified or identifiable natural person. The terms "**you**" and "**your**" shall refer to the legal entity, partnership or other organization you represent and/or, as the case may be, to you as a natural person, e.g. as a representative, partner, principal, employee or other affiliate of an existing or potential external investment manager, portfolio company and their respective controlling sponsors. "**LGT Capital Partners**", "**we**", "**us**" or "**our**" shall mean any subsidiary of LGT Group Holding Ltd. that is active in the business of asset management (hereinafter collectively referred to as "**LGT CP Companies**", individually "**LGT CP Company**"). LGT Group Holding Ltd. is a stock company incorporated under the laws of the Principality of Liechtenstein with registered address at Herrengasse 12, 9400 Vaduz, Liechtenstein.

#### Important note

In the course of our dealings with you, we may process Data of persons related to you or to the company or other organization you may represent. Such persons may include, but are not limited to, directors, representatives, current and former employees, shareholders or other participants, business associates, service providers such as consultants, financiers, legal advisors or any other affiliates of you and/or the company or other organization you may represent ("**Affiliates**"). As we cannot possibly bring the Notice to the attention of all Affiliates, we kindly ask you to do so on our behalf.

#### **Getting in touch**

With regard to our use of your Data, you may contact our Data Protection Officer at:

LGT Group Holding Ltd. Data Protection Officer Herrengasse 12 9490 Vaduz, Liechtenstein Telephone: +423 235 11 22 E-Mail: <u>lgt.datenschutz@lgt.com</u>

If you are unsure as to which LGT CP Company controls your Data, please do not hesitate to contact us. If such LGT CP Company has its registered office outside of the European Economic Area ("**EEA**"), the company acting as representative in the EEA is LGT Group Holding Ltd.

#### The Data we collect and process

In connection with your dealings with LGT Capital Partners, we may collect and process your Data. Depending on the circumstances, such Data may include: your name, e-mail address, residential address, telephone number, nationalities, place and date of birth, passport or other identification document, former and current employers, job title, details concerning your compensation (e.g. salary, bonus, carry), educational background, previous industry experience, references of former employers, criminal record, information on past and pending litigations, regulatory proceedings and other investigations, ownership structure of your company, former employees of your company and the reason for their leaving, your role and time commitment in managing specific investments, your commitments to investment management or other business activities outside of the affairs of the investments we are interested or invested in, anticipated amounts of compensation to be received for such activities, ownership interests in other undertakings, board responsibilities for portfolio companies and non-portfolio companies including the number of meetings to attend per year and similar information as customary in the industry.

### Purposes and legal basis for our use of your Data

When processing your Data, we do so based on our legitimate interest in running our business. Prior to making an investment, we

need to have a thorough understanding of you and your investment strategy. We may therefore process your Data for the purposes of assessing your business and investment strategy, in particular its inherent risks and opportunities, analyzing your business model and structure, conducting due diligence from a financial, operational, legal and tax perspective, screening key individuals of your company who substantially contribute to the evolution of the investment, particularly such individuals who are involved in the dayto-day management and investment process. Once we have invested, we have a legitimate interest to monitor the development of our investment. Therefore, we will continue to process your Data for the entire period of our investment. In order to organize the Data we hold in an efficient manner, we will store and process your data in our database. Furthermore, we may process your Data for the purpose of complying with legal and regulatory obligations we are subject to, e.g. in connection with Know-Your-Customer and Anti-Money Laundering rules, for the prevention of fraud, for legal, regulatory or tax reporting purposes, in response to legal requests or requests from regulatory, tax or other law enforcement authorities. Such use of your Data may occur prior to our investment and can take place at any time during our investment. Where we are required under applicable data protection laws to obtain your explicit consent for processing certain Data, we will contact you. Unless you explicitly object, we will continue to store your Data after direct business relationship between your organization and LGT Capital Partners has ended. We do this in the mutual interest of maintaining contact with you in view of possible future investments and other collaboration.

In the course of your dealings with LGT Capital Partners, we may transfer your Data to categories of recipients such as attorneys, auditors, prime brokers, consultants, providers of various services such as document storage, recordkeeping and background checks. We may also provide your Data to law enforcement authorities or other government entities based on a lawful disclosure request or to other parties as part of corporate business transactions such as mergers and acquisitions, joint ventures, financings or sales of company assets. We may further share your Data with any other subsidiary of LGT Group Holding Ltd., in particular with other LGT CP Companies.

LGT Capital Partners has operations throughout the world. Therefore, such recipients may be located outside of the EEA (in particular Switzerland, United States of America, Hong Kong, Japan, Australia, People's Republic of China and United Arab Emirates). In such cases, 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

Please note that you are under no general obligation to provide your Data to us, except where applicable law requires you to do so. However, processing your Data will be necessary for the performance of the existing or possible future business relationship between your organization and us. 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, the right to have your Data deleted;
- under certain circumstances, 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 applicable data protection laws, 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;
- where GDPR is applicable, you have the right to file a complaint with our lead supervisory authority in Liechtenstein:

Datenschutzstelle Liechtenstein Städtle 38 PO Box 9490 Vaduz Liechtenstein Telephone: +423 236 60 90 E-Mail: info.dss@llv.li You may also lodge a complaint to your local supervisory authority.

# For how long we store your Data

In order to monitor the development of our investment, it will be necessary for us to store and process your Data during the entire period of our investment. Because we strive to build long-term relationships with our business partners, we may continue to use your Data beyond the period of our investment in order to foster possible business opportunities. Should you leave your organization at an earlier stage, we shall delete your Data as soon as we learn of your departure. Longer retention periods may be applicable if required by applicable laws and regulations. Furthermore, possible legitimate interests of LGT Capital Partners may allow us to use your Data for a period exceeding the abovementioned term, particularly where our continued use of your Data is necessary for the establishment, exercise or defense of legal claims. In any case, you may at all times object to our processing of your Data. In any case, you may at all times object to our use of your Data and we shall review such request without undue delay (see above "Getting in touch").