

# ASTANOR VENTURES FAIR PROCESSING NOTICE

## 1. Introduction

This fair processing notice (the “**Notice**”) is to be read concomitantly to the Astanor Privacy Policy as made available on [www.astanor.com](http://www.astanor.com) and is maintained by Astanor GP S.à.r.l., and is applicable to all the Astanor Entities (as defined in the List of Astanor Entities, as amended from time to time and available upon request) (collectively, “**Astanor**” “**Astanor Ventures**”, “**we**”, “**us**” or “**our**”). Each Astanor Entity must formally approve abidance with this Notice and provide proof of ratification to the compliance department of Astanor (the “**Compliance Department**”). For the avoidance of doubt, this Notice applies to all processing of personal data, whether automated or not (including paper files) implemented by Astanor in the context of its activities.

Astanor and the Astanor Entities are committed to respecting your privacy and protecting your personal data in accordance with the law, in particular the EU General Data Protection Regulation 2016/679 (the “**GDPR**”). Each partner, consultant, or employee of Astanor (an “**Astanor Associate**”) is responsible in case of collection of personal data necessary for the performance of their tasks and must do so in accordance with applicable internal policies (including storing personal data in appropriate folders, application or database).

## 2. Purpose

Under this Notice, an individual who has been in contact (or intend to be) with Astanor will find information required by law to further understand to which extent its personal data is collected, processed and retained until the end of the relationship with Astanor. For any question in relation to this Notice, an individual can reach out to [compliance@astanor.com](mailto:compliance@astanor.com) or send a letter to: Astanor Ventures, c/o Compliance Department, 480 Avenue Louise, Brussels, Belgium.

## 3. Individuals (and their intermediaries) as investors

### a. Processing purposes and legal basis

Astanor may collect and process personal data on you, where you or your company (which you represent, own or for which you act as a contact person): (i) are an actual, former or prospective investor, or (ii) act as an intermediary for an investor (e.g., agent, insurance company, trusts, family office, foundation, lawyer, banker). For the purposes of this Notice, individuals under (i) or (ii) are referred to as **Investors**. The processing of your data as an Investor is based on the following grounds:

<b>PURPOSE OF PROCESSING</b>	<b>GDPR LEGAL BASIS</b>
<i>Astanor processes your data:</i>	<i>The processing is necessary:</i>
- for Investor onboarding and vetting purposes	- in order to take steps prior to entering into a contract with you or your company. - to comply with legal obligations to which Astanor Entities are subject. - for purposes of legitimate interests pursued by the Astanor Entities, that is, Investor onboarding and vetting.
- for Investor reporting and communication purposes	- for the performance of a contract with you or your company.

	<ul style="list-style-type: none"> <li>- for purposes of legitimate interests pursued by Astanor, that is, Investor reporting and communication.</li> </ul>
<ul style="list-style-type: none"> <li>- for the management of Investors relations</li> </ul>	<ul style="list-style-type: none"> <li>- for the performance of a contract with you or your company.</li> <li>- for purposes of legitimate interests pursued by Astanor, that is, Investor relationship management.</li> </ul>
<ul style="list-style-type: none"> <li>- to manage the Investor portal</li> </ul>	<ul style="list-style-type: none"> <li>- for the performance of a contract with you or your company.</li> <li>- for purposes of legitimate interests pursued by Astanor, that is, Investor portal management.</li> </ul>
<ul style="list-style-type: none"> <li>- for Know-your-Customer, anti-money laundering and terrorism financing rules compliance/risk management</li> </ul>	<ul style="list-style-type: none"> <li>- to comply with legal obligations to which Astanor is subject.</li> <li>- in order to take steps prior to entering into a contract with you or your company, or for the performance of a contract with you or your company.</li> </ul>

In exceptional cases, an Astanor Entity may need your consent for certain processing operations. In such case, the relevant Astanor Entity will ask for your consent separately. For the avoidance of doubt, this is not the case for the processing purposes detailed under this Section 2.

b. Collection of personal data

Astanor may collect and process the following categories of personal data or documents containing such data, as relevant to your particular situation (as an Investor) and nature of relation with a relevant Astanor Entity:

- identity (name, first name) and contact details (address, email, phone, website)
- KyC/AML-FT controls (ID/passport, proof of residence, self-declarations, date/place of birth, nationality, tax details /ID number/status, sanctions lists watch, Google/LinkedIn/other professional networks' search, PEP status, wealth details/source) and onboarding decision
- subscription form (identity, contact details, tax number, contact persons, country/jurisdiction, corporate name/registration, ID/passport of representatives, investor profile, FATCA/CRS data)
- regular updates/discussions information on investments, deal flow, investment portfolio, correspondence
- amount/value of investments, transactions
- Investor portal access credentials (login, password), access logs and reports, and
- Investor votes/decisions as per law/investors' rights/obligations (e.g., on potential conflicts of interests, corporate decisions, amending articles of incorporation), management of votes/proxies, management of advisory, investment and other committees, documenting votes/decisions.

Where you provide personal data on third-party Investor or intermediaries (e.g., employees, advisors, providers, servicers, representatives or else) to an Astanor Entity, you should make sure you have informed them accordingly.

c. Data recipient

To the extent allowed by law, an Astanor Entity may share your data with another Astanor Entity, intermediaries, fund servicers (e.g., transfer agents, registrar agents, custodian banks, management

companies/AIFMs), administrative and or judicial authorities (e.g., CRF, CSSF) and other service providers. Please note that Astanor may transfer your personal data outside the EU/EEA due to its internal organization or as necessary to fulfil the above listed purposes, including to countries which do not have a similar level of protection of personal data as the EU. In such case, and in accordance with GDPR, data transfers will (i) be limited to what is necessary to perform the contract with the Investor, or conclude a contract with a third-party in the Investor interest, or (ii) be justified by the establishment, exercise or defense of legal claims, or (iii) if appropriate, be covered by appropriate safeguards, such as entering into European Commission approved standard contractual clauses, or (iv) in exceptional cases, with your consent (in such case under (iv) the relevant Astanor Entity will ask for your consent separately).

d. Investor data retention duration

The relevant Astanor Entity will retain your personal data for as long as required to manage the Investor (or its intermediary) relation, and then for the mandatory retention duration set forth by applicable law (typically ten (10) years after the termination of the relation with the Investor).

**4. Individuals (and their intermediaries) as investees**

a. Processing purposes and legal basis

Astanor may collect and process personal data on you, where you or your company (which you represent, own or for which you act as a contact person): (i) are an actual, former or prospective investee or (ii) act as an intermediary for an investee (e.g., agent, insurance company, trusts, family office, foundation, lawyer, banker). For the purposes of this Notice, individuals under (i) or (ii) are referred to as **Investees**. The processing of your data as an Investee is based on the following grounds:

<b>PURPOSE OF PROCESSING</b>	<b>GDPR LEGAL BASIS</b>
<i>Astanor processes your data:</i>	<i>The processing is necessary:</i>
- for investment prospection	- for purposes of legitimate interests pursued by Astanor, that is, investment prospection.
- for investment due diligence/vetting	- for purposes of legitimate interests pursued by Astanor, that is, investment due diligence and vetting.
- for the investment management	- for purposes of legitimate interests pursued by Astanor, that is, investment management.
- for Know-your-Customer, anti-money laundering and terrorism financing rules compliance/risk management	- to comply with the legal obligations to which Astanor and its Astanor Entities are subject. - in order to take steps prior to entering into a contract with you or your company, or for the performance of a contract with you or your company.

In exceptional cases, an Astanor Entity may need your consent for certain processing operations. In such case, the relevant Astanor Entity will ask for your consent separately. For the avoidance of doubt, this is not the case for the processing purposes detailed under this Section 3.

b. Collection of personal data

Astanor may collect and process the following categories of personal data or documents containing such data, as relevant to your particular situation (as an Investee) and nature of relation with a relevant Astanor Entity:

- Investee founders identity/background, representatives/key person's identity
- Investee due diligence information (data room data provided by an Investee or its intermediary)
- KyC/AML-FT controls (ID/passport, proof of residence, self-declarations, date/place of birth, nationality, tax details /ID number/status, sanctions lists watch, Google/LinkedIn/other professional networks' search, PEP status, wealth details/source) and investment decision
- Investee's representatives, shareholders/UBOs, contact persons and signatories' identity, professional profile, seniority, age, remuneration, gender, position, function, employment details/contract, CV/experience
- Investee's beneficial owners' profile (identity, contact details, tax number, contact persons/agents, country/jurisdiction, corporate name/registration, ID/passport of representatives, due diligence and legal reporting data), and
- Intermediaries and other investors in Investee identity, contact details, correspondence, reports, bank details, correspondence.

Where you provide personal data on third-party Investee or intermediaries (e.g., employees, advisors, providers, servicers, representatives or else) to an Astanor Entity, you should make sure you have informed them accordingly.

c. Data recipient

To the extent allowed by law, an Astanor Entity may share your data with another Astanor Entity, intermediaries, fund servicers (e.g., transfer agents, registrar agents, custodian banks, management companies/AIFMs), administrative and or judicial authorities (e.g., CRF, CSSF) and other service providers. Please note that Astanor may transfer your personal data outside the EU/EEA due to its internal organization or as necessary to fulfil the above listed purposes, including to countries which do not have a similar level of protection of personal data as the EU. In such case, and in accordance with GDPR, data transfers will (i) be limited to what is necessary to perform the contract with the Investor, or conclude a contract with a third-party in the Investor interest, or (ii) be justified by the establishment, exercise or defense of legal claims, or (iii) if appropriate, be covered by appropriate safeguards, such as entering into European Commission approved standard contractual clauses, or (iv) in exceptional cases, with your consent (in such case under (iv) the relevant Astanor Entity will ask for your consent separately).

d. Investor data retention duration

The relevant Astanor Entity will retain your personal data for as long as required to manage the Investee (or its intermediary) relation, and then for the mandatory retention duration set forth by applicable law (typically ten (10) years after the termination of the relation with the Investee).

**5. Individuals (and their intermediaries) as recipients of communication, public and press relations, social media content, newsletters and invited to Astanor events**

a. Processing purposes and legal basis

In addition to data collection under Section 2 and 3, Astanor may collect and process personal data on you, where you or your company (which you represent, own or for which you act as a contact person): (i) are an actual, former or prospective Investor or Investee, or (ii) are a press or PR contact (a "**Communication Contact**"), or (iii) have subscribed to our newsletter (a "**Subscriber**"), or (iv) communicate with us or follow us on social networks (a "**Social Network Contact**"), or (v) participate or are invited to events we organize (an "**Event Invitee**"). The processing of your data either as an

Investee, an Investor, a Communication Contact, a Subscriber, a Social Network Contact or an Event Invitee is based on the following grounds:

<b>PURPOSE OF PROCESSING</b>	<b>GDPR LEGAL BASIS</b>
<i>Astanor processes your data:</i>	<i>The processing is necessary:</i>
- for Investor and or Investee communications purposes	- for purposes of legitimate interests pursued by Astanor, that is, Investor and or Investee communications.
- for public and or press relations management purposes	- for purposes of legitimate interests pursued by Astanor, that is, public and or press relations.
- for newsletter subscription and management purposes	- for purposes of legitimate interests pursued by Astanor, that is, newsletter subscription and management.
- for event organization purposes	- for purposes of legitimate interests pursued by Astanor, that is, event organization.

In exceptional cases, an Astanor Entity may need your consent for certain processing operations. In such case, the relevant Astanor Entity will ask for your consent separately. For the avoidance of doubt, this is not the case for the processing purposes detailed under this Section 4.

b. Collection of personal data

Astanor may collect and process the following categories of personal data or documents containing such data, as relevant to your particular situation (as an Investee) and nature of relation with a relevant Astanor Entity:

- For communications with Investee and or Investor: name, contact details (e.g., email, address, phone), company, position, Investor, Investee status, history of communications sent.
- For communication with Communication Contact: name, contact details (e.g., email, address, phone), company, position, country and or city of activity, area of publication and interests, interviews, articles published.
- For communications with Subscriber: name, email, company, position, subscription details, category (Investor/Investee, current/potential, subscribed publications), newsletter dispatching (history of newsletters sent) and follow up (newsletter opened, clickstream).
- For Social Network Contacts: community management, posts/publication/comments, interactions with community members for matters concerning controllers.
- For Event Invitees: name, contact details (e.g., email, address, phone), license plate (parking), food allergies, accompanying persons, invitees' lists, no show status, photos, videos made during events, publications.

Where you provide personal data on third-party Investees, Investors or Intermediaries (whether employees, advisors, providers, servicers, representatives or else) to Astanor, you should make sure you have informed them accordingly.

c. Data recipient

To the extent allowed by law, an Astanor Entity may share your data with another Astanor Entity, intermediaries, event organizers, social networks or other service providers. Please note that Astanor may transfer your personal data outside the EU/EEA due to its internal organization or as necessary to fulfil the above listed purposes, including to countries which do not have a similar level of protection of personal data as the EU. In such case, In such case, and in accordance with GDPR, data transfers will

be covered by appropriate safeguards, such as entering European Commission approved standard contractual clauses.

d. Investor data retention duration

The relevant Astanor Entity will retain your personal data for as long as required to efficiently manage the relationship with you, and then for the mandatory retention duration set forth by applicable law:

- For Investors and Investees: until five (5) years after the end of our relation, unless contact is maintained for other purposes below.
- For press and or PR purposes: without limitation in time, subject to your right to object/erasure.
- For newsletters and social networks: unlimited until unsubscription, subject to your right to object/erasure.
- For event management: 1 month after events.

**6. Individuals (and their intermediaries) as shareholders and or managers**

a. Processing purposes and legal basis

Astanor may collect and process personal data on you, where you or your company (which you represent, own or for which you act as a contact person) act as shareholder, manager or director of an Astanor Entity. For the purposes of this Notice, individuals under this Section are referred to as **Shareholders and Managers**. The processing of your data as an Investee is based on the following grounds:

PURPOSE OF PROCESSING	GDPR LEGAL BASIS
<i>Astanor processes your data:</i>	<i>The processing is necessary:</i>
- for corporate secretary and management purposes	- to comply with legal obligations to which Astanor is subject.
- in order to take steps prior to entering into a contract with you, or for the performance of a contract with you	- to comply with the legal obligations to which Astanor is subject. - in order to take steps prior to entering into a contract with you, or for the performance of a contract with you.

In exceptional cases, an Astanor Entity may need your consent for certain processing operations. In such case, the relevant Astanor Entity will ask for your consent separately. For the avoidance of doubt, this is not the case for the processing purposes detailed under this Section 5.

b. Collection of personal data

Astanor may collect and process the following categories of personal data or documents containing such data, as relevant to your particular situation (as an Investee) and nature of relation with a relevant Astanor Entity:

- Shareholders meeting management documentation (convening notices, preparation, proxies, resolutions, votes management), correspondence, dividend payment details (bank account, payments), accounting ledgers/books, share register.
- Board meeting management (convening notices, preparation, proxies, resolutions, votes management), correspondence.
- Signature, corporate powers, delegations.

c. Data recipient

To the extent allowed by law, an Astanor Entity may share your data with another Astanor Entity, intermediaries, local authorities (CSSF, RCS, tax administrations), shareholders, lawyers or other service providers. Please note that Astanor may transfer your personal data outside the EU/EEA due to its internal organization or as necessary to fulfil the above listed purposes, including to countries which do not have a similar level of protection of personal data as the EU. In such case, In such case, and in accordance with GDPR, data transfers will be covered by appropriate safeguards, such as entering European Commission approved standard contractual clauses.

d. Investor data retention duration

The relevant Astanor Entity will retain your personal data for as long as required to efficiently manage the relationship with you, and then for the mandatory retention duration set forth by applicable law:

- For an unlimited retention as may be required for Astanor to comply with corporate law requirements and document corporate decisions/history.
- For certain data, for ten (10) years starting from the end of the current financial year, where required under applicable law.

**7. Individuals (and their intermediaries) as job applicants, associates, partners (and their relatives)**

a. Processing purposes and legal basis

Astanor may collect and process personal data on you, where you or your company (which you represent, own or for which you act as a contact person) acting either as (i) actual, former and prospective employee (an “**Employee**” and “**Prospective Recruit**”), (ii) associate (an “**Associate**”), (iii) a partner (a “**Partner**”), (iv) an intern (an “**Intern**”) and (v) a consultant (a “**Consultant**”). The processing of your data as an Investee is based on the following grounds:

<b>PURPOSE OF PROCESSING</b>	<b>GDPR LEGAL BASIS</b>
<i>Astanor processes your data:</i>	<i>The processing is necessary:</i>
<b>1. For Prospective Recruits which apply to an Astanor job opening (or via open candidacy):</b>	
- to manage recruitments and review job applications,	- in order to take steps prior to entering into a contract with you, and for purposes of legitimate interests pursued by Astanor, that is, HR management and hiring process.
<b>2. For Employees, Associates, Partners, Interns, Consultants:</b>	
- as required by law (labor, tax, social, corporate, CSSF rules, sanitary -e.g., COVID-19 mandatory checks- or other) and make legally required filings or reporting to authorities	- to comply with legal obligations to Astanor is subject.
- to manage staff onboarding, payroll management, process payments and expenses, benefits management,	- for the performance of a contract with you, and to comply with legal obligations to which Astanor is subject.
- for usual human resources management purposes (including employment/service contract management, performance	- for purposes of legitimate interests pursued by Astanor, that is, HR, asset security, activities and business management.

<p>reviews, appraisals, training, background checks, discipline, career development, investigations, security, emergency contacts, contingency plans, absence/sickness leave, working time and project management, budgeting and financial forecasting and record-keeping purposes), to ensure the security of Astanor’s assets, the continuity of activities and, in general, administer Astanor’s business</p>	
<p>- for IT management (IT accounts management, IT licenses, contact/agenda management, monitoring/investigations), electronic communications management (corporate email, laptops/workstations, mobiles, telephony and connectivity)</p>	<p>- for purposes of legitimate interests pursued by Astanor, that is, IT and asset management and protection.</p>

In exceptional cases, an Astanor Entity may need your consent for certain processing operations. In such case, the relevant Astanor Entity will ask for your consent separately. For the avoidance of doubt, this is not the case for the processing purposes detailed under this Section 6.

b. Collection of personal data

Astanor may collect and process the following categories of personal data or documents containing such data, as relevant to your particular situation (as an Investee) and nature of relation with a relevant Astanor Entity:

- For Prospective Recruits: job ads, profile sought, applications, profile, CV, letters, other documents provided by candidates (certifications, degrees, references), working permit, residence permit, correspondence, tests/assessments, background, reference and Google checks, interview notes/comments, criminal record, hiring decision, job description and contract details.
- For Employees, Associates, Partners, Interns, Consultants: identity (first/last name, personal address/email/phone, date/place of birth, nationality, passport/ID, social security number, gender), personal status (marital status, household composition, next of kin /emergency numbers), financial data (tax number, bank account details, remuneration, benefits), accounting ledgers/books, social security affiliation details, insurance details (health, professional insurance), meal vouchers, expenses, travel, venue, employment details (internal number, entry/exit date, job description, reporting lines, part time, etc.), bike leasing program (name, email), training details (training requests/performed, tests results, assessment, certification), employment contract details and salary slips/payments for employees, service contract details and invoices for external staff, absence, holidays, personal allowances, home working data, sickness leave, maternity/parental leave, medical certificates, photo, appraisals forms and feedback, interview notes, promotion/salary decision and disciplinary file; and
- For Employees, Associates, Partners, Interns, Consultants relatives: next of kin, emergency numbers.

Where you provide personal data on third parties (such as your relatives) to Astanor, you should make sure you have informed them accordingly.

c. Data recipient



To the extent allowed by law, an Astanor Entity may share your data with another Astanor Entity, intermediaries, third-party partners and providers (including insurance companies, head hunters and recruitment agencies, leasing, lunch vouchers and similar benefits, training, transportation and venue providers, auditors, advisors, consultants, lawyers, banks) and, where required by law, to competent local regulators and authorities. Please note that Astanor may transfer your personal data outside the EU/EEA due to its internal organization or as necessary to fulfil the above listed purposes, including to countries which do not have a similar level of protection of personal data as the EU. In such case, and in accordance with GDPR, data transfers will (i) be limited to what is necessary to perform your contract, or conclude a contract with a third-party in your interest, or (ii) be justified by the establishment, exercise or defense of legal claims, or (iii) if appropriate, be covered by appropriate safeguards, such as entering into European Commission approved standard contractual clauses, or (iv) in exceptional cases, with your consent (in such case under (iv) the relevant Astanor Entity will ask for your consent separately).

d. Applicable data retention duration

The relevant Astanor Entity will retain your personal data for as long as required to efficiently manage the relationship with you, and then for the mandatory retention duration set forth by applicable law:

- For Prospective Recruits: for up to 2 years in case of future recruitments; you may however object such retention by contacting [privacy@astanor.com](mailto:privacy@astanor.com).
- For Employees, Associates, Partners, Interns, Consultants: until termination of your employment/collaboration/partnership, and then for the mandatory retention duration set forth by applicable law (typically ten (10) years).
- For Employees, Associates, Partners, Interns, Consultants relatives: until termination of concerned individual's employment, collaboration or partnership.

**8. Your statutory rights.**

You have certain rights concerning your personal data under GDPR and can exercise them by contacting Astanor at [privacy@astanor.com](mailto:privacy@astanor.com).

- **Right to information.** If you are an individual falling into one of the category herein mentioned, Astanor may not have your current details and thus cannot contact you conveniently and in confidentiality. You may find at any time updated information on Astanor processing of their data on the Astanor website. You can request further clarification by contacting Astanor directly at [compliance@astanor.com](mailto:compliance@astanor.com).
- **Access right.** You have the right to access your personal data. Astanor processes a large quantity of information, and can thus request, in certain cases and in accordance with GDPR, that before the information is delivered, you specify the information or processing activities to which your request relates.
- **Right to rectification.** You can ask Astanor to rectify, correct or update inaccurate and/or incorrect data.
- **Other rights.** In certain limited cases (in which case Astanor will first analyze whether the conditions for the exercise of such rights are fulfilled, in line with GDPR), you may object to, or request the limitation of, the processing of your personal data, or request the erasure or portability of your personal data. You should note that the law authorizes Astanor (acting through its relevant Astanor Entities) to retain and continue processing certain personal data, even where you have exercised your rights to object or erasure or, if applicable, withdraw your consent: this is the case in particular where Astanor has legitimate and compelling reasons for continuing the processing,

such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority or any applicable authority in your applicable jurisdiction to introduce a claim.

## **9. Breach management**

A personal data breach (a “**Breach**”) is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. Astanor has implemented a procedure (“**Data Breach Procedure**”) in case of Breach with the following objectives: (i) allow Astanor and the Astanor Entities to fulfil their legal obligations in case of Breach, (ii) describe roles and responsibilities in managing a Breach, and (iii) minimizing risks and consequences for Astanor, the Astanor Entities and concerned persons in the case of a Breach. The Data Breach Procedure is distributed to all Astanor Associates involved directly or indirectly in activities involving the processing of personal data or the management of information systems and is available upon request.

## **10. astanor.com**

astanor.com (the “**Website**”) may contain links to other websites. We do not have any control over these websites. Therefore, we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Notice. You should exercise caution and look at the privacy notice applicable to the website in question.

The Website may use cookies: these are small files that are stored on each website user internet browser. We use cookies and similar technologies to ensure our website works properly, personalize your browsing experience, and analyze how website users use our website. This includes cookies which are necessary for the operation of our website. For these reasons, we may share website user usage data with our analytics partners. Each website user can choose whether or not they want to consent to our use of cookies through the Website. More information can be found in our Group Cookie Policy.