

Privacy Notice

AS BaltCap and its subsidiaries (the “**BaltCap Group**”) collect your personal data while respecting your right to privacy. This Privacy Notice (the “**Notice**”) is issued on behalf of the BaltCap Group and a reference to “**BaltCap**” shall mean the relevant company in the BaltCap Group that is the controller of your personal data and determines the purpose for which your data is processed and how it is used. Contact information of BaltCap’s offices in Estonia, Latvia and Lithuania can be found here: <http://www.baltcap.com/contacts>. Your first point of contact for any information or request in relation to your personal data should be one of BaltCap’s offices or the following e-mail address: info@baltcap.com.

Which personal data do we collect?

We collect only such personal data and to such extent that is necessary for the purposes of our business as specified below. Most commonly, the personal data we collect will fall into one or many of the following categories:

- ✓ Identification data (name, date of birth, identification document details, *etc.*)
- ✓ Contact data (address, telephone number, e-mail address, *etc.*)
- ✓ Financial data (bank account details, income details, *etc.*)
- ✓ Professional data (professional position, employment history, *etc.*)
- ✓ Newsfeed data (e-mail address, your newsfeed preferences, *etc.*)

How do we collect personal data?

We collect personal data that you provide to us (for example, when you communicate with us via e-mail, telephone or other channels; when you give us your business card; when you agree to receiving our newsfeed; or when you respond to our anti-money laundering check or other information request). In some cases, we additionally collect your personal data from other sources such as sector-specific newsfeed as well as public databases, search engines and webpages.

For which purpose do we use your personal data and on which legal basis?

We only collect and use your personal data when we have a specific purpose to do so. Most commonly, we use your personal data for one of the purposes listed below.

- ✓ **For performance of our duties to the investment funds managed or advised by BaltCap**, we use mainly the identification, contact and professional data of the representatives of the investors. The legal basis for the processing is the performance of a contract.
- ✓ **For communication with potential investors**, we use mainly the identification, contact and professional data of the representatives of the potential investors. The legal basis for the processing is the pursuance of our legitimate interest to conduct our business of raising, managing and advising private equity investment funds as well as (at your respective request) to take steps to enter into a contract.
- ✓ **For evaluation of the funds’ potential investments and management and divestment of actual investments**, we use mainly the identification, contact, professional and financial data of the board members, employees and other representatives of the potential or actual portfolio companies. The

legal basis for the processing is, as appropriate, either taking steps at your respective request to enter into a contract, or the performance of a contract, or the pursuance of our legitimate interest to conduct our business of managing and advising private equity investment funds.

- ✓ **For performance of another type of contract we have entered into with you or for taking steps to enter into a contract with you**, we use mainly your identification and contact data as well as other data the processing of which is necessary, depending on the contract in question.
- ✓ **For performance of anti-money laundering checks**, we use your identification, contact, financial, professional and other data if and to the extent that is necessary for performing the anti-money laundering check. The legal basis for the processing is compliance with a legal requirement.
- ✓ **For sending you newsfeed relating to our business**, we use your name and e-mail address with your consent. You have the right to withdraw your consent at any time by using the “unsubscribe” option at the end of the relevant e-mail.

What if I do not provide my personal data?

Where we need to collect your personal data on the basis of a legal requirement (such as the anti-money laundering checks) or under the terms of a contract we have with you or for taking steps to enter into a contract with you, we might not be able to do business with you if you fail to provide the data requested.

With whom do we share your personal data?

In the context of the purposes outlined above, we share your personal data with third parties. Such third parties include other companies in BaltCap Group, our service providers (including for example IT and telecommunications, business management software, fund administration), professional advisers (including for example lawyers, financial advisors, banks, auditors and insurers), and regulators and other authorities. We only disclose your personal data to such third parties that have ensured us to implement adequate safeguards to protect the security of your personal data and use it in accordance with the law. Where relevant, we enter into data processing agreements with the third parties stipulating their obligations in respect of handling your personal data.

Some of the third parties we share your personal data with may be located outside of the European Union. In such case, we make sure that at least one of the following safeguards is in place:

- ✓ The country we transfer the data to has been deemed to provide an adequate level of protection for personal data by the European Commission.
- ✓ The recipient of the data is bound by a contract approved by the European Commission which gives personal data the same level of protection it has in the European Union. For further details, please refer to: [European Commission: Model contracts for the transfer of personal data to third countries.](#)
- ✓ The US service provider we transfer the data to is part of the Privacy Shield which requires it to provide similar protection to personal data. For further details, please refer to: [European Commission: EU-US Privacy Shield.](#)

How long will we keep your personal data?

We will keep your personal data for only as long as is necessary for the purposes outlined above or where we are relying on consent to process your personal data until you withdraw your consent, unless we are

required to continue storing such data for a longer period of time due to legal, accounting or reporting requirements. Where we are in doubt about what the appropriate retention period of a certain category or item of personal data is, we consider the nature and scope of the data, the context and purposes of processing such data as well as the risk of harm to the rights and freedoms of the person concerned in the event of a data breach, in order to finally determine the appropriate time for deleting the data.

Your rights

You have the right to request a copy of your personal data as well as correction of any incorrect personal data. You also have the right to request erasure of your personal data if there is no valid reason for us to keep it. Where we are relying on consent to process your personal data, you may withdraw consent at any time. In some cases you may have a right to request a restriction on processing your personal data or to object to processing of your personal data. You also have the right to receive your personal data in a machine-readable format and have the data transferred to another party responsible for data processing. You may exercise your aforementioned rights in accordance with the requirements of applicable EU and local laws by contacting one of our offices or via e-mail to info@baltcap.com.

If you think your privacy rights have been breached, you may lodge a complaint with an authority of the EU country of your residence. Contact information for these authorities can be accessed here: [European Commission: An overview of the National Data Protection Authorities](#).

Updates to the Notice

This Notice was last updated in May 2018. We reserve the right to change this Notice from time to time by publishing the updated Notice on our webpage.