

PRIVACY NOTICE

Introduction

Marguerite Investment Management S.A. (hereinafter “MIM”) is an AIFM headquartered in Luxembourg, licenced and supervised by the Commission de Surveillance du Secteur Financier.

1. Privacy Notice Disclaimer

This Privacy Notice, as defined in the following paragraph, applies to Marguerite entities. Hereafter “Marguerite”, “we”, “us” or “ours” refers to one or more Marguerite entities, its network of member firms and their related entities as identified here:

- MIM,
- Marguerite Adviser S.A.,
- Marguerite GP S.à r.l.,
- Marguerite II GP S.à r.l.,
- Marguerite Partners II GP S.à r.l. and
- Marguerite III GP S.à r.l.

This Privacy Notice is a "privacy notice" for the purposes of applicable data protection laws, and in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (the "GDPR"), given by MIM when acting in its capacity as a data controller in relation to its collection and use of Personal Data, as defined by GDPR.

This Privacy Notice explains what Personal Data we collect about natural persons, what we use Personal Data for and with who we share Personal Data. It also sets out the rights of natural persons in relation to their Personal Data and the contact details for more information or queries.

“Personal Data” as used in this Privacy Notice means any information relating to an identified or identifiable natural person. We may sometimes collectively refer to handling, collecting, protecting and storing your Personal Data as “processing” such personal data.

2. What Personal Data do we collect?

Depending on the purpose of processing Personal Data disclosed in this Privacy Notice, Marguerite may process the following categories of Personal Data:

- Identification data (e.g. full name, date and place of birth, nationality, identification number, gender, photo);
- Contact details (e.g. e-mail addresses, residential or professional addresses, phone/fax numbers);
- Professional data (e.g. names of current or former employers, your job title and education details, professional qualifications, skills, or references from current or former employers);
- Financial and tax-related information (e.g. tax identification number, tax residency, income, bank account details, source of wealth); and/or
- Health information (e.g. where required by law in relation to an employee of Marguerite).

Sensitive Personal Data

Due to the nature of its activities, Marguerite will not collect, store or otherwise process highly sensitive Personal Data such as:

- political opinion;
- religious or philosophical beliefs;
- race or ethnicity;
- trade union membership;
- physical or mental health (other than information on an employee or potential employee which Marguerite is required by applicable laws to process);
- sexual life;
- or any other information that may be deemed to be sensitive under applicable law.

3. Purpose of processing and legal basis for the processing

Marguerite may, in its capacity as Data Controller or Joint Data Controller or Data Processor, process the Personal Data (as defined by GDPR) for the following purposes:

- to carry out anti-money laundering, counter terrorist financing and counter proliferation financing checks and related actions which Marguerite considers appropriate to meet any legal obligations imposed. Such processing is required in order to ensure Marguerite's compliance with Luxembourg and international laws and regulations as well as in connection with any initial due diligence and then agreement we may enter into with you. Marguerite has a legitimate interest in performing such processing in accordance with Marguerite internal procedures;
- to execute and perform a relevant contract with the individual or the entity which they represent. Such processing is based on the necessity to execute and perform the contract and based on a legal obligation;
- to on-board a potential client. The Personal Data processing is required in order for Marguerite to execute and perform the agreements;

- to report tax related information to the Luxembourg tax authorities in order to comply with legal obligations. The processing of Personal Data is necessary to ensure compliance with legal obligations imposed on Marguerite;
- to process an application for employment with Marguerite. In that respect the processing is based on Marguerite's legitimate interest;
- to update and maintain records of Marguerite fee billing services. In that respect the processing is based on the performance of a contract and on a legal obligation;
- to respond to the enquiries and/or request for information sent through the contact form published on the official website of Marguerite or by the traditional or electronic correspondence; and/or
- to comply with any other legal obligation as necessary for Marguerite's legitimate interests indicated above and/or where the processing is legally required.

4. Who we share Personal Data with?

Personal Data might be disclosed to and/or transferred to and/or otherwise accessed by any counterparty (including without limitation central administration, investment advisor, depositary agent, custodian bank, auditor or any other service provider) with which Marguerite has entered into an agreement with in order to carry out the duties and tasks in the best interest of Marguerite's stakeholders. Such disclosure will be processed with respect to the applicable laws.

Moreover the Personal Data will be disclosed to any court, governmental, supervisory or regulatory bodies, including tax authorities in Luxembourg or in various jurisdictions (including without limitation the jurisdiction where the stakeholders of Marguerite are resident, domiciled or citizen), in order to comply with any legal obligation. This includes exchanging information with other companies and organisations for the purposes of fight against or preventing fraud, tax evasion, money laundering, terrorist financing and/or proliferation financing.

The Personal Data will be disclosed to a third country on the base of any judgement of a court or tribunal and any decision of an administrative authority of a third country requiring Marguerite to transfer or disclose personal data if based on an international agreement in force between the requesting third country and the European Union ("EU") or Grand Duchy of Luxembourg.

Marguerite shall not transfer any Personal Data outside the EU except:

- to countries which provide an adequate level of protection for Personal Data as decided by the European Commission; or
- to recipients under a suitable agreement which contains the legal requirements for such transfer. The adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission for transfers of Personal Data to third countries.

5. Protection of Personal Data

MIM, as a regulated financial entity in Luxembourg, is directly or indirectly subject to internal measures to prevent the loss, misuse, accidental or unauthorised or accidental access or disclosure,

applies appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of Personal Data, and/or the accidental loss or destruction of, or damage to, Personal Data. This includes but is not limited to using properly configured and maintained logical and physical security measures and mechanisms.

6. Data retention

Personal Data will be retained by Marguerite for the duration of the business relationship. The Personal Data will be retained after the termination of the business relationship, the duration of retention of such data is limited to time imposed by applicable laws and regulations. The aggregate information may be retained beyond the end of the business relationship for statistical analysis and research purposes and for the improvement of services provided by Marguerite.

Retention periods are kept under review. There may be some cases in which we are obliged to delete Personal Data we process, such as the data having been processed in breach of the Applicable Data Protection Law or to comply with a legal obligation to delete it. In other cases, there may be no specific time limit applicable to the retention of particular Personal Data and, in determining how long particular Personal Data will be retained for, we will use criteria including whether:

- the data is no longer necessary for the purpose in relation to which it was collected;
- the data can, if required, be collected again without undue delay or difficulty.

7. What are your Data protection rights?

We would like to make sure you are fully aware of all of your data protection rights.

You are entitled to the following:

- the right to access – you have the right to request Marguerite for copies of your Personal Data. We may charge you a small fee for this service.
- the right to rectification – you have the right to request that Marguerite correct any information you believe is inaccurate. You also have the right to request our Company to complete information you believe is incomplete.
- the right to erasure – you have the right to request that Marguerite erase your Personal Data, under certain conditions.
- the right to restrict processing – you have the right to request that Marguerite restricts the processing of your Personal Data, under certain conditions.
- the right to object the processing - you have the right to object to Marguerite's processing of your Personal Data, under certain conditions.
- the right to data portability – you have the right to request Marguerite to transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

8. How to contact us

The contact details for the person responsible for the data protection are as follows:

Marguerite Investment Management S.A.

Attn: Data Protection Officer

4, rue du Fort Wallis

L-2714 Luxembourg

Grand Duchy of Luxembourg

9. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Marguerite has not addressed your concern in a satisfactory manner, you may contact the data protection regulator in Luxembourg:

National Commission for Data Protection

1, avenue du Rock 'n' Roll

1--4361 Esch-sur-Alzette

Grand Duchy of Luxembourg

Tel. +352 (0) 26 10 60-1

Website: <https://cnpd.public.lu/en/suppofflcontact.html>

10. Changes to the Privacy Notice

We review our policies and procedures regularly and we reserve the right to amend the terms. Marguerite keeps its Privacy Notice under regular review and places any updates on this web page.