



## Privacy Policy

**Last Updated: May 2023**

Permira Advisers (London) Limited and its subsidiaries and affiliates and subsidiaries the Permira Private Equity and Permira Credit funds (hereafter, the "**Data Controller**") recognise the importance of protecting your personal data. This notice explains how we collect, store and use your personal data in compliance with applicable data protection law, including, where relevant, (as amended from time to time) the General Data Protection Regulation (EU) 2016/679 ("EU GDPR") and any national laws enacted pursuant to the EU GDPR, the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 No. 419 ("UK GDPR"), the UK Data Protection Act 2018, and the Data Protection (Bailiwick of Guernsey) Law 2017 (the "DPGL").

### SCOPE:

The Data Controller uses a solution called "Hivebrite" to provide Permira employees and portfolio company employees, as well as associated contractors and third parties with access to an online platform (hereafter, the "**Platform**") for community engagement. The Data Controller may extend invitations to join the Platform at its discretion. Upon receiving an invitation, individuals can elect to subscribe to the Platform and create a corresponding user account. This Privacy Policy is intended for all Users of the Platform (hereafter, the "**Users**").

#### 1. COLLECTED PERSONAL DATA

When subscribing to the Platform, the User is informed that the following personal data is collected for the purpose of creating a user account:

##### Specific Elements:

- First name;
- Last name;
- Email address
- Phone Number (Work)
- Location
- Headline (Title)

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

##### Optional data:

User-Generated Content

Social Media Profile

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### Sensitive Personal Information:

The User is aware that when using the Platform, the User may decide to provide special categories of personal data or sensitive personal information within the meaning of applicable data protection law(s), for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

Unless we request it, we ask that you not send or disclose any sensitive or special categories personal information.

## THE PURPOSE OF THE DATA PROCESSING

The Controller can process PI lawfully to the extent that there is a valid legitimate basis for doing so.

### **We rely on your consent when we process your personal information for the following purposes:**

- Creation and management of a user account.
- Providing the User with all functionalities of the Platform, meaning:
  - Sending invitations for events organized by Data Controller or other Users
  - Allowing users to participate in topic-based community forums
- Management of prospection operations
- Sending email prospect campaigns in the Name of Permira and/or its commercial partners
- Sending newsletters in the Name of Permira and/or its commercial partners
- Processing for the above purposes may involve the transfer of your personal information outside your country of residence. We rely on your consent for these international transfers. See the Terms and Conditions for additional information.

### **We rely on legitimate interests when we process your personal information for the following purposes:**

- Generating statistics in order to:
  - improve the quality of the services proposed by the Platform;
  - improve the usage functionalities of the Platform (personalize experience, prevent misuse etc.)

From time to time the Controller may need to process the PI on other legal bases, including: to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest.

## DATA RETENTION PERIOD

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User's subscription on the Platform.

Following the termination of said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted within one year of termination.

## DATA TRANSFERS

User data is stored in the European Economic Area (EEA) by the Data Controller, its subsidiaries, its affiliates and its trusted service providers. However, depending on the processing, the Users' data may also be transferred to a country outside the EEA, to service providers, its subsidiaries and/or affiliates.

When transferring data outside the EEA, the Data Controller ensures that the data is transferred in a secure manner and with respect to applicable data protection laws. When the country where data is transferred does not have a protection comparable to that of the EU, the Data Controller uses “appropriate or suitable safeguards.”

Where data is transferred to the service providers located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

## COMMITMENT OF THE DATA CONTROLLER

The Data Controller commits to process User’s personal data in compliance with applicable data protection laws and respect the following principles:

- Process User’s personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users’ data for the strict purpose as described in this Policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do the best efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep personal User’s data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users’ data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

## EXERCISE OF THE USERS’ RIGHTS

Applicable law may provide you with a number of legal rights in relation to personal data processed in connection with this Platform. Depending on the legal basis of the processing, this may include the right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

When processing is based on User’s consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

If you wish to exercise any of the rights referred to above, please contact us using the details set out in the contact section below. We review and verify data protection rights requests. We apply non-discriminatory principles when we action requests relating to your data, in accordance with applicable data protection laws and principles. We exercise particular care when receiving a request to exercise these rights on your behalf by a third party. We will ensure that the third party is correctly authorised by you to receive the requested information on your behalf.

You also have the right, at any time, to lodge a complaint about our processing of your personal data with the relevant body regulating data protection in your country.

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## THIRD PARTIES AND PERSONS AUTHORIZED TO ACCESS USER DATA

The Data Controller may share your Personal Information with our affiliates, business partners, and other third parties. We may do so for the purposes of operating our business, delivering and improving the services provided to you, as well as for other legitimate purposes permitted by applicable law such as sending marketing and other communications related to our business.

**Service providers** carry out various operations on behalf of the Data Controller. The Data Controller will only provide service providers with information needed to perform the service. Personal information may be shared with Service Providers for a variety of purposes including, but not limited to: operating the Platform, hosting data and content produced or provided by the User, sending emails from the Platform, and providing customer support.

Additionally, the Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of the Data Controller, its customers or employees.

## SECURITY OF PERSONAL INFORMATION

Permira is committed to protecting your Personal Information from unauthorized access and use. To help protect your personal information, we implement and maintain appropriate technical, physical, and administrative safeguards. Access to your personal information is restricted solely to those employees who need to know that information to provide our services to you. Our employees receive training to maintain the confidentiality, privacy, and security of your personal information.

## COOKIES

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the [Data Controller Cookie Policy](#).

### Supplement for California Residents

The California Consumer Privacy Act of 2018 (the "CCPA"), as amended and expanded by the California Privacy Rights Act of 2020 (the "CPRA"), provides California residents with certain data rights regarding what we do with your personal information. If you are a California resident and it is determined that the CCPA and CPRA applies to you, this section details those rights, how you may exercise them, and what Permira will do in response.

### Data Subject Rights

If you are an individual who resides in California and whose Personal Information is collected and processed by Permira, you may have the right to:

- Request that we disclose to you, free of charge, the categories of the PI we collect, specific to you over the last twelve (12) months, including the categories of sources from which the PI was collected (and/or, if applicable, sold, shared or otherwise disclosed to a third party), and the business purpose for collecting PI.
- **Request the correction of any inaccurate Personal Information maintained by us about you.**
- Request that we delete the PI we have collected. Following our verification of the request, we will comply with the request and delete any or all the PI in our possession that we collected from the California resident and/or any or all such PI in the possession of our service providers, unless otherwise restricted by law or regulation.

California residents also have [the right to request that we limit the use of your Sensitive Personal Information](#) under certain circumstances. Use of this Platform, does not require Users to submit Sensitive Personal Information, as defined under the CPRA,

and Permira does not collect or process any information designated as Sensitive Personal Information under the CPRA in connection with the operation of this Platform.

Please note that, for purposes of California law information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or by the consumer; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience is considered “publicly available” Sensitive personal information that is “publicly available” shall not be considered sensitive personal information or personal information. Permira collects the following categories of information as defined under the CCPA: A. identifiers, B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), F. Internet Activity, and I. Professional or employment-related information.

California residents also have the right to opt out of the sale or sharing of Personal Information.

Under the CPRA, sharing is defined as the disclosure of personal information to third parties for purposes of “cross-context behavioral advertising.” Cal Civil Code Section 798140 (ah) (1). **Permira does not sell or share your PI and has not done so within the past twelve (12) months.**

For business purposes, Permira may sometimes need to disclose PI to third parties. Under the CPRA, you have the right to request information about the categories of your personal information that Permira has collected and/or disclosed within the past twelve (12) months. This information can be found in Table 1, Appendix A at the end of this Policy.

Please note that the rights under the CCPA and CPRA do not apply to PI collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

### Non-Discrimination for Exercising Your PI Rights

We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this Privacy Policy and Supplement.

### Questions or Concerns and Exercising Your Data Subject Rights

If you have any questions or concerns regarding the information in this privacy policy or would like to exercise any of your rights set forth in this privacy policy, please contact us using the information provided at the end of this notice. Please include a description of what right you want to exercise and the information to which your request relates. Please note that you may only make a disclosure request twice within a 12-month period.

### Verifying Your Identity

If you choose to contact us with a request, you will need to provide us with identifying information that matches the PI we currently have about you.

### Authorized Agent

You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact us using the information provided in the Contact Us section at the end of this notice.

### Accessibility Information

For consumers with disabilities who need to access this policy in an alternative format, please contact using the information provided in the Contact Us section at the end of this notice.

**CONTACT US:**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data, or to exercise of any of the rights listed above, please address questions, comments and requests to our Data Compliance Lead at [dataprivacy@permira.com](mailto:dataprivacy@permira.com).