

Revantage Europe Privacy Policy

Revantage Luxembourg

Revantage United Kingdom

Revantage Netherlands

December 2020

Revantage Europe have developed this privacy policy section (hereinafter the “**EU and UK Privacy Policy**”) to clearly define our ongoing commitment to protecting privacy rights and to explain how we collect, use and disclose personal information as required by applicable law or as we require in the course of fulfilling our professional responsibilities and operating our business.

This EU and UK Privacy Policy is issued, on behalf of Revantage Europe, by Revantage Europe / Revantage Global Services Europe S.à r.l., a limited liability (*société à responsabilité limitée*) formed under the laws of Luxembourg with registered office at 2-4, rue Eugène Ruppert, L-2453 Luxembourg, Grand Duchy of Luxembourg, registered within the *Registre du Commerce et des Sociétés* in Luxembourg under the number B 243.327, which acts as data controller (i.e. the organisation which determines why and how to process Personal Data) within the meaning of applicable data protection legislation.

Any entity of the Revantage Europe group processing Data Subjects’ Personal Data, (as defined below) and/or to which Data Subjects (as defined below) provide Personal Data and/or with which Data Subjects have or had contacts may also act as data controller for the purposes of the EU and UK Privacy Policy (Revantage Global Services Europe S.à r.l., Revantage Global Services UK Ltd, Revantage Real Estate Ltd, Revantage Europe Netherlands BV and all concerned entities and affiliates jointly referred hereinafter to as “**Revantage Europe**”, “**we**”, “**our**” or “**us**”).

1. Definitions

The terms and expressions in capital letters used in the EU and UK Privacy Policy have the meanings set forth below. Words in singular include the plural and vice versa. These terms and expressions shall always be interpreted according to applicable data protection rules including, but not limited to, the European Union Regulation 2016/679 on the protection of natural persons with regards to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC, as may be amended, replaced or re-enacted and the UK Data Protection Act 2018 (the “**Data Protection Legislation**”).

“**Data Subjects**”: means natural persons whose personal data is being processed by Revantage Europe.

“**Personal Data**”: means any information allowing the direct or indirect identification of an individual.

“**Processing**”: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Technical and Organizational Security Measures**”: means measures aimed at protecting Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access,

in particular where the processing involves the transmission of Personal Data over a network, and against all other unlawful forms of processing.

2. Collection and processing of Personal Data

When does Revantage Europe collect your Personal Data? Revantage Europe collects, stores and otherwise processes Personal Data relating to Data Subjects having interactions with Revantage Europe in accordance with Data Protection Legislation. Data Subjects may include, but are not limited to, the following categories of individuals:

- individual shareholders/investors/business or asset owners (as well as individuals linked to investors/shareholders/business or asset owners being entities), individual beneficial owners, board members, signatories, contact persons, representatives, and any other individuals involved or being a part of Revantage Europe's business; and
- representatives, employees, contact persons and any other individuals related to Revantage Europe's service providers;
- any other individual having or who had interactions with Revantage Europe.
- Individuals under an employment, student or trainee contract with Revantage Europe, job applicants and individual consultants do not fall within the scope of this EU and UK Privacy Policy and are covered under Revantage Europe's Human Resources Privacy Policy.

Legal basis for the processing of Personal Data. We will only process Personal Data where we have a lawful reason for doing so. The lawful basis for the processing of Personal Data performed by us will always be at least one of the following:

- the processing is necessary for the performance of a contract you are a party to or in order to take steps at your request prior to you entering into a contract;
- the processing is necessary for us to comply with our legal and regulatory obligations (including but not limited to comply with applicable commercial law, tax identification and reporting (where appropriate) notably under the Luxembourg law of 18 December 2015 on the OECD common reporting standard, for AML/KYC, as well as to comply with requests from or requirements of regulatory and enforcement authorities, as well as reporting obligations to any competent authority, for fraud and other criminal activity prevention, for payment verification, to implement changes in our corporate or ownership structures;
- the processing is necessary for the pursuit of our legitimate business interests pursued by us or by a third party that are necessary, for instance, for Revantage Europe to carry out its daily activities, to create statistics and tests, to manage risk litigation (including disputes and collections), for accounting, audits, tax returns, etc.
- you have given your prior consent to the processing and your consent has been obtained pursuant to applicable Data Protection Legislation;
- the processing is necessary for the establishment, exercise or defense of legal claims.

No automated decisions will be made in relation to the Personal Data processed.

Update of Personal Data. We will endeavor to keep the Personal Data in our possession or control accurate. Data Subjects providing Personal Data to us are however responsible for promptly informing us of any change to their Personal Data.

You are aware that not providing us with some specific Personal Data may unfortunately prevent Revantage Europe from interacting with you, from entering into an agreement or maintaining the related ongoing agreement with you.

Types of Personal Data and purposes of the processing. We aim to be transparent about what we process and why.

For further information on our processing activities please review the relevant sections below:

- **Shareholders/investors/business or asset owners being individuals and individuals associated with shareholders/investors/business or asset owners being entities:**

- Collection: We only collect the Personal Data of the above Data Subjects that is necessary for us to run our business.

We may receive the Personal Data we process directly from Data Subjects or receive it from a third party. We may also collect Personal Data available from public sources (such as when we use specific tools for AML/KYC checks).

- Types of Personal Data:
 - Identification data (such as surname, family name, date and place of birth, gender);
 - Private and business contact details (such as phone and fax numbers, home and professional address, email address, country of (tax) residence);
 - Other relevant personal details (such as nationality, citizenship, marital status, mandates);
 - Government identification numbers (social security numbers, tax number, copy of ID card or passport);
 - Images of passport, signatures;
 - KYC related information;
 - Criminal records or history when required and in accordance with applicable laws;
 - Financial details (billing address, bank account numbers, transaction and counterparty details, amount of shares owned);
 - Any other Personal Data related to the conduct of Revantage Europe's business towards and/or with shareholders, investors, owners, etc.
- Use: We may notably use such Personal Data:
 - To administer and manage our contractual relationship, for the performance of our business, to manage ongoing deals, to communicate with you;
 - For AML/KYC purposes: fulfilling our regulatory compliance obligations, including "Know Your Client" checks and confirming and verifying your identity and screening against government,

supranational bodies (including but not limited to the European Union) and/or law enforcement agency sanctions lists as well as internal sanctions lists and other legal restrictions;

- For financial and billing management;
- For fraud prevention: detecting, preventing and investigating fraud;
- For investigation: detecting, investigating and preventing breaches of policy;

- **Business contacts:**

- Collection: The Personal Data of business contacts that are not otherwise shareholders/investors/business or asset owners or suppliers of Revantage Europe can be collected and stored by Revantage Europe.

Most of the Personal Data we process in respect to business contacts is information that is knowingly provided to us by such Data Subjects (such as when you provide us with a business cards). However, in some instances, we may process Personal Data received from a third party or collected from public sources.

- Types of Personal Data: Such Personal Data may include:

- Identification data (such as surname, family name);
- Business contact information (such as professional phone number, email address, professional address);
- Other relevant professional details (such as nationality, preferred language, job title, function within a company);
- Any other Personal Data related to the conduct of Revantage Europe's business

- Use: We may use such Personal Data

- For contact and communication purposes:
- in order to make your contact details available to our employees and other members of Revantage Europe (such as to allow them to accomplish their daily work and contacting you when required by you or when necessary);
- In order to perform analytics (such as trends, sales intelligence, marketing effectiveness, uptake and progress);

- **Suppliers including individual contractors:**

- Collection: We may collect Personal Data from our suppliers being individuals or from individuals related to our suppliers (employees, persons of contacts) and from individual contractors:

Most of the Personal Data we process in respect to the above Data Subjects is information that is knowingly provided to us by them. However, in some instances, we may process Personal Data of individuals provided by third parties (such as when a supplier being an entity provides us with the contact details of one of its employees).

- Types of Personal Data: Such Personal Data may include:
 - Identification data (such as surname, family name);
 - Business contact information (such as phone number, email address, professional address);
 - Other relevant professional details (such as job title, function within a company);
 - Types of services provided to Revantage Europe;
 - Any other Personal Data related to the management by Revantage Europe of its suppliers.

- Use: We may use such Personal Data:
 - To receive services from suppliers;
 - To manage the contractual relationship with the supplier;
 - For administration and billing purposes (such as to agree on payment arrangements with our suppliers and to make payments to them).

We do not seek to collect or otherwise process any Personal Data that could be considered as falling within a specific category of Personal Data under the Data Protection Legislation, except where:

- the processing is necessary for compliance with a legal obligation (such as for AML/KYC purposes with information on criminal convictions);
- the processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- you have manifestly made those sensitive Personal Data public;
- the processing is necessary for the establishment, exercise or defense of legal rights; or
- we have, in accordance with applicable law, obtained your explicit consent prior to processing your sensitive Personal Data.

Such Personal Data will be processed in accordance with applicable Data Protection Legislation and will be subject to appropriate technical and organizational security measures.

3. Disclosure of Personal Data

Personal Data will not be shared with third parties, except as provided below.

Disclosure of Personal Data. To achieve the above-listed purposes, we may disclose Personal Data to the following recipients:

- Other entities within the Revantage Europe group;
- Professional advisors such as accountants, auditors, financial and tax advisors, lawyers, notaries and other outside professional advisors to Revantage Europe, subject to binding contractual obligations of confidentiality;
- Anti-fraud services;
- Governmental, legal, tax and regulatory or similar authorities, ombudsmen, and central and/or local government agencies, upon request or where required;
- Official registers (when required by law);

- Banks, non-bank lenders, company administrators, trade and corporate registries and depositaries;
- General partners of funds;
- Debt-collection agencies and tracing agencies;
- Accreditation bodies;
- Third party processors);
- Any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary and as permitted under applicable law.

If we engage a third-party processor to process your Personal Data, the processor will be subject to binding contractual obligations to: (i) only process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data, together with any additional requirements under applicable law.

In such circumstances, Revantage Europe ensures that Personal Data is kept secure from unauthorized access and disclosure.

Transfer of Personal Data. Because of the international nature of our business, we may need to transfer your Personal Data within the Revantage Europe group and to other recipients mentioned above, in connection with the purposes set out in this EU and UK Privacy Policy.

For this reason, we may transfer your Personal Data to recipients located outside the territory of the European Economic Area or, in the case of data subjects in the UK, outside the UK and the European Economic Area. Any data transfer to such third parties will, depending on the nature of the transfer:

- A. be covered by standard contractual clauses approved by the European Commission (the “**SCC**”), in which case:
- we will conduct a privacy risk assessment on case-by-case basis prior to determine whether a third country provides an adequate level of protection of personal data; and
 - we will assess the risk, necessity and possibility of introducing additional safeguards to the SCC for the transfers to third countries which, according to our privacy risk assessment, may not provide adequate level of protection.

The Data Subject may obtain a copy of such safeguards by contacting us.

- B. be otherwise authorized under data protection laws, as the case may be, as such transfer is necessary for the performance or execution of a contract concluded in the Data Subject’s interest or for the establishment, exercise or defense of legal claims or for the performance of a contract between the Data Subject and us.

4. Data Subjects’ rights in relation to the processing of their Personal Data

Rights granted to Data Subjects. In accordance with applicable law, Data Subjects are granted the following rights with regards to the processing of their Personal Data:

- the right to request access to their Personal Data stored by Revantage Europe;
- the right to update or correct any of their Personal Data, if the Personal Data is incorrect or incomplete;
- the right to oppose to the processing of their Personal Data, on grounds related to their particular situation;
- the right to request from Revantage Europe; the erasure of their Personal Data, to the extent such Personal Data (i) are no longer necessary in relation to the initial purpose(s) for which they were collected, (ii) consent, where applicable, has been withdrawn and there is no other means of legitimating the processing of Personal Data, (iii) the Data Subject objects to the processing of the Personal Data, (iv) the Personal Data is unlawfully processed;
- the right to request the restriction of the processing of Personal Data, if such Personal Data is found to be inaccurate or unlawful, is no longer needed for the purposes of the processing, or should a court decision on a complaint lodged by a Data Subject be pending;
- the right to data portability;
- the right to withdraw any consent given in the context of this EU and UK Privacy Policy;
- in the event of a dispute between the Data Subject and Revantage Europe regarding the processing of Personal Data which failed to be resolved by the parties in an amicable manner, the right to lodge a complaint with your local competent data protection authority, a list of which is available at https://edpb.europa.eu/about-edpb/board/members_en.

Revantage Europe will respond to individual complaints and questions relating to privacy and will investigate and attempt to resolve all complaints. Revantage Europe will only be able to answer favorably to any of the above requests related to the right to oppose, right of erasure and right of restriction provided that it does not interfere with or contradict a legal obligation of Revantage Europe (e.g. a legal obligation to keep the related Personal Data) or due to any other impediment that would justify that Revantage Europe would not be able to grant such requests.

Revantage Europe undertakes to handle each request by a Data Subject free of charge and within a reasonable timeframe (in any case within maximum one month).

How to exercise such rights. Data Subjects can exercise the rights mentioned above or challenge compliance with this EU and UK Privacy Policy, by contacting Revantage Europe at LU_GDPR@revantage.eu.

5. Data retention

Revantage Europe undertakes not to use the Personal Data for purposes other than those for which it has been collected and that such information shall not be stored for a period longer than necessary for the realization of such purposes.

Retention periods shall, in any case, be compliant with any applicable law and proportionate to the purposes of the processing.

6. Technical and Organizational Security Measures

Ensuring that Personal Data is appropriately protected from data breaches is a matter of high priority for Revantage Europe.

Revantage Europe implements adequate technical and organizational security measures, such as, depending on the equipment, password protection, encryption, physical locks, etc., to ensure a level of security appropriate to the risks represented by the processing and the nature of the Personal Data to be protected.

7. Internal training program

All individuals within Revantage Europe, having access to Personal Data are provided with specific training programs/information in order to improve their practical skills and knowledge that relate to data protection issues.

8. Amendment

Revantage Europe reserves the right to change, supplement and/or amend this EU and UK Privacy Policy at any time.

In such case, notification will be given by email or any other methods allowed by the Data Protection Legislation.

9. Contact

If you have any questions or comments about this EU and UK Privacy Policy, or if you would like us to update information we have about you, please email us at LU_GDPR@revantage.eu.

This EU Privacy Policy was last updated in November 2020.