

## Data protection information

### Who is responsible for processing your data and who can you contact?

Responsible according to art. 4 no. 7 GDPR is:

CAM Alternatives GmbH  
Gereonshof 12  
50670 Cologne  
Germany  
Phone +49 221 937085 0  
Fax +49 221 937085 19  
E-mail [cgk.info@altamarcam.com](mailto:cgk.info@altamarcam.com)

You can reach the company's data protection officer **Anna Schaefer** at:

Phone +49 6172 6875 515  
Mobile +49 173 9476 192  
E-mail [cgk.dataprotection@altamarcam.com](mailto:cgk.dataprotection@altamarcam.com)

### How is your data collected and processed?

Your personal data will only be processed for the purpose for which you provided it to us. This depends on the respective contractual relationship with you.

We have either collected your personal data as part of our business relationship with you (e.g. interviews or telephone conversations, either from consultations, applications or contracting of any product, any transaction or operation, letter of commitment or MIFID test) or we have received it from other companies in the AltamarCAM Group (details of which can be consulted via this link: <https://www.altamarcam.com>) or from other third parties (e.g. the Federal Central Tax Office, third party databases for money laundering and fraud purposes, different open access media, registers of public bodies, entities with which CAM Alternatives GmbH has distribution agreements and databases of compliance or non-compliance with monetary obligations).

### Which of your data will be processed?

We process different types of personal data depending on the type of contractual relationship we have with you.

In particular, the following personal data may be processed by us (i) within the framework of an address as potential customer, (ii) during the collection of master data, (iii) in the course of a power of attorney (fund power of attorney) or (iv) upon appointment as any other person authorized to dispose of a fund / contract:

- Name, address, contact data (e-mail address, telephone numbers), date and place of birth, gender, nationality, language, marital status, business activity, occupational group key / type of partner (employed / self-employed), identification data (e.g. ID card data), tax ID and authentication data (e.g. your signature), account data, FATCA status.
- Data that is collected in the course of contact with you, such as consultation protocols, documents in correspondence or information on participation in events.

When concluding or using products in the securities business and typical private equity products, the following personal data may essentially still be collected, processed or stored:

- Current or previous occupation, detailed information on knowledge / experience in the securities business (MiFID status), your investment behaviour / strategy (scope, frequency, solvency and risk tolerance), information on the origin of assets, tax information, advisory documents, socio-economic, reputational, fraud and compliance or non-compliance of monetary obligations data.
- CAM Alternatives GmbH, due to an existing investment agreement, may process personal data of third parties: (i) legal representatives, (ii) beneficial owners, (iii) indirect holders of control of the company, (iv) directors, (v) family members and minors, if any. Clients declare that the personal data and third-party information communicated is true and accurate and that they have informed about the communication of the third-party data and obtained their consent for the corresponding processes. Furthermore, you must make the data protection information available to these third parties so that they are informed about the processing of their data by CAM Alternatives GmbH. This information may be requested at any time via e-mail at [cgn.dataprotection@altamarcam.com](mailto:cgn.dataprotection@altamarcam.com). In case of processing data of minors, CAM Alternatives GmbH will only process this information relating to minors with the due authorization of the legal representative (mother/father/guardian).

### **On what legal basis do we process your data?**

We process your data exclusively in accordance with the requirements of the GDPR and the new German Federal Data Protection Act (BDSG-new). In the following, we would like to outline in detail which legal bases it can be in detail:

#### 1. to fulfil contractual obligations pursuant to art. 6 para. 1 lit. b) GDPR

In this case the processing of your personal data for the provision of business and financial services within the contract execution with our customers or for the implementation of pre-contractual measures, which take place on your request. The concrete processing purposes depend on the respective contractual relationship. In any case, the personal data processing activities that may be carried out under this legal basis are:

- Depending on the fund chosen, CAM Alternatives GmbH may transfer only the personal data necessary to third party custodian entities of the funds contracted. If you would like to know the identity of the custodian entities of the funds, please contact CAM Alternatives GmbH.
- Fulfilment of accounting, legal, fiscal and administrative obligations.
- Management of queries, updating of data, suggestions and complaints.
- CAM Alternatives GmbH may consult and process your solvency and credit history data from entities providing solvency and credit information services in order to be able to accredit the degree of commitment to the proposed investment. In the event that it does not meet its investment commitments, CAM Alternatives GmbH may carry out activities aimed at enforcing compliance.
- CAM Alternatives GmbH may communicate any data of an identifying nature, including any data collected or obtained by CAM Alternatives GmbH in compliance with the regulations on the prevention of money laundering and the financing of terrorism, as a result of the various investments made by the funds managed by CAM Alternatives GmbH. Therefore, such personal data may be communicated to the underlying funds, co-investments or investments in other types of vehicles, to their depositories, as well as to the various companies that may provide them with services for the sole purpose of making or maintaining such investments. Likewise, the communication of such data shall be carried out in accordance with all the guarantees and under all the principles of proportionality and minimization of personal data. These entities may be located inside or outside the European Union and you will be periodically informed of their identity. In any case, if you would like to know more details of the information relating to such entities, you may request such information from CAM Alternatives GmbH's Data Protection Officer.
- CAM Alternatives GmbH will periodically provide you with information on the products contracted.
- Furthermore, through your "Login", provided on the corporate website, CAM Alternatives GmbH will process the relevant information collected in this private area, as well as the data relating to the verification of the identity that allows access to your profile.

You can find more information in the respective contract documents.

2. to fulfil legal obligations pursuant to art. 6 para. 1 lit. c) GDPR or to safeguard a public interest pursuant to art. 6 para. 1 lit. e) GDPR

As an investment company, we are subject to a number of legal requirements (Capital Investment Code, Commercial Code, Money Laundering Act, Securities Trading Act, Investment Act, Tax Act) as well as regulatory requirements (e.g. from the Federal Financial Supervisory Authority). Within this range of topics, it may be necessary to process your personal data. The processing purposes include, among others, money laundering prevention, identity verification, compliance with tax reporting obligations and risk assessment and control for CAM Alternatives GmbH.

This is the case, e.g. with the following processing activities:

- Your personal data may be communicated to entities in which CAM Alternatives GmbH has direct or indirect holdings located within the European Union, details of which can be consulted via this link: <https://www.altamarcam.com> for measures to prevent money laundering and the financing of terrorism.
- CAM Alternatives GmbH may obtain and update your personal data, either through internal AltamarCAM Group databases or from external sources also available for the purpose of preventing money laundering and terrorist financing.
- CAM Alternatives GmbH may communicate your personal data to public administrations and regulatory bodies that may be located both inside and outside the European Union, when its transfer is mandatory under current legislation, for important reasons of public interest.
- Based on other regulations to which CAM Alternatives GmbH may be subject, different regulatory authorities or Courts may require information relating to you.
- Processing of data derived from the exercise of data protection rights, derived from the obligations of data protection regulations.

### 3. to safeguard a legitimate interest pursuant to art. 6 para. 1 lit. f) GDPR

If necessary, we process your personal data beyond the original fulfillment of the contract to protect our legitimate interests or those of third parties. This includes the following purposes:

- Compliance with retention periods,
- Risk control,
- Assertion of claims in legal disputes,
- Prevention of crime,
- Ensuring the IT security of our company as well as for
- Marketing measures. If the client does not opt-out by notifying CAM Alternatives GmbH respectively, CAM Alternatives GmbH may process personal data in order to send information, both by electronic and ordinary means, about other services or products offered by us.

### 4. based on your consent pursuant to art. 6 para. 1 lit. a) GDPR

Only if you are interested, we will communicate your data to the other entities in which AltamarCAM has holdings (<https://www.altamarcam.com/es/el-grupo/> and <https://www.altamarcapital.com/estructura/>) so that they can send you commercial communications, either by electronic means or by ordinary means (calls or post), about services and products offered by these entities. If you are interested, please confirm.

You can revoke your consent at any time and informally. However, we would like to point out that a revocation of your consent will only be effective for the future, i.e. it

will not affect previous processing before the revocation. You can request an overview of the consents granted by you from us at any time.

### **To whom will your data be transmitted?**

Within our financial institution, only those employees or authorized users of your data who need it to fulfil our contractual and legal obligations will have access to it. We will only pass on your data to third parties, if you have given your consent, if we are obliged to do so by law or if our contract data processors can guarantee compliance with the GDPR and the new BDSG as well as confidential handling of your data. CAM Alternatives GmbH is also obliged to maintain secrecy regarding all customer-related facts and valuations of which it becomes aware. Furthermore, your personal data may be transferred within the AltamarCAM Group in accordance with the GDPR. For a complete list of the AltamarCAM Group entities, please see CAM's "Privacy and Cookies Policy" (<https://cam-alternatives.com/home/en/privacy-policy-2/>).

Recipients can be accordingly, e.g.:

- According to legal / official regulations e.g. the German Federal Bank, the Federal Financial Supervisory Authority, financial authorities, courts, or the Federal Central Tax Office.
- The depositary entities of the funds contracted.
- The entities of the underlying funds, the funds themselves, co-investments or investments in other types of vehicles, their depositories, as well as the various companies that may provide services to them.
- In order to prevent fraudulent conduct, as well as in order to centralize the obligations regarding the prevention of money laundering, data may be shared between the entities within the AltamarCAM Group (<https://www.altamarcam.com>), as well as in centralized information systems.
- Our contract data processors in the field of processing bank information as well as tax consultants, maintenance service providers for our IT, service providers for data destruction, video alloy optimization, fund administration, auditors, share registers, payment transactions and providers of electronic data rooms, external experts, lawyers, consulting services, advisors, technology platforms, distribution services, development and data hosting services, backup services, financing services, potential buyers or investors and administrative services, among others. CAM Alternatives GmbH pre-selects these suppliers on the basis of data protection compliance criteria, has data protection contracts with all of them and monitors their compliance with their data protection obligations.
- Other recipients for whom you have given us permission to transmit data, depending on the order.

### **Is your data being transferred to a third country or to an internationally active organization?**

Data will only be transferred to countries outside the EU or the EEA (classified as "third countries" in the GDPR) to the extent that this is necessary for the execution of your contracts, required by law (e.g. reporting obligations under tax law), in the case that entities managing underlying funds or entities providing the services indicated in the previous paragraph or finally you have given us special consent or as part of order processing. We have obligated service providers in third countries to comply with European data protection by means of written instructions (e.g. EU standard contract clauses).

If you need more information or details of the contractual measures, you can contact CAM Alternatives GmbH's Data Protection Officer at the following e-mail address:

[cg.dataprotection@altamarcam.com](mailto:cg.dataprotection@altamarcam.com).

### **How long will your data be stored?**

Of course, we will delete your data as soon as the processing purpose and the legal storage obligations have expired. The processing purpose depends on the respective contractual agreements with you. The further storage periods are as follows

- from commercial and tax law requirements in accordance with the German Commercial Code, the Tax Ordinance, the Money Laundering Act and the Securities Trading Act. The periods are between two and ten years after the termination of the contractual relationship or the year in which the respective balance sheet is drawn up.
- for individual data records (indirectly) from the periods for evidence arising from para. 195 et seq. of the German Civil Code. These can be up to 30 years, whereby the regular limitation period is three years.

### **What rights do you have as a data subject?**

- Right to **rectification** pursuant to art. 16 GDPR:

You have the right to demand the correction of your incorrect personal data immediately from the responsible person. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data - also by means of a supplementary declaration.

- Right to **deletion** ("right to be forgotten") pursuant to art. 17 GDPR:

You have the right to demand that the person responsible delete your data immediately. The person responsible is obliged to delete personal data immediately if one of the following reasons applies:

- a) The purposes for which the personal data were collected are no longer applicable
- b) You revoke your consent to the processing. There is no other legal basis for the processing.
- c) You object to the processing. There is no other legal basis for the processing.
- d) The personal data have been processed unlawfully.

e) The deletion of personal data is necessary to fulfil a legal obligation under Union law or the law of the Member States to which the controller is subject.

f) The personal data have been collected in relation to information society services offered in accordance with art. 8 para. 1 GDPR.

- Right to **limitation of processing** pursuant to art. 18 GDPR and para. 35 BDSG:

You have the right to request the restriction of processing if one of the following conditions is met:

a) The correctness of the personal data is doubted by you.

b) The processing is unlawful, but you refuse to delete it.

c) Personal data is no longer required for the purposes of processing; however, you need the data to assert, exercise or defend legal claims.

d) You have lodged an objection against the processing pursuant to art. 21 para. 1 GDPR. As long as it is not yet clear whether the justified reasons of the person responsible outweigh those of you, the processing will be restricted.

- Right to **data transfer** pursuant to art. 20 GDPR:

You have the right to receive the data provided by you in a structured, common and machine-readable format from the person responsible. We must not hinder a forwarding to another responsible person.

- Right of **objection** according to art. 21 GDPR:

For this purpose, please contact the person responsible for processing (see above).

- Right of **appeal to the supervisory authority** pursuant to art. 13 para. 2 lit. d), 77 GDPR in conjunction with para. 19 BDSG:

If you are of the opinion that the processing of your data violates the GDPR, you have the right to lodge a complaint with the supervisory authority. For this purpose, please contact the responsible supervisory authority which is: <https://www.lidi.nrw.de/>

- Right to **withdrawal of consent** pursuant to art. 7 para. 3 GDPR:

If the processing is based on your consent pursuant to art. 6 para. 1 lit. a), you are entitled at any time to withdraw your consent without affecting the lawfulness of the processing carried out based on the consent until revocation.

If you have any questions about your personal data, please feel free to contact our data protection officer at any time, who will also assist you in safeguarding your rights.

### **Do you have a duty to provide your data?**

We can only enter into a business relationship (and thus our contractual obligations) with you if you provide us with the necessary data. In particular, we are obliged, e.g. by the provisions of the Money Laundering Act, to collect and process your identity card data

(name, place of birth, date of birth, nationality, residential address). If you do not agree to the collection of this data, we may not enter into the desired business relations with you.

Otherwise, you are not obliged to disclose your data to us. This concerns in particular the data processing for marketing measures. If you do not wish this, you can informally object to the data processing for this purpose at any time without the contractual relationship with us being impaired.

**To what extent does your data flow into profiling measures?**

We are obliged by law to combat money laundering and fraud. Data analyses are also carried out. These measures also serve to protect you. In addition, we do not use any fully automated decision-making measures pursuant to art. 22 GDPR. Should we have to deviate from this passage in individual cases, you will be informed of this separately.

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