



DATA PRIVACY POLICY

1. Purpose and scope

This policy is based on Regulation 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, and repealing Directive 95/46/EC (General Data Protection Regulation or "**GDPR**").

Under Luxembourg law, the competent authority is the National Commission for Data Protection ("CNPD") whose legal framework is established by the Law of 1 August 2018 on the organisation of the National Commission for Data Protection and implementation of 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 the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), amending the Labour Code and the amended law of 25 March 2015 laying down the salary regime and the conditions and modalities of promotion of civil servants.

In this context, reference is also made to the communications of the CNPD which can be found on its website: www.cnpd.lu.

This policy extends to all legal entities of the Brederode Group whose members are identified in the most recent annual report published on the www.brederode.eu website.

This Policy is addressed to all natural persons with whom the companies of the Brederode Group may be in contact, in particular:

- their staff members (current but also former and future);
- to individual shareholders but also to representatives of institutional shareholders;
- business contacts who are natural persons, including representatives of private equity fund managers in which the group invests;
- natural persons representing the group's suppliers;
- members of the boards of directors of group companies;
- visitors to the premises of the group companies;
- to visitors to the Group's website; and
- analysts, journalists and subscribers via the website to quarterly press releases.

The policy does not apply to information processed concerning legal entities.

2. Definitions

In this Policy:

'**personal data**' means any information relating to an identified or identifiable natural person ('data **subject**'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical identity, physiological, genetic, mental, economic, cultural or social of that natural person;

"**processing**": means any operation or set of operations which is carried out on personal data or on sets of personal data, whether by automated means or not, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or other making available, alignment or combination, restriction, erasure or destruction ("**treat**" or "**processed**" results from this definition).

Brederode SA or another entity of the Brederode Group is responsible for the processing of personal data concerning you insofar as it decides on the grounds and methods of their processing, thus acting as "**controller**".

For the purposes of this Policy, the terms "**Brederode**", "we" and "us" refer to Brederode SA or the relevant entity of the Brederode Group.

3. Data controller

Unless otherwise provided in this section, we are responsible, as data controller, for the processing of personal data concerning you.

In the case of future, current or former staff members, the controller of personal information concerning them will be their potential, current or former employer (which may refer to another entity of the Brederode Group).

4. Type of data collected

We collect or become aware of basic identifying information about individuals with whom we interact, such as, for example, name, position, company name, email and/or postal address, and landline and/or mobile phone number.

This information may either be provided directly by natural persons, communicated to us by the legal entity for which the person works, provided to us by one of our service providers, or come from publicly available sources.

a. Data collected relating to staff members

With respect to our future, current or former staff (including interns and temporary workers), we may also collect or become aware of the following information:

- additional identification information (e.g. date and place of birth, nationality, identity card or passport numbers and copy of identity card/passport, transport cards, residence and work permits, emergency contact);
- information relating to family situation;
- training and experience;
- function;

- remuneration data;
- social security information;
- electronic identification data;
- information necessary to draw up and maintain insider lists for Brederode SA in accordance with the Market Abuse Regulation¹;
- geolocation data (from mobile phones and tablets in case of loss or theft);
- photos; and
- more generally, information about the activities carried out in the context of functions at Brederode.
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b. Collected data relating to shareholders

With respect to our individual shareholders or representatives of "institutional" shareholders, we may also collect or become aware of the following information:

- information about shares held; and
- content of communications (if applicable).

It should be noted that the shares of Brederode S.A. have been dematerialized since 2014. We therefore no longer have access to the bank details of shareholders.

c. Data collected relating to business contacts

With respect to representatives of our portfolio entities and target companies, we may also collect or become aware of the following information:

- additional identification information (e.g. copy of identity card/passport); and
- content of communications (if applicable).

d. Data collected relating to suppliers

With respect to our suppliers of products or services who are natural persons (such as self-employed persons) or representatives of our suppliers who are legal entities, we may also, in addition, collect the following information:

- electronic identification data necessary for the purpose of delivering products or services to our company or visits to our premises (e.g. username, access rights, passwords, badge number, IP address, etc.);
- in the case of natural persons acting as suppliers or service providers, financial information (e.g. bank details, credit card number, invoices) and contract-related information (e.g. type of contract, parties and duration); and
- information necessary for the establishment and maintenance of insider lists concerning Brederode SA in accordance with the Market Abuse Regulation.

¹ Regulation No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse.

e. Data collected relating to board members

With respect to members of the Board of Directors, we may also collect or become aware of the following information:

- additional identification information (e.g. date and place of birth, nationality, copy of identity card/passport, service bills and travel cards);
- information relating to family situation;
- training and experience;
- function;
- data relating to remuneration within the Brederode Group;
- electronic identification data (e.g. logins, passwords, audio and/or video recordings such as those made through surveillance cameras or voice recordings);
- bank details;
- information necessary for the establishment and maintenance of insider lists for Brederode SA in accordance with the Market Abuse Regulation;
- photos; and
- more generally, information about the activities carried out within the framework of their functions at Brederode.

f. Data collected relating to visitors to our premises

With regard to visitors to our premises, we may also, in addition, collect or become aware of identification data.

g. Data collected about website visitors and third parties who come into contact with Brederode, such as analysts, journalists and subscribers to our press releases

With respect to website visitors and any third parties who come into contact with our company, such as analysts, journalists and subscribers to our press releases, we may also collect the following information:

- electronic identification data (http header fields, IP address, browser identification information, computer equipment and software location information, if available);
- browser and device information (e.g. Internet service provider's domain, browser type and version, operating system and platform, screen resolution, device manufacturer and model);
- information provided by the third party when subscribing to our press releases (e.g. name/last name, address, subscription decision); and
- data collected by means of cookies, website code and web beacons (e.g. language preferences and analyses regarding the use of the website, such as the pages viewed, the order in which these pages were viewed and the duration of the visit).

h. Sensitive data and other topics

To the extent permitted or required by law, we may also process sensitive data, such as data relating to health data. We will only do so to the extent strictly necessary for the purposes listed in section 6 below or in order to comply with a legal obligation and, if necessary, subject to prior consent. In such cases, we will only access and process the data under the responsibility of a representative of the relevant company of the Brederode Group, who will be subject to an obligation of confidentiality.

We may also collect the social security registration number but we will only process this data if we are legally obliged to do so.

5. Timing of data collection

We will collect personal data:

- when natural persons apply to become members of staff of a company of the Brederode Group;
- when a member of staff interacts with us, other members of our staff, our computer equipment and other systems;
- when we interact with former staff members;
- when we interact with (representatives of) our potential investors, shareholders and suppliers;
- when we interact with representatives of companies/managers in our portfolio/targets;
- when we interact with board members; and
- when natural persons visit our website, visit our premises, subscribe to our press releases or contact us.

6. Legal basis and purpose of the processing of personal data

a. Legal basis

We are not allowed to process personal data in the absence of a valid legal basis. Therefore, we will only process personal data if:

- we have obtained prior consent;
- the processing is necessary in order to perform our contractual obligations or to take pre-contractual measures at the request of the natural person;
- the processing is necessary for compliance with our legal or regulatory obligations;
- the processing is necessary in order to protect the vital interests of the natural person in question or those of another natural person; or
- the processing is necessary in view of Brederode's legitimate interests and does not unduly affect the interests, fundamental rights and freedoms of the natural person in question.

When processing personal data on the latter basis, we always seek to maintain a balance between our legitimate interests and privacy. Examples of the "legitimate interests" in question include:

- to carry out our investment activity;
- to benefit from cost-effective services (for example, we may choose to use certain platforms offered by external providers);
- to facilitate communications with (representatives of) our investors/shareholders (for example, we may share professional contact details of one of our staff members with an investor/shareholder, indicating that this person is the contact person within Brederode);
- to prevent fraud or criminal activity and to protect the security of our computer systems, architecture and networks;
- to meet our corporate and social responsibility objectives; and
- to take a number of measures to promote health in the Group.

b. Purposes of processing

We always process personal data for a specific purpose and we only process those that are relevant for the achievement of that purpose. In particular, we process personal data for one of the following purposes.

i. Staff members

In the case of future, current or former staff members (including interns and temporary workers), we process personal data for the purposes of recruitment activities, personnel administration, salary management, performance reviews, monitoring the activities of staff members at their workplace, including compliance with applicable health and safety policies and rules, management of any disciplinary measures and internal complaints relating to violent, psychological and undesirable (sexual) behaviour, maintaining compliance and reporting, maintaining business continuity, the management of investments and disposals involving our company and for all other purposes imposed by law and authorities.

ii. Shareholders

In the case of our individual shareholders or representatives of "institutional" shareholders, we process personal information in order to analyse the shareholding of our company, to communicate about and prepare for shareholder meetings (e.g. sending notices of meeting) and to pay dividends to our shareholders, if applicable, and to answer questions from shareholders.

iii. Business Contacts

In relation to our business contacts as individuals or representatives of our portfolio entities and target companies, we process personal information in order to identify investment opportunities and to maintain relationships with our portfolio companies and managers and their shareholders, to communicate about and prepare for events (for example, sending invitations) and answer questions.

iv. Suppliers

With regard to our suppliers of products or services who are natural persons (such as self-employed persons) or representatives of our suppliers who are legal persons, we process personal data in order to perform tasks in preparation for contracts or within the framework of such existing contracts, to monitor the activities carried out on our premises, including compliance with applicable health and safety policies and regulations, managing our IT resources, including infrastructure management and business continuity and for billing purposes.

v. Members of the Board of Directors

In the case of board members, we process personal data for the purpose of organising and preparing board and board committee meetings (including managing attendance and absences, conducting background checks, creating and maintaining directories, arranging travel), managing compensation (e.g. administering compensation and other contractual benefits, business expenses), maintaining compliance and communication, maintaining business continuity, managing investments and divestitures involving our company and for any other purposes required by law and authority.

vi. Visitors to our premises

With regard to visitors to our premises, we process personal data in order to manage our premises (e.g. management of access to the building and visits), manage access to our WIFI network and to ensure the security of the building.

vii. Website visitors, analysts, journalists and subscribers to our press releases

With regard to visitors to the Brederode website and any third parties who come into contact with our company, such as analysts, journalists and subscribers to our press releases, we process personal data in order to manage and improve our website, to measure the use of our website, to periodically send our press releases using the e-mail address provided and to monitor and prevent fraud, violations and other potential misuse of our website.

viii. General purposes

In addition to the specific purposes above, we process all personal data for the following general purposes:

- store contact information (e.g. business cards);
- manage and administer the relationship we have with data subjects;
- manage our IT resources, including infrastructure management and business continuity;
- safeguard the company's economic interests and ensure compliance and communication (e.g. compliance with our local policies and legal requirements, tax obligations and deductions, management of alleged cases of misconduct or fraud, conducting audits and defending litigation);
- comply with any legal obligations imposed on us in connection with our business;
- respond to an official request from a public or judicial authority by means of the necessary authorisation;
- archiving and record keeping;
- manage investments and divestitures involving our company; and
- any other purpose related to our investment activity.

7. Data protection

We have implemented appropriate technical and organisational measures to ensure an adequate level of security and confidentiality for personal data. These measures take into account:

- a. the evolution of technology;
- b. the costs of its implementation;
- c. the nature of the data; and
- d. the risk associated with the treatment.

These measures aim to protect the data against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and against other unlawful forms of processing.

In addition, when we process personal data, we:

- collect and process only those that are adequate, relevant and not excessive, to the extent necessary in relation to the above purposes; and
- We ensure that these remain up-to-date and accurate.

With regard to the latter, we may ask to confirm the personal data we hold. We also invite natural persons in contact with us to inform us spontaneously in the event of a change in personal data so that we can keep them up to date.

8. Access to and sharing of data

a. Transfers to third parties

We may transfer personal data to third parties external to Brederode in order to achieve the purposes listed above insofar as they need it in order to carry out the instructions we have given them, or allow them to access this data. This may include:

- third parties who process personal data, such as our remuneration service provider, our (IT) system providers, our website designers and host, payment service providers, financial institutions and clearing houses, compliance service providers (e.g. for the purposes of the Market Abuse Regulation), credit card companies, insurance and pension fund companies, leasing companies, social security institutions, event organisers (e.g. for shareholder meetings), training centres, email delivery service providers, database and storage/archiving service providers, consultants, taxi travel agencies, railway or airline companies, security companies;
- any third party to whom we assign any of our rights or obligations under an agreement;
- our lawyers and external counsel; and
- any national and/or international regulatory, law enforcement or exchange body or court of law if we are required to do so by applicable law or regulation or at their request.

With the exception of public authorities which are subject to their own rules, we will take all reasonable steps to ensure that the above third parties will be contractually bound by Brederode to protect the confidentiality and security of personal data concerning you, in accordance with applicable law.

b. Transfers outside the European Economic Area

Personal data processed by Brederode may, in exceptional cases, also be transferred / processed in a country outside the European Economic Area (the "EEA"). Non-EEA countries may not offer the same level of protection for personal data as EEA countries.

If personal data is transferred outside the EEA, we will therefore put security measures in place to ensure that this transfer is carried out in compliance with applicable data protection rules.

9. Use of cookies and similar technologies

A cookie is a text file that can be placed on your device when you visit our website. It contains information that is collected on your device and sent back to the website on each subsequent visit in order to remember your actions and preferences over time.

The management of cookies on the www.brederode.eu website is outsourced to the provider Piwik PRO, which ensures that the use of the cookies in question complies with the GDPR.

Please note that it is possible to modify your browser so that it notifies you when cookies are being sent to it. If you do not wish to receive cookies, you can also refuse them by deactivating the corresponding settings in your browser. Please note that if you choose to refuse all cookies, some areas of the website may no longer be accessible to you or may not function properly. Finally, you can also delete cookies that have already been set.

10. Retention of data over time

We will retain personal data only for as long as necessary in relation to the purposes for which the data was collected or to comply with legal, regulatory or internal policy requirements.

We only retain data related to candidates for recruitment purposes for a maximum of two years. For current staff members, the retention period is the duration of your employment, and ten years after the statutory retirement age, unless the law or regulation imposes longer or shorter binding retention periods.

In the case of contracts, the retention period is the duration of the contract that you (or your company) have concluded with us, plus the period until legal claims relating to this contract can no longer be made, unless the law or regulation imposes longer or shorter priority retention periods.

Personal data collected and processed in the context of a dispute are deleted (i) as soon as an amicable settlement has been reached, (ii) once a decision of last resort has been rendered or (iii) when the action is time-barred.

Once the above retention periods have expired we will take all reasonable steps to ensure that your personal data is deleted from our systems, destroyed or permanently anonymised.

However, if natural persons wish to have their personal data deleted from our databases, they may submit a request to that effect in the manner set out in Article 11. We will consider this request as set out below.

11. Rights and exercise of rights of natural persons

a. Rights of natural persons

You have the right to access the personal data concerning you that is processed by Brederode within the framework of this policy. If you believe that any information we hold about you is inaccurate or incomplete, you may also request its correction. Brederode will correct this information promptly.

You also have the right to:

- request the deletion of your personal data;
- request the restriction of the processing of personal data concerning you;
- withdraw your consent if Brederode has obtained your consent to the processing of personal data (without such withdrawal affecting the lawfulness of the processing carried out prior to such withdrawal);
- object to the processing of your personal data (for example, for direct marketing purposes); or
- object to the processing of personal data concerning you for other purposes in certain cases, if Brederode processes this data on a legal basis other than your consent.

Brederode will consider such requests, withdrawals or oppositions and honor them to the extent provided by applicable data protection law.

In addition, you also have a right to portability of your data. This is the right to obtain the personal data you have provided to Brederode in a structured, generally used and machine-readable format, and to request that this data be transmitted to a third party, without Brederode being able to object and subject to your own confidentiality obligations.

b. Exercise of the rights of natural persons

If you have a question or wish to exercise the above rights, you can send an email to the attention of Dimitri van der Mersch to the following address: info@brederode.eu, or a letter to Brederode SA, 4 place Winston Churchill, L-1340 Luxembourg, G. D. of Luxembourg, accompanied by a scan of your identity card for identification purposes, it being understood that we will only use this data to verify your identity and that we will not keep the scan in question after identifying you. If you send us such a scan, please ensure that your photograph and national identification number are not included.

If you are not satisfied with the way in which we process your personal data, please send your request to Dimitri van der Mersch at the following address: info@brederode.eu.

In any case, you also have the right to lodge a complaint with the competent data protection authorities, in addition to the above rights.

12. Updates to this Policy

This policy is subject to change. Any future changes or additions to the processing of personal data described in this policy affecting you will be communicated to you through the appropriate channel, depending on how we normally communicate with you.