Privacy Notice

Privacy Notice of LGT Capital Partners to External Investment Managers and Portfolio Companies

General Information

LGT Capital Partners cares about the protection of your personal data. This Privacy Notice ("Notice") explains how and for what purposes LGT Capital Partners uses your personal data in relation with its ordinary business. Certain contents of the Notice, including data subject rights, may apply only where our processing of your personal data falls within the scope of specific data protection laws (in particular GDPR).

For the purposes of the Notice, "Data" shall mean personal data, i.e. any information relating to an identified or identifiable natural person. The terms "you" and "your" shall refer to the legal entity, partnership or other organization you represent and/or, as the case may be, to you as a natural person, e.g. as a representative, partner, principal, employee or other affiliate of an existing or potential external investment manager, portfolio company and their respective controlling sponsors. "LGT Capital Partners", "we", "us" or "our" shall mean any subsidiary of LGT Group Holding Ltd. that is active in the business of asset management (hereinafter collectively referred to as "LGT CP Companies", individually "LGT CP Company"). LGT Group Holding Ltd. is a stock company incorporated under the laws of the Principality of Liechtenstein with registered address at Herrengasse 12, 9400 Vaduz, Liechtenstein.

Important note

In the course of our dealings with you, we may process Data of persons related to you or to the company or other organization you may represent. Such persons may include, but are not limited to, directors, representatives, current and former employees, shareholders or other participants, business associates, service providers such as consultants, financiers, legal advisors or any other affiliates of you and/or the company or other organization you may represent ("Affiliates"). As we cannot possibly bring the Notice to the attention of all Affiliates, we kindly ask you to do so on our behalf.

Getting in touch

With regard to our use of your Data, you may contact our Data Protection Officer at:

LGT Group Holding Ltd.
Data Protection Officer
Herrengasse 12 9490 Vaduz, Liechtenstein

Telephone: +423 235 11 22 E-Mail: lgt.com

If you are unsure as to which LGT CP Company controls your Data, please do not hesitate to contact us. If such LGT CP Company has its registered office outside of the European Economic Area ("**EEA**"), the company acting as representative in the EEA is LGT Group Holding Ltd.

The Data we collect and process

In connection with your dealings with LGT Capital Partners, we may collect and process your Data. Depending on the circumstances, such Data may include: your name, e-mail address, residential address, telephone number, nationalities, place and date of birth, passport or other identification document, former and current employers, job title, details concerning your compensation (e.g. salary, bonus, carry), educational background, previous industry experience, references of former employers, criminal record, information on past and pending litigations, regulatory proceedings and other investigations, ownership structure of your company, former employees of your company and the reason for their leaving, your role and time commitment in managing specific investments, your commitments to investment management or other business activities outside of the affairs of the investments we are interested or invested in, anticipated amounts of compensation to be received for such activities, ownership interests in other undertakings, board responsibilities for portfolio companies and non-portfolio companies including the number of meetings to attend per year and similar information as customary in the industry.

Purposes and legal basis for our use of your Data

When processing your Data, we do so based on our legitimate interest in running our business. Prior to making an investment, we need to have a thorough understanding of you and your investment strategy. We may therefore process your Data for the purposes of assessing your business and investment strategy, in particular its inherent risks and opportunities, analyzing your business model and structure, conducting due diligence from a financial, operational, legal and tax perspective, screening key individuals of your company who substantially contribute to the evolution of the investment, particularly such individuals who are involved in the day-to-day management and investment process. Once we have invested, we have a legitimate interest to monitor the development of our investment. Therefore, we will continue to process your Data for the entire period of our investment. In order to organize the Data we hold in an efficient manner, we will store and process your data in our database. Furthermore, we may process your Data for the purpose of complying with legal and regulatory obligations we are subject to, e.g. in connection with Know-Your-Customer and Anti-Money Laundering rules, for the prevention of fraud, for legal, regulatory or tax reporting purposes, in response to legal requests or requests from regulatory, tax or other law enforcement authorities. Such use of your Data may occur prior to our investment and can take place at any time during our investment. Where we are required under applicable data protection laws to obtain your explicit consent for processing certain Data, we will contact you. Unless you explicitly object, we will continue to store your Data after direct business relationship between your organization and LGT Capital Partners has ended. We do this in the mutual interest of maintaining contact with you in view of possible future investments and other collaboration.

Data transfers to other recipients

In the course of your dealings with LGT Capital Partners, we may transfer your Data to categories of recipients such as attorneys, auditors, prime brokers, consultants, providers of various services such as document storage, recordkeeping and background checks. We may also provide your Data to law enforcement authorities or other government entities based on a lawful disclosure request or to other parties as part of corporate business transactions such as mergers and acquisitions, joint ventures, financings or sales of company assets. We may further share your Data with any other subsidiary of LGT Group Holding Ltd., in particular with other LGT CP Companies. We may also share Data with authorities, courts, etc. if required under applicable law or as necessary to enforce or defend legal claims. These recipients may be located outside the territory you live in. In addition, LGT Capital Partners has operations throughout the world. Therefore, such recipients may be located outside of the EEA, and potentially worldwide. Not all countries provide an adequate level data protection. Where a recipient is located in a country without adequate protection, we put safeguards in place, usually the European Commission's Standard Contractual Clauses, which are available at https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32021D0914. In some cases, we may transfer data without such safeguards, for example if you have provided consent to the disclosure, or if it is necessary in relation with a contract or to defend, exercise or enforce legal claims.

Your rights

Please note that you are under no general obligation to provide your Data to us, except where applicable law requires you to do so. However, processing your Data will be necessary for the performance of the existing or possible future business relationship between your organization and us. You have the following rights regarding our use of your Data:

- the right to access your Data and to be informed of, inter alia, the purpose of our use of your Data, the categories of Data concerned and the recipients to whom we disclose your Data;
- the right to obtain from us without undue delay the rectification of inaccurate Data concerning you;
- under certain circumstances, the right to have your Data deleted;
- under certain circumstances, in particular if you contest the accuracy of the Data we use, the right to obtain from us restriction of our processing of your Data;
- where we rely on our legitimate interests to use your Data and provided that you can claim overriding interests, the right to object at any time to our use of your Data;
- where your consent for our use of your Data is required pursuant to applicable data protection laws, the right to withdraw your consent at any time with effect for the future;
- the right to data portability where processing is carried out by automated means and based on either the performance of a contract or, where applicable, your consent;
- the right to file a complaint with our lead supervisory authority in Liechtenstein:

Datenschutzstelle Liechtenstein Städtle 38 PO Box 9490 Vaduz Liechtenstein

Telephone: +423 236 60 90 E-Mail: info.dss@llv.li

You may also lodge a complaint to your local supervisory authority within your country.

For how long we store your Data

In order to monitor the development of our investment, it will be necessary for us to store and process your Data during the entire period of our investment. Because we strive to build long-term relationships with our business partners, we may continue to use your Data beyond the period of our investment in order to foster possible business opportunities. Should you leave your organization at an earlier stage, we shall delete your Data as soon as we learn of your departure. Longer retention periods may be applicable if required by applicable laws and regulations. Furthermore, possible legitimate interests of LGT Capital Partners may allow us to use your Data for a period exceeding the abovementioned term, particularly where our continued use of your Data is necessary for the establishment, exercise or defense of legal claims. In any case, you may at all times object to our processing of your Data. In any case, you may at all times object to our use of your Data and we shall review such request without undue delay (see above "Getting in touch").

Failure to provide your Data

The GDPR requires us to inform you of the consequences if you fail to provide your Data. You are not under an obligation to us to share Data with us. However, if you choose not to provide us with Data which is required in order to prepare and maintain our business relationship with you, such relationship cannot be established and maintained.

California Resident Notice of Collection of Personal Information Effective January 1, 2023

The purpose of this Notice of Collection of Personal Information ("Notice") is to inform our California resident external investment managers and portfolio companies about LGT Capital Partners ("LGT's") collection of their personal information and sensitive information (as applicable), and the specific categories of information collected, as well as the purpose for which these categories of information will be used.

Personal information we collect: We collect a range of personal information about clients for our legitimate business purposes and in accordance with applicable data protection laws.

Collected information may include:

Category of Information Collected	Examples
Personal Identifiers	Name, address, email, phone number, passport or other identification document
Personal Information	Name, address, email, phone number, passport or other identification document, information relating to current and potential investments, educational background
Protected classification characteristics under California or federal law.	Nationality, place and date of birth
Professional or Employment Information	Current employer, former employers, job title, details concerning your compensation (e.g. salary, bonus, carry), previous industry experience, references of former employers, ownership structure of your company, former employees of your company and the reason for their leaving, ownership interests in other undertakings, board responsibilities for portfolio companies and non-portfolio companies including the number of meetings to attend per year and similar information as customary to the industry

Sensitive Personal Data

Subject to the relevant jurisdictional requirements, LGT may process sensitive personal information. LGT will only use and disclose sensitive personal data for a purpose for which it was originally collected. Unless we request it, we ask that you not send us, or disclose, any sensitive personal data.

The sensitive data that LGT processes may include:

- Information related to racial, ethnic origin, political opinions, religious or philosophical beliefs, or union membership.
- A social security, driver's license, state identification card, or passport number.
- An account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- The contents of an individual's mail, email, and text messages unless the business is the intended recipient of the communication.

Purposes for Collecting Personal Information

We collect personal information for the business or commercial purposes and from the sources set forth in "Purposes and legal basis for our use of your Data", respectively, in the Privacy Notice above.

LGT does not sell your personal data or share your personal data for the purpose of cross context behavioral advertising, as defined by the California Privacy Rights Act (CPRA) of 2020.

Retention

We retain the categories of personal information set forth above in the "Personal information we collect" section of this Supplemental California Consumer Privacy Act Notice of Collection only as long as is reasonably necessary for those business or commercial purposes set forth in "Purposes and legal basis for our use of your Data" in the Privacy Notice above, except as may be required under applicable law, court order or government regulations.

Sources of Information

We obtain personal information directly from you, when you apply for, access and use our and our business associates' financial products and services - whether in person, by telephone or electronically. We may verify this personal information or collect additional personal information from third parties, including consumer reporting agencies or other public sources.

We may also obtain some of your information indirectly, from a variety of sources, such as your joint account holder(s), and / or our service providers, such as vendors providing anti-money laundering and sanctions checking databases.

Disclosure of Personal Information

Within the last twelve (12) months, we have disclosed each of the following categories of personal information collected with third-party service providers as set forth in "Data transfers to other recipients" in this Privacy Notice, and we collect personal information from the sources set forth in "The Data we collect and process" in this Privacy Notice.

Personal Information Category	Category of Third-Party Recipients
Personal Identifiers	Fund administrators or custodians, attorneys, auditors, prime brokers, consultants, providers of various services such as document storage, recordkeeping and background checks, subsidiaries of LGT Group Holding Ltd., authorities, courts
Personal Information	Fund administrators or custodians, attorneys, auditors, prime brokers, consultants, providers of various services such as document storage, recordkeeping and background checks, subsidiaries of LGT Group Holding Ltd., authorities, courts

Professional or Employment Information	Fund administrators or custodians, attorneys, auditors, prime brokers, consultants, providers of various services such as document storage,
	recordkeeping and background checks, subsidiaries of LGT Group Holding Ltd., authorities, courts

Your Rights: You have certain rights under the CCPA/CPRA in respect of the personal information we hold and which you may exercise. These rights are:

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you over the last twelve (12) months. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties or persons with whom we share the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

Additional Rights: Under CCPA/CPRA, you also have the right to:

- Request the correction of any inaccurate personal information maintained by us about you.
- Request that we limit the use and disclosure of your sensitive personal information. Currently, however, we do not use or disclose your sensitive personal information other than for the purpose(s) for which it was collected.
- Choose to opt-out of the sale of personal information or the sharing of personal information for cross-context behavioral advertising. Currently, however, we do not sell or share personal information as defined under the CCPA/CPRA.

Your rights will in each case be subject to the restrictions set out in the CCPA/CPRA. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your personal data, can be obtained by contacting us.

Non-Discrimination for Exercising Your 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 notice.

Exercising Your Rights

To exercise any of your rights under the CCPA, please contact us at ccpainfo@lgtcp.com or call us toll-free at 1-833-849-7743.

Verifying Your Identity: If you choose to contact us with a request, you will need to provide us with identifying information that matches the PII 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 LGT at ccpainfo@lgtcp.com.

Accessibility Information: For employees with disabilities who need to access this policy in an alternative format, please contact LGT at ccpainfo@lgtcp.com.

This Notice was last updated in March 2024.