

**PERMIRA**  
**PRIVACY NOTICE**  
**INVESTORS**

**INTRODUCTION**

Permira Advisers (London) Limited and its subsidiaries and affiliates and the Permira Private Equity and Permira Credit funds (hereinafter collectively referred to as "**Permira**", "**we**", "**our**", "**us**"), recognise the importance of protecting your personal data. For the purposes of the 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**"), the general partner, manager or advisor (as the case may be) you are engaging with will be the data controller. If you are unsure of the identity or contact details of the relevant data controller, please contact us using the details set out in the contact section below.

This notice explains how we collect, store and use your personal data and what rights and options you have in this respect. When used in this notice, unless otherwise stated, the terms "**controller**", "**processor**", "**data subject**", "**personal data**", "**process**", "**processes**", and "**processing**" have the meanings given to them in the EU GDPR.

This notice applies to (i) current, prospective and former investors in our funds, and (ii) the beneficial owners, officers, trustees, nominees, agents, representatives and/or employees and other staff members of current, prospective and former investors in our funds ("**you**", "**your**" or "**data subject**").

**WHAT PERSONAL DATA DO WE COLLECT?**

The personal data we collect may include:

- (a) Identifiers and contact information (e.g., real name, alias, postal address, email address, social security or driver's licence number, government ID, signature, telephone number);
- (b) Financial information (e.g. tax-related information/codes and bank account details);
- (c) Other characteristic information (e.g. age/date of birth, nationality, citizenship, country of residence, gender);
- (d) Commercial information (e.g., assets, income, transaction and investment history, accounts at other institutions, information concerning source of funds and any applicable restrictions on your investment such as political exposure or sanctions) and any other information used for monitoring and background checks to comply with laws and regulations, including know-your-client (KYC), anti-money laundering, Politically Exposed Person (PEP) and sanctions checks;
- (e) Internet or other network activity (e.g., browsing or search history, information regarding interaction with an internet website, application, or advertisement, online identifiers such as cookies);
- (f) Sensory and surveillance data (e.g., recordings of telephone calls where permitted or required by law, and other records of your interactions with us or our service providers, including electronic communications); and
- (g) Personal data we collect as a result of your engagement with us (e.g. investment history, transaction history, risk tolerance, etc).

We may have collected any of these categories of personal information from you in the preceding 12 months.

**WHERE DO WE COLLECT PERSONAL DATA FROM?**

- (a) ***Personal data that you give us or one of our affiliates.*** This is information about you that you provide by (among other things) filling in forms, signing up to our newsletters or events, giving us a business card or CV, or corresponding with us by telephone, post, email or otherwise;
- (b) ***Personal data that our websites collect about you.*** If you visit our websites they will automatically collect some information about you and your visit, including internet or other network activity;
- (c) ***Personal data that our other systems collect about you.*** If you exchange emails or other communications with us, our information technology systems may record details of those conversations, sometimes including their content; and
- (d) ***Personal data collected from other sources.*** We may collect some information from other sources, such as public websites, publicly accessible databases or registers, tax authorities, governmental agencies and supervisory authorities, credit agencies, fraud prevention and detection agencies and other public sources and information received from your advisers or from intermediaries.

### **HOW DO WE USE YOUR PERSONAL DATA?**

Your personal data may be processed by us for the following purposes. Where we process your personal data in relation to the below purposes, we do so by relying on one of a number of lawful bases, including under Article 6 of the EU GDPR (or equivalent provisions in applicable privacy laws, as the case may be), depending on the nature and purposes of processing carried out.

- (a) Where we are processing your personal data in order to verify and execute instructions we receive from you, or evidence your authority in relation to an investor or investment, or where we are processing your personal data in connection with general business administration, including processing subscriptions and transfers of limited partner interests and payments of distributions to investors, liaising with you, communicating with other investors, communicating with service providers and counterparties, decision-making in relation to a fund, accountancy and audit services, and the administration of IT systems.

Under the EU GDPR, the UK GDPR and the DPGL, the lawful basis of such processing is Article 6(1)(b) of the EU GDPR (or equivalent provisions in the UK GDPR and/or DPGL, as the case may be) (i.e. the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract). Where you are not party to the relevant contract (e.g. because you are an employee of the investor, as opposed to the investor), under the EU GDPR, the UK GDPR, and the DPGL, the lawful basis of such processing is Article 6(1)(f) of the EU GDPR (or equivalent provisions in the UK GDPR and/or DPGL, as the case may be) (see (d) below)).

- (b) Where we are processing your personal data in order to comply with legal, tax and regulatory obligations and industry standards pertaining to Permira, a fund or a fund manager, depositary or administrator, including KYC procedures, the automatic exchange of tax information and legal judgments.

Such processing includes:

- (i) undertaking our client and investor due diligence, and on-boarding checks;
- (ii) carrying out verification, KYC, terrorist financing, sanctions, and anti-money laundering and PEP checks;
- (iii) verifying the identity and addresses of our investors and (if applicable) their owners, directors, officers and employees;
- (iv) complying with requests from regulatory, governmental, tax and law enforcement authorities;
- (v) maintaining statutory registers (including among other things the Luxembourg register of beneficial owners and the register of investors); and

- (vi) complying with legal sanctions requirements.

Under the EU GDPR, the UK GDPR and the DPGL, the lawful basis of such processing is Article 6(1)(c) of the EU GDPR (or equivalent provisions in the UK GDPR and/or DPGL, as the case may be) (i.e. the processing is necessary to discharge a relevant legal or regulatory obligation to which we are subject).

- (c) Where we are processing your personal data in order to further our commercial interests and monitor and manage our risks, including:

- (i) carrying out the ordinary or reasonable business activities of Permira, a fund, or a fund manager, depositary or administrator or other persons, or other activities previously disclosed to you;
- (ii) sending updates, information and notices or otherwise corresponding with you in connection with investments;
- (iii) preventing and detecting fraud;
- (iv) monitoring and improving our relationships with investors;
- (v) carrying out audit checks and investigations;
- (vi) ensuring compliance with legal, tax and regulatory obligations which relate to third countries;
- (vii) compliance with industry standards;
- (viii) assisting our transaction counterparties to comply with their regulatory and legal obligations (including anti-money laundering, KYC and sanctions checks);
- (ix) assisting with internal compliance with our policies, processes and record keeping activities;
- (x) seeking professional advice, including legal advice;
- (xi) complying with requests from regulatory, governmental, tax and law enforcement authorities in third countries;
- (xii) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings;
- (xiii) the provision of evidence, in the event of a dispute, of a transaction or any commercial communication;
- (xiv) in connection with any proposed purchase, merger, or acquisition of any part of our business; and
- (xv) ensuring the security of information systems.

Under the EU GDPR, the UK GDPR and the DPGL, the lawful basis of such processing is Article 6(1)(f) of the EU GDPR (or equivalent provisions in the UK GDPR and/or DPGL, as the case may be) (i.e. the processing is necessary for the purposes of our legitimate interests or those of a third party such as the administrator, a transaction counterparty or lender, except where such interests are overridden by your interests, fundamental rights and freedoms which require protection of personal data).

- (d) Where we process sensitive personal data, including 'special categories of personal data' defined in Article 9(1) of the EU GDPR (or equivalent provisions in the UK GDPR and/or DPGL, as the case may be), such as any personal data relating to the political opinions of a PEP, or 'personal data relating to criminal convictions and offences' as defined in Article 10(1) of the EU GDPR (or equivalent provisions in the UK GDPR and/or DPGL, as the case may be), under the EU GDPR, the UK GDPR and the

DPGL the lawful basis for such processing is (as the case may be) Part 2 of the Data Protection Act (and, in particular, paragraphs 10 and 12) (i.e. such processing may be necessary for reasons of substantial public interest, including the prevention and detection of unlawful acts, or regulatory requirements relating to unlawful acts, including fraud, terrorist financing and money laundering) or Articles 9 and 10 of the GDPR.

We may have processed your personal information for any of the purposes described above in the past 12 months.

Generally, except where we tell you otherwise, we do not rely on your consent as a legal basis for processing your personal data. In the event that we do process your personal data based on your consent, you have a right to withdraw such consent at any time.

We do not sell your personal information.

We do not currently carry out third party direct marketing.

We do not envisage your personal data will undergo any automated decision making.

Where we request data from you, and you do not provide such data to us, this may adversely affect your investment in the relevant fund (or the investment of the person who you represent).

### **WHO DO WE DISCLOSE PERSONAL DATA TO?**

We may share your personal data with the following third parties (and for the following purposes):

- (a) To our fund partners, managers, depositaries and administrators, for purposes related to the administration of our funds;
- (b) To third party agents and contractors for the purposes of providing services to us, including other service providers of a fund, IT and communications service providers, law firms, accountants, auditors, administrators, depositaries, reference providers, and background check providers. These third parties will be subject to confidentiality requirements and they will only process your personal data as described in this notice (or as otherwise notified to you);
- (c) To governmental, judicial, or prosecution bodies, tax authorities, regulators and courts, for the purposes of compliance with laws, regulations or court orders, including laws, regulations and court orders relating to a third country (for example, if we are under a duty to disclose your personal data in order to comply with any legal obligation);
- (d) To third parties for the purposes of establishing, exercising or defending our legal rights;
- (e) To other current and prospective co-investors and investors;
- (f) To regulators, where we or the regulator may deem appropriate in the context of the regulatory regimes in which it operates; and
- (g) To third parties in connection with investments in, or the sale of, our business or assets, or the sale of one of the businesses in which we invest (an "**Investee**") or an acquisition of our business (or a part of our business) or an Investee by a third party.

We may have disclosed your personal information to any of the third parties listed above in the past 12 months.

Some recipients will process your personal data on our behalf as processor. Others will determine the purposes and means of processing of your personal data as controller and may be permitted to disclose your personal data to other parties in accordance with applicable law.

## **PERSONAL DATA OF THIRD PARTIES**

To the extent that you provide us with personal data of third parties, you agree and acknowledge that you have informed them of, and they have agreed to, our use, collection and disclosure of their personal data including the purposes of such use, collection and disclosure of personal data as set out in this notice.

## **DO WE TRANSFER PERSONAL DATA OVERSEAS?**

The disclosures described above may involve transferring your personal data overseas. If you are dealing with us within the European Economic Area (the “EEA”) you should be aware that this may include transfers to countries outside the EEA, including the UK, the United States and Guernsey. (Equally, if you are dealing with us within the UK or Guernsey, you should be aware that we may transfer your data outside of the UK or Guernsey.) Some of these countries do not have similarly strict data privacy laws.

We will ensure that any such transfers are carried out in compliance with applicable law, including, where necessary, being governed by data transfer agreements (such as the European Commission approved model clauses) designed to ensure that your personal data is protected on terms approved for this purpose by the European Commission (or UK or Guernsey government, as applicable) or as otherwise required under applicable law. If you want to request a copy of any such agreements, please contact us using the details set out in the contact section below.

## **HOW LONG DO YOU RETAIN PERSONAL DATA?**

Subject to applicable law, we retain your information for:

- (a) As long as it is required for our legitimate purposes;
- (b) As long as it is required to perform our contractual obligations;
- (c) As long as we have your consent; or
- (d) Such period as is required or required by any legal or regulatory obligations which apply to us.

We will delete or anonymise your personal data when it is no longer required.

## **WHAT RIGHTS DO I HAVE IN RESPECT OF MY PERSONAL DATA?**

Applicable law may provide you with a number of legal rights in relation your personal data that we process. These rights may include:

- (a) A right to know what personal data we process and a right of access to such personal data;
- (b) The right to request any incomplete or inaccurate personal data be corrected;
- (c) The right to object to our processing of your personal data where we send you direct marketing;
- (d) The right to require us to delete your personal data and/or otherwise restrict our processing of your personal data in some circumstances;
- (e) The right to object to our processing of some or all of your personal data on grounds relating to your particular situation which are based on legitimate interests, at any time (and require such personal data to be deleted). If you object, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for such processing which override your interests, rights and freedoms or where it is necessary for the establishment, exercise or defence of legal rights; and
- (f) A "data portability" right to require us to transfer your personal data to you or to a new service provider in a structured, commonly used and machine-readable format.

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 (for the European Union, details are available [here](#)<sup>1</sup>). In the UK, you can lodge a complaint about our processing of your personal information with the office of the UK Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). In Guernsey, you can lodge a complaint to the Office of the Data Protection Authority (ODPA) ([www.odpa.gg](http://www.odpa.gg)). In California, you can lodge a complaint with the Office of the Attorney General ([www.oag.ca.gov](http://www.oag.ca.gov)). In Singapore, you can lodge a complaint with the Personal Data Protection Commission ([www.pdpc.gov.sg/Contact-Us](http://www.pdpc.gov.sg/Contact-Us)).

If you do not want Permira to send you e-mail or postal mail, you can opt out at any time by contacting Permira by e-mail at [dataprivacy@permira.com](mailto:dataprivacy@permira.com).

You should be aware that when you are on the websites, you could be directed to other websites that are beyond our control. There are links to other sites from the sites that may take you outside our service. We cannot guarantee that the privacy policies of these websites meet our standards. You should read the privacy notice of any new website you go to online.

California residents may also request certain information about our disclosure of personal data during the past 12 months, including information about the categories of information we process, the purpose of processing that data, the categories of recipients to which we disclose this information and the source of the information.

### **HOW DO I CONTACT YOU?**

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).

### **CHANGES TO THIS NOTICE**

Any minor changes we make to this notice in the future will be posted to the Investor Portal and are also available if you contact us. Please check back frequently to see any changes.

This policy was last reviewed/updated: 3 March 2022.

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<sup>1</sup> [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)