

Privacy Policy

Vauban Infrastructure Partners may collect and process personal data in the course of carrying out its business.

The purpose of this Privacy Policy is to set out the type of personal data Vauban Infrastructure Partners may collect, the purpose, basis and method of processing such data, and the rights of the persons whose data may be collected.

This Privacy Policy is applied by Vauban Infrastructure Partners on its behalf and its subsidiaries or associated entities for the processing of personal data.

THE NATURE OF THE PERSONAL DATA COLLECTED, ITS PURPOSES AND RETENTION PERIOD

1. FOR INVESTORS AND POTENTIAL INVESTORS¹

A) The nature of the personal data collected or likely to be collected

Vauban Infrastructure Partners may collect:

- First name, last name, residential and business addresses, email address, telephone number and other contact information;
- Date and place of birth, citizenship and occupation;
- Information on marital and family status;
- Copies of identity card/passport number or other national identifier;
- Tax data (tax identifier, tax residence, status under dividend and interest withholding tax rules, FATCA rules, SIR rules and any other tax rules);
- Financial details and financial situation (bank account number, transaction data, financial information including source of wealth, bank account details, transaction data, etc.);
- The person's knowledge, investment experience and investment objectives;
- Publicly available information;
- The duties and powers of the representative(s) (if any);
- Information relating to the duties performed, in particular with a view to verifying whether the person is a politically exposed person;
- The name, address and other information or details detailed above concerning the representative(s) and ultimate beneficiary(ies) (if applicable);
- Information collected in forms.

As part of its due diligence obligations, Vauban Infrastructure Partners may also collect certain information, available in databases dedicated to the identification of the status of the investor or potential investor as a politically exposed person or if its status presents risks related to terrorism, organized crime or money laundering.

We do not collect nor process any personal data regarding religion, ethnic origins, political opinions, sexual life or genetic or biometric information.

B) Purpose of collecting this personal data

Data collection is required by Vauban Infrastructure Partners to:

- Offer products or services related to the company's business;
- Communicate with the relevant investor in relation to those products and services;
- Perform transactions and transactions related to these products and services;

¹ This paragraph also applies to the legal representatives, affiliates (and their legal representatives) of that investor and to any person relating to that investor or affiliate.

To exercise due diligence to comply with its legal, regulatory and tax obligations within the framework of laws and regulations; and

Where appropriate, defend the interests or those of the investment vehicles managed or advised by Vauban Infrastructure Partners, in particular in a litigation or pre-litigation context.

This information is collected, as appropriate, in pursuit of the legitimate interest of Vauban Infrastructure Partners, the conclusion of a contract with the investor or the compliance of legal, regulatory or tax obligations. The information collected is limited to what is necessary for the purposes for which it is processed.

C) *Sharing personal data*

Personal data relating to investors or potential investors may be transmitted:

All Vauban Infrastructure Partners employees whose knowledge of such personal data is necessary for the performance of their duties;

Suppliers of Vauban Infrastructure Partners who act as subcontractors, in particular those responsible for carrying out the communication, marketing and distribution operations of the products and services offered by Vauban Infrastructure Partners, as well as those responsible for providing networks, IT tools and IT services;

Third parties where this is necessary to perform the services contracted by Vauban Infrastructure Partners or the investment vehicles managed or advised by Vauban Infrastructure Partners (including law firms, audit and consulting firms, depositories, account keepers and auditors, banks); and

Judicial, tax or regulatory authorities in the performance of their respective powers and tasks.

D) *Retention period of personal data*

Vauban Infrastructure Partners retains the personal data of investors and potential investors for as long as it is necessary for the fulfilment of the purposes described above, and according to the following criteria:

For the duration of the contract with the investor;

For the purpose of complying with record-keeping obligations in accordance with the regulations applicable to Vauban Infrastructure Partners and the legislation applicable to the fight against money laundering;

In case of litigation, the data shall be kept for the duration of the proceedings and until expiry of ordinary and extraordinary remedies.

At the end of these periods, the personal data of investors and potential investors will be retained until expiry of the applicable limitation periods and in accordance with the regulations in force.

2. FOR PERSONS INVOLVED OR LIKELY TO BE INVOLVED IN TRANSACTIONS WITH VAUBAN INFRASTRUCTURE PARTNERS OR ITS INVESTMENT VEHICLES

(A) *The nature of the personal data collected or likely to be collected*

Vauban Infrastructure Partners may collect:

First name, last name, residential and business addresses, email address, telephone number and other contact information;

Copies of identity card/passport number or other national identifier;

Tax data (tax identifier, tax residence, status under dividend and interest withholding tax rules, FATCA rules, SIR rules and any other tax rules);

Financial details and financial situation (bank account number, transaction data, financial information including source of wealth, bank account details, transaction data, etc.);

The duties and powers of the representative(s) (if any);
Information relating to the duties performed, in particular with a view to verifying whether the person is a politically exposed person;
Publicly available information;
Information collected in forms.

As part of its due diligence obligations, Vauban Infrastructure Partners may also collect certain information, in particular available in databases dedicated to identifying the status of the person involved or likely to be involved as a politically exposed person or if his status presents risks related to terrorism, organized crime or money laundering.

We do not collect nor process any personal data regarding religion, ethnic origins, political opinions, sexual life or genetic or biometric information.

B) Purpose of collecting this personal data Data

collection is required by Vauban Infrastructure Partners to:

Communicate with the persons involved in the transaction;
Perform the transactions related to that transaction;
Offer products or services related to the company's business;
Communicate in the context of these products and services;
Exercise due diligence to comply with legal, regulatory and tax obligations within the framework laws and regulations; and
Where appropriate, defend the interests or those of the investment vehicles managed or advised by Vauban Infrastructure Partners, in particular in a litigation or pre-litigation context.

This information is collected as appropriate in pursuit of the legitimate interest of Vauban Infrastructure Partners, the conclusion of a contract with the data subject or the compliance of legal, regulatory or tax obligations.

C) Sharing personal data

Personal data relating to persons involved or likely to be involved in transactions may be transmitted:

All Vauban Infrastructure Partners employees whose knowledge of this personal data is necessary for the performance of their duties;
Suppliers of Vauban Infrastructure Partners acting as subcontractors, in particular those responsible for the provision of networks, IT tools and IT services;
Third parties where this is necessary to perform the services contracted by Vauban Infrastructure Partners or the investment vehicles managed or advised by Vauban Infrastructure Partners (including law firms, audit and consulting firms, depositories, account keepers and auditors, banks); and
Judicial, tax or regulatory authorities in the performance of their respective powers and tasks.

) Retention period of personal data

Vauban Infrastructure Partners retains the personal data of persons involved or likely to be involved in the transactions for as long as it is necessary for the fulfilment of the purposes described above, and according to the following criteria:

For the duration of the contract concluded with the persons involved or for the duration of the transaction concerned;
For the purpose of complying with record-keeping obligations in accordance with the regulations applicable to Vauban Infrastructure Partners and the legislation applicable to the fight against money laundering;

In the event of litigation, the data shall be kept for the duration of the proceedings and until expiry of ordinary and extraordinary remedies.

At the end of these periods, the personal data of the persons involved or likely to be involved in the transactions will be retained until expiry of the applicable limitation periods and in accordance with the regulations in force.

3. FOR EMPLOYEES, AGENTS OR SUPPLIERS OF A HOLDING (OR ONE OF ITS SUBSIDIARIES) IN WHICH VAUBAN INFRASTRUCTURE PARTNERS INVESTS (OR IS LIKELY TO INVEST) DIRECTLY OR THROUGH AN INVESTMENT VEHICLE

(A) *The nature of the personal data collected or likely to be collected*

Vauban Infrastructure Partners may collect:

First name, last name, residential and business addresses, email address, telephone number and other contact information;
Bank information;
Professional information (CV, diploma);
Information relating to the office of an officer or director, the employment contract and remuneration;
Tax data (tax identifier, tax residence, status under dividend and interest withholding tax rules, FATCA rules, SIR rules and any other tax rules); and
Individual photos.

We do not collect nor process any personal data regarding religion, ethnic origins, political opinions, sexual life or genetic or biometric information.

(B) *Purpose of collecting this personal data*

Data collection is required by Vauban Infrastructure Partners to:

Selecting and concluding contracts with the persons concerned;
Communicate with such persons in the context of current or potential business relationships;
Perform tasks for which the persons have been authorized;
Carrying out audits prior to the making of an investment or during an investment;
Conducting audits to ensure that Vauban Infrastructure Partners can meet its legal, regulatory and tax obligations under laws and regulations; and
Where appropriate, defend the interests or those of the investment vehicles managed or advised by Vauban Infrastructure Partners, in particular in a litigation or pre-litigation context.

This information is collected as appropriate in pursuit of the legitimate interest of Vauban Infrastructure Partners, the conclusion of a contract with the data subject or the compliance of legal, regulatory or tax obligations.

E) Sharing personal data

Personal data relating to employees, agents and providers of participation may be transmitted:

All Vauban Infrastructure Partners employees whose knowledge of this personal data is necessary for the performance of their duties;
Suppliers of Vauban Infrastructure Partners acting as subcontractors, in particular those responsible for the provision of networks, IT tools and IT services;
Third parties where this is necessary to perform the services contracted by Vauban Infrastructure Partners or the investment vehicles managed or advised by Vauban Infrastructure Partners

(including law firms, audit and consulting firms, depositories, account keepers and auditors, banks); and
Judicial, tax or regulatory authorities in the performance of their respective powers and tasks.

F) Retention period of personal data

Vauban Infrastructure Partners retains the personal data of employees, agents or suppliers of a participation (or one of its subsidiaries) for as long as it is necessary for the fulfillment of the purposes described above, and according to the following criteria:

For the purpose of complying with record-keeping obligations in accordance with the regulations applicable to Vauban Infrastructure Partners and the legislation applicable to the fight against money laundering;

In the event of litigation, the data shall be kept for the duration of the proceedings and until expiry of ordinary and extraordinary remedies.

At the end of these periods, personal data relating to employees, agents and providers of participation will be retained until expiry of the applicable limitation periods and in accordance with the regulations in force.

4. FOR SUPPLIERS OR SERVICE PROVIDERS OR LEGAL OR EMPLOYEE REPRESENTATIVES OF SUCH SUPPLIERS OR SERVICE PROVIDERS OF VAUBAN INFRASTRUCTURE PARTNERS OR VEHICLES OR THEIR RESPECTIVE SUBSIDIARIES

(A) The nature of the personal data collected or likely to be collected

Vauban Infrastructure Partners may collect:

First name, last name, residential and business addresses, email address, telephone number and other contact information;

Bank information;

Professional information (CV, diploma); and

Individual photos.

(B) Purpose of collecting this personal data Data collection

is required by Vauban Infrastructure Partners to:

Enable Vauban Infrastructure Partners to select and appoint a provider;

Communicate with a supplier in the context of the goods or services connected with the **company's business**;

Enable the service provider to carry out the tasks entrusted to him;

Ensure that Vauban Infrastructure Partners can comply with legal, regulatory and tax obligations within the framework of laws and regulations; and

Where appropriate, defend the interests or those of the investment vehicles managed or advised by Vauban Infrastructure Partners, in particular in a litigation or pre-litigation context.

This information is collected as appropriate in pursuit of the legitimate interest of Vauban Infrastructure Partners, the conclusion of a contract with the data subject or the compliance of legal, regulatory or tax obligations.

G) Sharing personal data

Personal data relating to suppliers or service providers or legal or employee representatives of such suppliers or service providers of Vauban Infrastructure Partners or vehicles or their respective subsidiaries may be transmitted:

- All Vauban Infrastructure Partners employees whose knowledge of this personal data is necessary for the performance of their duties;
- Suppliers of Vauban Infrastructure Partners acting as subcontractors, in particular those responsible for the provision of networks, IT tools and IT services;
- Third parties where this is necessary to perform the services contracted by Vauban Infrastructure Partners or the investment vehicles managed or advised by Vauban Infrastructure Partners (including law firms, audit and consulting firms, depositories, account keepers and auditors, banks); and
- Judicial, tax or regulatory authorities in the performance of their respective powers and tasks.

H) Retention period of personal data

Vauban Infrastructure Partners shall retain the personal data of service providers or service providers or legal or employee representatives of such service providers or service providers for as long as necessary for the fulfilment of the purposes described above, and according to the following criteria:

- For the duration of the contract concluded with the persons involved;
- For the purpose of complying with record-keeping obligations in accordance with the regulations applicable to Vauban Infrastructure Partners and the legislation applicable to the fight against money laundering;
- In the event of litigation, the data shall be kept for the duration of the proceedings and until expiry of ordinary and extraordinary remedies.

At the end of these periods, personal data relating to service providers or service providers or legal or employee representatives of such service providers or service providers will be retained until expiry of the applicable limitation periods and in accordance with the regulations in force.

5. FOR RECRUITMENT CANDIDATES

(A) The nature of the personal data collected or likely to be collected

Vauban Infrastructure Partners may collect:

- First name, last name, residential address, email address, telephone number and other contact information;
- Professional and good repute information (CV, letter of motivation, diploma, remuneration...).

Vauban Infrastructure Partners may also collect this information from recruitment agencies, as well as the profiles and results of the tests that would have been conducted by these agencies.

We do not collect nor process any personal data regarding religion, ethnic origins, political opinions, sexual life or genetic or biometric information.

(B) Purpose of collecting this personal data

Data collection is required by Vauban Infrastructure Partners to:

- Communicating with applicants through a recruitment process;
- Assess the qualifications of candidates for the concerned position;

If an application is accepted, the information may be used by Vauban Infrastructure Partners to undertake the steps required to conclude employment contracts.

I) *Sharing personal data*

Personal data shall only be accessible to authorized Vauban Infrastructure Partners staff, namely the management team, members of the team that the applicant is likely to integrate, the company's administrative staff and members in charge of human resources management.

Your personal data may be transferred to

Suppliers of Vauban Infrastructure Partners acting as subcontractors, in particular those responsible for the provision of networks, IT tools and IT services;

To third parties where this is necessary for the performance of the services contracted by Vauban Infrastructure Partners (e.g. recruitment agencies);

Judicial, tax or regulatory authorities in the performance of their respective powers and tasks.

J) *Retention period of personal data*

The personal data are kept by Vauban Infrastructure Partners for the duration of the examination of applications and for a maximum of two years from the last contact with a candidate. The good repute data is kept for 3 months.

HOW VAUBAN INFRASTRUCTURE PARTNERS ENSURES PERSONAL DATA SECURITY

Vauban Infrastructure Partners has put in place technical and organizational security measures to protect any personal data against loss, misuse or unauthorized disclosure.

DATA SHARING OUTSIDE THE EU

Vauban Infrastructure Partners may disclose personal data to its subcontractors, as well as to meet legal obligations and explicit requests from authorized third parties (tax authorities, judicial authorities or police services). In connection with the management of business relations Vauban Infrastructure Partners may disclose and/or transfer personal data to countries outside the European Union solely for the purpose of performing a contract signed with you, fulfilling a legal obligation, protecting the public interest or defending its legitimate interests.

Transfers of personal data outside the European Union take place in conditions and with guarantees suitable for ensuring the confidentiality and security of such data in accordance with the applicable legislation. To this end, Vauban Infrastructure Partners implements appropriate technical and organizational measures to ensure the security of your personal data which could be communicated.

WHAT ARE THE RIGHTS OF THE PERSONS WHOSE PERSONAL DATA ARE KEPT?

Every person whose personal data is stored by Vauban Infrastructure Partners has the right to be informed about how their personal information is processed. Every person has the right to access, object, rectify, erase and restrict access to his or her personal data to the fullest extent permitted by law.

In certain circumstances, individuals have the right to request that their information be deleted unless Vauban Infrastructure Partners retains this personal information to comply with a legal obligation

Every person has the right to data portability in the following cases: (i) the processing is based on consent or a contract, (ii) the processing is performed by automated means, and (iii) it does not infringe the rights and freedoms of others.

In certain circumstances, such persons may exercise their right to object to the processing of their personal data based on a specific situation.

Each individual also has the right to set out in advance guidelines regarding the fate of their personal information.

Each person may exercise his/her rights by sending a written request to the data protection officer at Vauban Infrastructure Partners at the following e-mail address: dpo@vauban-ip.com, or to the following mailing address: 16-18 rue du 4 Septembre – Le Centorial 75002 Paris, attention DPO.

Each person may lodge a complaint with the competent authority, that is to say, the authority of the country of the European Economic Area where his residence or place of work is located or where the alleged violation of the regulation was committed (in France, the Commission Nationale de l'Informatique et des Libertés (CNIL)) at the following address: www.cnil.fr.