

PRIVACY NOTICE – NOTEUS PARTNERS

(Last modified on September 4th, 2024)

Our Commitment to Privacy

Your privacy is important to Noteus Partners SAS and its affiliates (together, “Noteus,” “our,” “us,” “we” or “company”). To better protect your privacy, we are providing information explaining our online information practices.

This Website Privacy Notice (the “Privacy Notice”) describes how and why we gather and use personal data from visitors of this website or other websites that we control and where this Privacy Notice is posted (this “Site”). Please read this Privacy Notice carefully.

Visitors that are located in the United Kingdom (“UK”), the European Union (“EU”) or the European Economic Area (“EEA”), or whose personal data is otherwise subject to EU and/or UK data protection laws (“EU & UK Visitors”) should also refer to our [EU & UK Privacy Notice](#) below.

Visitors that are residents of California should also refer to our [California Privacy Policy](#) below.

Information We Collect

The types of personal information we collect about you depends on the nature of your interaction with us and our reasons for collecting your personal information. The categories of personal information we collect include the following:

- *Your basic information:* such as your name, prefix/title, gender, age and/or date of birth.
- *Contact information:* such as physical address, telephone number and/or email address.
- *Information we obtain by automated means:* such as information about your computer / device and IP address, content and traffic data. We may also collect personal data about you through automated technology when you access and use our Site, such as cookies and similar technology (please see the “*Cookies*” section below for information about how we use such technologies).
- *Information obtained through communications with us:* such as information obtained through telephone calls (which may be recorded for compliance purposes), video communications and other verbal communications, and written correspondence.
- *Other information:* such as information provided by third parties or obtained through publicly available sources.

Some internet browsers have incorporated “Do Not Track” features. Most of these features, when turned on, send a signal or preference (the “DNT Signal”) to websites you visit indicating that you do not wish to be tracked. At this time, we do not currently respond to DNT Signals.

Unfortunately, the transmission of information and data via the Internet is not completely secure. Although we make an effort to protect your personal data, we cannot guarantee the security of any information or data transmitted to or through our Site; any transmission of information or data by you to or through this Site is at your sole risk.

How We Obtain Your Personal Information

In connection with forming and operating our Site, we may collect and maintain your nonpublic personal information from the following sources:

- Information from your communications with us in connection with this Site, including any update notices provided by you.
- Information captured on our Site, including registration and account information, information provided through online forms, the “Contact Us” page and any information captured via cookies.

We may combine personal information that you provide to us with information that we collect from or about you from publicly available sources. This will include information collected in an online or offline context.

How We Use Your Personal Information

We will use your personal information for one or more of the following business or commercial purposes:

Purpose	Legal Basis (relevant to the EU & UK Website Privacy Notice)
To conduct business with you or to provide you with the services you have requested, including responding to your enquiries and requests and providing you with support.	Contractual necessity; and/or our legitimate interest in operating our business and providing investment services.
To communicate with you, to operate, schedule and facilitate meetings (in-person and online) and to administer your participation in any of our events.	Our legitimate interest in operating our business and providing investment services; and/or consent.
To verify your identity (including to conduct anti-money laundering or KYC checks) or to evaluate a potential investor, business partner or supplier.	Our legitimate interest in operating our business and providing investment services; contractual necessity; legal requirement; and/or consent.
To protect against, identify and prevent fraud, money-laundering, cyber-attacks, theft of our property, other threats to the safety, security and integrity of our website, investor portals, products and services, databases, technology assets or our business, and other malicious, or unlawful activity.	Legal requirement; and/or our legitimate interest in operating our business and providing investment services securely and safely.
To conduct conflicts checks.	Legal requirement.
To conduct due diligence activities in connection with an actual or prospective corporate transaction or investment which are evaluated by us or which we are party to.	Our legitimate interest in operating our business and providing our investment services; contractual necessity; and/or legal requirement.

To monitor and manage our portfolio companies.	Our legitimate interest in operating our business; and/or contractual necessity.
To process and administer details associated with your investment and service your requests, and to offer and improve our services.	Our legitimate interest in operating our business; and/or consent.
Complying with our legal obligations and corporate governance practices, which may require recording or monitoring telephone calls or other communications with you.	Legal requirement; our legitimate interest in operating our business; and/or consent.
Litigation management and conducting internal audits and investigations.	Legal requirement; and/or our legitimate interest in operating our business.
To keep a record of and manage your relationship with us.	Our legitimate interest in operating our business and providing services; and/or legal requirement.
To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about the Site users is among the assets transferred.	Our legitimate interest in operating our business.
For any other purpose that has been notified in writing.	Consent.

Additionally, we may use your personal information to keep you informed of our services, if you have provided your consent to us doing so, or where we have an existing relationship with you and we wish to contact you about services similar to those which we provide you, in which you may be interested. You may opt-in to certain kinds of marketing, or all forms of marketing at any time, by contacting us and you may unsubscribe to receiving emails by clicking on the “opt-out” or “unsubscribe” link provided in all our marketing emails.

Disclosure of Personal Information

Your personal data may be disclosed to and processed by our affiliates and agents and certain service providers as necessary to fulfil the purposes set out in this Privacy Notice, including professional advisors, consultants and data hosting providers, and in some instances, placement agents and other fund administrators, as well as regulators, law enforcement and other government bodies. We make sure anyone who provides a service to, or for us, enters into an agreement with us and meets our standards for data security.

We may disclose personal information collected in connection with this Site for a business or commercial purpose. We reserve the right to disclose your personal data as required by law or regulation, or when we

believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security or any other legal or investigatory process involving us. Should we, or any of our affiliated entities, be the subject of a takeover, divestment or acquisition we may disclose your personal data to the new owner of the relevant business and their advisors.

The Site may contain links to other websites which are not hosted or operated by us. These websites may use automated means to collect information regarding your use of the websites. This information is subject to the privacy policies or notices of the provider's website.

Security and Retention

We are committed to protecting the personal data you entrust to us. We adopt robust and appropriate technologies and policies, so the personal data we have about you is protected to the extent possible from unauthorized access and improper use. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected or actual personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Although we take reasonable precautions to protect your personal data, there remains a risk that personal data transmitted over the internet and stored digitally may be intercepted or accessed by an unauthorized third party. As such, any transmission of personal data by you to or through the Site is at your sole risk.

We review the personal data we hold periodically and delete it securely. We will keep your personal data only for as long as is reasonably necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required by law. We will not keep more information than we need for those purposes. For further information about how long we will keep your personal data, please contact compliance@noteus.com.

Capacity

You represent to Noteus that you have the authority to visit this Site. This Site is only intended for individuals who are at least 18 years of age. We do not knowingly encourage or solicit visitors to this Site who are under the age of 18 or knowingly collect personal information from anyone under the age of 18 without parental consent. If we learn we have collected or received personal information from an individual under the age of 18, we will delete that information.

Cookies

Users are informed that, during a visit to the site, a cookie may be automatically installed on their browser. Cookies are small data files that websites generate and ask to store on your computer. They are typically used to remember settings, information you gave to a website and measure how you use the website.

Users can change their Internet browser settings to inform them of the presence of cookies and to block them if they wish. Doing so may break certain functionalities of this website.

Notification of Changes

We reserve the right to amend this Privacy Notice from time to time and for any reason, in our sole discretion, without notice, by updating this Privacy Notice. Accordingly, users are strongly encouraged to review our Privacy Notice regularly. If we decide to change our Privacy Notice, we will post those changes so our users are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it. If at any point we decide to collect personal information or use any collected information in a

manner different from that stated at the time it was collected, we will notify users by posting changes on this page. We will use information only in accordance with the Privacy Notice under which the information was collected. Your continued access or use of this Site following the posting of changes to this Privacy Notice means that you accept such revisions, changes and/or amendments. If you object to any of the changes to this Privacy Notice, please stop accessing this Site. Please check this page frequently and review any changes to this Privacy Notice carefully so you are aware of any changes, as they are binding on you.

Contact Us

If you have any questions or concerns about this Privacy Notice, wish to exercise any rights, submit requests, or appeal any of our decisions in connection with this Privacy Notice (each, a “Communication”), please contact us at compliance@noteus.com.

We verify Communications by matching information provided in or in connection with your Communication to information contained in our records. Depending on the sensitivity of the Communication and the varying levels of risk in responding to such Communications (for example, the risk of responding to fraudulent or malicious communications), we may request further information or your investor portal access credentials, if applicable in order to verify your Communication.

CALIFORNIA PRIVACY POLICY
September 4th, 2024

This California Privacy Policy (the “California Privacy Policy”) supplements the **Privacy Notice** with respect to specific rights granted under the California Consumer Privacy Act of 2018, as amended (the “CCPA”), to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This supplement is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in this CCPA supplement is otherwise set forth in the **Privacy Notice**. To the extent there is any conflict with the privacy requirements under the Gramm-Leach-Bliley Act and/or Regulation S-P (“GLB Rights”), GLB Rights shall apply.

What the California Privacy Policy Applies To

This California Privacy Policy applies solely to your interactions with us through our Site (as defined in the Privacy Notice above). If you provide personal information to use through another means (e.g., as an investor or an employee seeking employment) you will receive a separate privacy notice and that notice will govern that personal information.

Information We Collect

The types of personal information we collect about you depends on the nature of your interaction with us. The categories of personal information we have collected from individuals on these Site over the last twelve (12) months include the following:

Category	Examples	Collected
A. Identifiers	Name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and driver’s license or state identification card number).	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and information regarding investors’ status under various laws and regulations (including social security number, tax status, income and assets).	YES
C. Protected classification characteristics under California or federal law	Date of birth, citizenship and birthplace.	NO
D. Commercial information	Account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment,	NO

Category	Examples	Collected
	income and losses, source of funds used to make the investment in the applicable fund(s).	
E. Biometric information	Imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns and voice recordings or keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contains identifying information.	NO
F. Internet or other similar network activity	Use of our Site, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries	YES
G. Geolocation data	Physical location or movements.	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
L. Sensitive Personal Information (see further information on use of sensitive personal information below)	Social security, driver's license, state identification card, or passport numbers; 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; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; the contents of a consumer's mail, email, and text messages unless you are the intended recipient of the communication; biometric information for the purpose of uniquely identifying a consumer; and personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	YES, as to the following types of information: account log-in, financial account in combination with any required security or access code password, or credentials allowing access to an account only.

We do not collect or use sensitive personal information other than:

- To perform services, or provide goods, as would reasonably be expected by an average consumer who requests those goods or services;
- As reasonably necessary and proportionate to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information;
- As reasonably necessary and proportionate to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for such actions;
- For short-term, transient use (but not in a manner that discloses such information to another third party or is used to build a profile of you or otherwise alter your experience outside of your current interaction with us);
- To perform services on behalf of our business;
- To verify or maintain the quality or safety of a service or to improve, upgrade, or enhance such service or device; and
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

How We Use Your Personal Information

We collect personal information for the business or commercial purposes and from the sources set forth in “Information We Collect” and “How We Obtain Your Personal Information,” respectively, in the Privacy Notice above. We retain the categories of personal information set forth above in the “Information We Collect” section of this California Privacy Policy only as long as is reasonably necessary for those business or commercial purposes set forth in “Information We Collect” in the Privacy Notice above, except as may be required under applicable law, court order or government regulations.

Additionally, we may use your personal information to keep you informed of our services, if you have provided your consent to us doing so, or where we have an existing relationship with you and we wish to contact you about services similar to those which we provide you, in which you may be interested. You may opt-in to certain kinds of marketing, or all forms of marketing at any time, by contacting us and you may unsubscribe to receiving emails by clicking on the “opt-out” or “unsubscribe” link provided in all our marketing emails.

To Whom We Disclose Your Personal Information

We do not share for the purpose of cross-context behavioral advertising or sell (as such terms are defined in the CCPA) any of the personal information we collect about you to third parties.

Within the last twelve (12) months, we have disclosed personal information collected in connection with this Site for a business or commercial purpose to the categories of third parties indicated in the chart below. We may also disclose your information to other parties as may be required by law or regulation, or in response to regulatory inquiries.

Personal Information Category	Category of Third-Party Recipients
A. Identifiers	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.
C. Protected classification characteristics under California or federal law	N/A
D. Commercial information	N/A
E. Biometric information	N/A
F. Internet or other similar network activity	Administrators, law firms, governmental agencies or pursuant to legal process, consultants and placement agents.
G. Geolocation data	N/A
H. Sensory data	N/A
I. Professional or employment-related information	N/A
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	N/A
K. Inferences drawn from other personal information	N/A
L. Sensitive Personal Information	Administrators, law firms, governmental agencies or pursuant to legal process, consultants and placement agents.

How We Keep Your Personal Information Secure

We consider the protection of personal information to be a sound business practice, and to that end we employ appropriate organizational, physical, technical and procedural safeguards, which seek to protect your personal information in our possession or under our control to the extent possible from unauthorized access and improper use.

Your Rights Under the CCPA

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. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

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. 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;
- the categories of third parties to whom we disclose 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.

Correction Right: You have the right to request that we correct any inaccuracies in the personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

No Discrimination: We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

Contact Us

For any requests relating to the exercise of your rights under the CCPA, to access this notice in an alternative format, or questions regarding our processing of your personal information, please submit or have your authorized representative submit a request using any of the methods set forth below:

- Email us at the following email address: [**compliance@noteus.com**](mailto:compliance@noteus.com)

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request further information or your investor portal access credentials, if applicable, in order to verify your request. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above.

Please contact [**compliance@noteus.com**](mailto:compliance@noteus.com) with any questions about this California Privacy Policy.

EU & UK WEBSITE PRIVACY NOTICE

DATE: September 4th, 2024

Our Commitment to Privacy

This European Union “EU” and United Kingdom (“UK”) Privacy Notice (“EU & UK Website Privacy Notice”) supplements the **Privacy Notice**¹ with respect to additional information as required by applicable EU and UK data protection laws, including Regulation (EU) 2016/679 (the “EU GDPR”), the UK equivalent of the EU GDPR (the “UK GDPR”) and the Data Protection Act 2018 (together, the “EU & UK Data Protection Laws”).

To the extent that EU & Data Protection Laws apply to our processing of your personal data, Noteus will be a “controller” of your personal data. In simple terms, when applicable, this means we: (i) “control” the personal data that we collect from you or other sources; and (ii) make certain decisions on how to use and protect such personal data.

Any additional personal data we may collect

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), although there may be limited circumstances where we need to collect this type of personal data, or it is collected incidentally. Nor do we collect any information about criminal convictions and offences.

Further information about the types of personal data that we collect and how we use them are set forth in the “*Information we collect*” section of the **Privacy Notice**.

How we use your personal data and our legal basis

We rely on various legal bases under the EU and UK Data Protection Laws in order to process your personal data, as we have set forth in the section titled “*How and why we use your personal data*” in the **Privacy Notice**.

We may also process personal data for any other purpose that has been notified to you, or that has been agreed in writing with you.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

If we require your personal data due to a legal requirement or obligation or in order to perform a contract with you, we will make you aware of this at the time we collect your personal data, and the possible consequences of you failing to provide this personal data. Failure to provide this information means that we cannot provide our services or products to you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Disclosure and transfer of personal data

¹ **Note to Noteus:** Please hyperlink to the Privacy Notice.

We may share your personal data, where permitted by EU & UK Data Protection Laws, with our affiliates and certain service providers as necessary to fulfil the purposes set out in this **Privacy Notice**.

Your personal data may be transferred to, and stored at, a destination outside the EEA which may not always have data protection laws providing equivalent protection. In such case, we will take steps to ensure that your information is protected by appropriate organisational and security measures, and that any such transfers are done using specific legally-approved safeguards. For further information about the safeguards/derogations used, please contact **compliance@noteus.com**.

Your rights

Under certain circumstances, by law you have the right to access personal data we maintain about you, and there are several ways you can control the way in which and what personal data we process about you.

- **Access:** You have the right to ask for a copy of the personal data that we hold about you free of charge, however we may charge a 'reasonable fee', if we think that your request is excessive, to help us cover the costs of locating the information you have requested.
- **Correction:** You may notify us of changes to such your personal data if it is inaccurate or it needs to be updated.
- **Deletion:** If you think that we shouldn't be holding or processing your personal data anymore, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- **Restrictions on use:** You may request that we stop processing your personal data (other than storing it), if: (i) you contest the accuracy of it (until the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your data for the purposes for which it was collected, but you still need your data to establish or defend a legal claim; or (iv) you object to the processing, and we are verifying whether our legitimate grounds to process your personal data override your own rights.
- **Object:** You have the right to object to processing, including: (i) for direct marketing; (ii) for research or statistical purposes; or (iii) where processing is based on legitimate interests.
- **Portability:** If you wish to transfer your personal data to another organisation (and certain conditions are satisfied), you may ask us to do so, and we will send it directly if we have the technical means.
- **Withdrawal of consent:** If you previously gave us your consent (by a clear affirmative action) to allow us to process your personal data for a particular purpose, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent.
- **Lodge a complaint:** You have a right to lodge a complaint to your local supervisory authority (as discussed below) if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal data.

You may contact us at **compliance@noteus.com** if you wish to exercise any of the rights set forth herein. These rights are not absolute and in certain circumstances their exercise may not be possible including when personal data must be maintained to comply with applicable laws.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure

that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will respond to your request within one month of receipt of your request. In some cases, we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

Should you wish to lodge a complaint with regards to how your personal data has been processed by us under:

- the UK GDPR and/or Data Protection Act 2018, please contact the UK Information Commissioner's Office at <https://ico.org.uk/global/contact-us>; or
- the EU GDPR, please contact your local supervisory authority.

We would, however, appreciate the opportunity to address your concerns before you approach the relevant supervisory authority, so please contact us in the first instance.

Contact us

If you have any questions or concerns about this EU & UK Website Privacy Notice, please contact **compliance@noteus.com**.