Final version

Investor Privacy Notice

This privacy notice ("**Privacy Notice**") applies to personal information that **Gi21 Datacenter Infrastructure SCA SICAV-RAIF,** an investment company with variable capital, organized as a reserve alternative investment fund established under the laws of the Grand Duchy of Luxembourg, having its registered office at 16, rue Glesener, L-1630 Luxembourg, Grand Duchy of Luxembourg, and in the process of being registered with the Luxembourg Trade and Companies Register – "RCS" (the "**Fund**"), represented by its unlimited managing general partner, **Gi21 Datacenter Infrastructure GP S.à r.l**., a limited liability company (*société à responsabilité limitée*), incorporated in the Grand Duchy of Luxembourg, with registered office at 16, rue Glesener, L-1630 Luxembourg, Grand Duchy of Luxembourg, and registered with the RCS under number B311967 (the "**General Partner"**) ("**we**"/"**our**"/" **us**") may obtain and process about its investors (or potential investors) or any individual employee, proxyholder, other representative or ultimate beneficial owner of an investor or potential investor thereof ("**you**"/"**your**").

This Privacy Notice describes the types of personal information we may obtain and process, how we may use the information, with whom we may share the information (including where they are located), how long we will retain the information and your choices regarding our use of the information. We also describe the measures we take to safeguard the information and tell you how to contact us about our privacy practices as provided for under applicable data protection legislation and regulation to which we are subject, in particular the EU General Data Protection Regulation 2016/679 ("**GDPR**").

Who We Are

This Privacy Notice is issued by the Fund (acting through its General Partner) when acting as "controller" of the processing operations concerning personal data we process about you. For further information and question about the processing of your personal data by the Fund or its service providers, please contact us as indicated in the **How To Contact Us** section of this Privacy Notice.

Information We Collect

Personal Information you provide when subscribing to the Fund

We may collect and process various personal information about you for the purposes set out in this Privacy Notice, in particular when you subscribe for Fund's interests via completion of a subscription agreement and/or completion of any other ancillary document/form in relation to the Fund, or when you otherwise communicate with us, including in particular:

- contact information, such as your name, postal address, email address, telephone number, facsimile number, SSN, government identification number, TIN, copies of passport or other official documentation;
- financial information such as your investment experience or financial expertise, details of your investment or proposed investment;

- other information regarding your work authorization status, work history, references, education history, employment history and professional designations; and other personal information about your qualifications.
- information resulting from KYC and AML-CTF checks.

Personal Information we collect from other sources

We may also obtain some information about you indirectly, for example from publicly available sources such as the Internet and/or subscription based services or public/ governmental registries.

Sensitive Information

We only process information about criminal offences to the extent required by applicable laws, in particular with regard to KYC and AML-CTF screening and financial sanction screening programmes, and in any case within the limits set out in those applicable laws, in particular when such processing is mandated or authorized by applicable laws providing appropriate safeguards for your rights and freedoms.

In the event that you are identified as a PEP as a result of any required screening process, you may be required to provide additional information and/or documentation to the Fund or its service providers. Such processing, which may reveal your political opinion or other special categories of personal data will only occur in limited circumstances. The Fund may notably process such type of personal data (i) which you have manifestly made public; or (ii) necessary for reasons of substantial public interest.

How We Use the Information We Collect

We may process, notably via our service providers, the aforementioned personal data for the following purposes and their correlated legal bases as further described hereunder:

	Purpose	Legal Basis
	To perform our contract, including managing the assets of the Fund, providing periodic and annual reporting, responding to your queries and requests (including complaint handling) and all correlated communications, managing payments and distributions, provision of related investor services	• To perform our contract with you • We also have a legitimate business interest in carrying out processing for some of these purposes where we consider that, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms
	Legal compliance - detecting, investigating and preventing breaches, fraud, and criminal offences, in accordance with applicable laws	• The processing is necessary for compliance with a legal obligation; or • We have a legitimate interest in carrying out the processing
	CRS/FATCA reporting and/or ultimate beneficial owners declarations	• The processing is necessary for compliance with a legal obligation
	KYC - confirming your identity and screening against government, supranational bodies or sanctions lists or performing other on-boarding due diligence	• The processing is necessary for compliance with a legal obligation;
	AML-CTF checks – carrying due diligence checks	• The processing is necessary for compliance with a legal obligations • The processing is necessary for the performance of a task carried out in the public interest
	Reporting to and/or cooperating with supervisory and regulatory bodies, and/or other authorities pursuant to applicable laws and regulations and complying with general prudential duties	• The processing is necessary for compliance with a legal obligation
	Legal proceedings	• We have a legitimate interest in carrying out the processing for the purpose of establishing, exercising or defending our legal rights
	Conducting merger and acquisition and/or any other restructuring and/or financing operations concerning the Fund or its assets	• We have a legitimate interest in carrying out the processing for the purpose of improving our products or services where we consider that, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms

	To send direct marketing communications for similar products and/ or investment services in relation to other funds managed by the investment advisor	• We have a legitimate interests to promote investment in the Fund or another fund, and that of investors to access the Fund or another fund (subject to an opt-out right at any time);

Recipients of your personal data

For proper performance of the aforementioned purposes, we may share personal information with third parties (e.g. service providers) who perform services on our behalf.

In particular, the Fund may share your personal data with the following recipients or any of their successor such as:

(a) the AIFM, currently IQ EQ Fund Management (Luxembourg) S.A.;

(b) the administrative agent, currently EY PFS Solutions, which may either act as controller or as processor and which may in turn use the services of sub-processors, some of which may be located in countries outside of the EEA as the case may be;

(c) the depositary, currently IQ EQ Depositary Services (Luxembourg) S.A., which may either act as controller or as processor and which may in turn use the services of sub-processors, some of which may be located in countries outside of the EEA, in particular in Singapore, the Philippines and Mauritius;

(d) the domiciliary agent, currently Accounting, Tax, Expertise & Solutions, which may either act as controller or as processor and which may in turn use the services of sub-processors, some of which may be located in countries outside of the EEA as the case may be;

(e) the investment advisor, currently Stridegate Limited, located in Cyprus;

(f) accountants, auditors, tax advisors, lawyers located in the EEA;

(g) banking establishments or lenders;

(h) governmental, judicial or administrative bodies, in Luxembourg or abroad;

(i) IT and communication services providers located in the EEA;

(j) any public register to be used for ultimate beneficial owners declarations (as accessible online as the case may be);

We also may disclose information about you (i) if we are required to do so by law, regulation or legal process (such as a court order or subpoena or for tax reporting purposes), (ii) in response to requests by government agencies, such as law enforcement or regulatory authorities, (iii) for the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising or defending our legal rights, or (iv) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. We also reserve the right to transfer any information we have about you to potential third party acquirer(s) in the event we sell or transfer all or a portion of the Fund's assets (including in the event of a reorganization, dissolution, liquidation or other corporate event) and/or target companies.

The disclosures of personal information referred to above may include transfers to third countries, such as Singapore, the Philippines and Mauritius, which are not regarded by the European Commission as ensuring an adequate level of data protection.

In case of transfers of personal information to entities located in non-EEA countries, such transfers will rely on appropriate safeguards as permitted or required under the GDPR.

Record-Keeping of personal data

The period for which we will keep your personal information varies depending on the information and why we obtained it. Personal information will not be held for longer than it is needed, given the purposes for which it is held.

In any case, the Fund and its appointed service providers will retain all documentation provided by you in relation to your investment in the Fund for such period of time as may be required by Luxembourg legal and regulatory requirements, and after the period of your investment has ended or the date on which you had your last transaction with us. In this respect, the Fund holds personal data for a subsequent period of ten (10) years where necessary to comply with applicable laws and regulations, and/or to establish, exercise or defend actual or potential legal claims.

Your data protection rights

Within the limits set out in the GDPR, you can benefit from:

(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.

To exercise any of these aforementioned rights, please contact us as indicated in the **How To Contact Us** section of this Privacy Notice.

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).

Updates To Our Privacy Notice

This Privacy Notice may be updated periodically to reflect changes in our personal information practices. We will bring such changes to your attention by any proper mean of communication.

How To Contact Us

If you have any questions about this Privacy Notice, or if you would like us to update information we have about you or your preferences or exercise the other rights described in this Privacy Notice, please contact us at: privacy@gi21capital.com

Anyone, either as a direct investor or a nominee, who communicates to the Fund personal data about any third party data subject when subscribing to the Fund must first provide the latter with the information about how the Fund processes personal data as described in this Privacy Notice. The Fund will hence consider that the data subjects concerned are informed of the processing of their personal data relating to them that the Fund may carry out as described herein.