

PRIVACY POLICY – INNPACT S.A.

Last update: 11/07/2022

Innpact S.A. (hereafter referred to as “**Innpact**” or “**we**” or “**us**”) understands the importance of keeping your Personal Data (as defined in section 1 below) safe. This privacy policy (the “**Policy**”) describes how Innpact treats the information collected or provided during the course of Innpact’s activities, how it is stored, processed, secured, and what are the rights of the Data Subjects (as defined below) in relation to these Personal Data.

Personal Data may be collected, recorded, stored in digital form or otherwise, adapted, transferred or otherwise processed and used in accordance with the Luxembourg law of 2 August 2002 on the protection of persons with regard to the processing of Personal Data (as amended), the European Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”) and any other European Union or national legislation which implements or supplements the foregoing.

This Policy is issued by Innpact, identified as personal data controller within the meaning of the GDPR (“**Data Controller**”), and applies to individuals with whom Innpact interacts, including but not limited to employees, consultants, clients, prospects, directors and other counterparties (hereafter referred to as the “**Data Subject(s)**” or “**you**”).

This Policy applies to any Data Subject whose Personal Data is provided to Innpact directly by the Data Subject or indirectly through another natural or legal person, public authority, agency or another body in connection with Innpact’s relationship with the Data Subject where Innpact acts as Data Controller within the meaning of the GDPR.

This Policy may be amended from time to time to reflect changes in our practice with respect to the processing of Personal Data, or changes in applicable law, and we will notify you in writing of any changes we make.

1. Types of Personal Data collected or provided to Innpact and sources of Personal Data

The main categories of personal data processed by Innpact (the “**Personal Data**”) are (inter alia):

- Personal identification data, such as name, date and place of birth, address, email address, phone number, any other contact details, nationality, gender, bank account information, social security number, copies of identity documents, CVs,
- IP addresses or other visitor origin profiles maybe traceable from visiting our website or social media profiles,
- Profile pictures, pictures from events organised by Innpact and videos.

For the avoidance of doubt, Innpact does not process, and service providers of Innpact are not authorised to process, any special categories of personal data revealing racial or ethnic origin, political opinions,

religious or philosophical beliefs, trade union membership, genetic data, biometric data, health related data (except medical certificates provided by any employee of Innpact in case of sickness) or data related to sexual orientation.

We use different sources to collect your Personal Data including, but not limited to:

- Direct interactions: information provided verbally, electronically or in writing, including information provided on questionnaires, websites and other forms provided by you or your organization,
- Information that is generated by Innpact in the course of its business with you,
- Third-parties or publicly available sources: information obtained from international sanctions lists, publicly available websites, financial market infrastructures and other public data,
- The performance of contract that you have entered into with Innpact from time to time,
- The use of products and services and your relationship with Innpact, as well as with Innpact service providers.

2. Legal basis and purposes of processing

Any Personal Data provided to us is processed based on the legal grounds enumerated in Art. 6, Par. 1 of the GDPR. Innpact does not use Personal Data for marketing purposes without explicit consent of the relevant Data Subject.

Most of our Personal Data processing arises from regulatory or contractual requirements, without which we would not be able to provide the contracted services or comply with applicable laws.

Regarding website users, their Personal Data is processed for statistics purposes, to communicate with the user and to answer any request.

In accordance with Art. 30 of the GDPR, each service provider of Innpact which is processing Personal Data on behalf of Innpact, shall maintain a record of its data processing, which shall be made available to the Data Controller for inspection upon request.

Certain Personal Data, such as business cards and photographs we may have of Data Subjects further to events, or IP address (for website users), may be processed based on consent or to pursue legitimate interests such as internal communication and business administration.

If we do rely on your consent, we will make this clear to you at the time we ask for your consent. You will have the right to withdraw such consent at any time.

3. Recipients of Personal Data

Innpact's data systems are maintained and backed-up by an external IT service provider which is also located in Luxembourg and is complying with GDPR requirements.

In order to fulfil our obligations arising from contract or applicable laws, certain Personal Data may be transmitted to other service providers of Innpact, such as Innpact's website service provider, HR support service providers, auditors, legal advisers, or regulatory authorities.

Due diligence is performed on such third parties to ensure that they are complying with the GDPR.

4. Profiling and automated decision-making

Innpact does not use data profiling or automated decision-making as per Art. 22 and recital 71 of the GDPR.

5. Transfer to third countries

In order to fulfil Innpact's obligations arising from contract or applicable laws, certain Personal Data may be transmitted to other service providers outside of the European Union ("EU").

To the extent practicable, Innpact avoids transferring Personal Data to non-EU countries or to countries without EU equivalent data protection rules. In the event Personal Data is transferred outside of the EU, prior due diligence is performed to ensure that data processors or service providers only transfer data to their affiliates which are compliant data protection rules equivalent to GDPR, that the IT cloud solutions chosen has implemented GDPR compliant security measures and that the Personal Data is transferred in a secure way.

The data systems shall be maintained and backed-up by an external IT service provider located within the EU, in jurisdictions deemed to have an EU-equivalent level of protection, or which are otherwise bound contractually to comply with GDPR requirements, based on standard contractual clauses.

6. Provision of Personal Data

Personal Data relating to directors and officers must be provided in order to enable Innpact to perform its services.

Certain Personal Data relating to representatives of investors and contractual counterparties are also required to be provided to enable effective notification to the respective parties.

7. Storage of Personal Data

Any and all Personal Data will be held for a period of maximum ten (10) years after the termination of the relationship between the Data Subject and Innpact, and will not be retained for longer than necessary in order to fulfil our obligations arising from contract or applicable laws, taking into account any required retention period to meet any legal procedural requirements in case of any need to provide information with integrity to competent authorities.

8. Your rights as a Data Subject

Requests from Data Subjects related to the exercise of the rights described below shall be referred to as “**Data Requests**” and shall be handled in accordance with the section below “Handling of Data Requests”.

Please find below an outline of the most pertinent rights you have as Data Subjects in relation to your Personal Data processed by Innpact as Data Controller. The exhaustive list of your rights as Data Subject can be found in Art. 15-22 and Art. 77 of the GDPR.

- *Right to access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17+19 GDPR)*

You have the right to see what Personal Data we have of you in our files.

If you spot an error in your Personal Data in our files, or that it is no longer up to date, you have the right to request that it is rectified.

Any of your Personal Data we have in our files will be deleted upon request, unless Innpact has an overriding obligation to maintain the Personal Data such as those arising from contract or applicable laws.

- *Right to restriction of processing (Art. 18+19 GDPR)*

Innpact will limit the ways and purposes your Personal Data is processed upon request, unless there are overriding obligations arising out of contract or applicable laws.

- *Right to data portability (Art. 20 GDPR)*

You have the right to request that your Personal Data is transferred from Innpact to another recipient of your choosing.

- *Right to object (Art. 21+22 GDPR)*

You have the right to object to the processing of your Personal Data by Innpact and to request Innpact to stop processing your Personal Data. In such case Innpact will stop processing your data unless there are overriding obligations such as those arising from contract or applicable laws.

- *Right to withdraw your consent at any time (Art. 7)*

For the processing of Personal Data that are based on Data Subjects’ consent, Data Subjects have the right to withdraw their consent and request that we stop processing and delete such Personal Data at any time.

Please note that Innpact does not send any newsletters and does not pass on your contact details to any third parties for their own marketing purposes without your explicit consent. You can unsubscribe from the Innpact newsletter or marketing messages at any time via the “unsubscribe” link at the bottom of the emails you receive or by contacting us.

- *Right to complain (Art. 77 GDPR)*

You have the right at all times to lodge a complaint with regarding the processing of your Personal Data, whether to Innpact using the contact form on Innpact’s website or the contact details in section 10 below, or directly to a national data protection authority of a European Union Member State, such as the Luxembourg data protection authority, the *Commission Nationale de Protection des Données* (“**CNPD**”).

9. Handling of Data Requests

Data processors shall assist Innpact as Data Controller within the scope of its abilities and the information reasonably available to it, to respond to requests from Data Subjects regarding the Personal Data mentioned hereabove.

For Data Requests addressed to Innpact, we shall be responsible for obtaining and coordinating the necessary information from the relevant service providers as well as responding to the relevant Data Subject.

10. Contact information

In case of any questions about this Policy, your Personal Data or your rights as Data Subjects, please contact us by using the contact form on Innpact’s website or the contact details below:

Postal and visitor’s address:

Innpact S.A.

5, rue Jean Bertels

L-1230 Luxembourg

Grand Duchy of Luxembourg

Phone number: +352 27 02 93 1

Email: info@innpact.com

Data protection officer:

Charles Kirsch

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5, rue Jean Bertels

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Phone number: +352 27 02 93 24

Email: dpo@innpact.com