

## PRIVACY NOTICE – INNPACT S.A.

Last update: 14/02/2025

### 1. Scope of application

This privacy notice (the “**Notice**”) describes how Innpact S.A. (hereafter referred to as “Innpact” or “we” or “us”) 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 (as defined below in section 2).

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 Notice 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 Notice 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 Notice 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.

The Data Controller for the purposes of this Notice is Innpact S.A. with the contact details provided in Section 10.

### 2. 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, driver’s license, CVs,
- Financial data, such as banking details, income details, tax information, source of wealth,
- 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 during meetings, networking events or on questionnaires, websites and other forms provided by you or your organization,
- AML/ KYC obligations: information provided directly or indirectly by Data Subjects to comply with AML and KYC obligations,
- 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,
- Service providers: information provided indirectly by the service providers of Innpact.

Innpact informs Data Subjects of the specific source of any indirectly collected Personal Data at the time it is processed, where applicable.

### **3. Purposes and legitimate basis 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: Processing is necessary for compliance with a legal obligation or for the performance of a contract to which the Data Subject is party. Without this processing, we would not be able to provide the contracted services or comply with applicable laws.
- Legitimate interests: (e.g. to ensure security of the Innpact's website or access to platforms the Innpact is using), except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of Personal Data.
- Explicit consent: Some Personal Data, such as business cards, photographs collected at events, or IP addresses (for website users), may be processed based on consent or legitimate interests, such as internal communication and business administration.

Regarding website users, their Personal Data is processed for statistical purposes, to communicate with users, and to respond to requests.

If we rely on your consent, we will make this clear at the time we request it. You have the right to withdraw consent at any time and may request that we stop processing and delete such Personal Data.

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

#### **4. 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-party service providers to ensure that they are complying with the GDPR.

#### **5. 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 the duration required by applicable law or contractual obligations, 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.

#### **6. Transfer of Personal Data**

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.

#### **7. 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.

## **8. Rights of Data Subjects**

Requests from Data Subjects related to the exercise of the rights described below shall in general 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. Handling of Data breaches**

In the event of a data breach likely to result in harm to Data Subjects (a "**Personal Data Breach**"), Innpact in its capacity as Data Controller has the responsibility to notify the CNPD in accordance with Art. 33 of the GDPR.

Taking into account the processing by service providers and storage of Innpact's Personal Data, a Personal Data Breach requires detection by the relevant service provider, which will in turn immediately notify us (addressing the Data Protection Officer) without undue delay after becoming aware of such Personal Data Breach.

The service provider experiencing Personal Data Breach is the primary party responsible for performing assessment regarding the nature of the breach and the likelihood of risk to the rights and freedoms of Data Subjects.

Innpact will determine the likelihood of risk to the rights and freedoms of Data Subjects (with the continuous information from the service provider) and whether there is a need to further notify the CNPD and the relevant Data Subjects (as required).

The above-mentioned notifications shall include the following information:

- Describe the nature of the Personal Data Breach;
- Communicate the name and contact details of the Data Protection Officer or contact point where more information can be obtained;
- Describe the likely consequences of the Personal Data Breach;
- Describe the measures taken or proposed to be taken by the Data Controller to address the Personal Data Breach.

## **11. Contact information**

In case of any questions about this Notice, Personal Data held by Innpact or rights of the 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](mailto:info@innpact.com)