Personal Data Protection Policy

Blocs de la page

Last update: 18 / 03 / 2024

Eurazeo SE, a French company registered in the Paris Trade and Companies Register under number 692 030 992, having its registered office at 66 rue Pierre Charron, 75008 Paris, France, or any other Eurazeo entity worldwide (hereinafter referred to as "Eurazeo") collects and processes personal data (hereinafter referred to as "Personal Data") on its own behalf in the course of its business.

Eurazeo is therefore the data controller.

In this context, Eurazeo undertakes to process the Personal Data of the data subjects in accordance with the provisions of European Regulation No. 2016/679 of 27 April 2016, known as the General Data Protection Regulation ("GDPR"), and Act No. 78-17 of 6 January 1978 on data processing, data files and individual liberties, as amended, as well as the provisions of this Personal Data Protection Policy (hereinafter referred to as the "Personal Data Protection Policy"). The purpose of this policy is to inform all persons concerned ("You" or "Your") of the manner in which Eurazeo collects and uses Your personal data, the means available to You to control such use, the manner in which Eurazeo may disclose such data to third parties and under what conditions, and how Eurazeo ensures the confidentiality of such personal data.

1. Scope of application for this personal data protection policy

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to that natural person.

This Policy sets out the principles and guidelines applicable to all Personal Data processed by Eurazeo for various categories of persons whose data is collected and processed by Eurazeo, i.e., website visitors, service providers, shareholders, investors, co-investors, distributors, heads of companies in which Eurazeo plans to invest, with the exception of its employees and persons applying for a position at Eurazeo.

Eurazeo collects and processes Personal Data in the following situations:

- 1. When You look for information, want to communicate or are communicating with Eurazeo
 - when You browse its website
 - when You complete the form to register for Eurazeo web conferences and watch web conferences
 - via social media platforms (Facebook, Twitter, LinkedIn and Youtube)
 - during discussions between You and Eurazeo, particularly those that take place in Eurazeo's offices or during meetings or trade fairs, interviews
 - during communications with Eurazeo by telephone, e-mail or any other means. E.g.: information submitted to Eurazeo studies and surveys conducted for research purposes
- 2. When You take part in a competition or event organized by Eurazeo
- 3. When Eurazeo hires You as part of a service agreement
- 4. When you want to invest in our investment funds or alongside Eurazeo into a company
- 5. When You become a Eurazeo shareholder and during the entire time that You remain a Eurazeo shareholder
- 6. When Eurazeo plans to invest in one of the companies that You manage or in which You are one of the main executives

7. When You are a distributor for Eurazeo

This Policy is applicable regardless of how Your Personal Data is collected or processed

2. What personal data is used by Eurazeo, why is it used and what legal basis is it processed?

You will find below, according to Your status (website user, shareholder, co-investor, service provider, etc.), information on how Your data is used (purposes of processing), as well as the legal basis justifying such processing in accordance with the applicable regulations.

2.1. When You look for information, want to communicate or are communicating with Eurazeo

What Personal Data is used?

The information that You disclose to Eurazeo may involve

 Your identification, particularly Your surname, first name, postal address, the company You work for or represent, Your e-mail address and Your telephone number, information regarding the request You are sending Eurazeo and may also include recordings relating to our correspondence and Your responses to various surveys.

Some of Your Personal Data may be collected automatically, including:

- Technical information, including anonymous data collected by the host server for statistical purposes, the IP (Internet Protocol) address used to connect Your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Refer to the COOKIES MANAGEMENT POLICY for further information on the collection and use of such data
- Any Personal Data that You agree to share and which features in Your public profile on a third-party social network. This data mainly includes Your identifiers (surname, first name, IP address and information that You allow social networks to share with their partners).

Eurazeo obtains some of Your Personal Data from sources outside of the company, including in other entities held by Eurazeo or other third-party entities, such as audience measurement service providers.

For what purposes is it used?

This Personal Data is used to:

- Ensure communication and/or the exchange of information with Eurazeo website users
- Manage Your account on the information portal
- Communicate with You and send you our press releases (external information and communications relating to our business and that of our portfolio companies)
- Enable you to access and follow a web conference and conduct statistical analyses, particularly audience measurement, to develop and improve the web conferences.

On what legal basis is it processed?

This processing is:

- partly necessary to fulfill a contract, especially when You send us a request which we answer or when we provide you with a service that enables You to access our website or a web conference
- partly necessary to pursue Eurazeo's legitimate interests, when we send You press releases. or information on how Eurazeo assesses its legitimate interest.

2.2. When you take part in a competition or event organized by Eurazeo

Eurazeo may organize competitions or events and specifically it organizes an annual photo competition with varying themes.

What Personal Data is used?

In these instances, the following Personal Data can be collected:

Your surname, first name, address, postal code, city/town, telephone, e-mail, possibly the company you work for or represent. For the photo competition, the previously mentioned information is collected as well as the following Personal Data: e-mail address of the representative where necessary, photograph, resume.

For what purposes is it used?

The Personal Data collected on this occasion is processed in order to:

- Manage Your participation in the competition or event organized by Eurazeo
- Communicate with You on this occasion
- Manage communications with the prizewinner
- Manage the allocation of the prize money, the use of the competition winner's photos

On what legal basis is it processed?

This processing is:

- partly necessary to fulfill a contract, particularly Personal Data that is strictly required to manage the organization of the event or determine and communicate with the prizewinner
- partly based on Your consent
- partly necessary to comply with legal obligations

2.3. When you are one of Eurazeo's service providers

What Personal Data is used?

On this occasion, the following Personal Data is collected: identifiers of the contact within the company acting as Eurazeo service provider, mainly his or her surname, first name, postal address, e-mail address; telephone number; information on the company acting as service provider; financial data associated with the contractual relationship: invoices, bank details, payment data; data collected and processed as part of supplier assessments pursuant to the applicable legislation, and particularly in France, the Law on transparency, anti-corruption and the modernization of the economy ("Sapin II law").

For what purposes is it used?

The Personal Data collected on this occasion is processed in order to:

- manage the contractual relationship with our service providers, i.e., manage the contract, orders, deliveries, accounting, payments, and more generally, monitor the contractual relationship by regularly communicating with the service provider
- satisfy Eurazeo's legal obligations, particularly its tax and anti-corruption and money laundering obligations and meet the requirements of the Sapin II law in France.

On what legal basis is it processed?

This processing is:

- partly necessary to fulfill the contract between Eurazeo and Your company
- partly necessary for Eurazeo to comply with its legal obligations and especially its tax and accounting obligations and those relating to the Sapin II law.

2.4. When you want to invest in our investment funds or alongside Eurazeo into a company

What Personal Data is used?

On this occasion, the following Personal Data is collected:

- Your identification mainly your surname, first name, birth date and location, postal address, e-mail address; telephone number, nationality, proof of identity, proof of address
- professional data as professional status, sector of activity, Kbis extract, FATCA/CRS self-certification, identity document of the director and signatory, delegation of powers of the signatory, professional e-mail address, professional telephone number
- financial data, particularly amounts invested, date of investment, number
 of shares or quotas held, IBAN / RIB, total assets and financial assets,
 annual household income, proof of the origin of funds invested, tax
 address, audited accounts, etc...
- PPE status for investors.

In addition, certain Personal Information about You may be collected automatically when You log on to the Investor Portal:

 Technical information, including anonymous data collected by the host server for statistical purposes, the IP (Internet Protocol) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Refer to the Cookies management policy for further information on the collection and use of such data

The data collected may concern:

- The natural person who creates the account on the Portal
- The legal representative of the subscribing legal entity
- The employees of the subscribing legal entity
- Any beneficial owners of the subscribing legal entities

For what purposes is it used?

- The Personal Data collected on this occasion is processed in order to:
- Manage relations with Eurazeo's investors or potential investors
- Manage the retail portal
- Manage relations with institutional investors and manage the institutional investor portal
- Enable subscription to the various investment funds

 Communicate with our investors or potential investors, particularly in connection with the regular transmission of Eurazeo updates and information.

On what legal basis is it processed?

This processing is:

- partly necessary to fulfill a contract to which the relevant persons are party
- partly necessary to comply with our legal obligations such as Anti Money Laundering and financial terrorism for example
- partly necessary to pursue Eurazeo's legitimate interests to communicate with its investors and potential investors

2.5. When you become or are a Eurazeo Shareholder

When You become a Eurazeo shareholder, Your Personal Data is collected and processed whether you are:

- a bearer shareholder
- a registered shareholder (in this case, Your data will be collected by the Financial Institution in charge of the service).

What Personal Data is used?

On this occasion, the following Personal Data is collected:

- Your identification mainly your surname, first name, postal address, e-mail address
- Financial data as number of shares, type of shares; type of shareholder (employee shareholder, directly or intermediary registered shareholder, bearer shareholder, member of shareholder agreements).

For what purposes is it used?

The Personal Data collected on this occasion is processed in order to:

 get to know all Eurazeo shareholders, with either bearer or registered shares • manage relations with shareholders, particularly in connection with the regular transmission of Eurazeo updates and information

On what legal basis is it processed?

This processing is:

- partly necessary to fulfill a contract to which the relevant persons (shareholders) are party
- partly necessary to pursue Eurazeo's legitimate interests in order to get to know and communicate with its shareholders.
- partly necessary to comply with legal obligations as the issuer of securities.

2.6. When Eurazeo plans to invest in one of the companies in which You are one of the managers or main executives

What Personal Data is used?

On this occasion, the following Personal Data can be collected:

- Your identification mainly your surname, first name, birth date and location, postal address, e-mail address; telephone number
- Professional data: function, resume
- financial data, particularly compensation.

Eurazeo obtains some of Your Personal Data from sources outside of the company, including in other entities held by Eurazeo or other third-party entities, such as service or business providers.

For what purposes is it used?

The Personal Data collected on this occasion is processed to manage audit operations (due diligences) in connection with potential Eurazeo investments in the company in which You are one of the managers or main executives.

On what legal basis is it processed?

This processing is necessary to pursue Eurazeo's legitimate interests.

2.7. When You are one's of Eurazeo's distributors

What Personal Data is used?

On this occasion, the following Personal Data is collected:

- Identifiers of the contact within the company acting as Eurazeo distributor, mainly his or her surname, first name, postal address, e-mail address; telephone number;
- Information on the company acting as distributor;
- Financial data associated with the contractual relationship: invoices, bank details;

For what purposes is it used?

The Personal Data collected on this occasion is processed in order to:

- Manage the contractual relationship with our distributors
- In particular through the management of Partner Portal
- Enable You to follow up on Your clients who wish to invest in a fund managed by Eurazeo

On what legal basis is it processed?

This processing is:

- Partly necessary to fulfill the contract between Eurazeo and Your company
- Partly necessary to pursue Eurazeo's legitimate interests
- Partly necessary for Eurazeo to comply with its legal obligations

2.8. Possible processing for any category of persons covered by the Policy

For all categories of persons covered by this Policy, Eurazeo may also be required to set up processing in order to:

- · Detect, prevent and reduce fraud or other illegal activities
- Safeguard the network and information systems that enable us to protect Your Personal Data from risks of loss or deterioration, theft or unauthorized access
- Reply and/or assist a public authority or body with an ongoing investigation or ongoing legal proceedings in accordance with applicable regulations
- Verify the accuracy of your data in our possession, so that we can then grant the requests that you may submit in accordance with Section 6 of this Policy.

This processing may involve all the Personal Data collected by category of persons and is:

- Partly based on Eurazeo's legitimate interest, insofar as this processing is
 of benefit to Eurazeo but does not infringe upon your interests and
 fundamental rights.
- Partly based on Eurazeo's legal obligations, and in particular (i) its
 obligation to secure and keep confidential the Personal Data processed in
 accordance with the GDPR; (ii) its obligations to grant the requests of
 public authorities or bodies; and (iii) its obligations to grant the requests of
 the relevant persons based on Articles 15 to 22 of the GDPR.

3. With whom does Eurazeo share Your personal data?

Your Personal Data is used exclusively by the relevant Eurazeo internal departments to best respond to Your requests, i.e., depending on the purpose: Legal Department, Compliance Department, Information Services Department,

Communications Department; Financial Reporting Department, Taxation Department, Accounting Department, fundraising and investment teams.

Your Personal Data will not be sold or exchanged with third parties for commercial prospection purposes.

It may however be transmitted to third parties in certain cases, when strictly necessary depending on the purposes mentioned in the previous section, in the following contexts:

- To Eurazeo portfolio companies, for the reasons listed in Article 2 of this Policy, in order to best meet Your requirements and requests in a consistent and harmonized manner
- To legal or financial authorities, government agencies or public bodies, at their request and within the limit of what is authorized by regulations, if required by law or if Eurazeo honestly believes that such disclosure is reasonably necessary to comply with legal proceedings (e.g. a mandate, subpoena or any other legal decision) or protect the rights, property or personal security of Eurazeo, its partners or the general public
- To service providers acting as subcontractors within the meaning of applicable regulations to perform services in line with our services or business. These service providers are involved in hosting, storage, analysis, marketing, communications, data processing, database management or IT maintenance. These service providers only act on Eurazeo's instructions and will only have access to the Personal Data of relevant persons to carry out these services and will be bound to the same security and confidentiality obligations as Eurazeo
- to providers or partners performing services for Eurazeo (custodians, distributors, business providers, lawyers, auditors, etc.)
- to third parties as part of a merger, acquisition or sale of all or part of Eurazeo's assets, whose user acknowledges that it has been informed.

Furthermore, when You enroll in an event organized by Eurazeo, Eurazeo may share Your name, the name of Your company and Your electronic address with other participants and sponsors of the same event for organizational and communication purposes and to exchange ideas.

4. Where can Your personal data be transferred?

Please note that in certain cases Eurazeo may be required to transfer Your Personal Data outside the European Union, mainly to Eurazeo portfolio companies and its service providers as mentioned in the previous section. The location of Eurazeo Group Companies is available on the Eurazeo website (https://www.eurazeo.com/fr).

Prior to its transfer, Eurazeo will verify the level of data protection applicable in the relevant country. If the country is not considered to offer a suitable level of protection in accordance with the GDPR, Eurazeo will set up the necessary guarantees to transfer the data in compliance with the GDPR, including by signing standard contractual clauses with the entities to whom the data is transferred pursuant to Articles 46 and 47 of the GDPR.

5. For how long will Eurazeo keep Your personal data?

Eurazeo does not store Your Personal Data longer than is required. Storage periods may vary according to the types of data and processing.

Eurazeo processes and uses Your Personal Data in accordance with applicable data protection regulations and will retain your Personal Data:

- (i) only for the reasonable time required to achieve the objectives mentioned above in Section 2, i.e. during the time necessary to meet any of Your requests, to manage participation at an event and its consequences, and more generally over the duration of our contractual relationship;
- (ii) as long as is required by operational, regulatory and legal constraints, mainly to meet the storage obligations for certain documents (e.g. obligation to store certain documents for ten years to comply with accounting and tax requirements in France), and according to the applicable limitation periods (i.e. generally 5 years in France upon expiry of the contractual relationship with Eurazeo). Likewise, data will be stored to secure rights of defense and respond to legal claims and requests from authorities and regulators until expiry of the relevant storage period or until a final decision is issued on such claims.

Examples of data retention:

Documents	Data retention	Legal sources
All tax documents	6 years from the date of the last operation	Article L102 B Livre des procédures fiscales
Any accounting document (supporting documents)	10 years from the end of the financial year	Article L.123-22 Code de commerce
Any document relating to the client and the transactions carried out in the context of the AML/FT	5 years from the closure of the accounts or termination of the relationship or from the execution of the transactions	Article L. 561-12 Code monétaire et financier

6. What are Your rights and how can You exercise them?

Eurazeo has introduced adapted Personal Data protection measures to verify that such data is used in accordance with the above purposes and ensure that it is accurate and up to date.

Under the applicable regulations, You have the following rights:

- Right to information: You have the right to be informed in a precise, accurate, transparent and accessible manner regarding information that concerns You. This is why we have drafted this policy
- Right of access: You can obtain precise information concerning the processing of your Personal Data and a copy of the data concerning You that we process
- Right to rectification: If You consider that Your Personal Data is inaccurate or incomplete, You can request that this data be rectified or completed accordingly
- Right to erasure: You can request the erasure of Your Personal Data, to the extent permissible under the regulations
- Right to restriction of processing: In certain cases, You can request that the processing of your Personal Data be restricted
- Right to withdraw your consent: The consent You have given to process Your Personal Data (see Section 2 above to determine consent-based processing) can be withdrawn at any time
- Right to data portability: When this right applies, which is to say when the
 processing is automated and based on consent or the fulfillment of a
 contract (see Section 3 above to determine the processing covered by this
 right), You can ask Eurazeo to communicate your Personal Data, or, when
 it is technically feasible, have it transferred to a third party, without any
 objection from Eurazeo
- Right to object to the processing of your Personal Data when the
 processing is based on the legitimate interest of Eurazeo (see Section 2
 above to determine processing based on legitimate interest): You can at
 any time object to the processing of Your Personal Data on grounds
 relating to Your particular situation, unless Eurazeo can demonstrate
 compelling legitimate grounds for the processing which override Your
 interests, rights and freedoms or when such data is necessary for the
 establishment, exercise or defense of legal claims.

Eurazeo reserves the right not to grant certain requests based on particular circumstances and in all cases in accordance with the applicable laws and regulations.

Should You wish to exercise the aforementioned rights or simply ask questions concerning the processing of Your personal data, You can send an e-mail to the following address by identifying yourself and the scope of the request:

by simple letter

Eurazeo

Compliance Department

66 rue Pierre Charron

75008 Paris

by e-mail:

DATAPRIVACY.COMPLIANCE@EURAZEO.COM

Pursuant to the applicable regulations, in addition to the aforementioned rights, You have the right to file a claim with the competent data protection authority (such as the CNIL in France: www.cnil.fr or the CNDP in Luxembourg: www.cnpd.public.lu/fr). We nevertheless ask that You get in touch with us using the aforementioned contact information before filing any claim with the competent data protection authority.

7. What security measures has Eurazeo put in place?

Our objective is to securely store Your data at all times during its processing. From the moment we receive your Personal Data, we put in place appropriate technical and organizational measures and various controls to prevent, to the extent possible, any accidental or unlawful destruction, loss, alteration, revelation or unauthorized access.

8. Modification of the Personal Data Protection Policy

Eurazeo reserves the right to make any changes it deems necessary and useful to the policy at any time.

In the event of a material change to the Policy, You will be notified of the updated Policy. If you do not wish to accept the new version of the Policy, it is Your responsibility to request the deletion of your account and to cease all access to the Website and all use of the functions offered by Eurazeo.