



**EOS INVESTMENT MANAGEMENT LTD &
EOS IM GROUP**

Privacy Policy Statement

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Introduction

EOS Investment Management Group (“**EOS IM Group**” or “**we**”) is an independent international fund management group, specialising in alternative asset sectors.

This Privacy Policy (the “**Policy**”) is adopted, approved by and applicable to EOS Investment Management Ltd (“EOS IM”), and is applied to the EOS IM Group and the funds (“**Funds**”) managed/advised by EOS Investment Management Ltd (“**EOS IM**”). The entities within the scope of the EOS IM Group are set out in Schedule 1 of this Policy.

This Policy and any applicable agreement entered into by you and the EOS IM Group, sets out the basis on which EOS IM Group and the Funds, collect, use, and share your personal information. Each of these parties acts as a data controller in respect of your Personal Data for the purposes of the applicable national data protection legislation, including Data Protection Act (DPA) 2018, also known as UK GDPR and the European Union’s General Data Protection Regulation (jointly “GDPR”).

The collection and processing of data is for the purposes and requirements associated with the ability to conduct the operation of its business and the business activities of the Funds. All service providers appointed by EOS IM Group and the Funds to process Personal Data (“**Data Processors**”) will process Personal Data provided in accordance with EOS IM Group’s instructions and EOS IM Group entities will act as the Data Controller of any such Personal Data.

This Privacy Notice applies to you if:

- (i) you are an investor or potential investor in any of the Funds, where EOS IM or EOS IM group entities have been appointed in a fund management or related capacity;
- (ii) you are a client or potential client;
- (iii) you have requested to receive any marketing material; and/or
- (iv) you have given your Personal Data for any other purpose.

We are committed to protecting your personal and confidential information and respecting your privacy. Where we hold personal information, it will use this fairly and lawfully. The information is collected in order to facilitate the provision of services to clients and the benefit of underlying investors, through these services.

By using the Website and any services we offer, you are agreeing to be bound by this Policy in respect of the information collected about you via this Website. Where required under the applicable national data protection legislation, EOS IM Group will also obtain your consent.

Please read and consider this Policy carefully.

What Is Personal Information?

"Personal information" is any information that can be used to identify you or that we can link to you and which we have in our possession or control – i.e., data we collect from you, the way in which it is collected and the purposes for which it is collected and used.

Depending upon the nature of the interaction, the information you provide us with will vary and may include: name, date of birth, nationality, photograph, your gender, government issued identifiers (e.g., passport numbers), home address and home telephone number, mobile telephone number, employer, occupation, job titles, education and qualification details, your CV, and references. There may be additional items required and included in the formal processes for activities such as subscription, applications, and assessment documents.

Whose Personal Information Is Collected?

We will process personal information that you give to us, including when you email us or contact us through various other channels. We may collect and use information about the following types of individuals, in their capacity as and representing:

- Clients, joint venture partners and other corporate relationships;
- Investors in funds and beneficiaries (current, prospective, and former). Where the investor is a legal entity, this will usually include any of their directors, officers, employees, partners, shareholders and/or agents;
- Individuals owning and/or managing prospective and existing portfolio companies, where the fund managed by EOS IM has an interest. For example, through the investment acquisition process conducted by EOS IM in relation to ownership of equity in portfolio companies;
- Suppliers and service providers;
- Professional advisers and consultants;
- Individuals who contact EOS IM and or EOS IM Group entities by email, phone or otherwise;
- Employees, contractors, and other individuals working with/for EOS IM and/or EOS IM Group entities (current, prospective, and former);
- Recruitment applicants, applying for a role.

Where We Receive Personal Information From

The sources of personal information collected will broadly fall into the following types:

- Directly provided by you;
- Related to and arising from services provided to you and/or other interaction with EOS IM Group;
- Received from the owners and/or senior managers of companies that the Funds are considering investing in, have invested in or are selling;
- Received from your representatives or advisers;

- Received from third parties, including administrators of products managed and advised by EOS IM Group; or
- Collected using cookies and other technologies when visiting the Website. Please refer to the “Cookies” section of this Policy for further information.

The Website uses cookies to distinguish you from other Website users and help ensure that the Website is operating smoothly.

If you make a recruitment application to us, to assess your skills and suitability for the work we will require personal information. We may collect personal information relating to past employment, qualifications and education, opinions from third parties about you, past employment history and other details about you, which may be provided to us by a third party that provides background screening services to us. We may also as part of the process collect, store, and use the following “special categories” of more sensitive personal information relating to race, ethnicity, religious beliefs, sexual orientation and political opinions, health, criminal convictions and offences.

If we collect or receive your personal information in the context of our provision of EOS IM Group’s services, we might receive information from third parties such as your firm, other parties relevant to the services we are providing (e.g., a colleague might request sign-up for you for an EOS IM Group educational event) and others such as regulators and authorities. That information could include your name, contact details, employment details and other information relevant to the services that we are providing.

Purposes for Collecting Personal Information

EOS IM Group may use the information held about you to:

- Provide services to the Funds managed by EOS IM Group;
- Support and participate in and the control of the investment process, including where permitted the processing of subscription applications and assessment of potential investments;
- Assess your suitability for products or services;
- Engage in activity in relation to our investment management services. This may include sending you product, services, research or events and other information related to the fund management service that may be of interest to you. Information provided and made available to investors, potential investors and clients may include personal data (such as information concerning EOS IM Group individuals);
- Fulfil any contract between you and EOS IM Group;
- Where you have applied for a position with us, review, assess and process your job application in terms of the role requirements;
- Comply with legal or regulatory obligations that we must discharge;
- Establish, exercise, or defend our legal rights, or for the purposes of legal proceedings;
- Log your use of our website or our other online services for our own legitimate business purposes, which may include the analysis of usage, measurement of site performance, generation of reports. This includes ensuring that the Website is effectively presented for you and for your computer or device;

- Look into any complaints or queries;
- Prevent and respond to actual or potential fraud or illegal activities, and
- Collate, process, and share any statistics based on an aggregation of information held by us, provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

We may also combine any information that you provide with the information received from other sources. This combined information may be used for the purposes set out above.

Grounds for using your personal information

We rely on the following legal grounds to process your personal information, namely:

- **Performance of a contract** - we may need to collect and use your personal information to enter into a contract with you, to perform our obligations under a contract with you and/or the Funds managed by EOS IM Group.
- **Legitimate interests** - we may use your personal information for our legitimate interests, some examples of which are given above.
- **Compliance with law or regulation** - we may use your personal information as necessary to comply with applicable laws/regulations.
- **Information about other products and services** – from time to time we may send you information about our services which we think may be of interest to you. You can tell us to stop this at any time by sending an email to privacy@eosinvestment.co.uk with “UNSUBSCRIBE” as the subject line.
- **Consent** - we may (but usually do not) need your consent to use your personal information. You can withdraw your consent by contacting us (see below).

Disclosure of your information

EOS IM Group may share your personal information within its European network offices for the purposes set out above, except as described in local national requirements and privacy laws.

A data transfer agreement will be applied, incorporating the Standard Contractual Clauses (“**SCCs**”) approved by the European Commission, to govern the transfer of personal data where (i) the data recipient as processor is based outside the European Economic Area (“**EEA**”) or the United Kingdom, in a jurisdiction which has not obtained a finding of adequate level of protection by the European Commission.

EOS IM Group may also share your personal information with selected third parties relevant to the services that we provide. This may include, but is not limited to, counterparties to litigation, professional service providers, regulators, authorities, and governmental institutions. The third parties may also include your current, prospective and former employers, in the event of reference checking and screening requirements for recruitment processes.

EOS IM Group may also share your personal information with third parties including in the following circumstances:

- If a Fund sells or buys any business or assets of portfolio companies fully or partly owned by Funds and managed by EOS IM Group, it may be necessary to share your personal information with the prospective seller or buyer;
- If EOS IM or other EOS IM Group entities are acquired by a third party, the personal information held by the applicable EOS IM Group entity will be one of the transferred assets;
- Service providers including lawyers, auditors, accountants, tax advisers, administrators, custodians, depositaries, distribution managers, AML service providers, tax information exchange service providers, event organisers or other agent, adviser, or service provider; or
- If there is a duty to share your personal information in order to fulfil any legal and/or regulatory obligation that applies to an entity in the EOS IM Group.

Control Over of Your Information

Access to your personal information by EOS IM Group's staff and third parties is restricted and processed on a need-to-know basis, in accordance with EOS IM Group's policies and procedures.

A key element of the data protection framework is the implementation of a model whereby the objective is to protect information by both design and default, safeguarding individuals information and rights.

In essence, this means we integrate or 'bake in' data protection into the processing activities and business practices, from the design stage right through the lifecycle. This is a legal requirement.

Thus, data protection by design is about considering data protection and privacy issues upfront in everything we do. It helps EOS IM and the wider EOS IM Group ensure that they comply with the GDPR and UK GDPR's fundamental principles and requirements, and forms part of the focus on accountability.

Where EOS IM Retains Your Personal Information

The information that EOS IM Group collects from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by EOS IM Group or EOS IM Group's suppliers operating outside of the EEA for the purposes set out above.

If EOS IM Group sells or buys any business or assets, it may be necessary to share your personal information with the prospective seller or buyer located outside of the EEA.

By submitting your personal information to EOS IM Group, you agree to this transfer, storing or processing. EOS IM Group will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with the Policy.

Data Retention

How long we hold your personal information will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

For example, we may keep some of your personal information for the purposes outlined above and for as long as we maintain an ongoing relationship with you to manage our business relationship or you are lawfully on our database.

After our business relationship is terminated, we may keep your personal data for up to 10 years after that date in order to maintain records in accordance with applicable laws and regulations which apply to the EOS IM Group and to respond to any regulatory requests or questions.

To the extent we are not permitted to delete your Personal Data for legal, regulatory, internal compliance and audit, or technical reasons we may keep your data for longer than 10 years. In addition, personal information data held in for example automated back systems will not be available for destruction.

In such circumstances, we will ensure your Personal Data and privacy is protected.

Your Choices and Rights

You have a number of legal rights in relation to the personal information that we hold about you and you can exercise your rights by contacting us using the details set out below.

These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information which we hold about you, in accordance with GDPR requirements and limitations.
- Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information. In particular, information that is subject to legal professional privilege.
- Requesting that we correct your personal information if it is inaccurate or incomplete.
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information, but we are legally required and/or entitled to retain it.
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally required and/or entitled to refuse that request.
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

- Lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us. We can, on request, tell you which data protection authority is relevant to the processing of your personal information.

Changes to This Policy

Any changes EOS IM Group may make to this Policy will be posted on the Website. Please check back frequently to see any updates or changes to this Policy.

Cookies

We have set out below a generic description of Cookies. Please refer to the Cookies Policy located on our Website for further details.

What are cookies?

- When you visit the Website, we may store some information (commonly known as a "cookie") on your computer. Cookies are pieces of information that a Website transfers to your hard drive to store and sometimes track information about you. Cookies are specific to the server that created them and cannot be accessed by other servers, which means that they cannot be used to track your movements around the web. Passwords, credit card numbers and identifiable personal information are not stored in cookies.
- A cookie helps you get the best out of the Website and helps us to provide you with a more customised service.

Which Cookies do we use?

- We use standard analytics Cookies to remember which web pages you visit and what you have done on previous pages or previous visits to our website. No personal information is collected by Google Analytics and all information collected is stored safely and securely to prevent unlawful third-party access.
- We use Google Analytics to measure how you are interacting with the Website to ensure that we help you get the best out of the Website.
- Further information on Google Analytics can be found on www.google.com/analytics/learn/privacy.html

Managing Cookies

- You can block or erase cookies from your computer if you want to (your browser's help screen or manual should tell you how to do this), but certain parts of the Website are reliant on the use of cookies to operate correctly and may not work correctly if you set your browser not to accept cookies.
- To find out more about cookies and how these affect your web-browsing experience one of the following websites contain further information:
<http://www.allaboutcookies.org>
<http://www.microsoft.com/info/cookies.mspx>

Contact

General Queries:

General queries should be sent by email to privacy@eosimgroup.com

The queries will be handled and allocated to the appropriate corporate entity. The Postal addresses of the corporate entities within EOS IM Group are included under Schedule 1.

Recruitment & HR

If you want to enquire about or submit an application related to an employment or contractual position within EOS IM or the European Network, please contact the relevant office. CV's and personal data should only be sent following this contact and agreement is reached for the relevant office to receive the information.

Complaints

If you require to make a complaint about our use of personal data, please send an email with the details of your complaint to privacy@eosimgroup.com. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred within the EU.

UK:

The Information Commissioner's Office ("**ICO**") is the UK data protection regulator/supervisory authority.

Italy:

The Italian Data Protection Authority (*Garante per la protezione dei dati personali*) is the Italian data protection regulator/supervisory authority.

Luxembourg:

The National Commission for Data Protection (*Commission Nationale pour la Protection des Données – CNPD*) is the Luxembourg data protection regulator/supervisory authority.

SCHEDULE 1

Corporate entities within the EOS Investment Management Group

EOS Investment Management Ltd

67 Grosvenor Street London W1K 3JN

Fysis Specialized Asset Management S.à r.l.

12C rue Guillaume J. Kroll | L-1882 | Luxembourg

EOS ReNewable Infrastructure GP SARL

12C rue Guillaume J. Kroll | L-1882 | Luxembourg

EOS Energy Partners Ltd

67 Grosvenor Street London W1K 3JN

EOS Private Equity Partners Ltd

67 Grosvenor Street London W1K 3JN

EOS Capital Partners Srl

Via Giacomo Puccini 3 | 20121 | Milan

EOS Private Equity Partners Srl

Via Giacomo Puccini 3 | 20121 | Milan

Manage Your Energy Srl

Via Giacomo Puccini 3 | 20121 | Milan

Funds connected to the EOS Investment Management Group

Fysis Fund SICAV-SIF S.C.A.

412F, route d'Esch, L-2086 Luxembourg

EOS Energy Fund II S.C.A SICAV-RAIF

412F, route d'Esch, L-2086 Luxembourg