



# Personal data protection policy

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## Introduction

The security of your personal data has always been a priority for the Tikehau Capital Group (“Tikehau Capital”) and we have increased security still further since the introduction of the General Data Protection Regulation (GDPR).

The Group’s entities are strongly committed to respecting freedoms and fundamental rights, particularly privacy and the protection of personal data.

Personal data consist of information that identifies you directly or indirectly as a natural person.

The GDPR aims to harmonise and strengthen European legislation regarding the storage, processing and transparency of personal data. In France, the GDPR enshrines and reinforces the main principles of France’s Data Processing, Data Files and Individual Liberties Act 1978. It increases individuals’ rights by giving them greater control over their data.

As an international organization, Tikehau Capital also complies with regulations relating to personal data in the countries in which the Group has offices, for example the Gramm-Leach-Bliley Act (GLBA) in the United States or the Personal Data Protection Act (PDPA) in Singapore.

## 1. Personal data protection

Tikehau Capital undertakes to provide its existing and prospective clients with the highest level of security for the the products and services it provides to them.

By protecting your personal data and by ensuring that the process is simple and transparent for you, Tikehau Capital intends to treat your personal data with respect and in an exemplary manner as part of a relationship of trust.

Tikehau Capital aims to ensure that its products and services are reliable and to develop them in an environment that is changing rapidly in both technical and regulatory terms.

Protecting your personal data is a crucial concern for Tikehau Capital.

By paying close attention to constantly changing security threats and risks, Tikehau Capital puts security at the heart of its day-to-day operations.

### 1.1. How do we collect your personal data?

As part of its activities, Tikehau Capital collects and processes some of your personal data.

This data is either collected directly from you or indirectly from our partners and service providers.

In particular, Tikehau Capital collects information about you:

- when you enter into an employment agreement with Tikehau Capital;
- when you subscribe to a fund managed by one of the Tikehau Capital Group’s asset management companies;
- when you interact with Tikehau Capital by email, on the phone or in person;

- when you visit one of our websites or use our app.

## 1.2. What personal data do we collect?

The personal data that Tikehau Capital collects includes your first name, last name, date of birth, email address and telephone number.

## 1.3. How do we use your personal data?

Tikehau Capital uses your personal data if the processing of that data is permitted under at least one of the following lawful bases:

- Complying with statutory obligations;
- Protecting Tikehau Capital's legitimate interests;
- Performing a contract or taking steps at the request of the data subject prior to entering into a contract;
- Acting in the public interest;
- Protecting the vital interests of the data subject;
- Acting under consent given by the data subject.

Tikehau Capital processes the personal data it collects for purposes including the following:

- Management and fulfilment of obligations relating to products, services and contracts;
- Analysis of some or all of the data in order to improve service quality, products or client experience;
- Management of the commercial relationship, including proposing products and services, unless you refuse;
- Complaint, pre-dispute and dispute management and defence of Tikehau Capital's rights;
- Production of statistics and financial reports that enable it to ensure the stability of its operations and fulfil commitments made to its clients;
- Security and continuity of its services;
- Efforts to combat fraud, which may lead to people being added to a list of those presenting fraud risks;
- Compliance with obligations such as tax and regulatory obligations and the prevention of money laundering and terrorist financing.

## 1.4. Who receives your personal data?

Your personal data may be collected by certain entities or departments of Tikehau Capital.

They may also be transferred outside of Tikehau Capital as part of the implementation or execution of your contract.

For example, they may be transferred to:

- Service providers to which it has entrusted certain activities (custodians of funds managed by its asset management companies, companies that host data in secure datacentres, cybersecurity providers, payroll processors, etc.);
- Banks involved in payment and collection transactions;
- Distributor partners and intermediaries;
- Government entities in relation to social-security and tax returns;

- Client companies as part of work to check assets under management in relation to collective contracts.

Tikehau Capital may also send some of your personal data to its various subsidiaries for regulatory or direct marketing purposes. Such transfers may only take place with your prior consent, except in the case of direct marketing aimed at the representative of a legal entity.

Tikehau Capital ensures that it has sufficient personal data protection guarantees (including from its partners and service providers) each time that data is transferred.

### **1.5. Where are your personal data stored and processed?**

Since personal data protection regulations differ between countries, Tikehau Capital has decided to favour hosting and processing this data in France or in another European Union member state.

Where necessary, Tikehau Capital forms agreements with its service providers that include protection measures consistent with regulations in force.

### **1.6. How long is your personal data stored?**

Tikehau Capital only processes personal data in a way that is adequate, relevant and limited to that which is necessary in relation to the purposes for which it is processed.

This requires, in particular, ensuring that the period for which the personal data is stored is limited to a strict minimum.

That storage period is variable and depends on the type and purpose of the data, and on the statutory and regulatory rules to which they are subject.

For example, personal data processed for direct marketing purposes is only stored for three years after the last time the prospect made contact.

To comply with its statutory obligations, Tikehau Capital uses monitoring techniques intended to prevent money laundering and terrorist financing and violating international sanctions regulations. Data used for this purpose is stored for five years from the end of the data subject's relationship with a Tikehau Capital Group entity. Data relating to transactions carried out by individuals are stored for five years after the transactions were carried out, including where the relationship with a Tikehau Capital Group entity has ended. For this purpose, information may be sent to Tracfin in France, to the NCA<sup>1</sup> in the UK or to other local Financial Intelligence Unit.

### **1.7. What rights do you have in relation to your personal data?**

Under data protection regulations, you have the following rights:

- a right to access and receive information about you and the way it is processed;
- a right to rectification, including the ability to supplement and update your information;
- a right to portability, i.e. to have information about the person making the request sent to a third party where technically possible, it being stipulated that this right only applies to data provided directly by the person concerned;
- a right to determine what happens to your data in the event of your death;
- a right to erase your data;
- a right to restrict the processing of your data;

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<sup>1</sup> National Crime Agency.

- a right to object to the processing of your data;
- a right to withdraw consent to use your data.

Tikehau Capital informs you that it reserves the right not to honour certain requests regarding erasure, restriction, objection or withdrawal of consent in cases where the law requires it, where it is consistent with its contractual obligations, where it is in the public interest (efforts to combat money laundering and terrorist financing) and where Tikehau Capital has a legitimate interest in doing so.

In addition, where requests are manifestly unfounded or excessive, in particular because of their repetitive character, Tikehau Capital may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- refuse to act on the request.

However, Tikehau Capital bears the burden of demonstrating the manifestly unfounded or excessive character of the requests.

### **1.8. How can you exercise your rights?**

You can exercise your rights by sending your request (enclosing a proof of identity):

- by post to the Data Protection Officer (DPO) at Tikehau Capital, 32 rue de Monceau, 75008 Paris;
- by email to the Data Protection Officer (DPO) at [dpo@tikehaucapital.com](mailto:dpo@tikehaucapital.com).

Tikehau Capital will reply within one month. If your request is complex or if you have made a large number of requests, that timeframe may be increased to three months.

Requests must only relate to complaints made under personal data protection regulations.

### **1.9. How can you make a complaint to the competent Authority?**

If, despite all the care with which Tikehau Capital processes your personal data, you feel that Tikehau Capital has not satisfied your request, you can make a complaint to CNIL (French Data Protection Commission) on its website [www.cnil.fr](http://www.cnil.fr) or by post to the following address: 3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 07.

In the UK, if you are unhappy with the response received from Tikehau Capital, you should contact the Information Commissioner's Office (ICO) by email [casework@ico.org.uk](mailto:casework@ico.org.uk), telephone 0303 123 1113 or by post to the following address: Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire. SK9 5AF.

If it is necessary for you, depending on your nationality, to contact another competent authority, you can find the contact details of the European competent authorities at the following address: [https://edpb.europa.eu/about-edpb/board/members\\_fr](https://edpb.europa.eu/about-edpb/board/members_fr).

Your complaint must only relate to requests made under the personal data protection regulations.

## 1.10. How is your personal data protected?

Tikehau Capital ensures that the processing of personal data is subject to the highest level of security.

Tikehau Capital guarantees that “appropriate technical and organisational measures” are taken depending on the type of data, the processing purposes and the associated risks.

If an incident takes place that leads to a personal data breach, Tikehau Capital will report it to the competent supervisory authority and if necessary will inform the data subjects at the earliest opportunity.

## 2. Managing cookies

Tikehau Capital has set up a system allowing you to manage the way in which websites store cookies on your devices.

If you have not set your cookie preferences, you will be invited to follow a link to a page where you can do so.

### 2.1. What is a cookie?

A cookie is a file downloaded by your internet browser that logs your visit to a website. It is stored on your device (computer, tablet, mobile phone etc.)

Cookies can be used for various purposes related to your internet use. For example, they can be used to store your login details or browsing history for use by Tikehau Capital for statistical or advertising purposes.

The information obtained using cookies can be aligned and combined in order to offer you services that match your profile.

### 2.2. What cookies are used by Tikehau Capital?

Tikehau Capital uses a limited number of cookies that are necessary for its websites to function.

Other cookies fall into four distinct categories:

#### a. Performance cookies for optimal browsing

These are used to improve your browsing experience on Tikehau Capital's websites and to help you make the best use of their various functions.

In particular, they allow a website's presentation to be adapted to your display preferences (language, display resolution, operating system etc.), depending on your peripherals and the display or media player software used by the peripherals.

#### **b. Functional cookies**

These store your browsing preferences on Tikehau Capital websites by saving the various choices you made on your last visit.

This allows Tikehau Capital to offer you the same preferences again, making it easier for you to use its websites.

#### **c. Audience measurement cookies**

The aim is to record your visits to Tikehau Capital websites for statistical purposes and to analyse your browsing behaviour for optimisation purposes.

These cookies store information about your browsing for use on your subsequent visits:

- the pages you have visited;
- the times and dates at which you visited them;
- the number of pages you viewed;
- the IP address you used.

#### **d. Targeting cookies**

These cookies record your visits to Tikehau Capital websites, the pages you have visited and the links you have followed. Tikehau Capital will use this information to make its websites and advertising displayed on it more relevant to your interests.

Tikehau Capital may also share this information with third parties for this purpose, so that when you are on another website, you may be shown advertising based on your browsing patterns on Tikehau Capital's websites. Tikehau Capital may also show you advertising on its websites based on your browsing patterns on other websites that it has obtained from its advertising partners.

### **2.3. Managing your cookie preferences**

You can accept or refuse cookies that are not essential for the functioning of Tikehau Capital websites at any time, for example by adjusting your cookie settings using the cookie preferences management tool provided for that purpose.

If you do not set your cookie preferences, no non-essential cookies will be stored on your device, but this may affect your browsing experience on Tikehau Capital websites.

### **2.4. Storage period**

Cookies may be stored on your devices for up to thirteen (13) months, except for purely technical cookies, for which the storage period is unlimited.