

PARVUS PRIVACY & COOKIES POLICY – NON-INVESTORS

This Privacy and Cookies Policy ("**Policy**") is provided by:

- (a) Parvus Asset Management Jersey Limited; and
- (b) Parvus Asset Management (Services) LLP,

and their affiliates from time to time. Throughout this Policy, all references to "**Parvus**", "**we**", "**us**" and "**our**" refers to any and all of the entities above, and any other affiliated entities from time to time.

In this Policy:

- "**Personal Information**" means information relating to a living individual and from which that individual can be identified.
- "**Data Protection Legislation**" means any law applicable to Parvus from time to time relating to the processing of Personal Information and/or privacy, including the Data Protection (Jersey) Law 2018, the Data Protection Authority (Jersey) Law 2018, the UK Data Protection Act 2018, the UK General Data Protection Regulation, the EU General Data Protection Regulation and Privacy and the Electronic Communications (EC Directive) Regulations 2003.

Parvus is committed to safeguarding the Personal Information of third parties ("**you**") including our clients, investors, suppliers and all other visitors to the websites at www.parvusfunds.com and/or www.parvusfunds.je (the "**Parvus Websites**"). We will ensure that your Personal Information is handled in accordance with the Data Protection Legislation. This Policy sets out how we will use and protect any Personal Information collected by us when you visit the Parvus Websites, together with other Personal Information you may provide to us or which we acquire through our day-to-day business. Please note that we also have specific privacy notices that apply to:

- (i) Personal Information relating to potential, current and past investors – please see [Parvus Privacy Policy - Investor Data.pdf](#); and
- (ii) Personal Information relating to our staff (including partners, directors, officers, employees and temporary personnel) – please see our separate Staff Privacy Notice.

We will ordinarily process your Personal Information as a "**data controller**" (as defined in the Data Protection Legislation). The data controller in respect of your Personal Information will be one or more of the Parvus entities listed above.

This Policy covers the following topics:

1. Personal Information that we collect from you
2. Personal Information that we receive from others
3. Sensitive Personal Information
4. What we do with your Personal Information
5. How we share your Personal Information
6. International transfers
7. Data retention and security
8. Third party links
9. Our use of cookies
10. Your rights
11. Changes to this policy
12. Contact details and complaints

1. PERSONAL INFORMATION THAT WE COLLECT FROM YOU

We may collect your Personal Information directly from you. Most commonly, we would collect Personal Information directly from you in the following circumstances:

- (i) Where you engage with us (e.g. by sending us emails, contacting us via telephone, visiting or making an enquiry through the Parvus Websites, entering into a contract with us or preparing to enter into a contract with us), you may provide us with Personal Information including your name and contact details (e.g. your work and/or home address, email address and telephone number).
- (ii) Where you apply for a job with us, you may provide us with Personal Information (e.g. the information in your CV, information provided during job interviews, and information about your right to work). Where we offer you a job, you may provide us with additional Personal Information (e.g. your national insurance number, social security number (or equivalent), identity documentation, date of birth and bank details).
- (iii) Where you make use of our Parvus Websites, we may collect information about your use of the Parvus Websites (e.g. your IP address and choice of web browser). See section 0 of this Policy for more information on our use of cookies.
- (iv) Some of our offices have CCTV cameras, which are generally used for the purpose of crime prevention. We will clearly display appropriate notices where CCTV cameras are used, but please note that when you visit our offices, our CCTV cameras may capture footage of you. Some of the communal areas in our premises have CCTV cameras that are under the control of a third party, and therefore you should consult any notices they display and their privacy statements for more information on their processing of your Personal Information as data controllers.
- (v) In order to comply with our legal obligations, we record all calls made on certain partners, officers and employees' telephone lines. If your call is recorded, the recording may contain Personal Information that you provide during the call.

2. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHERS

We may collect your Personal Information from third parties. For example:

- (i) where we or any of our service providers conduct due diligence on prospective clients, suppliers or investee companies;
- (ii) your employer may provide your Personal Information to us in connection with a service they provide to us or in connection with services that we provide to our clients;
- (iii) our staff may give us emergency contact information as part of our emergency scenario planning, and may also give us details of their dependents and of other people in relation to their employee benefits arrangements;
- (iv) we may receive information from past employers and others concerning your employment history and suitability for the role where you apply for a job with us; and
- (v) where a third party controls a CCTV camera that is in a communal area of our premises, we may request CCTV footage from that third party in limited circumstances, for example where we suspect the commission of a criminal offence.

Where this is the case, the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Policy as to how we will process your Personal Information and obtaining any relevant consents from you. However, once we are holding it, we will only handle Personal Information in accordance with this Policy and Data Protection Legislation.

Where you provide Personal Information on behalf of another individual, you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Policy for information on how we process their Personal Information.

3. SENSITIVE PERSONAL INFORMATION

"Sensitive Personal Information" is Personal Information concerning an individual's (i) racial or ethnic origin, (ii) political opinions, (iii) religious beliefs or other beliefs of a similar nature, (iv) membership of a trade union, (v) physical or mental health or condition, (vi) sexual life or orientation, (vii) commission or alleged commission of any offence or any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

We may process your Sensitive Personal Information, for example if you provide us with Sensitive Personal Information when you apply for a job with us. Your provision of Sensitive Personal Information to us is entirely voluntary. However, we may be unable to carry out some activities necessary to process your application, instructions or other requests without the provision of such information.

4. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We may process your Personal Information because the processing is necessary for us to perform our contract with you or take steps at your request prior to entering into a contract, because it is necessary for us to comply with our legal obligations, and/or because the processing is necessary for our legitimate interests or the legitimate interests of a third party (and these interests are not outweighed by the rights and freedoms of the individual). Our legitimate interests include the carrying out and improving our business, analysing the use of the Parvus Websites and servicing and supporting our clients and staff.

We will only process your Sensitive Personal Information if, in addition to the grounds set out in the previous paragraph, you have given your express consent to the processing, the processing is necessary for the purpose of carrying out our obligations and exercising our or your rights in the field of employment, the processing is necessary for reasons of substantial public interest on the basis of domestic law, you have made the Sensitive Personal Information public and/or the processing is necessary for the establishment, exercise or defence of legal claims. If we rely on your express consent to the processing, we will let you know (and give you the chance to withdraw consent).

Where Parvus requires Personal Information to comply with our legal or contractual obligations, the provision of such Personal Information is mandatory; if it is not provided, we will not be able to meet obligations placed on us.

We will generally use your Personal Information for one or more of the following purposes:

- (i) to perform any agreement that we may have with you or your employer, or to enter into an agreement with you or your employer;
- (ii) to supply our services and provide support in respect of those services;

- (iii) to communicate with you in respect of our services or any agreement that we have with you or your employer;
- (iv) to improve our Parvus Websites and other services;
- (v) to comply with our legal obligations;
- (vi) to contact you if you are listed as an emergency contact for one of our staff members, or to administer our employee benefits arrangements;
- (vii) hiring and recruitment purposes;
- (viii) the prevention and detection of crime;
- (ix) for our internal business processes, such as updating and maintaining records; and
- (x) for compliance, quality, business analysis, training and related purposes.

Where you have explicitly consented or where we otherwise have a right to do so, we may also use your Personal Information for marketing purposes. You have the right to ask us not to process your Personal Information for marketing purposes, by following the instructions outlined in any marketing communications you receive, or by using the contact details in section 12 of this Policy.

5. HOW WE SHARE YOUR PERSONAL INFORMATION

Personal Information may be shared with Parvus group companies, third party service providers to Parvus (such as IT service providers), appointed representatives and our professional advisors, in each case for one or more of the purposes referred to above. Personal Information shared with other Parvus group companies will be processed in accordance with this Policy and as otherwise described in any additional policies or notices provided to you from time to time. We will never sell your Personal Information.

Personal Information may also be shared with government authorities, law enforcement agencies, courts and/or similar bodies (i) if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering obligations or anti-terrorist financing obligations), (ii) to assist a regulator or any competent authorities (including tax authorities), courts and/or similar bodies, (iii) to enforce our rights under any agreement we may have with you, (iv) to carry out an internal investigation, or (v) otherwise to protect the rights, property, or safety of Parvus, our group companies and our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us, so that they can continue to provide the services you have requested/maintain any existing relationship (as applicable).

6. INTERNATIONAL TRANSFERS

It may be necessary for us to transfer your Personal Information outside Jersey, the UK or the European Economic Area ("EEA"). Your Personal Information may also be accessed by staff operating outside Jersey, the UK or the EEA who work for us or for one of our suppliers or group companies. This includes staff engaged in, among other things, the provision of support services.

We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside Jersey, the UK or the EEA. This means that we will only transfer Personal Information to our non-Jersey, non-UK and/or European offices (as applicable) and Funds and other third parties outside Jersey, the UK or the EEA if (i) that third party is situated in a country that has been confirmed by the European Commission or the Jersey or UK Government (as relevant) to provide adequate protection to Personal Information, (ii) that third party has agreed (by way of written contract or by some other form of data transfer mechanism approved by the European Commission or the Jersey or UK Government) to provide all protections to Personal Information as required by the Data Protection Legislation and we have undertaken a transfer risk assessment in respect of the transfer (as required), or (iii) we have your explicit consent to do so (such as where you have requested us to make the transfer). Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by contacting us using the details in section 12 of this Policy.

7. DATA RETENTION AND SECURITY

We will only retain your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of such information, the purposes for which we process such information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We implement technical and organisational measures to safeguard your Personal Information. Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your Personal Information transmitted via the Parvus Websites; any transmission is therefore at your own risk. Further, where you have chosen a password which allows you to access certain parts of the Parvus Websites, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

8. THIRD PARTY LINKS

The Parvus Websites may contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

9. OUR USE OF COOKIES

A cookie is a small file that is sent to your browser from a web server and is stored on your computer. We use cookies in order to make the Parvus Websites work, to make the Parvus Websites work more efficiently (e.g. by remembering information about your preferences), and to gather information on use and performance of the Parvus Websites (for example, to analyse web traffic and identify which pages of the Parvus Websites are being used).

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Parvus Websites and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings).

In particular, we may use the following cookies on the Parvus Websites:

- (a) **Strictly necessary cookies.** These cookies are essential in order to enable you to move around the Parvus Websites and use their features, such as accessing secure areas.
- (b) **For functionality.** These cookies and similar technologies remember choices a user makes. We use these cookies to provide the site user with an experience more appropriate with their selections and to make their use of the platform more tailored.
- (c) **Performance cookies.** These cookies collect information about how visitors use our Parvus Websites, for instance which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Parvus Websites work.

You can manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. Note, however, that if you block all cookies (including strictly necessary cookies) via your browser settings you may not be able to access or use all or parts of our Parvus Websites.

You can also find more information about cookies generally here: <https://www.allaboutcookies.org/verify>.

10. YOUR RIGHTS

Subject to some exceptions, you have the right to ask Parvus for a copy of the Personal Information we hold about you, and to ask us to (i) make any changes to ensure that any Personal Information we hold about you is accurate and up to date, (ii) erase or stop processing any Personal Information we hold about you where there is otherwise no longer a legal ground for us to hold it, (iii) in some circumstances, transfer any information we hold about you to a specified third party, and (iv) in some circumstances, restrict the processing of your Personal Information.

You also have the right to ask us not to process your Personal Information for marketing or research purposes and to object to processing in some circumstances, such as where Parvus relies on its legitimate interests to process your Personal Information.

In addition, where we have asked for your consent to process your Personal Information, you have the right to withdraw that consent at any time. If you ask to withdraw your consent to Parvus processing your Personal Information, this will not affect any processing which has already taken place but this may affect our ability to process your Personal Information in accordance with this Policy.

Please note that these rights may be limited (e.g. if fulfilling your request to access your Personal Information would reveal Personal Information about another person, or if you ask us to delete Personal Information which we are required by law to keep or have compelling legitimate interests in keeping). Where applicable, we will inform you of relevant exemptions we rely upon when responding to any request you make.

If you want to exercise any of your rights or withdraw your consent to processing, please contact us by using the contact details in section 12 of this Policy. Please note that we may need to request proof of identification to verify your identity.

11. CHANGES TO THIS POLICY

Parvus may amend this Policy at any time. Any changes to this Policy will be posted on the Parvus Websites. You should check the Parvus Websites to make sure you are happy with any

changes. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) the Parvus Websites.

12. CONTACT DETAILS AND COMPLAINTS

If you have any questions or concerns about how Parvus processes your Personal Information, or you want to exercise any of the rights described above, please contact data@parvusfunds.com.

If you are unhappy with how we have handled your Personal Information, you may make a data protection complaint directly to us by emailing data@parvusfunds.com, by post to the Chief Privacy Officer at Parvus Asset Management Jersey Limited, Second Floor, No. 4 The Forum, Grenville Street, St. Helier, Jersey, JE2 4UF (in respect of Parvus Asset Management Jersey Limited) or at Parvus Asset Management (Services) LLP, 7 Clifford Street, London, United Kingdom, W1S 2FT (in respect of Parvus Asset Management (Services) LLP), or through any other channel. We will acknowledge your complaint within 30 days and will respond to it without undue delay.

You also have the right to make a complaint to the Jersey Office of the Information Commissioner (which is the supervisory authority in Jersey) in respect of Parvus Asset Management Jersey Limited, or to the Information Commissioner's Office (which is the supervisory body in the UK) in respect of Parvus Asset Management (Services) LLP, or, if you are an EU data subject, one of the competent [European supervisory authorities](#).

Rev. October 2026