

PRIVACY POLICY

1. INTRODUCTION

SCP Group S.à.r.l and SCP Group Advisory Limited ("**we**", "**us**", or "**our**") are part of Swan Capital Partners, and we may collect and use information about you from which you can be identified ("**personal data**"). When we mention "**we**", "**us**" or "**our**" in this privacy policy, we are referring to SCP Group S.à.r.l as the relevant group company responsible for processing your personal data – the "**controller**" of your personal data.

In some circumstances our other group companies will be the controller of your personal data, we will let you know where that is the case. The information provided in this privacy notice still applies.

This privacy policy provides information on: (i) the personal data we collect from you; (ii) the purposes for which the personal data is processed and our lawful basis for doing so; (iii) how long we will retain your personal data for; (iv) how your personal data is shared by us; and (v) your rights in relation to your personal data and how you can exercise them.

This privacy policy is supplemental to and should be read together with any terms of use that apply to the services or website which are presented to you. If you have any questions about this privacy policy or our processing activities, please contact us as follows:

By mail: 16 rue Erasme, Luxembourg, L-1468, Grand-Duchy of Luxembourg

By email: info@swancappartners.com,

in each case, marked for the attention of the General Counsel

2. WHAT DATA DO WE COLLECT ABOUT YOU / HOW DO WE COLLECT IT

We collect your personal data **directly** when you engage with us including when you: (i) visit our website; and/or (ii) communicate with us, e.g. via email or telephone including via the email address on our website.

We may also receive your personal data **indirectly**, for example when (i) we are conducting due diligence and your personal data is uploaded to the data room / shared with us through other transaction processes; (ii) we receive personal data from our portfolio companies (by virtue of our role as investment adviser); and/or (iii) we collect Business Data from local company registries, professional sites (such as LinkedIn and Bloomberg) or international search databases.

We collect different categories of information which we have grouped together as follows:

CATEGORY	DETAILS
Identity data	Name, title, place and date of birth, nationality, country of residence/domicile and personal characteristics including age, passports or national identification card (as applicable) and proof of address.
Contact data	Name, title, billing/correspondence address, home address, email address, contents of communications (where this relates to you), telephone number and other professional contact details.
Business data	Directorships, professional information and emails.
Browser or device generated information	Domain, IP address, date, time and duration of your visit, browser type, operating system, page visits, internet traffic and other information about your computer or device.

We also collect, use and share **anonymised data** such as demographic or statistical data which is **not** reasonably likely to reveal your identity. If we combine or connect anonymised data with other data so that it can directly or indirectly identify you, the combined data is personal data which will be used in accordance with this privacy policy.

We generally do not collect or process special category personal data, but will inform you of this at the time if this changes.

3. COOKIES

Cookies are small text files containing small amounts of information which are downloaded and may be stored on your device e.g. your computer (or other internet enabled devices, such as a smartphone or tablet). We use **essential cookies only** on our websites, to support website security and basic functionality (e.g. network management / accessibility of core features of our website). The following link contains further information about cookies: <https://www.internetcookies.com/>

4. OUR LAWFUL BASIS

Under data protection laws, we must have a lawful basis to process your personal data – this is set out in section 5 below. This will either be, **necessity for performance of a contract** (whether in anticipation of an arrangement with us e.g. exploring an investment or other business opportunity or where we have terms of business to provide a service to you), our **legitimate interests**, **legal obligation** and/or **consent**.

If you provide us with your **consent** to processing, you can withdraw it at any time and we will stop the processing activities based only on consent as a lawful basis. We may still process the data if we have another lawful basis for processing (this will be for more limited purposes e.g. back-up storage). Where we need to collect personal data due to a **legal obligation**, or for **performance of a contract** this will be indicated to you (i.e. with an *), and if you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. We will notify you of this at the time.

5. WHY WE COLLECT YOUR PERSONAL DATA

PURPOSE	TYPE OF DATA	LAWFUL BASIS	RETENTION PERIOD
Operational matters (including financial and fund administration)	- Identity data - Contact data - Business data	- Legitimate interests to provide investment advisory services in line with market standards and practices, in respect of portfolio interests across Europe, including pipeline opportunities - Contract	Generally 7 years following collection <i>(Note: this is subject to change on the basis of our contractual undertakings and local legal requirements e.g. statutes of limitations to bring a claim).</i>
Anti-money laundering compliance and verification checks	- Identity data - Contact data	Legal obligation	As required by the applicable law.
Deal-specific data room information <i>Note: this data is collected indirectly, throughout the transaction processes.</i>	- Identity data - Contact data <i>And additional information that may change on a deal-to-deal basis – in line with the additional transparency information you receive at the relevant time.</i>	- Legitimate interests to pursue pipeline opportunities in line with market standards and practices of an investment advisory business operating in Europe - Contract	7 years following completion of the relevant deal, or 18 months following termination of the discussions.
Marketing (e.g. for capital raising purposes)	Contact data	- Consent (where required by privacy laws or marketing laws, as applicable) - Where consent is not required, we rely on	Data will be processed until consent is withdrawn or you have opted-out (as appropriate).

PURPOSE	TYPE OF DATA	LAWFUL BASIS	RETENTION PERIOD
		our legitimate interests described in section 5	
Protect and improve our website	• Browser or device generated information, including IP address • Contact data	• Legitimate interests to protect our intellectual property and confidential information and improve our engagement with website visitors	2 years
Comply with other relevant legal or regulatory obligations	• Identity data • Contact data	• Legal obligation	As required by the applicable law.

6. MARKETING COMMUNICATIONS

If you solicit certain information (e.g. you contact us to raise an enquiry via email), we will share that information which might including marketing communications.

Some privacy laws or marketing laws, as applicable, require us to have your consent to send direct electronic marketing that isn't solicited (e.g. via emails or SMS or direct social media messages).

You may also receive indirect marketing from us by way of online advertisements (e.g. adverts on third party websites that aren't targeted to particular individuals) or general marketing communications from us- (e.g. postal mail) on the basis of our legitimate interest to undertake advertising activities linked to investment opportunities and to develop, deliver and maintain relevant services and marketing communications.

You can withdraw your consent or ask us to stop sending you direct marketing messages at any time by contacting us at info@swancappartners.com, then we will no longer conduct any direct electronic marketing unless you opt-in again at a later point.

7. WHO WE SHARE YOUR DATA WITH

We share your personal data with the parties set out below:

- **Internal third parties** – we are part of a group enterprise and share your personal data with other companies in that group based within the EEA and the UK.
- **External third parties** – we share your personal data with external third parties namely:
 - System administration service providers (including IT and data storage providers and data management platform providers);
 - Other service providers such as software providers, payments services providers, and travel management companies;
 - Any party who has a legal need to conduct due diligence, for example financial institutions;
 - Regulators, local authorities and government bodies, including the police and taxation authorities, to comply with any legal or regulatory requirements or formal/informal investigations;
 - Courts, parties to litigation and professional advisers where we reasonably deem it necessary in connection with the establishment, exercise or defence of legal claims;
 - A purchaser or parties interested in purchasing or investing in any part of our business (and professional advisers supporting on the transaction); and
 - Professional advisers such as lawyers, accountants, auditors, insurance claims managers, facility management providers and insurance companies (including brokers).

8. INTERNATIONAL TRANSFERS

If we transfer your personal data out of the UK or the EEA, we take steps to ensure that an equivalent level of protection is ensured, particularly by one of the following safeguards:

- If we transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and/or the UK Information Commissioner's Office. For further details of countries that are considered "adequate", please see [European Commission: Adequacy of the protection of personal data in non-EU countries](#) and [ICO: International Transfers](#); and
- Where we use certain service providers, we use specific contracts approved by the European Commission and/or the UK Information Commissioner's Office. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#) and [International data transfer agreement and guidance | ICO](#).

You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us as if you would like further information or to request a copy where the safeguard is documented (which may be redacted to ensure confidentiality).

9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We apply a general rule of keeping personal data only for as long as required to fulfil the purposes for which it was collected. In general, we retain your personal data for a period of time corresponding to a statute of limitation setting out the period during which legal claims may be filed in court. For example, we'll retain your personal data during the statute of limitation period, to maintain an accurate record of your dealings with us and, as applicable, assert or defend against a legal claim.

More specific retention periods are outlined in section 5 above. Following the expiry of the retention periods outlined in section 5 we dispose of your information by deleting data from our document management system.

10. YOUR RIGHTS

Under data protection laws, you have various rights which are set out below. The rights available to you depend on our reason for processing your personal data.

You are not required to pay any charge for exercising your rights, although we may charge a reasonable fee if your request is unfounded, repetitive or excessive. We have one month to respond to you (unless you have made a number of requests or your request is complex, in which case we may take up to an extra two months to respond but we will inform you where this is the case). Please note that, where we ask you for proof of identification, the one-month time limit does not begin until we have received this. If we require any clarification and/or further information on the scope of the request, the one-month deadline is paused until we receive that information.

RIGHT TO OBJECT TO PROCESSING. You can object to processing of your personal data where we are relying on a legitimate interest at any time. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or we need to process the personal data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

You can also object to processing of your personal data for direct marketing purposes at any time. If you object, we will stop that processing.

- **Right of access.** You can ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process. These exemptions include situations where the information requested also includes personal data about somebody else.
- **Right to rectification.** You can ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure.** You can ask us to erase your personal data in certain circumstances.
- **Right to restriction of processing.** You can ask us to restrict the processing of your information in certain circumstances.

- **Right to withdraw consent.** Where we are relying on consent to process your personal data, you can withdraw it at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right to data portability.** This only applies to information you have given us. You can ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on performance of a contract and/or your consent.

You also have the right to make a complaint at any time to a supervisory authority, including your local authority.

If you are based in Luxembourg, this will be the National Commission for Data Protection, who can be contacted here: **National Commission for Data Protection**, 15, Boulevard du JazzL-4370 Belvaux.

Helpline number: (+352) 26 10 60-1, <https://cnpd.public.lu/en/support/contact/contact-prive.html>

If you are based in the UK, this will be the Information Commissioner's Office, who can be contacted here: **Information Commissioner's Office**, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Helpline number: 0303 123 1113 <https://www.ico.org.uk>

If you are based in Germany, your local supervisory authority will be the one competent for the Federal State in which you live. A list of these authorities can be found [here](#).

We would appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us in the first instance using the details at the start of this privacy policy.

11. CHANGES TO THIS PRIVACY POLICY

We will make changes to this privacy policy from time to time, e.g. to keep it up to date or to comply with legal requirements or changes in the way we operate our business. Any changes or updates we may make will be posted on this page in advance so that you are aware of the impact to our data processing activities before you continue to engage. If we have your contact details on file we will notify you in advance of any significant changes that are material or may otherwise impact you. Please check back frequently to see the latest version on our website.

LAST UPDATED: APRIL 2025