

## DATA PRIVACY POLICY

Creation date : April 29, 2020

Last update : September, 2023

*Personal data processing is subject to EU regulation 2016/679 of April 27th 2016 “GDPR”, Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95 / 46 / EC (general data protection regulation)..*

### 1. Scope of this policy

This policy aims at providing detailed information on how Axeleo Capital collects, protects and stores your personal data, as well as the purpose for which it is used and on potential sharing. This policy also aims to inform you of your rights concerning the collection and processing of your personal data and how you can exercise your rights.

Axeleo Capital can update its data policy protection at any time and put it online, indicating the revision date. We invite you to visit Axeleo Capital website on a regular basis to keep yourself informed of the latest updates.

The elements concerned by the following policy are taken up and updated regularly by the company’s Data Privacy Officer (DPO) under the company’s processing register.

### 2. Who are we?

Axeleo Capital is a French société par actions simplifiée with share capital of €230,940, whose registered office is located at Wojo 4 place Amédée Bonnet - 69002 Lyon, France, registered in Lyon Trade and Companies Register under the unique number 824 690 002.

Axeleo Capital is licensed as a management company of Alternative Investment Funds (AIF) by the French Autorité des Marchés Financiers since March 2017 (license number n°GP-17000006).

### 3. What are the personal data used by Axeleo Capital?

Axeleo Capital can collect different kind of personal data related to you and via contracts signed between you and Axeleo Capital, Typeform contact forms or Google Form, website contact form or even Mailchimp:

- Your identification data (first name, last name, nationality, date and place of birth, gender),
- Your contact details (postal address, email address, phone number) ;
- Your family status (for instance marital status, number of dependents),
- Information related to your education, profession, professional experience and financial knowledge;
- Data related to your subscription to financial products managed by Axeleo Capital, in particular banking, tax, financial and transactional data, experience with financial products and services,
- Data collected in the context of exchanges, on its website, on social networks, at meetings or trade fairs, interviews, telephone conversations, e-mails.

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These data are collected with your explicit consent and solely for the purposes listed below.

Axeleo Capital may also collect personal data by accessing databases (most often compiling public data) managed by third-party companies such as Pappers, Phantombuster, Refinitiv-Worldcheck, LinkedIn Sales Navigator. This list may change from time to time and is available on request from Axeleo Capital's DPO.

As an employer, Axeleo Capital also collects personal data on its employees and candidates.

#### **4. What are the uses of Axeleo Capital's data collection?**

Axeleo Capital keeps up to date a register of the processing which lists the different purposes of processing which the main ones are these following:

- To conformed to its legal and reglementary obligations.
- To conclude a contract with you or to take contact with you, at your request to conclude a contract.
- To communicate on a regular basis on its news or the ones of its participations
- To invite you to take part to events organized by Axeleo Capital
- For application management and personnel administration as part of its role as employer

#### **5. With who Axeleo Capital can share, store or transfer your personal data?**

Your personal data will be used exclusively by Axeleo Capital and will not be sold or passed on to third parties. It may, however, be communicated in certain cases:

- To judicial or financial authorities, state agencies or public bodies, at their request and within the limits authorized by regulations;
- To partners or service providers performing services on behalf of Axeleo Capital or the funds managed by Axeleo Capital as part of its investment fund activity: CRM for monitoring the marketing of fund units, CRM for monitoring dealflow and the investment portfolio, custodians, statutory auditors, periodic control service providers;
- To service providers performing services on behalf of Axeleo Capital in the context of its role as employer: payroll, management of expense accounts, complementary health insurance, management of job applications and all other personnel administration services.
- To service providers performing services on behalf of Axeleo Capital as part of its communications and events activities.

The service providers or subcontractors to whom Axeleo Capital may transfer your personal data are mainly located in the European Union and are therefore subject to the same requirements in terms of personal data protection.

Axeleo Capital limits as much as possible the subcontractors or partners choice who process personal data in a country outside the EU. Only the following partners carry out all or part of their activities outside the European Union: Google : United States of America (Analytics & Cloud)

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- Edda: United States of America (CRM)
- Eventbrite: United States of America (Events)
- Mailchimp United States of America (Emailing)
- Monday: United States of America (CRM)
- Docusign: United States of America (online signing)
- Notion: United States of America (shared workplaces :

These partners committed to respect these obligations included in the GDPR.

## 6. How long are your personal data stored?

Axeleo Capital stores your personal data as long as needed to realize the purposes they were collected and processed for.

The retention periods for personal data are based on Axeleo Capital's regulatory or legal obligations. Personal data is deleted or made anonymous:

- 5 years from the end of the contractual relation (transfer of units or liquidation of the Fund) for unitholders of units of FIAs managed by Axeleo Capital;
- 3 years from the last active contact for prospects, unless required by law. In the event of suspicion of money laundering or terrorist financing, data is kept for 5 years in France;
- 5 years from the end of the contractual relationship (end of employment contract) for employees.
- 2 years for unsuccessful job applications.

## 7. How to ensure personal data security?

Axeleo Capital put in place IT and organizational security measures to monitor personal data protection. These measures relied on:

- Management of tool access rights (license for each user)
- Partners or subcontractors selection having IT security certificates, IT system security policy, private data policy
- Rules governing the external distribution of confidential information and documents and/or documents containing personal data about customers or prospective customers
- Raising staff awareness: this document is sent to all new employees as part of their induction process.
- Finally, in the event of a personal data breach, Axeleo Capital undertakes to inform the CNIL within 3 days of becoming aware of it, and to inform the persons concerned as soon as possible.

## 8. What are your rights and how can you exercise them?

Selon la législation applicable à votre situation, vous pouvez exercer les droits suivants :

- Right to information: you have the right to be informed in a precise, accurate, transparent and accessible manner;

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- Right of access: you can obtain information about the processing of your personal data, as well as a copy of this data;
- Right of rectification: if you consider that your personal data is inaccurate or incomplete, you may request that it be rectified or completed accordingly;
- Right to erasure: you may request the deletion of your personal data, to the extent permitted by law;
- Right to restrict processing: in certain cases, you may request that we restrict the processing of your personal data;
- Right to withdraw your consent: if you have given your consent to the processing of your personal data, you may withdraw this consent at any time. Axeleo Capital may, however, invoke legitimate and compelling reasons to retain them;
- Right to data portability: when this right is applicable, you can ask Axeleo Capital to communicate your personal data or, when technically possible, to transfer them to a third party, without Axeleo Capital being able to object;
- Right to object: You also have the right to object to the processing of your personal data for reasons relating to your situation. You have the absolute right to object at any time to your data being used for commercial canvassing purposes, or for profiling purposes if such profiling is linked to commercial canvassing.

If you would like to exercise these rights or if you would like to ask questions regarding the processing of your personal data, you can send an email to the DPO to the following address: [data@axc.vc](mailto:data@axc.vc) or to send a letter to the company's headquarter:

Virginie LUCCHINI has been designated DPO of Axeleo Capital to the CNIL under the reference DPO-82873 effective on 04/04/2020.

In Appliance to the legislation, In addition to the rights mentioned above, you have the right to contact a data protection authority, such as the CNIL in France, via the online form: <https://www.cnil.fr/fr/plaintes>.

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