

September 2019

Capricorn Partners

Privacy Policy

We are committed to safeguarding the privacy of our business contacts, clients, prospective clients, suppliers, job applicants, and visitors.

This privacy policy explains how Capricorn Partners collects, stores and uses personal data in accordance with the data protection legislation, in particular the EU General Data Protection Regulation (the "GDPR").

Capricorn Partners

Capricorn Partners NV acts as the management company of, among others, Quest for Growth NV, Capricorn Cleantech Fund NV, Capricorn Health-tech Fund NV, Capricorn ICT Arkiv Fund NV, Capricorn Sustainable Chemistry Fund NV and Capricorn Digital Growth Fund NV. Capricorn also acts as investment manager of Quest Management Sicav – Quest Cleantech Fund and Quest+.

Capricorn Partners NV has its registered office at Lei 19/1, 3000 Leuven and company number 0449.330.922 (register of legal persons of Leuven) and is together with its representatives, employees, consultants and directors referred to as "Capricorn" or "we".

Capricorn is the controller of the personal data it processes about its business contacts, clients, prospective clients, suppliers, job applicants, and visitors, for the purposes of the data protection legislation.

Personal data

Personal data is any information relating to an identified or identifiable natural person. The personal data we collect and process about you will differ depending upon our relationship. Your personal data processed by us may include your name, title, gender, postal address, email address, phone number, language preference, job title, function, business relations, information about the sector you work in, reports of our contacts with you, mailing lists, and photographs at events. Depending on the relationship, we will process additional information, as explained below.

Please do not send us sensitive or special category personal data as, in general, we do not need these. These are among others personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, as well as personal data relating to criminal convictions and offences.

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If you send us personal data relating to your representatives, employees, consultants or directors, you have to inform them of the existence and content of our privacy policy.

We do not distribute personal data to third parties, except where the data protection legislation explicitly allows doing so (e.g. in order to enable suppliers to maintain a database or on the basis of a legal or regulatory obligation).

Categories of individuals – Purpose of processing – Legal basis for processing

This privacy policy is directed to individuals whose personal data we handle in the course of carrying out our business activities (“you(r)” or “individual(s)”). These individuals could be business contacts, clients, prospective clients, suppliers, job applicants, or their representatives, agents or appointees, or an employee, director, officer or representative of another organisation with which we have a business relationship. This privacy policy is also directed to visitors to the websites we operate.

The legal basis on which we process personal data is (a) your consent, (b) a legal obligation, (c) our contract with you and/or (d) our legitimate interests, as further explained below.

✓ Business contacts

If you have had contact with Capricorn, for example through emailing us or meeting a Capricorn representative, we may store the following personal data relating to you: your name, title, job title, employer, contact details and any specific details that are relevant for our business relation. We will collect and store these personal data for the purposes of:

- ✓ communicating with you;
- ✓ maintaining a record of contacts;
- ✓ carrying out prospective business relationship management;
- ✓ providing periodic business updates as described below;
- ✓ inviting you to presentations and events organised, attended or sponsored by Capricorn.

We may share the personal data of our business contacts with:

- ✓ companies who process personal data on Capricorn’s behalf, such as providers of cloud hosting solutions and IT providers and other external services providers;
- ✓ professional advisors, such as accountants, lawyers or other consultants.

In addition, we may share your name, title, job title, employer and contact details with other business contacts.

The legal basis of such processing is that it is necessary for our legitimate interests in running and promoting our business activities and commercial objectives, and in maintaining and improving our position on the market.

✓ Individuals involved in existing and potential transactions

If you are involved in an existing or potential transaction with Capricorn or one of its funds under management, be it as an existing or potential (co-)investor, shareholder, manager or advisor of an existing or potential portfolio company, we may store personal data relating to you. This might include your CV, language skills, education, details of your previous employment history and professional activities, information relating to your financial status and dealings, nationality information (including copies of identity documents, such as a passport), references provided by third parties, and results of other due diligence carried out. We collect and store this information for the purposes of:

- ✓ communicating with you;
- ✓ assessing potential transactions;
- ✓ maintaining records of investments;
- ✓ administering any transaction that we enter into;
- ✓ assessing your suitability for involvement in a transaction, including by verifying your identity;
- ✓ complying with our regulatory and legal obligations (such as anti-money laundering and financial crime provisions), including assessing and managing risk;
- ✓ safeguarding our legal rights and interests;
- ✓ seeking and receiving advice from our professional advisors, including accountants, lawyers and other consultants;
- ✓ providing periodic business updates, as described below.

We may share the personal data we hold about you only with:

- ✓ companies who process personal data on Capricorn's behalf, such as providers of cloud hosting solutions and IT providers and other external services providers;
- ✓ professional advisors, such as accountants, lawyers or other consultants;
- ✓ other persons who have an interest or involvement in, or who are considering an interest or involvement in, a Capricorn transaction, including existing and potential co-investors, other providers of finance, investors in Capricorn's funds, and portfolio companies.

The legal basis of such processing is that it is necessary for our legitimate interests in running, promoting and protecting our business and our position in the market, in particular by considering potential investments, and administering transactions that we enter into. If we enter into a transaction that you are involved in, it will also be necessary for us to process your personal data for performing that contract and to comply with our regulatory and legal obligations.

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✓ Shareholders and other clients

We hold and maintain all personal details of all our (former, present, and potential) shareholders, of the shareholders of the private funds we manage, and of the registered shareholders of the public funds we manage, who hold shares directly or indirectly. This will include the personal data required to effect a fully compliant ultimate beneficial owner inspection (such as place and date of birth, copies of identity documents), the number of shares you hold, your bank account number, and payments effectuated.

We do this for the purposes of:

- ✓ complying with our regulatory and legal obligations (such as anti-money laundering and financial crime provisions);
- ✓ communicating with shareholders (including the mailing of periodic and annual reports, AGM or EGM notices or proxy forms, or communications in relation to other corporate actions);
- ✓ facilitating capital drawdowns and payments/redemptions to shareholders.

We may share the personal data we hold about you only with:

- ✚ companies who process personal data on Capricorn's behalf, such as providers of cloud hosting solutions and IT providers and other external services providers;
- ✚ with any depository, stock exchange, clearing or settlement system, counterparties, dealers and others where such disclosure is reasonably intended for the purpose of effecting, managing or reporting transactions or establishing a relationship with a view to such transactions;
- ✓ professional advisors, such as accountants, lawyers, or other consultants.

The legal basis of such processing is a legal obligation, our contract with you (if any), and because such processing is necessary for our legitimate interests in running and operating our business and ensuring effective communications with shareholders.

If you are another type of existing or potential client of Capricorn, we will store personal data relating to you, including your name, title, job title, qualifications, employer and contact details. We will store these personal data for the purposes of:

- ✓ communicating with you;
- ✓ carrying out client management, including administering and maintaining records of services or advice we are giving, and performing further services;
- ✓ complying with our regulatory and legal obligations (such as anti-money laundering and financial crime provisions).

We may share the personal data we hold about you only with:

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- ✓ companies who process personal data on Capricorn's behalf, such as providers of cloud hosting solutions and IT providers and other external services providers;
- ✓ professional advisors, such as accountants, lawyers or other consultants.

The legal basis of such processing is a legal obligation, our contract with you (if any), and because such processing is necessary for our legitimate interests in running, protecting and promoting our business and ensuring effective communications with our clients.

- ✓ Suppliers and advisors

If you are a supplier to Capricorn or of one of its professional advisors, we will store personal data relating to you, including your name, title, job title, qualifications, employer and contact details. We will store these personal data for the purposes of:

- ✓ communicating with you;
- ✓ carrying out supplier and advisor management, including administering and maintaining records of services or advice we have received, and commissioning further services;
- ✓ ensuring the security of our premises and facilities and managing our business operations and IT infrastructure;
- ✓ complying with our regulatory and legal obligations, including assessing and managing risk.

We may share the personal data we hold about suppliers and professional advisors only with:

- ✓ companies who process personal data on Capricorn's behalf, such as providers of cloud hosting solutions and IT providers and other external services providers;
- ✓ professional advisors, such as accountants, lawyers or other consultants;
- ✓ portfolio companies for the purposes of carrying out our business in assisting these companies with their supplier management.

The legal basis of such processing is a legal obligation, our contract with you (if any), or because such processing is necessary for our legitimate interests in running, protecting and promoting our business and ensuring effective communications with our suppliers and advisors.

- ✓ Job applicants

If you are applying for a job within Capricorn, we may store personal data relating to you. This might include your CV, language skills, education, details of your previous employment history and professional activities, information relating to your financial status and dealings, nationality information (including copies of identity documents, such as a passport), references provided by third parties, and results of other due diligence carried out. We collect and store this information for the purposes of:

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- ✓ communicating with you;
- ✓ carrying out recruitment and selection activities;
- ✓ assessing your suitability for working with Capricorn, and possibly offering you a position;
- ✓ building a recruitment pool;
- ✓ complying with our regulatory and legal obligations, including assessing and managing risk.

We may share the personal data we hold about applicants with:

- ✓ companies who process personal data on Capricorn's behalf, such as providers of cloud hosting solutions and IT providers and other external services providers;
- ✓ professional advisors, such as accountants, lawyers or other consultants;
- ✓ (existing and potential) portfolio companies if case you indicated your interest in a job in such a company.

The legal basis of such processing is that is necessary for our legitimate interests in running and promoting our business. If we enter into a contract with you, it will also be necessary for us to process your personal data for performing that contract and to comply with our regulatory and legal obligations.

- ✓ Visitors to the websites we are operating

Quest websites (such as www.quest-plus.com, www.questcleantechfund.com, www.questforgrowth.com)

In general, you are not obliged to provide us with any personal data when browsing our Quest websites. Some of the functionalities provided on our websites however require you to provide us with certain personal data.

- ✓ Contact. If you contact us via our website, we will collect and hold your contact details (such as first name, last name and email address).
- ✓ Newsletter subscription. If you subscribe to our newsletters, we will collect and hold your contact details (such as your first name, last name, email address and postal address), your areas of interest, and your language preferences.

We do not use cookies to collect information about how visitors use our Quest websites. When we change our cookie policy, we will inform you thereof by way of an update to this privacy policy.

Capricorn websites (such as www.capricorn.be)

In general, you are not obliged to provide us with any personal data when browsing our Capricorn websites. Some of the functionalities provided on our websites however require you to provide us with certain personal data.

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- ✓ Contact. If you contact us via our website, we will collect and hold your contact details (such as first name, last name and email address).
- ✓ Investment proposals. If you register an investment proposal, we will collect and hold your contact details and any personal data contained in the investment proposal.
- ✓ Job Applicants. If you apply for a position at Capricorn, we will collect and hold your personal data as stated above.

We do not use cookies to collect information about how visitors use our Capricorn website. When we change our cookie policy, we will inform you thereof by way of an update to this privacy policy.

Periodic business updates

We may use personal data that we hold to send you periodic updates about Capricorn's business, activities and opportunities, in particular, by email and post. You can opt out of receiving updates at any time by contacting us (see "Capricorn contacts" below), or by following the unsubscribe instructions in any email that you receive.

Transfers of personal data to third countries

In principle, we store your personal data in Belgium or in another country within the European Economic Area. However, as we – including the funds we manage - have investments and activities throughout the world, from time to time we may need to transfer the personal data that we hold to, and store it at, a country outside of the EEA. In such case, we will ensure that those transfers take place in accordance with the data protection legislation, including by entering into data transfer agreements with recipients. If you would like more information about how we may transfer your personal data, please contact us using the contact information below.

Retention of your personal data

The period for which we will retain your personal data will vary depending on the purposes we collected it for, as well as the requirements of any applicable law or regulation.

Security of your personal data

We will take all reasonable steps to protect the confidentiality and security of your personal data in our databases, but cannot guarantee the security of any personal data you disclose online. Our responsibility for any breach of security relating to data you disclose online is limited to breaches due to Capricorn's negligence or wilful default.

Capricorn's websites may contain hypertext links to external websites. Capricorn is not responsible for and accepts no liability in relation to these websites or their contents.

Your rights

Right of access. You have the right to obtain confirmation about whether or not your personal data are being processed and, if so, to obtain access to your personal data and information regarding the processing.

Right to rectification. We will take all reasonable steps to keep your personal data accurate and, where necessary, up-to-date. You have the right to correct incorrect personal data, to complete your personal data and to request that recipients to whom personal data were provided be informed of the rectification.

Right to erasure. Subject to certain conditions set forth in the GDPR (such as the personal data no longer being necessary in relation to the purposes for which we collected or otherwise processed them), you have the right to have your personal data erased. If your personal data were made public, Capricorn will take reasonable steps to inform the controllers who are processing the personal data of your request to erase these data and to inform the recipients of personal data of your request to erase them.

Right to restriction of processing. Subject to certain conditions set forth in the GDPR, you have the right to obtain restriction of the processing of your personal data, and, in case of restriction, have the processing limited to mere storage.

Right to data portability. Subject to certain conditions set forth in the GDPR (such as that the processing is based on consent or on a contract and it is carried out by automated means), you have the right to be provided with your personal data, which you can reuse as you wish.

Right to object. You have the right to object to the processing of your personal data based on certain grounds and the right at all times to object to the use of your personal data for direct marketing purposes.

Right to withdraw consent. If you have given your consent to our processing of your personal data, you have the right to withdraw that consent at any time, without such withdrawal affecting the lawfulness of processing based on consent before its withdrawal.

Right to lodge a complaint with a supervisory authority. You have the right to lodge a complaint with a supervisory authority. You can contact the Belgian Data Protection Authority by regular mail at Drukpersstraat 35, 1000 Brussel, Belgium, by telephone at +3222744800, and by email at contact@apd-gba.be.

The above rights may be applicable in certain circumstances only and may be subject to certain conditions, exemptions or exceptions as set out in applicable data protection legislation.

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Capricorn contacts

For all enquiries relating to this data privacy policy, please email:

- ✓ For Quest for Growth: privacy@questforgrowth.com
- ✓ For Quest Cleantech Fund: privacy@questmanagement.com
- ✓ For Quest+ Fund: privacy@questmanagement.com
- ✓ For Capricorn Partners: privacy@capricorn.be.

You can also contact us by regular mail at Capricorn Partners NV, to the attention of the data protection officer, Lei 19/1, 3000 Leuven, and by telephone at: +3216284100.

Changes to the privacy policy

We will post changes to our privacy policy here, so please check Capricorn's privacy policy on a regular basis when you visit any Capricorn website. Any significant changes to this privacy policy will also be clearly indicated on the home page of the websites we operate.