



CIRCLE PARTNERS

Privacy Notice

This Privacy Notice is issued by Circle Holding Netherlands B.V. and applies to Circle Holding Netherlands B.V. and its direct or indirect subsidiaries (hereinafter “**Circle Partners**”).

At Circle Partners we respect and protect your right to privacy and will process your personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) of the European Union, the Data Protection Law (DPL) of the Cayman Islands and other applicable privacy laws.

The GDPR, DPL and any other applicable privacy laws apply to this Privacy Notice and anything not specifically mentioned in this Privacy Notice shall be governed by the GDPR, DPL and any other applicable privacy laws.

This Privacy Notice explains how we may use, process and store your personal data.

WHAT KIND OF PERSONAL DATA DO WE COLLECT?

Personal data means any information relating to an identified or identifiable natural person. Circle Partners processes the following types of personal data:

- name, address, email address, telephone number and other contact information;
- date and place of birth;
- nationality;
- gender;
- copies of identity documents (passport, national ID card, driver’s license, employee identification numbers);
- source of wealth;
- utility bill, bank statement;
- tax residency.

Please note that the list is not exhaustive and that Circle Partners may also collect and process personal data to extent this is useful or necessary for the provision of our services.

HOW DOES CIRCLE PARTNERS COLLECT PERSONAL DATA?

Disclaimer

No part of this document may be reproduced, transmitted or otherwise distributed in any form or by any means, electronic or mechanical, including by photocopying, and facsimile transmission without written permission from Circle Partners. Circle Partners and its affiliated entities expressly disclaim any liability in connection with use of this information the document or its contents by any third party. Any advice contained herein was not intended or written to be used.



We collect, control and process personal data in different ways.

- Personal data provided to Circle Partners directly:
 - We collect, control and process personal data directly from (prospective) clients, investors, business partners and intermediaries for the purposes of entering into an agreement and/or to meet certain legal requirements.
- Personal data obtained from third parties:
 - We also collect, control and process personal data from publicly accessible sources such as internet, social networks, World-Check or commercial registers. Furthermore we may receive personal data from third parties as part of the service we provide to you or in connection with legal requirements that are applicable to us.

HOW DOES CIRCLE PARTNERS USE PERSONAL DATA?

The majority of the personal data processed by Circle Partners is necessary for the performance of a contract to which the data subject is a party or to comply with the request of the data subject prior to entering into a contract. Circle Partners also processes personal data in order to comply with our legal and regulatory obligations.

We may furthermore process personal data for the purposes of the legitimate business interests. Such legitimate interests include general research and development (including statistical research or as a basis to analyze our current security measures) or to develop and improve our services or to strengthen our relationship with you. We may provide you with communications or information regarding our service offering which we think will be interesting for you.

When we process your personal data for our legitimate business interests, we will consider and balance any potential impact on you and your rights under the relevant data protection and any other relevant law. Whenever we process personal data for these purposes you have the right to object to this way of processing. Where there an evident legitimate business interest is absent we will always ask your consent for the processing of your data.

TO WHOM DOES CIRCLE PARTNERS PROVIDE PERSONAL DATA?

Circle Partners may disclose or transfer personal data collected by Circle Partners to group companies insofar as reasonably necessary for the purposes of our service offering or for bona fide compliance purposes as well as on the legal basis as set out in this Privacy Notice.

Circle Partners may disclose or transfer personal data to subcontractors for the purpose of the proper performance of the services we provide to our clients. It may, for example, disclose or transfer such personal data to third party service providers who provide administrative, computer, payment, data processing, debt collecting or other services. We enter into data processing agreements with such subcontractors to ensure that they process your data, on our behalf, with the same level of security and confidentiality as applied by Circle Partners. Circle Partners may furthermore disclose or transfer personal data when we received your consent to do so.

In addition Circle Partners may disclose or transfer personal data to protect our rights or those of our clients and/or to prevent fraud. Circle Partners can also be obliged to disclose or transfer personal data to competent authorities in order to comply with our legal and/or regulatory obligations.



Except as described in this paragraph, Circle Partners will not disclose, transfer or sell your personal data to any third party unless you have consented to this.

INTERNATIONAL TRANSFERS AND DATA STORAGE

Circle Partners may disclose or transfer personal data to other companies of the Circle Partners group that are located in countries that do not have comparable data privacy laws in place.

Circle Partners transfers data to third countries assessed by the European Commission to have adequate level of protection by means of an adequacy decision. Circle may transfer and provide access to Personal Data in other countries that ensure an appropriate protection level as defined under the Privacy Laws.

If disclosure or transfer of personal data is being done in a country that does not ensure an adequate level of protection of your personal data, Circle Partners will make sure additional safeguards will be put in place.

RETENTION

Circle Partners will process and store the relevant personal data for the duration of our services or for the duration of the business relationship. Circle Partners may also store the data for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations and, or for the establishment, exercise or defense of legal claims, and in general where it has a legitimate interest for doing so.

YOUR RIGHTS

You have the following rights:

- **Access to your information.** You have the right to access the personal information that Circle Partners holds about you at any time.
- **Data portability.** You may ask Circle Partners to provide you with a copy of the personal information that Circle Partners holds about you.
- **Correction of your personal information.** You have the right to ask Circle Partners to update and correct any out-of-date or incorrect personal information that we would hold about you.
- **Deletion of your personal information (the right to be forgotten).** You have the right to ask Circle Partners to delete your personal information, to the extent that Circle Partners has no legal and/or regulatory obligations to keep such personal information.
- **Restriction of processing of your personal information.** You have the right to ask Circle Partners to restrict the processing of your personal information in case:
 - You contested the accuracy of the personal information held by Circle Partners;
 - The processing is unlawful but you objected to the deletion of the personal data and request the restriction of the use instead;
 - Circle Partners no longer needs the personal data for the purposes of the processing, but you require them for legal reasons;



- You objected to processing and Circle Partners is investigating whether there are legitimate grounds to override your objection.
- **Object.** You have the right to object at any time to the processing of your personal data for any direct marketing (and related profiling) by Circle Partners. In addition, you have the right to make a complaint with the local supervisory authority with respect to the way Circle Partners is processing your personal data or the way Circle Partners is handling your rights.

AUTOMATIC DECISION MAKING

Circle Partners generally does not make decisions by purely automatic means, but if we do, you have the right to object.

NAVIGATION AND COOKIES

Please note that Circle Partners is the controller of personal data collected through the Circle Partners website (“**Website**”). Circle Partners will, however, only use this personal data in accordance with the purpose set forth in this Privacy Notice.

Circle Partners collects personally-identifiable information on certain areas of the Website when users register, request publications or other information, sign up for conferences and events, apply for jobs, and participate in user posting areas, such as bulletin boards, discussion forums, and surveys. The personally-identifiable information collected may consist of information that you provide, such as names, mailing addresses, e-mail addresses, telephone and fax numbers, and, for recruiting purposes, any other personally-identifiable information on your resume.

The Website also uses cookies to identify you and your interests and to track usage of the website. Cookies are small pieces of text stored on your computer that help us know which browser you are using and where you have been on the Website and on websites to which you may link in order to use some of our features. By accepting our cookie, you will be permitted access to certain pages of the Website without having to log in each time you visit. A user who does not accept the cookie from the Website may not be able to access certain areas of the Website. Circle Partners also logs IP addresses, or the location of computers on the Internet, to help diagnose problems with our server and to administer the Website. If you prefer not to accept a cookie, you can set your web browser to warn you before accepting cookies, or you can refuse all cookies by turning them off in your web browser.

HOW WE PROTECT PERSONAL DATA?

Circle Partners is committed to ensuring the security of your personal data. Circle Partners takes appropriate commercially reasonable technical, physical and organizational measures to prevent unauthorized or unlawful processing of your personal data or accidental loss or destruction of your personal data. Circle Partners will ensure a level of security suitable to the identified risks and pursuant to applicable data protection laws and, where the processing concerns personal data of EU residents, shall take measures required pursuant to article 32 GDPR.

Employees of Circle Partners are trained to handle personal data securely and with utmost respect and they will treat your personal data strictly confidential. Staff members shall be authorized to access personal data only to



the extent necessary to serve the applicable legitimate purposes for which the data are processed by Circle Partners and to perform their job.

Circle Partners will not divulge client information to a third party unless we have received explicit client authorization or we are required to do so by law.

CHANGES TO THIS NOTICE

Circle Partners may update this Privacy Notice from time to time. We advise you to periodically review this Privacy Notice to be informed of how Circle Partners is protecting your privacy.

DATA PROTECTION OFFICER

If you have any questions, concerns or complaints with respect to this Privacy Notice, the way Circle Partners is handling your privacy or you wish to exercise any of your rights please contact our Data Protection Officer:

Andreia Muresan

Tel: +31 (0) 33 467 3880

Email: amuresan@circlepartners.com

Contact Circle Partners

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