

Privacy Policy

This privacy policy (“Policy”) summarizes the principles of personal data processing by SIA Merito Partners and its subsidiaries (“Merito”), including SIA Merito Management AIFP which is a registered alternative investment fund manager.

Merito reserves the right to change this Policy from time to time by publishing the updated Policy on its webpage.

Collected Information

The main categories of collected personal data include: (i) identification data (name, date of birth, identification document details, etc.), (ii) contact data (address, phone, e-mail, etc.), (iii) financial data (bank account details, income details, etc.), (iv) professional data (education, professional position, employment history, etc.), as well as (v) other data that Merito is obliged to collect in accordance with the requirements of the applicable laws (including but not limited to the anti-money laundering and sanctions laws).

Merito collects personal data provided by the respective person, including when the person communicates with Merito via e-mail, telephone or other communication channels, or when the person provides the business card, when the person agrees to receiving newsfeed, or when the person responds to our anti-money laundering and KYC questionnaires. In some cases, the personal data is collected from other sources such as public databases, search engines and webpages.

Merito keeps personal data for only so long as it is necessary for the purpose for which they were collected (e.g., fulfilment of an agreement, taking decision on investment upon completion of due diligence, management of investments, completion of selection of job applicants, etc.) and for as long their storage is required by law. If personal data is processed in the context of any contractual relationship, any data storage period may be extended for the statutory period of limitation under the applicable laws. If the personal data is stored to meet legal requirements, such as, in respect of accounting or anti-money laundering measures, the length of storage of personal data is determined by the applicable laws.

Purpose

Merito collects and processes only such personal data and to such extent that is necessary for the purposes of its business. Such purposes primarily include (i) the responsibilities of Merito and the funds managed or advised by it, including with respect to fulfilment of know-your-client (KYC), anti-money laundering and any sanctions regimes legal obligations as well as for carrying out due diligence and later management of target companies, or (ii) for personnel recruitment purposes for Merito or for key positions in its portfolio companies. Merito may also keep contact details of individuals related to potential investors or potential target companies.

Such personal data is collected and processed based on Merito’s legitimate interests, including with respect to (i) conducting its business as an advisor or manager of alternative investment funds, (ii) entering into and performing the agreements (including with natural persons such as investors, business partners, employees), (iii) attracting investors to the funds advised or managed by Merito, (iv) recruiting employees and engaging partners for Merito itself as well as its portfolio companies, and (v) compliance with the applicable laws.

Rights of Person

The person whose personal data is collected has the following rights: (i) the right to request a copy of the personal data as well as correction of any incorrect personal data, (ii) the right to request erasure of the personal data if there is no valid reason for Merito to keep it, (iii) the right to withdraw the consent



at any time where Merito was relying on consent to process the personal data, (iv) the right to request a restriction on processing the personal data or to object to processing of the personal data in specific circumstances, (v) the right to receive the personal data in a machine-readable format and have the data transferred to another party responsible for data processing. The mentioned rights may be exercised in accordance with the requirements of applicable EU and local laws by contacting Merito.

If the person is not satisfied with the way in which Merito handles the personal data, the person may contact Merito by sending an e-mail to info@meritopartners.com. If the person is not satisfied with Merito's answer or consider that Merito is processing the personal data in an illegitimate or unlawful manner the person may file a complaint with the Latvian data supervisory authority (*Datu valsts inspekcija*) authority by sending an e-mail to info@dvi.gov.lv.

Third Parties

In the context of the purposes outlined above, the personal data may be shared with third parties. Such third parties may include the companies in the Merito group, the service providers, professional advisers, regulators and other authorities. Merito aims to ensure that Merito discloses such personal data to such third parties that ensure to implement adequate safeguards to protect the security of the personal data and use it in accordance with the applicable law. Where relevant, Merito enters into data processing agreements with the third parties stipulating their obligations in respect of handling of such personal data.

The personal data is generally processed within the EU/EEA. If, however, it would be necessary for Merito to transfer personal data to a country outside the EU/EEA, Merito shall take all required legal, technical and administrative steps to ensure that such information is managed securely and with a suitable level of protection which is comparable with the protection which is offered within the EU/EEA.

Contact Information

Any enquiries in relation to the personal data collected or processed by Merito or this Policy should be addressed to: info@meritopartners.com.