

ACTIS PRIVACY POLICY

1 INTRODUCTION

1.1 This privacy policy ('Privacy Policy') explains how Actis collects, stores, shares, protects and uses personal information of our website visitors, business contacts, suppliers, professional advisors, investors, actual and potential sponsors and management teams involved in a transaction or potential transaction with Actis and/or funds that it manages or advises and alumni. It also describes the cookies we may use and send to your computer or mobile device.

1.2 In this Privacy Policy 'Actis', 'we', 'us' and 'our' refer to Actis LLP and Actis GP LLP.

1.3 Personal information means any information that we hold about you from which you can be identified either directly or indirectly and it may include your name; contact details; job title, employer organisation, qualifications, CV, employment history and professional activities, information relating to your financial status and dealings, nationality information (including copies of identity documents, such as your passport), references provided by third parties, and results of other due diligence carried out.

2 HOW WE COLLECT PERSONAL INFORMATION

2.1 We will collect and store your personal information when you interact with our website, when you have had contact with Actis through introductions or meeting an Actis representative or when corresponding with us in relation to a transaction that Actis and/or the funds it manages or advises enter into, or a potential transaction that Actis is considering or in respect of the funds that Actis manages or advises.

2.2 We collect personal information in writing, by telephone, by e-mail and by online registrations. We may receive information from third parties who collect personal information from you and pass it on to us for example where we conduct verification or anti-money laundering checks on sponsors and management teams for prospective transactions.

3 WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

3.1 If you are a business contact we will hold limited amounts of personal information about you such as your name, contact details, job title, employer organisation and perhaps your CV.

3.2 If you are a supplier, consultant or professional advisor, we will hold personal information about you including the information set out in paragraph 3.1, as well as your date of birth, bank account details and VAT number (to the extent applicable).

3.3 If you are a job applicant, we may hold information you have provided to us in your CV, application form and covering letter including the information set out in paragraph 3.1 as well as your date of birth, gender and any information you provide to us as during an interview. We may also hold special categories of more sensitive personal information such as your race or ethnicity, information about your health including any medical condition and sickness records.

3.4 If you are registered for the Actis Alumni Network portal, personal information that we hold about you may include the same information listed in paragraph 3.1, as well as login details to the alumni portal, current job role, previous job role with Actis, feedback and survey comments.

3.5 If you are a sponsor or a member of an actual or potential management team in respect of a transaction and/or potential transaction that Actis and/or funds managed or advised by Actis enter into or consider, personal information that we hold about you will include the same information listed in paragraph 3.1 above and may include your CV, details of your previous employment history and professional activities, information

relating to your financial status and dealings, nationality (including copies of identity documents, such as a passport), references provided by third parties and results of other due diligence carried out.

3.6 If you are an investor or potential investor, personal information we hold about you may include the same information as listed in paragraph 3.1, as well as bank account details, share in investments, amounts invested, returns from such investments and tax number, and information relating to your financial status and dealings, nationality (including copies of identity documents, such as a passport), references provided by third parties and results of other due diligence carried out. For more information, relating to the information we hold about you if you are an investor, please refer to the relevant investment documentation.

3.7 We will take reasonable steps to keep the personal information that we store accurate and where necessary up to date. If you consider that any of the personal information that Actis holds about you is incorrect please notify Actis, see Contact Information in paragraph 18 below.

4 HOW WE USE YOUR INFORMATION

4.1 We will use your personal data, and may share your personal data with other parties acting on our behalf, for one or more of the following purposes:

- 4.1.1 managing and maintaining records of services or advice we have received, and commissioning further services;
- 4.1.2 seeking and obtaining advice from our professional advisors, including lawyers, accountants and other consultants;
- 4.1.3 inviting you to presentations and events and organising meetings between you and Actis representatives;
- 4.1.4 providing you with analysis of the markets Actis operates in;
- 4.1.5 assessing potential transactions;
- 4.1.6 maintaining records of investments and administering any transaction that one of our funds (or parties related to it) enters into;
- 4.1.7 assessing your suitability for involvement in a transaction, including verifying your identity and source of funds;
- 4.1.8 complying with our (and our funds') regulatory and legal obligations, including tax reporting and assessing and managing risk;
- 4.1.9 for our own administrative purposes or conducting internal audits;
- 4.1.10 protecting our legal rights and interests;
- 4.1.11 if you are a supplier, consultant, professional advisor or investor, to carry out our contract with you; and
- 4.1.12 to conduct research about the use of our website.

4.2 We will not sell your personal information to others.

4.3 If we wish to use your personal information for a purpose beyond that for which it was originally provided, we will ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law.

5 INFORMATION FOR MARKETING PURPOSES

- 5.1 We may use your information to send you updates and news concerning Actis and its business and activities and events which we feel may be of interest to you.
- 5.2 If at any time you wish us to stop using your information for these purposes, please notify Actis, see Contact Information in paragraph 18 below.

6 GROUNDS FOR PROCESSING

- 6.1 In order to store, hold and process your data lawfully we rely on one or more of the following legal grounds:
- 6.1.1 your consent to particular processing activities. For example, where you have consented to us using your information for marketing purposes; or
 - 6.1.2 our legitimate interests in running our business. For example, if we enter into a transaction involving you, whether it completes or not, it may be necessary for us to process your personal information for the purpose of performing that contract and/or for complying with our legal and regulatory obligations;
 - 6.1.3 our compliance with a legal obligation to which Actis is subject. For example, we have a duty to investigate and respond to complaints made against us and may need to process your personal information as part of such investigation; or
 - 6.1.4 if you are a party to a contract, because processing your personal data is necessary for the performance of that contract.

7 DISCLOSURE OF YOUR PERSONAL INFORMATION

- 7.1 There are circumstances where we may wish to disclose or are compelled to disclose your personal data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure:
- 7.1.1 to other companies in the Actis group or our representative or associated offices;
 - 7.1.2 to our outsourced third party service providers who process personal information on our behalf such as providers of cloud hosting solutions or providers of data storage or security;
 - 7.1.3 to professional advisors such as lawyers and accountants, fund administrators or other consultants;
 - 7.1.4 to persons who have an interest or involvement in or who are considering an interest or involvement in a transaction with Actis (or funds managed or advised by Actis) including financial intermediaries, providers of finance, co-investors and investors in funds managed or advised by Actis;
 - 7.1.5 to legal and regulatory authorities where we are required by law or regulation to do so; and
 - 7.1.6 to any other third party where you have provided your consent.

8 TRANSFER OF PERSONAL DATA OUTSIDE OF THE UK

Actis is an international business and we may transfer your personal data to a third party in countries outside the UK including outside of the EEA for further processing in accordance with the purposes set out in this Privacy Policy. In particular, your personal data may be transferred throughout the Actis group and to our outsourced service providers located abroad, and this may include companies, offices or data centres. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisational, contractual or other lawful means. Please contact us if you would like more information about how your personal data may be transferred by Actis and the safeguards that we have put in place; see Contact Information in paragraph 18 below.

9 RETENTION OF PERSONAL INFORMATION

We will take all reasonable steps to retain personal data only for the duration of the purpose for which it was obtained as set out in this Privacy Policy (unless longer retention is required by the applicable law or regulation). We may keep an anonymised form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

10 CONFIDENTIALITY AND SECURITY

10.1 Actis will take all reasonable steps to:

- 10.1.1 safeguard all personal information that you provide to us;
- 10.1.2 ensure that it remains confidential and secure; and
- 10.1.3 ensure that personal privacy is respected.

10.2 All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorised access or disclosure and loss or corruption by computer viruses and other sources of harm.

11 YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL INFORMATION

11.1 Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant data protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below at paragraphs 11.1.1 to 11.1.6:

- 11.1.1 **Right to obtain a copy of your personal information.** You may have the right to obtain a copy of the personal information we hold about you.
- 11.1.2 **Right to rectification.** You may request that we rectify any inaccurate and/or incomplete personal information. If we disagree and believe the information to be accurate and complete, we will advise you and include a notation on the record that you dispute the information's accuracy.
- 11.1.3 **Right to withdraw consent.** You may, as permitted by law, withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent.
- 11.1.4 **Right to object to processing.** You may request that we stop processing your personal information.

11.1.5 **Right to erasure.** You may request that we erase your personal information and we will comply, unless there is a lawful reason for not doing so.

11.1.6 **Right to lodge a complaint with the supervisory authority.** You have the right to complain about the use of your personal information to the relevant supervisory authority, which in the UK is the Information Commissioner's Office.

11.2 Any request under paragraphs 11.1.1 to 11.1.5 should be submitted in writing to the Data Protection Compliance Manager (compliance@act.is). We would also suggest that you contact us if you have any questions or if you have a complaint in relation to how we process your personal information, see Contact Information in paragraph 18 below. However, you do have the right to contact the relevant supervisory authority as noted in paragraph 11.1.6.

12 LINKS

Our website may provide hyperlinks to websites owned and controlled by others. Actis is not responsible and accepts no liability in relation to such websites or their contents or for their privacy practices. You should read any applicable privacy policy on any such website.

13 THIRD PARTIES

Where you submit personal information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their personal information, the reason you have provided it, how they can contact us and the terms of this Privacy Policy. You further confirm that they have consented to such collection, use and disclosure.

14 ACTIS ALUMNI NETWORK

14.1 This paragraph 14 applies to you if you are registered with or use the Actis Alumni Network. As part of the Actis Alumni Network you may receive information (including personal data) relating to other Actis Alumni. This information should not be used by or passed to any third parties. In respect of any such personal data that you may have access to, you agree:

14.1.1 not to process such personal data for any direct marketing purposes unless the consent of the data subject has been obtained in accordance with applicable data protection law;

14.1.2 to only use the personal data contained in the Actis Alumni Network in your personal capacity as an Actis alumni for social or professional networking and not on behalf of a company or other business entity seeking to commercialise the data; and

14.1.3 not to transfer or permit the transfer of any such personal data outside the EEA without the data subject's express written consent.

15 COMPLIANCE WITH PRIVACY LAWS

15.1 Actis complies with the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time.

15.2 Except to the extent expressly stated otherwise in this Privacy Policy, Actis accepts no obligations with respect to the handling of personal information other than those mandated by law in any relevant country.

16 COOKIES

- 16.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. This section of the Privacy Policy explains what cookies are, why we use them and what you may do if you wish to restrict, remove or refuse to accept cookies.
- 16.2 By continuing to use this website, you agree to the use of cookies for the purposes set out in this Privacy Policy.
- 16.3 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 16.4 We use the following cookies:
- 16.4.1 **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website such as the Alumni page.
 - 16.4.2 **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
 - 16.4.3 **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
 - 16.4.4 **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and any information and advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- 16.5 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Purpose	Duration	More information
Google Analytics _ga	Used to distinguish users	2 years	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form.
Google Analytics _gat	Used to throttle request rates to maintain website performance	1 minute	

Google Analytics _gid	Used to distinguish users	24 hours	including the number of visitors to the site, where visitors have come to the site from and the pages they visited. https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
cookiesDirective	Used to record user preference in relation to cookies	1 year	Used to record cookie acceptance and suppress message after accepting cookie use.
.auth	Authentication for logged in members	1 hour	Contains encrypted authentication ticket for the logged in user in alumni.act.is .

16.6 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

16.7 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

17 CHANGES TO ACTIS PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time and any changes will be posted here, so please check this Privacy Policy for changes each time you access our website.

18 CONTACT INFORMATION

If you have any questions about this Privacy Policy, please contact us by email at compliance@act.is.