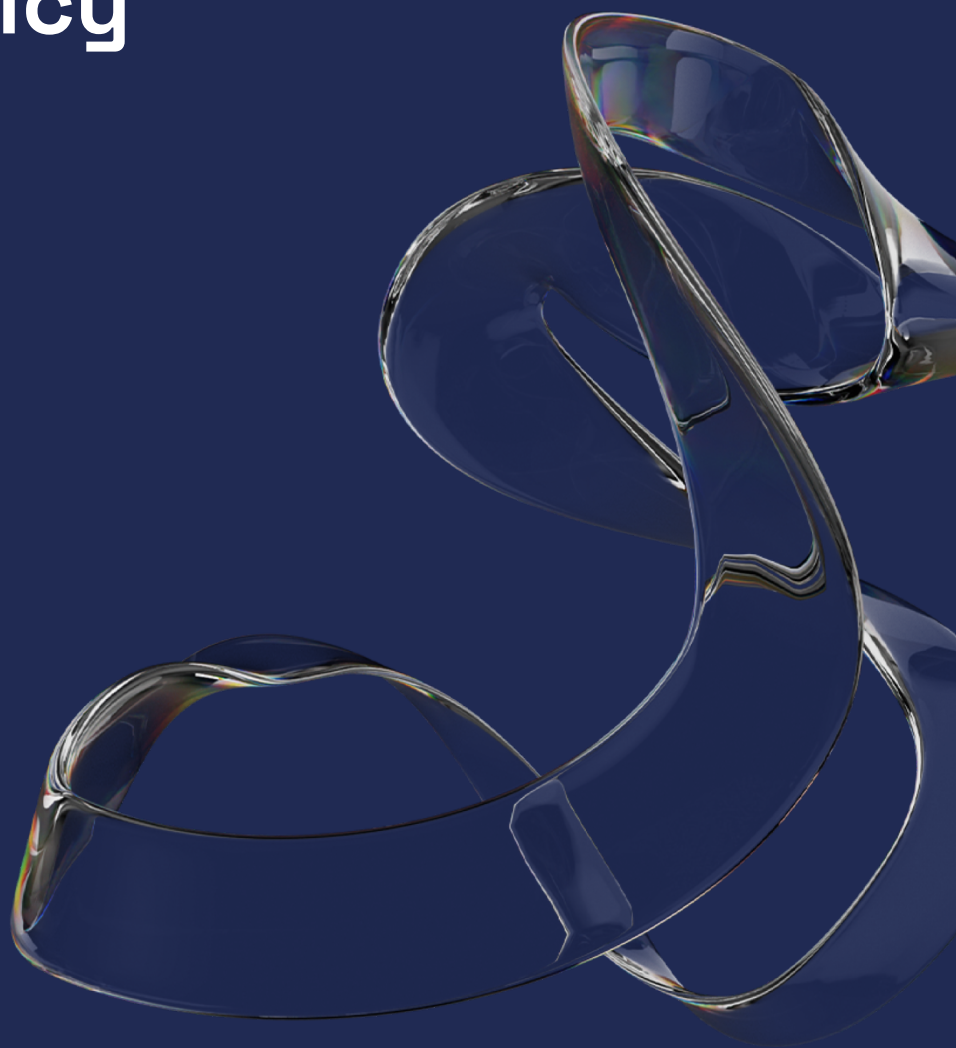


# Privacy Policy

Version. 2.0 – 19 October 2023



SG Capital Partners AIFP SIA

Reg. No: 40103946854

Taking care of the protection of your privacy and personal data, including your right to access to information, we, SG Capital Partners AIFP Ltd, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (27.04.2016. ) on the protection of natural persons 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) (hereinafter referred to as the "Data Regulation"), and other legal requirements of the European Union and the Republic of Latvia, financial industry recommendations and good practice guidelines, we have developed this Privacy Policy (hereinafter referred to as the "Policy").

In this Privacy Policy, we provide you with information relating to the processing of your personal data, i.e. any information that directly or indirectly relates to you, your right to privacy and its protection.

SG Capital Partners AIFP Ltd. is committed to lawfulness, fairness and transparency in the processing of personal data. Personal data is collected for specific, explicit and legitimate purposes and is not further processed in a manner incompatible with those purposes. Personal data shall be adequate, relevant and shall include only what is necessary for the purposes for which they are processed. Personal data shall be accurate and, where necessary, kept up to date in a form which permits identification of you, for no longer than is necessary for the purposes for which the personal data concerned are processed. Personal data shall be processed in such a way as to ensure appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, respecting their integrity and confidentiality.

SG Capital Partners AIFP Ltd. manages the closed-end alternative investment funds SG Capital Partners Fund 1, KS, SG Capital Partners Fund 2, KS and SG Capital Partners Sustainable Forest and Land Fund 1, KS, which hold shares in a Special Purpose Vehicle for the acquisition, management, development and subsequent sale of commercial real estate and forest/agricultural land in the Baltic States. The Privacy Policy also includes information relating to the processing of your personal data if you are a business partner of these Special Purpose Vehicles.

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# 1. DEFINITIONS

**You** (as the data subject) – you as the natural person whose personal data we process.

**The Controller** or **we** – the Controller of personal data processing is SIA SG CAPITAL PARTNERS AIFP, registered in the Register of Enterprises of the Republic of Latvia with registration number 40103946854, registered office at Skanstes 50, Riga, LV-1013, with whom you (or a person related to you, such as a company or organisation of which you are a representative or member) have or had a contractual or pre-contractual relationship, or whose services you intend to use, use or have used.

## Funds

SG Capital Partners Fund 1, KS, registered in the Register of Companies of the Republic of Latvia under registration number 40103990509, registered office at Skanstes 50, Riga, LV-1013.

SG Capital Partners Fund 2, KS, registered in the Register of Companies of the Republic of Latvia under registration number 40203333085, registered office at Skanstes 50, Riga, LV-1013.

SG Capital Partners Sustainable Forest and Land Fund I, KS, registered in the Register of Companies of the Republic of Latvia under registration number 40203333070, registered office at Skanstes 50, Riga, LV-1013.

**SPV** – Special Purpose Vehicle – Special Purpose Vehicles, the members of which (holding all the shares) are Funds managed by SG Capital Partners AIFP Ltd.

**Processing** means any operation or set of operations which is performed upon personal data or upon sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Personal data** – any information relating to an identified or identifiable natural person ("data subject").

**Consent** – any confirmation freely and knowingly given by you that you agree to the processing of your personal data for a specific purpose.

**State Data Inspectorate** – a direct administrative authority supervised by the Cabinet of Ministers, which is a data supervisory authority within the meaning of the Data Regulation and performs the tasks set out in the Data Regulation and the Law on Data Processing of Natural Persons in the area of data processing.

## 2. THE TYPES OF PERSONAL DATA WE PROCESS ABOUT YOU

We process the following personal data about you in accordance with and to the extent necessary for the purposes set out in this Privacy Policy:

Categories of personal data	Description
General personal and identification data	Name, surname, personal identification number, date of birth, details of identity documents (including a copy of the document if required by laws and regulations).
Contact	Address for correspondence, telephone number, e-mail address and other details.
Financial information	Bank account number, cash flow – incoming and outgoing payments, transaction history, credit and other commitments, origin of funds and assets, choice and purpose of investment services, trade requests, executed transactions in financial instruments and other data.
Tax residence information	Country of residence, taxpayer number, nationality, country of tax residence.
Information related to your family	Information about the status of a politically exposed person, a family member of a politically exposed person or a person closely associated with a politically exposed person, if applicable to you or your family members, which we need on the basis of the Law on Prevention of Money Laundering and Terrorism and Proliferation Financing ("AML/CFT").

Information on professional activities, education	Place of work, profession, position, occupation, education, investment knowledge and experience, information on the person's economic or commercial activities, etc.
Information relating to the examination of a special case of SG Capital Partners AIFP Ltd (equity investment in real estate)	SG Capital Partners AIFM Ltd provides due diligence on a case-by-case basis (invested capital in real estate) prior to a property purchase or sale transaction between the SPV and the sellers or buyers of the property, which includes information on the purpose, nature and seller/buyer of the property to the extent necessary to determine whether the transaction has any risk-enhancing factors in relation to AML/CFT and sanctions and whether additional due diligence/risk mitigation measures are required before the transaction is executed.
Information related to transactions between SPVs and lessees and service providers / sellers of goods	SG Capital Partners AIFM Ltd, in accordance with the principle of a diligent and prudent manager, applies certain due diligence measures (in the area of AML/CFT and sanctions) before establishing business relationships between SPVs and lessees and service providers / sellers of goods, which include basic natural / legal person data, verification of the sector of activity, residence, amount of transactions, verification of data on sanctions lists, verification of the status of a politically exposed person ("PEP") / family member of a PEP / closely related person of a PEP (economic link) and verification of the existence of negative information in public resources, etc.
Information related to your contractual obligations	Information about the service we provide to you, information about the performance or non-performance of contractual obligations, active or inactive obligations, applications, requests, complaints and other data.
Data collected in communication with you	Data we collect from your letters, emails, telephone contact.
Information extracted from various public registers	Information we obtain from publicly accessible registers in the course of providing services and researching natural or legal persons.

Information contained in the documents	Information about you held in physical and electronic documents.
Information obtained in connection with the recruitment, establishment and maintenance of employment relationships	Data obtained during the recruitment process (CV, application letter), for the establishment and maintenance of the employment relationship.

### 3. THE PURPOSES FOR WHICH YOUR PERSONAL DATA IS PROCESSED AND THE LEGAL BASIS FOR PROCESSING

Before we start processing your personal data, we always assess in advance the purposes for which we will need to process your personal data. The processing of your personal data is lawful because we do it on at least one of the following grounds, i.e. we process your personal data:

- the conclusion and performance of the contract (which also includes pre-contractual activities such as carrying out customer due diligence, gathering information about the property, etc.);
- SG Capital Partners AIFP to fulfil its statutory obligations;
- on the basis of your consent;
- to pursue the legitimate interests of SIA SG Capital Partners AIFP or a third party to provide you with the service set out in the contract, to safeguard the legitimate interests of SIA SG Capital Partners AIFP or third parties arising from the law, assessing whether the interests of SIA SG Capital Partners AIFP in processing your personal data are proportionate to your right to privacy.

SG Capital Partners AIFM Ltd manages the closed-end alternative investment funds SG Capital Partners Fund 1 KS, SG Capital Partners Fund 2, KS and SG Capital Partners Sustainable Forest and Land Fund I, KS, which are commercial real estate, forest and agricultural land funds registered in Latvia (hereinafter referred to as the "Funds"). The Funds' objectives are to invest in cash-generating properties in the Baltics, generating income for the Fund's investors and improving the sustainability of the properties.

**We process your personal data for the performance of our main functions, including:**

Purpose	Legal basis
Provision of investment services:	<ul style="list-style-type: none"> <li>• to provide the investment services required by the Agreement and the laws and regulations, to properly perform our contractual obligations and to safeguard the legitimate interests of SG Capital Partners AIFM Ltd, the Funds, their investors or third parties arising from the law;</li> <li>• to enter into a contract, to monitor payments under the contract, to inform you of any changes to the services we provide, etc.</li> </ul>
Compliance with the statutory obligations of alternative investment funds and their managers and the objectives of managing AML/CFT and sanctions risk:	<ul style="list-style-type: none"> <li>• to ensure compliance with the Law on Alternative Investment Funds and their Managers, the Law on AML/CFT and the Law on International and National Sanctions of the Republic of Latvia, including the identification and investigation of clients, business partners, investors in accordance with the aforementioned laws and regulations, including ascertaining the origin of funds, checking sanctions lists, publicly available registers, ascertaining the beneficial owner and politically exposed person status;</li> <li>• to provide information and comply with requests of state authorities / supervisory, investigative and other law enforcement authorities, sworn bailiffs in the cases stipulated by the regulatory enactments.</li> <li>• to ensure the necessary maintenance of registers, investor records, etc.</li> </ul>
Risk assessment and prevention in customer transactions:	<ul style="list-style-type: none"> <li>• to identify, assess, document and manage risks in transactions with customers;</li> <li>• to ensure that your risk profile is assessed before and during the contractual relationship, and to assess and research potential clients and client groups;</li> <li>• to verify information about you in publicly available registers as well as in publicly available reliable sources of information as part of the prevention of fraud related to the use of our services or the prevention of fraudulent use of our services.</li> </ul>



For marketing purposes:	<ul style="list-style-type: none"> <li>•to organise customer loyalty events;</li> <li>•to reach potential customers.</li> </ul>
Ensuring staff management:	<ul style="list-style-type: none"> <li>•to organise the recruitment process and fill the vacancy</li> <li>•to ensure the establishment and maintenance of the employment relationship, the recording and monitoring of performance of duties;</li> <li>•to organise health insurance, to involve cooperation partners, to give discounts to employees.</li> </ul>
Preventing crime on immovable property, ensuring and maintaining security and order:	<ul style="list-style-type: none"> <li>•use of CCTV systems in our workplace premises and grounds to ensure the safety of our employees, customers and visitors, security of our property, etc.</li> </ul>
Administration of payments and organisation of accounts:	<ul style="list-style-type: none"> <li>•to administer payments for services rendered (including preparation of certificates and reports, etc.), staff salaries and to comply with the requirements of the regulatory framework on accounting (preparation of relevant supporting documents, travel arrangements, etc.);</li> </ul>
Organisation of records:	<ul style="list-style-type: none"> <li>•to ensure the integrity of documentation, outgoing and incoming correspondence, contracts, etc. records and storage.</li> </ul>
Ensuring communication (email, phone or face-to-face):	<ul style="list-style-type: none"> <li>•collecting and processing questions, suggestions, complaints and other information in order to prepare replies and ensure communication with the addressee</li> <li>•to inform you of changes to the processing of your Personal Data.</li> </ul>
Carrying out economic and administrative activities	<ul style="list-style-type: none"> <li>•to defend your rights in case you have not fulfilled your contractual obligations, we provide debt recovery and enforcement actions, legal proceedings;</li> <li>•to ensure that the solvency criteria set by SG Capital Partners AIFM Ltd are met, audited, managed.</li> </ul>

## 4. HOW WE OBTAIN YOUR PERSONAL DATA

We collect your Personal Data:

- 1) When you give them to us:
  - when you apply for the service;
  - by contacting us by post, email, telephone, video conference or in person at our offices;
  - providing additional information at our request.
- 2) When you use our services.
- 3) When they are provided to us by third parties (SPVs, business partners, etc.):
  - our SPVs, who conduct due diligence on their business partners and apply AML/CFT risk mitigation measures to them;
  - maintainers of statutory databases, registers;
  - public authorities and law enforcement bodies and their officials.

## 5. WE TRANSFER YOUR PERSONAL DATA

We transfer your Personal Data:

- to our employees or directly authorised persons who need it for the performance of their duties;
- our business partners who are indirectly involved in the provision of our services, such as postal and courier service providers, companies providing IT solutions and technical support, website maintenance, etc;
- credit and financial institutions, insurance providers and financial intermediaries, third parties involved in the execution of transactions;
- supervisory authorities (the Bank of Latvia, the Consumer Rights Protection Centre, the Data State Inspectorate, the State Revenue

Service, etc.) on the basis of written requests or binding obligations of SG Capital Partners AIFP SIA established by regulatory enactments;

- in certain cases, to execute requests to competent state institutions, such as the Anti-Money Laundering Service, court, investigative authorities, prosecutor's office, subjects of operational activity, Corruption Prevention and Combating Bureau, State Treasury, State Audit Office, State Revenue Service and other persons specified in regulatory enactments, such as bailiffs, notaries, insolvency administrators;
- maintainers of databases established in accordance with the procedure laid down in laws and regulations, such as the Register of Companies;
- SIA SG Capital Partners AIFP for audit firms, legal service providers, interpreters.

Within the scope of processing your Personal Data, access to your Personal Data is limited to authorised employees of us and our business partners who need it to perform their work duties and who process your Personal Data only in accordance with the purposes and grounds for processing Personal Data set out in this Privacy Policy, as well as in compliance with the technical and organisational requirements for processing Personal Data set out by SG Capital Partners AIFP Ltd.

## 6. THE PERIOD OF RETENTION OF YOUR PERSONAL DATA

How long we keep your Personal Data depends on the purposes for which we process it and the criteria against which we assess the retention periods of your Personal Data. In determining the retention periods for your Personal Data, we consider:

- The need to store your Personal Data to ensure the performance of an existing service contract;
- the need to retain your Personal Data for the purposes of fulfilling the obligations imposed on SIA SG Capital Partners AIFP by law, for

example, in accordance with the 5-year period set out in the Law on Prevention of Money Laundering and Terrorism and Proliferation Financing, and within the various document retention periods set out in other laws;

- Retention of your Personal Data to protect our interests in the event of various claims after termination of our business relationship with you, for example for 10 years under the general limitation period;
- The need to retain your Personal Data in order to provide evidence of lawful processing of your Personal Data during the preceding period, such as the existence of your consent to previous processing activities;
- Where the processing of your Personal Data is carried out on the basis of Consent, for as long as your Consent is valid for the relevant purpose of processing your Personal Data, in the absence of any other basis for processing your Personal Data
- When assessing the retention periods of Personal Data, we take into account the guidelines developed by the Association of Latvian Commercial Banks for determining the retention periods of various documents. If, in the course of our assessment, we identify different reasonable retention periods for your Personal Data, for example, between the retention period prescribed by the laws and regulations and the period prescribed to protect our interests, this will be sufficient grounds to retain your Personal Data for longer. If one or more of the above criteria occur, we will ensure that your Personal Data is deleted or anonymised.

We will keep your CV and the documents you submit for a specific vacancy until the end of the competition and for at least six months afterwards to protect you against any claims or legal proceedings against us.

CCTV recordings are kept for a maximum of three months. Recordings shall be deleted automatically in chronological order from the moment of recording. Individual recordings may be retained for longer periods if this is necessary for certain purposes, such as the investigation of incidents and offences.

Once the above retention period has expired, we will securely delete your personal data or make it inaccessible or non-identifiable so that it can no longer be linked to you.

## 7. YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA

You have the right to receive the information required by the laws and regulations in relation to the processing of your data.

In accordance with the regulatory enactments, you also have the right to request SIA SG Capital Partners AIFP access to your personal data, as well as to request SIA SG Capital Partners to supplement, rectify or delete them, or to restrict processing in relation to your data, or the right to object to processing, as well as the right to data portability. These rights are exercisable insofar as the processing of data does not result from the obligations of SIA SG Capital Partners AIFP imposed on it by applicable laws and regulations and which are carried out in the public interest.

You can make a request to exercise your rights:

- in writing in person, on production of an identity document
- by electronic mail, signed with a secure electronic signature.

Upon receipt of your request to exercise your rights, SG Capital Partners AIFP Ltd verifies your identity, assesses the request and executes it in accordance with the regulatory enactments:

- we will respond to your request without undue delay and in any event within one month of receipt of your request; if necessary, taking into account the complexity and number of your requests, we have the right to extend the time limit for fulfilling your request by a further two months. In this case, we will inform you of the reasons for the extension and the reasons for the delay within one month of receipt of the request;
- we will provide you with information in response to your enquiries, either in person, by visiting our office or by email, taking into account,

where possible, the method you have indicated for receiving the response to your enquiry;

- Your request will be processed free of charge. However, if we conclude that your requests are repetitive, manifestly unfounded or excessive, we will, taking into account the administrative costs of providing the information or communication or taking the action requested (including staff resource costs), charge you a reasonable fee for dealing with your request or refuse to comply with your request by notifying you in advance.

In the event that there have been changes to your Personal Data, or if you have become aware that we are processing inaccurate or incomplete Personal Data, please inform us of the need to correct it. In such a case, SG Capital Partners AIFP Ltd is entitled to request you to provide documents supporting the rectification.

We will ensure the erasure of your Personal Data in our possession, including with our business partners, if the Personal Data is no longer necessary for the purposes for which we processed it. We will not be able to delete your Personal Data if we are required to ensure such processing in the cases provided for by laws and regulations, ensuring the retention periods of information or documents, such as those set out in the Law on Prevention of Money Laundering and Terrorism and Proliferation Financing, etc.

In the event that you object to the processing of your Personal Data based on the legitimate interests of SG Capital Partners AIFP Ltd, SG Capital Partners AIFP Ltd shall immediately suspend such Processing, but only for a period of time until SG Capital Partners AIFP Ltd conducts an assessment and indicates compelling legitimate grounds for the Processing of Personal Data that override your interests, rights and freedoms. SG Capital Partners AIFP Ltd will have the right to Process Personal Data if it is necessary for the exercise or defence of legal rights and interests, bringing legal proceedings (for example, for the purpose of legal proceedings).

### **Your consent to data processing and right to withdraw it**

Your consent to the processing of your personal data based on the legal basis of consent shall be given by you to SG Capital Partners AIFP Ltd in writing or by email.

You have the right to withdraw your consent to processing in the same manner as given at any time, in which case no further processing based on your consent for that purpose will be carried out.

Withdrawal of consent shall not affect the processing of data carried out at the time when your consent was valid. Withdrawal of consent may not interrupt the processing of data carried out on the basis of other legal grounds.

## **8. SECURITY OF PERSONAL DATA**

We guarantee the non-disclosure and security of your Personal Data by taking appropriate technical and organisational measures to ensure the physical and logical security of your Personal Data, by restricting access to your Personal Data, by securing the computer network, personal devices, data backup and other security measures, thereby also ensuring the protection of your Personal Data against unlawful access, use or disclosure.

Within the scope of our processing of Personal Data, access to your Personal Data is limited to our authorised employees and authorised employees of our business partners who need it for the performance of their duties and who process your Personal Data in compliance with the technical and organisational requirements for the processing of Personal Data set out by law. In order to ensure the quality and prompt performance of our obligations under the contract with you, we may authorise our business partners to perform certain tasks or services. If, in carrying out these tasks, our business partners process your Personal Data in our possession, the business partners concerned shall be deemed to be processors and we shall have the right to transfer your Personal Data necessary for the performance of these activities to our business partners to the extent necessary for the performance of these activities. Our business partners will ensure that they comply with the requirements for the processing and

protection of your Personal Data in accordance with the applicable laws and regulations and will not use your Personal Data for any other purpose.

SG Capital Partners AIFP Ltd shall ensure compliance with data processing and data protection requirements in accordance with laws and regulations and, in the event of your objection, shall take reasonable steps to resolve the objection. However, if this fails, you, as the Data Subject, have the right to apply to the supervisory authority, the **Data Inspectorate**.

## 9. CONTACT US

In case of any questions related to the processing of your Personal Data, you can contact us by writing to the following e-mail address: **info@sgcapital.lv**, or by coming to our office at Skanstes 50, Riga, LV-1013, where you will be provided with all necessary information related to the processing of your Personal Data, including answers to any unclear questions. All information will be passed on to the responsible employee who will respond to your request.

SG Capital Partners AIFP Ltd has the right to make amendments to this Privacy Policy. The previous and current versions of this Privacy Policy are on file at the offices of SG Capital Partners Ltd.

### Version history of the document

Version No.	Date	Type	Content of changes
1.0	01.05.2019.	Original version	The original version published.
2.0	19.10.2023.	Updated version	General changes to the text. The information in chapters 2 and 3 of the document (2. Types of personal data we process about you; 3. Purposes of processing your personal data and their legal basis) has been revised and supplemented.