



# Data Protection Charter

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**Document name:** Data Protection Charter  
**Version:** 1.0  
**Creation date:** March 2020  
**Approval Date:** Q1 2022



# 1. Introduction

## Purpose of the Data Protection Charter

Meridiam SAS (hereafter, “**Meridiam**”), domiciled 4 Place de l’Opéra, 75002 Paris, France, is responsible for the content of this charter aiming to provide you with Meridiam manner to process and protect your personal data (hereafter, the “**Data Protection Charter**” or the “**Charter**”).

Such Charter is up to date with the EU General Data Protection Regulation, entry into force on 25 May 2018 (hereafter, “**GDPR**”).

By providing Meridiam with Personal Data, you acknowledge having read and understood the Charter, and where necessary accepting the processing of your Personal Data by Meridiam, as described here below. By providing Meridiam with Personal Data belonging to third parties, you certify you have received all prior necessary approval, when consent is required.

Meridiam acts as controller when collecting and processing your Personal Data.

## Personal data definition

Reference to “**Personal Data**” means any information by which an individual may be identified, directly or indirectly, by referring to an identification number for example. Personal Data is:

- Identity data such as name, surname, age, marital status, social security number, tax identification number, etc.;
- Personal and professional details such as telephone number, mail address, email address, etc.;
- Economic and financial data;
- Medical data;
- Cultural or social data;
- Bank account details;
- Data generated by surfing on Meridiam website;
- Etc.

## 2. What categories of data are collected by Meridiam?

Main categories of Personal Data collected by Meridiam are listed below. All categories of data are not collected for everyone. Depending on your relationship with Meridiam (investors, partners, employees, etc.), one or more of the below categories of data may be collected, in accordance with the sought purposes:



- Your identification data such as name, surname, age, marital status, social security number, tax identification number, etc.;
- Your personal and professional details such as telephone number, mail address, email address, etc.;
- Your economic and financial data;
- Where necessary, your medical data;
- Where necessary, your bank account details;
- Data generated by your visit on Meridiam website.

Other data may be processed by Meridiam, in particular to comply with its legal and regulatory obligations, for the execution of precontractual or contractual measures, at your request, etc. Any processing of data is identified and managed through Meridiam Data Register (hereafter, the “**Data Register**” or “**Meridiam Data Register**”).

### 3. When and how does Meridiam collect your personal data?

In the context of its management company and human resources management activities, Meridiam collects your Personal Data through different kind of documents during our contractual or commercial relation, in particular:

- KYC questionnaires;
- Subscription forms;
- Subscription to events organized by Meridiam, e.g. Investor Days and Asset Management Days;
- When you apply to a job offer;
- In any exchange with Meridiam, by email, phone, mails or by visiting Meridiam at its office;
- Contact form on Meridiam website;
- Visiting Meridiam website (cookies);
- As the case may be, through your client account.

An exhaustive list of processing has been implemented in Meridiam Data Register, updated as necessary and at least once a year.



## 4. What is the source of personal data processed by Meridiam?

Meridiam collects data directly coming from you in the context of its collective management and human resources management activities as described above.

Meridiam collects some statistical data on your visits on the website by using cookies.

Meridiam has recourse to service providers to understand the use you may have of its website. To have additional information, refer to Meridiam Use of Cookies Policy available on the dedicated Meridiam webpage. When visiting Meridiam website for the first time, you may choose to refuse the use of cookies. You may also change your settings on the Personal Data webpage.

## 5. For what purposes and on which regulatory basis does Meridiam collect your data?

Personal data are collected to meet specific objectives (purposes) disclosed to concerned persons and identified in Meridiam Data Register. Such data cannot be subsequently used for other purposes than the ones for which it has been initially collected. A list of the core purposes is provided below:

### AIF Management

In this context, personal data processing is mandatory to comply with legal and regulatory obligations as well as our contractual obligations (opening of account with the depositary, subscription management, additional fundraisings, etc.).

### Investors relations management

In order to act in the best interests of its investors, Meridiam has to collect and process some of their personal data (identification of the individuals representing a legal person, addressees of reports, answering to questions, etc.).

### Partners relations management

For complying with precontractual and contractual obligations, liaising with partners, Meridiam needs to collect some personal data and to process them, in the strict respect and limits of the purposes for which such data is collected and processed.

### Projects development - Marketing

In the context of project development and commercialization of Meridiam vehicles, you may receive presentations of Meridiam or Meridiam vehicles, from Meridiam and/or one of its group entities (hereafter, the “**Group**”). In order to provide you with these presentations, Meridiam processes your Personal Data, i.e. in particular professional email addresses, professional mail addresses.



You may object reception of such presentations by contacting Meridiam as per modalities described in section “Contact” of this Charter.

### **Investors, partners and employees KYC**

In order to comply with legal and regulatory obligations, Meridiam must collect your Personal Data before the entry into relationship / first subscription in an alternative investment fund (hereafter “AIF”) management by Meridiam.

This processing has been implemented in particular by anti-money laundering and counter terrorism financing regulation (“AML-CFT”) to which Meridiam must comply with.

### **Marketing and communication management**

In the context of communication, Meridiam may process your Personal Data (such as email and mail addresses) for providing you with newsletters. You may object reception of such newsletters by contacting Meridiam as per the modalities described in section “Contact” of this Charter or by contacting directly your usual contact person at Meridiam.

### **Contact requests on Meridiam website**

To be able to respond to your request made through the contact form available on the website, Meridiam needs to collect some of your Personal Data. By contacting Meridiam through this service, you acknowledge having read and understanding that Meridiam will process the Personal Data you have sent, for the purpose of responding to you.

### **Human resources management**

As per human resources management, Meridiam collects your Personal Data necessary for recruitment management, management of the employees in the course of the exercise of their professional activity at Meridiam, work organization, etc. These purposes are directly linked to the execution of precontractual and contractual measures, as well as Meridiam legitimate interest.

### **CCTV and video monitoring**

Meridiam collects Personal Data for the monitoring of goods and individuals in the common areas of the office. The purpose is the legitimate interest of Meridiam.

In the context of your relations with Meridiam, your data may be collected for other purposes. Meridiam lists all processing of personal data and their respective purposes in its Data Register to verify and ensure they are compliant with applicable regulation.

All processing and purposes are monitored through Meridiam Data Register, updated as soon as necessary and at least on an annual basis.



## 6. What is the data storage period?

Personal Data are stored for a limited period of time, not exceeding the necessary purpose storage period.

Storage period is determined as per the processing purpose, the collected data of the concerned persons and in compliance with our legal, regulatory and professional obligations. It does not exceed the strict necessary period for the good execution of the processing.

Meridiam monitors the collected Personal Data and their purposes to comply with the deletion obligations at the end of the legal storage period.

## 7. Who are the recipients of your data?

Meridiam commits to provide your Personal Data only to entities of the Group or necessary third parties, and to never commercialize your Personal Data.

Meridiam uses services from selected service providers. Such third parties are contractually committed not to provide or access your personal data received in accordance with a designated service.

The third parties are in particular:

- IT service providers for hosting, management of IT systems, backup, provision and maintenance of IT networks, backup networks, etc.;
- Service providers for archiving, etc.

May have access to your Personal Data:

- Persons in charge of service provisions as per their respective attributions;
- Service providers, experts, lawyers, depository banks;
- Potential sub-processors;
- Authorized third parties (Courts, Supervisory Authority, control services (external auditors, auditors, internal controllers, etc.).

## 8. Transfer of personal data outside EU

Your Personal Data may be transferred outside the European Union or the European Economic Area because Meridiam has subsidiaries located in the following countries:

- Austria



- Canada
- United States America
- Ethiopia
- Jordan
- Luxembourg
- Senegal
- Turkey

As a matter of principle, a transfer of Personal Data outside EU mainly concerns employees and futures employees of the Group and is intended to occur only for the necessary execution of a contract between the employee or future employee and Meridiam, or the execution of precontractual measures. This transfer may also be necessary for the conclusion or the execution of a contract concluded in the interest of the employee between the controller and another individual or legal person (usually another entity of the Group), in compliance with provisions of GDPR Article 49.

In the case where Meridiam would transfer your Personal Data to a country non having an equivalent level of personal data protection within the meaning of GDPR and outside situations described in Article 49, you would be specifically informed at the time of the collect and Meridiam would adopt appropriate guarantees.

## **9. Data confidentiality and security**

Meridiam commits to ensure your Personal Data security by implementing an enhanced protection, using physical and IT securitization tools, in particular:

- Confidentiality engagement from Meridiam employees;
- IT and information systems security policy with our IT service providers;
- Physical, IT and organizational measures for limitation of inadequate access risks to such Personal Data.

## **10. What are your rights?**

In compliance with applicable data protection regulation requirements, you have:

- A right of access to your Personal Data collected by Meridiam





It means you may ask Meridiam to have access to all your Personal Data collected by Meridiam.

- A right of rectification of your Personal Data

It means you may ask for the rectification of your Personal Data if they seem not accurate or outdated. You may also ask to complete them where they seem incomplete to you.

- A right of objection to the processing

It means you may object to certain kind of processing, excepted when these processing are necessary for Meridiam to comply with its legal or regulatory obligations.

- A right of deletion of your Personal Data

However, Meridiam could be allowed to store your Personal Data for some legitimate reasons, such as when the processing is necessary for complying with a legal obligation to which Meridiam is subject or for the establishment, exercise or defense of a legal claim.

- A right to demand the transfer of your Personal Data to third parties (Portability)

It means you may ask for transmission of your Personal Data you have provided to Meridiam to a third party. Only information you have provided to Meridiam may benefit from this transfer. Information issued by Meridiam is not eligible to portability.

- A right of processing limitation of your Personal Data

It means your Personal Data will, except for their storage, be processed only with your consent or for the establishment, exercise or defense of a legal claim.

- A right to arrange the processing of your Personal Data after your death

It means you may provide guidance as per your Personal Data storage, deletion and communication after your death. Guidance are general or specific. General guidance is registered with a trusted third party. Specific guidance is kept with the controller.

- A right to withdraw your consent (where applicable)

It means you may withdraw at any time the consent you gave for the processing of your Personal Data.

You may exercise your rights, at any time, by contacting Meridiam using contact details provided below.

You may also submit a claim to the CNIL, on its website (<https://www.cnil.fr/fr/plaintes/internet>), or by sending a mail at the following address: CNIL – 3 place de Fontenoy – TSA 80715, 75334 Paris Cedex 07.

## 11. Contact

You may contact Meridiam, at any time:



- By mail at: 4 place de l'Opéra, 75002 Paris, to the attention of M. Emmanuel Chalopin;
- By email at: [gdpr@meridiam.com](mailto:gdpr@meridiam.com).

This Charter, available for anyone on Meridiam website, is updated on a regular basis to implement legal and regulatory changes, and any change in Meridiam organization, or in the proposed offers and services.

