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**HarbourVest Partners (Ireland) Limited**

**Data Protection Notice**

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<b>Version:</b>	<b>Review/Amendments:</b>	<b>Reviewed/Amended by:</b>	<b>Approved By:</b>	<b>Date Approved:</b>
1.	New Policy	N/A	Board of Directors	December 2023

## **Introduction**

The purpose of this document is to provide you with information on our use of your personal data in accordance with the EU data protection regime introduced by the General Data Protection Regulation (EU) 2016/679 (the "**Data Protection Legislation**").

In this document, "we", "us" and "our" refers to Harbourvest Partners (Ireland) Limited (registered in Ireland with company number 634468) and certain delegates and affiliates acting as a data processor ("**HarbourVest Ireland**").

## **Who this affects**

This notice affects natural persons who are (i) registered shareholders, and applicants for shares in funds managed by HarbourVest Ireland ("**Investors**") (ii) beneficial owners, directors, officers, trustees and / or authorised signatories of registered shareholders, or applicants for shares, in funds managed by HarbourVest Ireland ("**Connected Persons**") and (iii) not Investors or Connected Persons but who otherwise have contact with HarbourVest Ireland or funds managed by it for business reasons such as natural persons who are employed or engaged by service providers of HarbourVest Ireland or funds which it manages, prospective investors and job candidates ("**Business Contacts**"). In this notice, Investors, Connected Persons and Business Contacts are together referred as "**Individuals**".

If you are an institutional investor (or prospective investor in relation to our marketing of funds managed by us) that provides us with Personal Data on Individuals, this will be relevant for those Individuals and you should transmit this document to such Individuals or otherwise advise them of its content.

## **Personal data**

By virtue of making an investment in funds managed by us and other associated interactions with us you will provide us with information which constitutes personal data within the meaning of the Data Protection Legislation about you as an Investor or Connected Persons and/or Business Contacts. We have grouped this personal data together as follows:

- **Identity Data:** name, signature, nationality, residency information, place of birth, date of birth, passport number or similar identifier, signature, marital status, title, online identifiers and gender;
- **Contact Data:** residential address, email address, contact details, corporate contact information, and correspondence records;
- **Financial Data:** bank account information, wire transfer information, expense details, beneficiary designation, credit history, share or option numbers, values, and vesting, source of funds details, information about your financial circumstance including net assets and the size of your investment portfolio, and details relating to your investment activity;
- **Employment Data:** title/role, institution/company, location, compensation, work history, qualification/training, information provided on your CV/cover letter/application form, and information provided during an interview;
- **Marketing and Communications Data:** including details such as preferences in receiving marketing from us and our third parties and communication preferences;
- **Investment Analytics Information:** including investment history, proposals or recommendations, and preferences;
- **Certification Information:** including business partners or employee certification / accreditation details, conflicts information, approvals, registrations, licenses, and consent;
- **Cookies, Analytics and Related Technologies:** Refer to the HarbourVest Cookies Policy for the way in HarbourVest Partners LLC ("**HarbourVest**"), and its affiliates, use cookies. <https://www.harbourvest.com/cookies-and-technologies-policy/>.

We may also obtain personal data on you and persons connected with you from public sources such as sanctions listed published by the EU, the UN Security Council and other public authorities, the Companies Registration Office and market data providers such Bloomberg and Thomson Reuters.

### **Children and Special Category Data**

We do not intend to or knowingly collect or solicit personal information online from children under the age of 18. If you are under the age of 18, do not provide us with any personal data.

We do not collect (i) special categories of data unless you voluntarily provide them to us in connection with attending meetings or communicating with us or (ii) information relating to criminal convictions and offences unless provided to us by you or a third party in connection with due diligence carried out to comply with our legal obligations or those of the funds we manage.

### **How we may use your personal data**

We collect, store, use and share the following categories of personal data under the following lawful bases for the lawful purposes described below:

- **Legitimate Interest:** We collect, store, use and share the personal data described above relating to Individuals for our legitimate interests in operating our business and the legitimate interests of the funds we manage in operating their business as more particularly described in the Annex. We do not process personal data where such legitimate interests are overridden by your interests, fundamental rights or freedoms. Individuals have a **right to object** to us processing your personal data on the basis of these legitimate interests.
- **Legal Obligation:** We process Identity, Contact, Financial Data and Technical Data to discharge EU and EU member state legal obligations to which we are subject, including:
  - i. Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers;
  - ii. Commission Delegated Regulation (EU) No. 231/2013;
  - iii. European Union (Alternative Investment Fund Managers) Regulations 2013 (the "**AIFM Regulations**");
  - iv. European Union (Markets in Financial Instruments) Regulations 2017;
  - v. Criminal Justice (Money Laundering and Terrorist Financing) Act 2010
  - vi. Central Bank (Supervision and Enforcement) Act 2013 (the "**2013 Act**");
  - vii. Central Bank AIF Rulebook;
  - viii. Companies Act 2014 ;
  - ix. Taxes Consolidation Act 1997;
  - x. Regulation (EU) No.1215/2012 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters and Council Regulation EC No

1206/2001 on cooperation between the courts of Member States in the taking of evidence in civil or commercial matters;

- xi. GDPR and the Data Protection Act 2018; and/or
- xii. in order to comply with requests from EU and EU member state regulatory, governmental, tax and law enforcement authorities and/or report information to law enforcement where required such as under section 19 of the Criminal Justice Act 2011.

All references to laws are as may be amended, supplemented, consolidated, substituted in any form or otherwise modified from time to time.

Where HarbourVest Ireland requires personal data to comply with its legal obligations or those of a fund managed by HarbourVest Ireland, failure to provide this information means the relevant fund may not be able to accept you as an investor. Financial Data, Investment Analytics Data, Identity Data are required to assess your application and for the purposes of your contract with the relevant fund. Failure to provide this information means that HarbourVest Ireland may not be able to process your subscription application for the relevant fund, accept you as an investor in the relevant fund or otherwise deal with you.

**Consent:** Should we wish to use your or your Connected Persons' personal data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

### **Why we may share your personal data**

We anticipate that the following affiliates and delegates will process Individuals' personal data:

- HarbourVest Partners LLC, (privacy policy found at <https://www.harbourvest.com/privacy-policy/>), HarbourVest Partners LP (the "**Investment Manager**"), administrator, depositary, auditor, legal counsel, our affiliates and other service providers to (i) us and (i) the funds we manage who assist us in providing and managing our services and products;
- the distributors, intermediaries, brokers, and agents of the funds we manage who assist us in marketing and selling services and products of the funds we manage;

- courts, regulators, tax authorities, and other competent authorities who require us to disclose your personal data for legal or regulatory purposes and other third parties as required by applicable law;
- other third parties, and who are involved in any corporate transaction such as a joint venture, financing, merger, acquisition, reorganisation, insolvency or transfer of our business or assets, the funds we manage or their assets, or in any litigation, dispute, or claim involving us and/or the funds we manage or if we determine its disclosure is necessary to enforce our legal rights or contractual commitments;

and each of their respective affiliates and delegates.

### **Where we may transfer your personal data**

Certain of our affiliates and delegates are located outside the European Economic Area (the "EEA") including in the United Kingdom and the United States.

- (i) The European Commission has deemed certain jurisdictions to provide an adequate level of data protection. Details of these jurisdictions are available at [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en) Where we transfer personal data to any of these jurisdictions we will transfer personal data on the basis of Article 45 of the Data Protection Legislation.
- (ii) Where we transfer personal data to other jurisdictions outside of the EEA and it is a country in respect of which the European Commission has not adopted an adequacy decision, we transfer this personal data on the basis of Article 46 of the Data Protection Legislation (Transfers subject to appropriate safeguards). We ensure that appropriate safeguards are in place in respect of any such transfer such as standard contractual clauses as adopted by the European Commission in accordance with Article 46(2) of the Data Protection Legislation on 4 June 2021. Please contact us (see the section "**Getting in Touch**" below) if you wish to receive a copy of our standard contractual clauses.
- (iii) In respect of certain cross-border personal data transfers, we will obtain your consent to transfer your personal data outside the EEA after first informing you about the possible risks of such a transfer.

### **The data protection measures we take**

We and our duly authorised delegates shall apply appropriate information security measures designed to protect data in our/our delegates' possession from unauthorised access by third parties or any form of computer corruption.

We shall notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

### **Updates to personal data**

We will use reasonable efforts to keep your personal data up to date. However, you will need to notify us without delay in the event of any change in your personal circumstances, so that we can keep the personal data up to date.

### **Our retention of your personal data**

We or our duly authorised delegates may retain your personal data for as long as necessary for the purpose for which it is processed, including to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We or our duly authorised delegates may retain your personal data for as long as deemed necessary by the Fund in accordance with applicable law, and until your disinvestment from the funds managed by us or following the point where your business relationship with us has ceased or potentially for a longer period where necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.

Thereafter, we and our duly authorised delegates will refrain from collecting any further personal data on you and shall take appropriate steps to dispose of, delete or anonymise any records containing your personal data, to the extent this is operationally feasible and proportionate. Where your personal data has been anonymised, we may retain this information indefinitely.

### **Your data protection rights**

You have certain rights regarding our use of your personal data summarised as follows:

- the right to access your data (in an easily readable form);
- the right to examine and correct your data;
- the right of erasure and/or to restrict the use of your data;
- the right to data portability;
- the right to withdraw any consent given to the processing of your data (where applicable) without affecting the lawfulness of the processing carried before withdrawal of consent; and
- the right to lodge a complaint with the Data Protection Commission (our lead supervisory authority) or a supervisory authority in the EU member state of your usual residence or place of work.

### **Managing Communication Preferences**

If you have opted in to our marketing communications (or where permitted by law, if you have provided us with your contact information), we may send you email messages, direct mail marketing, or other communications regarding services depending on the method of communication selected. You may ask us not to do so when you access our websites or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

**Printed/Electronic Materials:** To opt out of receiving printed/electronic marketing materials at your postal/email address, please contact us using the details below. Please be sure to include your name and mailing/email address exactly as they appear on the respective marketing materials you received.

**Emails:** To opt out of receiving marketing communications via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

### **Changes to this Notice**



We may need to make changes to this Data Protection Notice from time to time and shall do so by amending the version of this Data Protection Notice published at <https://www.harbourvest.com>. We will notify you of any material changes by email, or by posting the updated notice on our website, or by other appropriate means. We encourage you to review this notice regularly to stay informed about how we protect your personal data.

### **Getting in touch**

We are not required to designate a data protection officer. However, should you have any queries or wish to discuss your data protection rights with us, please contact us at:

**Harbourvest Partners (Ireland) Limited**

**ATTN:** Deirdre Micks

23-25 Baggot Street Upper

The Lumen Building

Dublin D04 Y7T1

Tel. Number: +353 15 664422

Email: [EMEACompliance@harbourvest.com](mailto:EMEACompliance@harbourvest.com)

## Annex 1

We collect, store, use and share Personal Data relating to Individuals for our legitimate interests in operating our business and those of the funds which we manage in operating their business where these are not outweighed by the rights of the relevant Individuals as more particularly described in the following table:

Personal Data	Processing Purposes
<b>To provide services to the funds we manage including to provide:</b>	
Identity Data  Contact Data  Account/Financial Data	<ul style="list-style-type: none"> <li>- Portfolio management</li> <li>- Risk management</li> <li>- Administration services</li> <li>- Legal and fund management accounting services</li> <li>- Customer inquiries services</li> <li>- Valuation and pricing, including tax returns</li> <li>- Regulatory compliance monitoring</li> <li>- Maintenance of unit/shareholder register</li> <li>- Distribution of income</li> <li>- Unit/shares issues and redemptions</li> <li>- Contract settlements, including certificate dispatch</li> <li>- Record keeping</li> <li>- Marketing</li> </ul>
<b>To manage the relevant fund's relationship with Individuals including:</b>	
Identity Data  Contact Data  Account/Financial Information  Employment Information  Certification Information  Marketing and Communications Data	<ul style="list-style-type: none"> <li>- To communicate with, authenticate, and keep records of, Individuals</li> <li>- To perform fund/subscription processes, accounts, records, and on-boarding of Investors</li> <li>- To perform due diligence and background screening on Investors and Connected Persons</li> <li>- To assist the relevant fund in meeting relevant regulatory requirements</li> <li>- To accept/process funds from, pay funds to, keep records for, and provide services to Investors</li> </ul>

<p>Investment Information</p> <p>Analytics</p>	<ul style="list-style-type: none"> <li>- To contract with vendors</li> <li>- To perform due diligence on or monitor target or portfolio company's key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders</li> <li>- To carry out marketing and research</li> <li>- To provide Investor advisory services</li> <li>- To perform investment presentations</li> </ul>
<p><b>For the management day-to-day operation of our and the security of our Group IT systems:</b></p>	
<p>Identity Data</p> <p>Contact Account/Financial Information</p> <p>Data</p> <p>Employment Information</p> <p>Certification Information</p> <p>Technical Data</p>	<ul style="list-style-type: none"> <li>- To contact Individuals to respond to requests or inquiries</li> <li>- To provide newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you</li> <li>- To conduct market research, surveys, and similar inquiries to help us understand trends and Investor needs</li> <li>- To administer Investor profiles, analyzing investments, presenting customized marketing, and improving our services, programs, and other materials or potential investment offerings</li> <li>- To prevent, investigate, or provide notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal data, our data systems;</li> <li>- To meet non-EU or EU Member State legal or regulatory obligations;</li> <li>- To obtain legal advice, enforcing contractual obligations, complying on a voluntary basis with law enforcement requests and/or requests from non-EU Member State law authorities</li> <li>- To perform employee recruiting</li> <li>- To perform employment decisions and screenings of prospective employees, including: assessment of skills/qualifications/suitability for a role; background and reference checks where applicable; communicating with candidates regarding their recruitment process; keeping records related to hiring processes; and complying with legal and regulatory requirements.</li> <li>- To communicate with, paying funds to, keeping records for, and providing services;</li> </ul>

	<ul style="list-style-type: none"> <li>- To perform due diligence and corporate transactions;</li> <li>- To improving and customizing the Services for you;</li> <li>- To understanding how our services are being used;</li> <li>- To obtain insights into usage patterns of the Services;</li> <li>- To explore ways to grow, administer, develop and market our business;</li> <li>- To ensure the safety, security, and legal compliance of our services; and</li> <li>- To enhance protection against fraud, spam, harassment, intellectual property infringement, crime and security risks, including, if applicable, through background screening.</li> <li>- To maintain the security of HarbourVest IRL services, for fraud detection, and to protect HarbourVest IRL's rights</li> <li>- To manage HarbourVest IRL services and email messages and to collect and track information about user activities online over time and across different websites and social media channels.</li> <li>- To authenticate users and secure digital access control for employees; and</li> <li>- To perform recordkeeping and tracking in enterprise and storage software for employees.</li> </ul>
<p><b>To personalise content and improve our services</b></p>	
<p><b>Cookies, Analytics and Related Technologies</b></p>	<ul style="list-style-type: none"> <li>- As set out in the Cookies Policy <a href="https://www.harbourvest.com/cookies-and-technologies-policy">https://www.harbourvest.com/cookies-and-technologies-policy</a>.</li> </ul>