# LSP PRIVACY STATEMENT WEBSITE VISITORS BUSINESS PARTNERS

**AUGUST 2021** 

#### INTRODUCTION

This is the Privacy Statement of LSP Management Group B.V. and its group companies, including the companies specifically mentioned in Annex 1 aimed at website visitors and business partners. This Privacy Statement provides information on the processing of personal data by LSP Management Group B.V. and its group companies, hereinafter **LSP**, we or us.

The primary purpose of this Privacy Statement is to be a dynamic resource and business tool so that we can offer our services to you in the best possible way. We want you to feel secure when visiting our site and are committed to maintaining your privacy when doing so.

This Privacy Statement may be changed over time. Changes to this Privacy Statement will be brought to your knowledge by appropriate means. The most up-to-date Privacy Statement is published on our website. This Privacy Statement was last changed in **August 2021**.

If you are an investor in an LSP fund or an individual related to an investor in the fund and/or an individual related to an underlying beneficial owner being a legal entity, a separate privacy statement applies which can be found in the subscription agreement for the relevant LSP fund.

#### 1. WHEN DOES THIS PRIVACY STATEMENT APPLY?

This Privacy Statement is applicable to the processing by LSP of all personal data of its website visitors, business partners and other individual with whom we have a commercial relationship (but no investor relationship, see above). This Privacy Statement does also not address the processing of personal data of job applicants.

# 2. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

LSP and/or its group companies (specifically, the group company that is the website holder) are the controllers of the processing of all personal data that fall within the scope of this Privacy Statement. This Privacy Statement indicates what personal data are processed by LSP and for what purpose, and to which persons or entities the data will or may be provided.

## 3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

In the table below, we explain what personal data about you we will process, for what purpose we process this personal data, what this purpose entails, on what legal basis we process your personal data and how long we retain your personal data for the purpose.

After the retention period set down in the table, we delete your personal data.

# 3.1 When you interact with LSP (online or offline)

	Purpose	Personal data	Legal basis	Retention period
(a)	For answering your questions and addressing your requests. If you get in touch with us at the email addresses or via the contact form on	Name Contact details	Legitimate interest (i.e. our business interest)	7 years after the closing of the end of the financial year
	LSP's website, we will use your personal data in order to reply to and	Correspondence with LSP about your question or request and all other personal data which are necessary to answer your question or address your request		

	Purpose	Personal data	Legal basis	Retention period
(b)	To protect health, safety, security and to ensure integrity. At LSP, we value your health, safety, security and integrity highly. We process your personal data in order to safeguard our employees and visitors. As such,	Name Contact details	Legitimate interest (i.e. our business continuity purposes) Legal obligation	7 years after the closing of the end of the financial year
	we may screen your personal data against publicly available		Vital interest	
	government and/or law enforcement agency sanctions lists.			

# 3.2 When you use our website

	Purpose	Personal data	Legal basis	Retention period
(a)	To deliver you our website's functionalities and for their technical and functional management. If you use our website, we process technical data to offer you our website and functionalities and to allow our website's administrators to manage and improve our website's performance. Further, we process your personal data to allow you to save your data (such as preferences) to your saved items and to allow you to share these with others using the sharing options you have configured on your device. LSP also uses cookies to ensure you can retrieve information from our website quickly and easily.	Personal data you have provided on our website or personal data that are generated by the functionalities you have used on our website and the technical data from your device (such as its IP address, the internet browser you use, the pages you have visited on our website, your click- and surf behaviour and the length of your session)	Consent  Legitimate interest (i.e. our commercial business and marketing interests)	7 years after the closing of the end of the financial year
(b)	To allow you to connect with us (e.g. via LinkedIn). LSP is active on social media platforms such as LinkedIn. When you contact LSP via social media, we process your personal data in order to answer your questions and to respond to your messages.  In addition, when you visit a 'Connect with us' or 'Follow us' screen on our website, you can contact us through a variety of communication channels. We provide you with our email address as well as our website, Linked-In details. When you click one of the corresponding icons we will refer you to the website or app of the	(User) Name  Address  E-mail address  Gender  Personal data you have included in your message to LSP  Personal data that you have shared on your social media profile	Consent  Legitimate interest (i.e. our commercial business and marketing interests)	Not applicable

Purpose	Personal data	Legal basis	Retention period
applicable third party, whether this is			
your email provider or a social media			
platform.			

# 3.3 When you do business with us

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acceporder identifyour admindilige publicular elists. in order agree LSP investigated in the control of the con	business partner. We will cess your personal data or sonal data of any of your cloyees for assessment and eptance purposes, for example in er to confirm and verify your nitity. LSP will further process repersonal data for other ministrative purposes such as due gence and screening against licly available government and/or enforcement agency sanctions s. We also use your personal data order to deliver or receive and minister our or your services. LSP process your personal data in er to further execute our elements.  Puses the information stored in its estor and business contacts abase to send you suitable offers newsletters, as well as to provide	Name Contact details Date of birth Payment and credit information Personal data involved in any correspondence with us Signatory	Consent  Performance of contract  Legal obligation  Legitimate interest (i.e. our commercial business interest)	7 years after the closing of the end of the financial year

# 3.4 Other purposes

Purpose	Personal data	Legal basis	Retention period
To comply with laws. In some cases, LSP processes your personal data to comply with laws and regulations. For example, this could be the case where tax or business conduct related obligations apply.	Contact details	Legal obligation  Legitimate interest (i.e. our business interests)	7 years after the closing of the end of the financial year
In order to comply with relevant laws and regulations, we may need to disclose your personal data to government institutions or supervisory authorities.	Payment and credit information  Your chamber of commerce and VAT details  Tax details		

#### 4. COOKIES

We also collect information through the use of cookies. Cookies are small files of information which save and retrieve information about your visit to this website – for example, how you entered our site, how you navigated through the site, and what information was of interest to you.

## 5. WHO HAS ACCESS TO YOUR PERSONAL DATA?

#### 5.1 Access to your personal data within LSP

As a global organisation, data we collect may be transferred internationally throughout LSP's worldwide organisation. Your personal data may be exchanged with the LSP group and with companies working under the name LSP. We exchange your data for administrative purposes and so that we can have a complete overview of your contacts and contracts with the LSP group. We may also exchange your data in order to offer you a complete package of services and products.

LSP employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform their jobs.

## 5.2 Access to your personal data by third parties

The following third parties have access to your personal data, where relevant, for the provisioning of their products or services to LSP:

- Banks
- Insurance companies
- IT suppliers
- Service providers of LSP (such as marketing analytics service providers and marketing firms)
- Accountants
- Forensic specialists
- Fund administrators and fund depositaries
- Placement agents
- Portfolio companies

When third parties are given access to your personal data, LSP will take the required contractual, technical and organisational measures to ensure that your personal data are only processed to the extent that such processing is necessary. The third parties will only process your personal data in accordance with applicable law.

# 5.3 The use of your personal data by processors

When a third party processes your personal data solely following LSP instructions, it acts as a processor. We enter into an agreement with such a processor for the processing of personal data. In this agreement, we include obligations to ensure that your personal data are processed by the data processor solely to provide services to us.

#### 5.4 International data transfers

For the purposes listed above, your personal data may be transferred to any of the aforementioned recipients in any jurisdiction.

Transfers of such data will be made to countries located in or outside of the European Economic Area (the **EEA**). Certain countries in which recipients may be located and to which personal data may be transferred may not have the same level of protection of personal data as the one afforded in the EEA.

Personal data transferred to countries outside of the EEA will be protected by appropriate safeguards such as standard contractual clauses approved by the European Commission (and possibly required supplementary measures) and you may obtain a copy of such safeguards by contacting us using the contact details set out in section 8 below.

#### 6. HOW IS YOUR PERSONAL DATA SECURED?

LSP has taken adequate safeguards to ensure the confidentiality and security of your personal data. LSP has implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing.

## 7. YOUR RIGHTS

Under applicable data protection and privacy laws, you may have rights to:

## Access your personal data

You may ask us whether we process any personal data that relate to you. If this is the case, you may ask us to provide you with a copy of the personal data we process relating to you insofar as required by applicable data protection laws.

## • Correct and erase your personal data

You may request us to correct any inaccurate personal data we process relating to you. Also, you may ask us to erase the personal data that relate to you if they are no longer necessary for the purposes for which we processed them, if you have withdrawn your consent and we do not have another legal ground for processing your personal data, if your personal data have been unlawfully processed, if your personal data have to be erased following applicable EU or EU member state laws, or if it concerns a child's personal data processed in relation to offering online services.

## • Request the restriction of processing

You may request the restriction of the processing of your personal data if you have contested the accuracy thereof, if the processing is unlawful and you prefer restriction over erasure, if we no longer need your personal data for a purpose but you need them for the establishment, exercise or defence of legal claims, or while your exercised right to object is being reviewed.

#### Object to processing your personal data

You may object to our processing of your personal data based on our legitimate interest. We will then no longer process your personal data for this purpose, unless we have an overriding legitimate interest to do so. You may also ask us to erase your personal data, unless there is an overriding legitimate interest for the processing.

You may also opt out from processing your personal data for direct marketing purposes.

• Withdraw your consent to processing your personal data

You may withdraw your consent to the processing of your personal data (where LSP is processing your personal information based on your consent).

Data portability

You may request receipt or transmission to another organisation, in a machine-readable form, of the personal information that you have provided to LSP.

• Lodge a complaint with supervisory authority

If you feel that we do not comply with the applicable privacy laws, you have the right to lodge a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) or any other relevant data protection authority.

#### 8. CONTACT INFORMATION

If you have any questions regarding the processing of your personal data, or would like to send a request relating to any of your data protection rights, please contact LSP's General Counsel Bas Vaessen at <a href="mailto:bvaessen@lspvc.com">bvaessen@lspvc.com</a>.

# ANNEX 1

LSP Advisory B.V. LSP Operations B.V. LSP Services Deutschland GmbH LSP Bioventures, Inc.