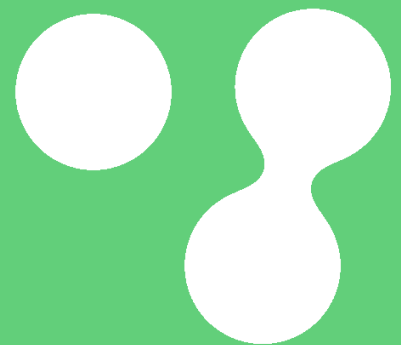


Privacy Information Notice for Investors



Privacy Information Notice for investors

Your privacy is very important to us. This privacy information notice (“Privacy Information Notice”) describes how Sova Ventures S.à r.l., acting on its own behalf, and on behalf of Sova VC SCSp RAIF will collect, use and protect your personal information in your capacity as potential investor and/or investor. It applies to any services and website applications offered by Sova Ventures S.à r.l. and Sova VC SCSp RAIF and referred to in this Privacy Information Notice.

1. Who we are

Sova Ventures S.à r.l. (company registered with the Luxembourg Trade and Companies Register with number B245195) located at 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg acting on its own behalf, and on behalf of Sova VC SCSp RAIF (company registered with the RCS number B246209) located at 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg. “Sova Ventures”, “we”, “us”, is a Data Controller (as defined below). This means that we are responsible for deciding how we hold and use Personal Data about you.

We are required under Data Protection Legislation to provide you with this Privacy Information Notice.

Sova Ventures is committed to protecting the privacy and security of your Personal Data. This Privacy Information Notice describes how we collect and use Personal Data about you during and after your investment relationship with us, in accordance with Data Protection Legislation.

| Term | What it means in this document |
|-----------------------------|---|
| Affiliate | any affiliated company in the Sova Group, including but not limited to LLC Concern Rossium (in Russian - ООО "Концерн "Россиум", with state principal registration number: 1065032052700), Sova Capital Ltd acting as the Investment Manager, Sova Asset Management (CY) Ltd acting as the AIFM |
| Data Controller | the natural or legal person who determines the purposes and means of processing Personal Data, i.e. Sova Ventures |
| Data Processor | the natural or legal person responsible for processing Personal Data on behalf of a Data Controller |
| Data Protection Legislation | the EU GDPR, the UK GDPR, the Luxembourg Data Protection Law (DPL) and the Data Protection in Criminal Matters Act and any other applicable data protection legislation or regulation, regulatory codes of practice and guidance issued or updated from time to time; |
| EEA | European Economic Area which is made up of EU countries plus Norway, Iceland and Liechtenstein |
| EU GDPR | The EU General Data Protection Regulation (EU) 2016/679 |
| UK GDPR | The UK version of the EU GDPR |
| Personal Data | Any Information relating to an identified or identifiable natural person (the ‘data subject’), where that person can be identified directly, or indirectly, from that data |

2. Why we need to collect, use and process your Personal Data

We collect Personal Data from you when you enter into a contract with us and/or complete an application form for any of our services and we process that Personal Data in order to administer and operate your account as investor, perform our contractual obligations and to comply with our legal obligations or regulatory requirements, including those laid down in tax and company law (including for the purposes of complying with the Foreign Account Tax Compliance Act and the OECD Common Reporting Standard for Automatic Exchange of Financial Account Information) as well as anti-money laundering and counter-terrorist financing laws and regulations and screening against sanctions lists.

When you enter into a contract with us and/or complete a client/investor application form to enable us to provide you with any of our services and/or fund shares, you understand that we will be processing your Personal Data for the purposes set out above.

3. The information we collect, hold and process about you

We may collect the following types of Personal Data from and about you, or if you are a legal person about your directors, officers or employees, your beneficial owners (if applicable) and any person or organisation you have appointed to act on your behalf in relation to our services, for example an investment manager or an attorney under a power of attorney (if applicable):

- a. Full name;
- b. Permanent residential address;
- c. e-mail addresses;
- d. Telephone and facsimile contact numbers;
- e. Nationality and citizenship;
- f. Date of birth;
- g. Passport information such as passport number and date of expiry;
- h. Employment status;
- i. Profession or occupational information;
- j. Educational information;
- k. Utility bills;
- l. Tax information such as tax identification numbers and country of residency or domicile for tax purposes;
- m. Financial information such as income sources and bank account details; and
- n. As part of our compliance with legal obligations such as AML/KYC (as defined below under section 9), we may be required to process special categories of Personal Data (as defined by the GDPR), including Personal Data relating to political opinions as well as criminal convictions and offences.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your investment relationship with us.

4. How we use and process your Personal Data

We will only use your Personal Data when the law allows us to. For the most part we do not rely on individual consent to allow us to process Personal Data. Our processing is permitted by the Data Protection Legislation because it is: (i) necessary in order to administer and operate your account as investor and perform our contractual obligations, (ii) necessary to comply with our legal obligations and regulatory requirements (including for the purposes of the prevention of fraud), and (iii) for Sova Ventures's legitimate interests in providing its services to you as our client. We will use your Personal Data in the following circumstances:

- a. To process subscriptions, redemptions and conversions of units and payments of dividends;
- b. For the purpose of account administration;
- c. For the purpose of client relationship management;
- d. To maintain the register of investors;
- e. To comply with any legal obligation or regulatory requirement;
- f. For the detection, prevention and investigation of illegal or prohibited criminal activities and in the protection of our legal rights (including liaison with regulators and law enforcement agencies);
- g. To provide you with access to any of our available web-based services and applications in relation to the services you have requested;
- h. To notify you about changes to our services.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. The consequences of not providing some types of Personal Data

You may, at your discretion, refuse to communicate your Personal Data to Sova Ventures. However, if you fail to provide certain information when requested, we may not be able to manage your investment in the fund, or we may be prevented from complying with our legal obligations and regulatory requirements and thus cannot accept you investing in the fund.

6. How we collect information

You may give us Personal Data when you apply to us to perform our services, by entering into a contract with us and/or filling in a subscription form or by corresponding with us by:

- a. Phone;
- b. Email;
- c. Post; or
- d. By any other electronic means.

We may also receive Personal Data (e.g. financial or tax information) from third parties with whom we work closely and who are entitled to share that information (e.g. credit agencies, search information providers, business partners, banking and related service providers, analytics providers, public sources or any other service providers), but in each case, as permitted by applicable law.

7. Disclosure of your information

Once you have entered into a contract with us and/or completed an investor application form to subscribe for fund shares, we may share your Personal Data (including storage and transfer of data) with:

- a. Any Affiliates or branches in the same corporate group as Sova Ventures for the purposes set out in this Privacy Information Notice;
- b. Agents selected by you (such as your investment manager or attorney) and for whom you have given prior written (via e-mail or in paper) or verbal consent for us to share Personal Data;
- c. Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies, credit reference agencies and company auditors;
- d. Our service providers and agents (including their sub-contractors) or third parties (such as our clearing agents, custodians and securities depositories, central administrator, auditor and legal advisors) who process information on our behalf solely for the purposes of providing their services to us, complying with their own legal obligations or pursuing their legitimate interests as described in this Privacy Information Notice; and
- e. Any third party such as courts, government agencies, tax and other regulatory authorities in the context of actual or threatened legal proceedings provided we can do so lawfully or in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, support an investigation or to protect our rights and interests.

8. Data retention

We may retain information about you:

- a. At the end of your legal contract with us;

- b. Where your application to become our investor is declined by us; or
- c. Where you decide not to proceed with entering into a legal contract with us.

This information will only be held for as long as is necessary to meet any contractual, legal, regulatory obligations or fraud prevention requirements and for our lawful business processing. We regularly review our records to ensure that we only retain your Personal Data for as long as is necessary for the purposes set out in this Privacy Information Notice.

Please note that where we no longer need your Personal Data, we will dispose of it in a secure manner (without further notice to you).

9. Automated decisions

We may use your Personal Data to undertake automated online identity and background checks for our know-your-customer (“KYC”) purposes and for the purposes of relevant checks in the detection, prevention and investigation of illegal or prohibited criminal activities such as anti-money laundering (“AML”) and counter-terrorist financing (“CTF”).

10. Transfers outside of the European Economic Area

The Personal Data that we collect from you may be transferred to, and stored at a destination in any country, including countries outside the EEA, such as Moscow, Russia and the UK, which may not have data protection laws as strict as in the EEA, and may not have been determined to ensure an adequate level of data protection by the European Commission. It may also be processed by our service providers (and their employees) operating outside the EEA. Where this is the case, such Personal Data will be held in accordance with local applicable law and, in accordance with the Data Protection Legislation we will seek to put appropriate safeguards in place to protect the transferred Personal Data including the use of data transfer agreements in the European Commission’s standard form where appropriate. By opening an account with us, you expressly acknowledge the fact that your Personal Data might be shared and transferred to Moscow, Russia or the UK.

11. Security and storage of information

The security and storage of your Personal Data is very important to us.

To protect the security of your Personal Data, we implement appropriate technical and organisational security measures which include physical and technical security safeguards and a governance model that ensures that adequate policies, procedures and controls are in place.

12. Your information and your rights

You have the following rights which can be exercised by contacting us via the contact details set out below:

- a. To be informed about how we obtain and use your information;
- b. To ask for a copy of the information that we hold about you;
- c. To have your information rectified or completed if it is inaccurate or incomplete;
- d. To request us to restrict processing of your Personal Data;
- e. To request to have your information erased (right to be forgotten);
- f. To object to the processing of your information (including to the processing of your Personal Data for direct marketing purposes);
- g. To have information you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine readable format where technically feasible (Data Portability);
- h. Where the processing of your information is based on your consent, the right at any time to withdraw that consent;
- i. To object to any decisions based on the automated processing of your Personal Data, including profiling; and

j. To lodge a complaint with the Luxembourg supervisory authority responsible for data protection matters the *Commission Nationale pour la Protection des Données* (the “CNPD”); or with any competent data protection supervisory authority in their Member State of residence.

You cannot opt out of receiving regulatory or legal information or updates (e.g. information about a change to the terms and conditions of our services). If you would like to use any of your rights, please contact us and we shall be available to assist you.

13. Electronic mail containing Personal Data

You and your agents may, from time to time, send Personal Data to us electronically. We are not responsible for the way in which you or your agent handles Personal Data. Where possible, we insist that you or your agent communicate using either secure/encrypted email, using encrypted files or any other secure method of transmission.

When we communicate Personal Data with you or your agent through electronic means we will ensure that it is done so securely using either encrypted files or secure messaging.

14 Cookies

We do not use cookies on our web site.

15. Changes to our Privacy Information Notice

We may change, modify or adjust this Privacy Information Notice from time to time. However we will not reduce your rights under this Privacy Information Notice.

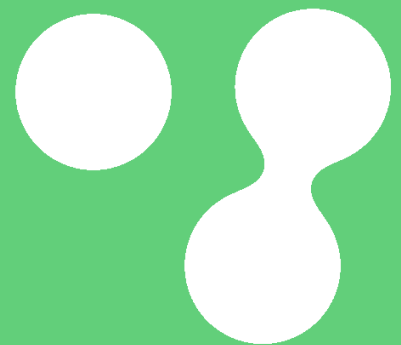
Any changes we may make to our Privacy Information Notice in the future will be found on our website <https://sova.vc/>. Copies are also available from us by post. Please contact us if you require a copy at gdpr@sova.vc.

16. Contact us

We take your privacy and protection of your Personal Data very seriously. If you have any questions, comments or queries about the way we are collecting or using your Personal Data, please contact the person in charge of data protection matters at Sova Ventures, 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg or telephone us on 020 7826 8200 or email us at gdpr@sova.vc.

If you have a concern about the way in which we are collecting or using your Personal Data you may also contact the CNPD directly via their telephone helpline (+352) 26 10 60 -1), by post at 15, Boulevard du Jazz, L-4370 Belvaux, Grand-Duchy of Luxembourg or with any competent data protection supervisory authority.

Privacy Information Notice for Employees and Representatives of Target Companies



Privacy Information Notice for Employees and Representatives of Target Companies

Your privacy is very important to us. This privacy information notice (“Privacy Information Notice”) describes how Sova Ventures S.à r.l., acting on its own behalf, and on behalf of Sova VC SCSp RAIF will collect, use and protect your personal information in your capacity as employee and/or representative of a target company.

1. Who we are

Sova Ventures S.à r.l. (company registered with the Luxembourg Trade and Companies Register with number B245195) located at 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg acting on its own behalf, and on behalf of Sova VC SCSp RAIF (company registered with the RCS number B246209) located at 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg. “Sova Ventures”, “we”, “us”, is a Data Controller (as defined below). This means that we are responsible for deciding how we hold and use Personal Data about you.

We are required under Data Protection Legislation to provide you with this Privacy Information Notice.

Sova Ventures is committed to protecting the privacy and security of your Personal Data. This Privacy Information Notice describes how we collect and use Personal Data about you during and after our working relationship with your employer, or with the target company you represent, in accordance with Data Protection Legislation.

| Term | What it means in this document |
|-----------------------------|---|
| Affiliate | any affiliated company in the Sova Group, including but not limited to LLC Concern Rossium (in Russian - ООО "Концерн "Россиум", with state principal registration number: 1065032052700), Sova Capital Ltd acting as the Investment Manager, Sova Asset Management (CY) Ltd acting as the AIFM |
| Data Controller | the natural or legal person who determines the purposes and means of processing Personal Data, i.e. Sova Ventures |
| Data Processor | the natural or legal person responsible for processing Personal Data on behalf of a Data Controller |
| Data Protection Legislation | the EU GDPR, the UK GDPR, the Luxembourg Data Protection Law (DPL) and the Data Protection in Criminal Matters Act and any other applicable data protection legislation or regulation, regulatory codes of practice and guidance issued or updated from time to time; |
| EEA | European Economic Area which is made up of EU countries plus Norway, Iceland and Liechtenstein |
| EU GDPR | The EU General Data Protection Regulation (EU) 2016/679 |
| UK GDPR | The UK version of the EU GDPR |
| Personal Data | Any Information relating to an identified or identifiable natural person (the ‘data subject’), where that person can be identified directly, or indirectly, from that data |

2. Why we need to collect, use and process your Personal Data

We collect Personal Data from you when entering into an agreement with your employer and/or to comply with the legal obligations imposed on us.

When your employer or the target company you represent enters into a contract with us, prior to or in the context of our working relationship with your employer or the target company you represent, you understand that we will be processing your Personal Data for the purposes set out above.

3. The information we collect, hold and process about you

We may collect the following types of Personal Data from and about you:

- a. Full name;

- b. Permanent residential address;
- c. e-mail addresses;
- d. Telephone and facsimile professional contact numbers;
- e. Nationality and citizenship;
- f. Date of birth;
- g. Passport information such as passport number and date of expiry;
- h. Employment status;
- f. Profession or occupational information;
- g. Educational information and past professional experiences (short CV, LinkedIn profile); and
- h. Picture.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during our working relationship with your employer or the target company you represent.

4. How we use and process your Personal Data

We will only use your Personal Data when the law allows us to. For the most part we do not rely on individual consent to allow us to process Personal Data. Our processing is permitted by the Data Protection Legislation because it is: (i) necessary in order to perform our contractual obligations with your employer, (ii) necessary to comply with our legal obligations and regulatory requirements (including for the purposes of the prevention of fraud), and (iii) for Sova Ventures' legitimate interests. We will use your Personal Data in the following circumstances:

- a. To perform the Data Controller's due diligence on the target company,
- b. To provide the proof, in the event of a dispute, of a transaction or any commercial communication as well as in connection with any proposed purchase, merger or acquisition of any part of our business,
- c. To meet and comply with our accountability requirements and regulatory obligations globally and/or any order of a foreign court, government, supervisory, regulatory or tax authority, and
- d. To exercise our business in accordance with reasonable market standards. We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. The consequences of not providing some types of Personal Data

You may, at your discretion, refuse to communicate your Personal Data to Sova Ventures. However, if you fail to provide certain information when requested, we may not be able to perform our due diligence and such failure may be an obstacle to the contemplated transaction, or we may be prevented from complying with our legal obligations and regulatory requirements.

6. How we collect information

You or your employer or the target company you represent may give us your Personal Data when entering into pre-contractual discussions (in the initial presentation your employer or the target company you represent provides us with and/or in the course of our working relationship with your employer or the target company you represent or by corresponding with us by:

- a. Phone;

- b. Email;
- c. Post; or
- d. By any other electronic means.

We may also receive Personal Data (e.g. financial or tax information) from third parties with whom we work closely and who are entitled to share that information (e.g. credit agencies, search information providers, business partners, banking and related service providers, analytics providers, public sources or any other service providers), but in each case, only as permitted by applicable law.

7. Disclosure of your information

In the course of our due diligence, and later once we have decided to invest in your employer's company or the target company you represent, we may share your Personal Data (including storage and transfer of data) with:

- a. Any Affiliates or branches in the same corporate group as Sova Ventures for the purposes set out in this Privacy Information Notice;
- b. Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies, credit reference agencies and company auditors;
- c. Our service providers and agents (including their sub-contractors) or third parties (i.e. our auditor and legal advisors) who process information on our behalf solely for the purposes of providing their services to us, complying with their own legal obligations or pursuing their legitimate interests as described in this Privacy Information Notice; and
- d. Any third party such as courts, government agencies, tax and other regulatory authorities in the context of actual or threatened legal proceedings provided we can do so lawfully or in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, support an investigation or to protect our rights and interests.

8. Data retention

We may retain information about you:

- a. At the end of our working relationship with employer or the target company you represent;
- b. Where, after carrying out our due diligence, we decide to not pursue our investment project; or
- c. Where your employer decides not to proceed with entering into a legal contract with us.

This information will only be held for as long as is necessary to meet any contractual, legal, regulatory obligations or fraud prevention requirements and for our lawful business processing. We regularly review our records to ensure that we only retain your Personal Data for as long as is necessary for the purposes set out in this Privacy Information Notice.

Please note that where we no longer need your Personal Data, we will dispose of it in a secure manner (without further notice to you).

9. Automated decisions

We may use your Personal Data to undertake automated online identity and background checks for our know-your-customer ("KYC") purposes and for the purposes of relevant checks in the detection, prevention and investigation of illegal or prohibited criminal activities such as anti-money laundering ("AML") and counter-terrorist financing ("CTF").

10. Transfers outside of the European Economic Area

The Personal Data that we collect from you, or your employer, or the target company you represent may be transferred to, and stored at a destination in any country, including countries outside the EEA, such as Moscow, Russia and the UK, which may not have data protection laws as strict as in the EEA, and may not have been determined to ensure an adequate level of data protection by the European Commission. It may also be processed by our service providers (and their employees) operating outside the EEA. Where this is the case, such Personal Data will be held in accordance with

local applicable law and, in accordance with the Data Protection Legislation we will seek to put appropriate safeguards in place to protect the transferred Personal Data including the use of data transfer agreements in the European Commission's standard form where appropriate. By being part of the target company's staff or by representing it, you expressly acknowledge the fact that your Personal Data might be shared and transferred to Moscow, Russia or the UK.

11. Security and storage of information

The security and storage of your Personal Data is very important to us.

To protect the security of your Personal Data, we implement appropriate technical and organisational security measures which include physical and technical security safeguards and a governance model that ensures that adequate policies, procedures and controls are in place.

12. Your information and your rights

You have the following rights which can be exercised by contacting us via the contact details set out below:

- a. To be informed about how we obtain and use your information;
- b. To ask for a copy of the information that we hold about you;
- c. To have your information rectified or completed if it is inaccurate or incomplete;
- d. To request us to restrict processing of your Personal Data;
- e. To request to have your information erased (right to be forgotten);
- f. To object to the processing of your information;
- g. To have information you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine readable format where technically feasible (Data Portability);
- h. Where the processing of your information is based on your consent, the right at any time to withdraw that consent;
- i. To object to any decisions based on the automated processing of your Personal Data, including profiling; and
- j. To lodge a complaint with the Luxembourg supervisory authority responsible for data protection matters the *Commission Nationale pour la Protection des Données* (the "CNPD"); or with any competent data protection supervisory authority.

You cannot opt out of receiving regulatory or legal information or updates (e.g. information about a change to the terms and conditions of our services). If you would like to use any of your rights, please contact us and we shall be available to assist you.

13. Electronic mail containing Personal Data

You and your employer or the target company you represent may, from time to time, send Personal Data to us electronically. We are not responsible for the way in which you or your employer or the target company you represent handle Personal Data. Where possible, we insist that you or your employer or the target company you represent communicates using either secure/encrypted email, using encrypted files or any other secure method of transmission.

When we communicate Personal Data with you or your employer or the target company you represent through electronic means we will ensure that it is done so securely using either encrypted files or secure messaging.

14 Cookies

We do not use cookies on our web site.

15. Changes to our Privacy Information Notice

We may change, modify or adjust this Privacy Information Notice from time to time. However we will not reduce your rights under this Privacy Information Notice.

Any changes we may make to our Privacy Information Notice in the future will be found on our website <https://sova.vc/>. Copies are also available from us by post. Please contact us if you require a copy at gdpr@sova.vc.

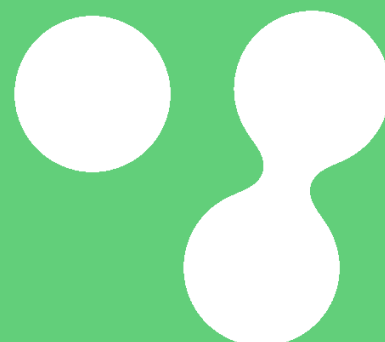
16. Contact us

We take your privacy and protection of your Personal Data very seriously. If you have any questions, comments or queries about the way we are collecting or using your Personal Data, please contact the person in charge of data protection matters at Sova Ventures, 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg or telephone us on 020 7826 8200 or email us at gdpr@sova.vc.

If you have a concern about the way in which we are collecting or using your Personal Data you may also contact the CNPD directly via their telephone helpline (+352) 26 10 60 -1), by post at 15, Boulevard du Jazz, L-4370 Belvaux, Grand-Duchy of Luxembourg or with any competent data protection supervisory authority.

Sova Ventures 21 April 2021

Privacy Information Notice for Directors



Privacy Information Notice for Directors

Your privacy is very important to us. This privacy information notice ("Privacy Information Notice") describes how Sova Ventures S.à r.l., acting on its own behalf, and on behalf of Sova VC SCSp RAIF will collect, use and protect your personal information in your capacity of Director, Board Member or potential Board Member.

1. Who we are

Sova Ventures S.à r.l. (company registered with the Luxembourg Trade and Companies Register with number B245195) located at 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg acting on its own behalf, and on behalf of Sova VC SCSp RAIF (company registered with the RCS number B246209) located at 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg. "Sova Ventures", "we", "us", is a Data Controller (as defined below). This means that we are responsible for deciding how we hold and use Personal Data about you.

We are required under Data Protection Legislation to provide you with this Privacy Information Notice.

Sova Ventures is committed to protecting the privacy and security of your Personal Data. This Privacy Information Notice describes how we collect and use Personal Data about you during and after your appointment as Director or Board Member of Sova Ventures S.à r.l., in accordance with Data Protection Legislation.

| Term | What it means in this document |
|-----------------------------|---|
| Affiliate | any affiliated company in the Sova Group, including but not limited to LLC Concern Rossium (in Russian - ООО "Концерн "Россиум", with state principal registration number: 1065032052700), Sova Capital Ltd acting as the Investment Manager, Sova Asset Management (CY) Ltd acting as the AIFM |
| Data Controller | the natural or legal person who determines the purposes and means of processing Personal Data, i.e. Sova Ventures |
| Data Processor | the natural or legal person responsible for processing Personal Data on behalf of a Data Controller |
| Data Protection Legislation | the EU GDPR, the UK GDPR, the Luxembourg Data Protection Law (DPL) and the Data Protection in Criminal Matters Act and any other applicable data protection legislation or regulation, regulatory codes of practice and guidance issued or updated from time to time; |
| EEA | European Economic Area which is made up of EU countries plus Norway, Iceland and Liechtenstein |
| EU GDPR | The EU General Data Protection Regulation (EU) 2016/679 |
| UK GDPR | The UK version of the EU GDPR |
| Personal Data | Any Information relating to an identified or identifiable natural person (the 'data subject'), where that person can be identified directly, or indirectly, from that data |

2. Why we need to collect, use and process your Personal Data

We collect Personal Data from you to carry out and execute the mandate as a Director, Board Member or potential Board Member of Sova Ventures S.à r.l. (i.e. to perform any pre-appointment measures as well as the mandate with which the post holder is entrusted by Sova Ventures S.à r.l.), for the legitimate interests of the Sova Ventures S.à r.l. and to comply with the legal obligations imposed on Sova Ventures S.à r.l..

When you enter into a contract with us prior to or in the context of your mandate as a Director, Board Member or potential Board Member, you understand that we will be processing your Personal Data for the purposes set out above.

3. The information we collect, hold and process about you

We may collect the following types of Personal Data from and about you:

- a. Full name;

- b. Permanent residential address;
- c. e-mail addresses;
- d. Telephone and facsimile contact numbers;
- e. Nationality and citizenship;
- f. Date of birth;
- g. Passport information such as passport number and date of expiry;
- h. Employment status;
- i. Profession or occupational information;
- j. Educational information;
- k. Utility bills;
- l. Tax information such as tax identification numbers and country of residency or domicile for tax purposes;
- m. Financial information such as income sources and bank account details;
- n. List of mandates; and
- o. As part of our compliance with legal obligations, we may be required to process special categories of Personal Data (as defined by the EU GDPR), including Personal Data relating to political opinions as well as criminal convictions and offences.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your mandate.

4. How we use and process your Personal Data

We will only use your Personal Data when the law allows us to. For the most part we do not rely on individual consent to allow us to process Personal Data. Our processing is permitted by the Data Protection Legislation because it is: (i) necessary in order to perform our contractual obligations, (ii) necessary to comply with our legal obligations and regulatory requirements (including for the purposes of the prevention of fraud), and (iii) for Sova Ventures's legitimate interests. We will use your Personal Data in the following circumstances:

- a. For the appointment of the Directors, Board Members or potential Board Members of Sova Ventures S.à r.l. and the execution of their mandate,
- b. Managing and conducting the activities of Sova Ventures S.à r.l. and Sova VC SCSp RAIF, and
- c. Complying with applicable legal obligations (such as anti-money laundering rules as well as other applicable regulation like the FATCA and the CRS Law).

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. The consequences of not providing some types of Personal Data

You may, at your discretion, refuse to communicate your Personal Data to Sova Ventures. However, if you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations and regulatory requirements.

6. How we collect information

You may give us Personal Data by entering into a contract with us and/or in the course of your mandate or by corresponding with us by:

- a. Phone;
- b. Email;
- c. Post; or
- d. By any other electronic means.

We may also receive Personal Data (e.g. financial or tax information) from third parties with whom we work closely and who are entitled to share that information (e.g. credit agencies, search information providers, business partners, banking and related service providers, analytics providers, public sources or any other service providers), but in each case, as permitted by applicable law.

7. Disclosure of your information

Once you have been appointed as a Director or Board Member, we may share your Personal Data (including storage and transfer of data) with:

- a. Any Affiliates or branches in the same corporate group as Sova Ventures for the purposes set out in this Privacy Information Notice;
- b. Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies, credit reference agencies and company auditors;
- c. Our service providers and agents (including their sub-contractors) or third parties (such as our clearing agents, custodians and securities depositories, central administrator, auditor and legal advisors) who process information on our behalf solely for the purposes of providing their services to us, complying with their own legal obligations or pursuing their legitimate interests as described in this Privacy Information Notice; and
- d. Any third party such as courts, government agencies, tax and other regulatory authorities in the context of actual or threatened legal proceedings provided we can do so lawfully or in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, support an investigation or to protect our rights and interests.

8. Data retention

We may retain information about you:

- a. At the end of your mandate;
- b. Where your application to become a board manager is declined by us; or
- c. Where you decide not to proceed with entering into a legal contract with us.

This information will only be held for as long as is necessary to meet any contractual, legal, regulatory obligations or fraud prevention requirements and for our lawful business processing. We regularly review our records to ensure that we only retain your Personal Data for as long as is necessary for the purposes set out in this Privacy Information Notice.

Please note that where we no longer need your Personal Data, we will dispose of it in a secure manner (without further notice to you).

9. Automated decisions

We may use your Personal Data to undertake automated online identity and background checks for our know-your-customer ("KYC") purposes and for the purposes of relevant checks in the detection, prevention and investigation of illegal or prohibited criminal activities such as anti-money laundering ("AML") and counter-terrorist financing ("CTF").

10. Transfers outside of the European Economic Area

The Personal Data that we collect from you may be transferred to, and stored at a destination in any country, including countries outside the EEA, such as Moscow, Russia and the UK, which may not have data protection laws as strict as in the EEA, and may not have been determined to ensure an adequate level of data protection by the European Commission. It may also be processed by our service providers (and their employees) operating outside the EEA. Where this is the case, such Personal Data will be held in accordance with local applicable law and, in accordance with the Data Protection Legislation we will seek to put appropriate safeguards in place to protect the transferred Personal Data including the use of data transfer agreements in the European Commission's standard form where appropriate. By accepting a mandate, you expressly acknowledge the fact that your Personal Data might be shared and transferred to Moscow, Russia or the UK

11. Security and storage of information

The security and storage of your Personal Data is very important to us.

To protect the security of your Personal Data, we implement appropriate technical and organisational security measures which include physical and technical security safeguards and a governance model that ensures that adequate policies, procedures and controls are in place.

12. Your information and your rights

You have the following rights which can be exercised by contacting us via the contact details set out below:

- a. To be informed about how we obtain and use your information;
- b. To ask for a copy of the information that we hold about you;
- c. To have your information rectified or completed if it is inaccurate or incomplete;
- d. To request us to restrict processing of your Personal Data;
- e. To request to have your information erased (right to be forgotten);
- f. To object to the processing of your information;
- g. To have information you provided to us, returned to you or sent directly to another company, in a structured, commonly used and machine readable format where technically feasible (Data Portability);
- h. Where the processing of your information is based on your consent, the right at any time to withdraw that consent;
- i. To object to any decisions based on the automated processing of your Personal Data, including profiling; and
- j. To lodge a complaint with the Luxembourg supervisory authority responsible for data protection matters the *Commission Nationale pour la Protection des Données* (the "CNPD"); or with any competent data protection supervisory authority.

You cannot opt out of receiving regulatory or legal information or updates (e.g. information about a change to the terms and conditions of our services). If you would like to use any of your rights, please contact us and we shall be available to assist you.

13. Electronic mail containing Personal Data

You may, from time to time, send Personal Data to us electronically. We are not responsible for the way in which you represent or handle Personal Data. Where possible, we insist that you communicate using either secure/encrypted email, using encrypted files or any other secure method of transmission.

When we communicate Personal Data with you through electronic means we will ensure that it is done so securely using either encrypted files or secure messaging.

14 Cookies

We do not use cookies on our web site.

15. Changes to our Privacy Information Notice

We may change, modify or adjust this Privacy Information Notice from time to time. However we will not reduce your rights under this Privacy Information Notice.

Any changes we may make to our Privacy Information Notice in the future will be found on our website <https://sova.vc/>. Copies are also available from us by post. Please contact us if you require a copy at gdpr@sova.vc.

16. Contact us

We take your privacy and protection of your Personal Data very seriously. If you have any questions, comments or queries about the way we are collecting or using your Personal Data, please contact the person in charge of data protection matters at Sova Ventures, 6D Route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg or telephone us on 020 7826 8200 or email us at gdpr@sova.vc.

If you have a concern about the way in which we are collecting or using your Personal Data you may also contact the CNPD directly via their telephone helpline (+352) 26 10 60 -1), by post at 15, Boulevard du Jazz, L-4370 Belvaux, Grand-Duchy of Luxembourg or with any competent data protection supervisory authority.

Sova Ventures 21 April 2021