

Aventicum Real Estate Partners Europe II

Data Privacy Notice for Investors

1. Why are you seeing this notice?

- You may need to provide personal data to us as part of your investment into Aventicum Real Estate Partners Europe II SCSp (the **Fund**).
- We want you to understand how and why we use, store and otherwise process your information when you deal with us or our relevant affiliates.
- This Data Privacy Notice also contains information about your rights in relation to your personal data.

Please read the information below carefully. It explains how and why personal data is processed by us.

2. Who is providing this notice?

The Fund is committed to protecting and respecting your privacy.

The Fund-related entities on whose behalf this privacy statement is made are: (i) the Fund; (ii) Aventicum Real Estate Partners Europe II GP S.à r.l. (together, the **Fund Parties**).

Where we use the terms "**we**", "**us**" and "**our**" in this Data Privacy Notice, we are referring to the Fund and the Fund Parties.

When you provide us with your personal data, the Fund acts as a "**data controller**". In simple terms, this means that:

- we "control" the personal data that you provide – including making sure that it is kept secure
- we make certain decisions on how to use and protect your personal data – but only to the extent that we have informed you about the use or are otherwise permitted by law

3. What information do we collect about you?

The types of personal data we collect and share depends on the product or service you have with us and the nature of your investment. This information can include or be related to:

- social security number and income
- assets and investment experience
- risk tolerance and transaction history
- investment activity
- accounts at other institutions
- assets

The personal data collected about you will help us provide you with a better service and facilitate our business relationship.

- We may combine personal data that you provide to us with information that we collect from, or about you, in some circumstances.
- This will include information collected in an online or offline context.

4. Where do we obtain your personal data?

We collect information about you from a number of sources, including from you directly:

	WHAT	HOW
1	<i>Information that you give us</i>	<ul style="list-style-type: none"> from the forms and any associated documentation that you complete when subscribing for an investment, shares and/or opening an account with us. This may include information about your name, address, date of birth, passport details or other national identifier, driving licence, your national insurance or social security number and income, employment information, information on your tax residence, and details about your investment or retirement portfolio(s) when you provide it to us in correspondence and conversations when you make transactions with respect to the Fund when you purchase securities from us and/or tell us where to send money
2	<i>Information we obtain from others</i>	<ul style="list-style-type: none"> publicly available and accessible directories and sources bankruptcy registers tax authorities, including those that are based outside the UK and the EEA if you are subject to tax in another jurisdiction governmental and competent regulatory authorities to whom we have regulatory obligations credit agencies fraud prevention and detection agencies and organisations

5. Why do we process your personal data?

We process your personal data for the following reasons:

	WHY	HOW
1	<i>Contract</i>	<p>It is <u>necessary to perform our contract</u> with you to:</p> <ul style="list-style-type: none"> administer, manage and set up your investor account(s) to allow you to purchase your holding (of interests) in our funds meet the resulting contractual obligations we have to you facilitate the continuation or termination of the contractual relationship between you and the Fund facilitate the transfer of funds, and administering and facilitating any other transaction, between you and the Fund
2	<i>Compliance with law</i>	<p>It is <u>necessary for compliance with an applicable legal or regulatory obligation</u> to which we are subject to:</p> <ul style="list-style-type: none"> undertake our client and investor due diligence, and on-boarding checks carry out verification, know your client (KYC), terrorist financing and anti-money laundering checks verify the identity and addresses of our investors (and, if applicable their beneficial owners) comply with requests from regulatory, governmental, tax and law enforcement authorities

WHY	HOW
	<ul style="list-style-type: none"> • comply with FATCA and Automatic Exchange of Information monitoring or reporting requirements to which we are subject • surveillance and investigation • carry out audit checks • maintain statutory registers • prevent and detect fraud • sanctions
<p>3</p> <p><i>Our legitimate interests</i></p>	<p>For our legitimate interests or those of a third party to:</p> <ul style="list-style-type: none"> • manage and administer your holding in any funds in which you are invested, and any related accounts on an ongoing basis • assess and process any applications or requests made by you • open, maintain or close accounts in connection with your investment in, or withdrawal from, the Fund scheme • send updates, information and notices or otherwise correspond with you in connection with your investment in the Fund scheme • address or investigate any complaints, claims, proceedings or disputes • provide you with, and inform you about, our investment products and services • monitor and improve our relationships with investors • send direct marketing communications to you • comply with applicable regulatory obligations • manage our risk and operations • comply with our accounting and tax reporting requirements; • comply with our audit requirements • assist with internal compliance with our policies and process • ensure appropriate group management and governance • keep our internal records • prepare reports on incidents / accidents • protect our business against fraud, breach of confidence, theft of proprietary materials, and other financial or business crimes (to the extent that this is not required of us by law) • analyse and manage commercial risks • seek professional advice, including legal advice • enable any actual or proposed assignee or transferee, participant or sub-participant of the partnership's or Fund vehicles' rights or obligations to evaluate proposed transactions • facilitate business asset transactions involving the Fund partnership or Fund-related vehicles, including in certain circumstances answering KYC or similar requests from other entities that they transact with • monitor communications to/from us using our systems • protect the security and integrity of our IT systems <p>We only rely on these interests where we have considered that, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms.</p>

Direct marketing as described at (3) above

We process your personal data for direct marketing purposes:

- to provide you with information, products and services that may be of interest to you in the context of the investment-related activities

- when raising investments into our funds
- in connection with future fundraising activities

You have a right at any time to stop us from contacting you for marketing purposes.

If you object to the processing of your personal data for direct marketing purposes, we will stop using your personal data for these purposes. If you no longer wish to be contacted for marketing purposes, please contact us – please see section 14 below for our contact information.

Monitoring as described at (3) above

We monitor communications where the law requires us to do so. We will also monitor where we are required to do so to comply with our regulatory rules and practices and, where we are permitted to do so, to protect our business and the security of our systems.

6. Who we share your personal data with

Your personal data will be shared with:

WHO	WHY
<i>Fund associates</i>	<p>We share your personal data with our associates, related parties and members of our group. This is to:</p> <ul style="list-style-type: none"> • manage our relationship with you • the purposes set out in this Data Privacy Notice
<i>Fund Managers, Depositories, Administrators, Custodians, Investment Advisors</i>	<ul style="list-style-type: none"> • delivering the services you require • managing your investment • supporting and administering investment-related activities • complying with applicable investment laws and regulations
<i>Tax Authorities</i>	<ul style="list-style-type: none"> • to comply with applicable laws and regulations • where required by EEA tax authorities (who, in turn, may share your personal data with foreign tax authorities) • where required by foreign tax authorities, including outside of the EEA
<i>Service Providers</i>	<ul style="list-style-type: none"> • delivering and facilitating the services needed to support our business relationship with you • supporting and administering investment-related activities
<i>Our lawyers, auditors and other professional advisors</i>	<ul style="list-style-type: none"> • providing you with investment-related services • to comply with applicable legal and regulatory requirements

In exceptional circumstances, we will share your personal data with:

- competent regulatory, prosecuting and other governmental agencies or litigation counterparties, in any country or territory
- organisations and agencies – where we are required to do so by law

7. Do you have to provide us with this personal data?

Where we collect personal data from you, we will indicate if:

- provision of the personal data is necessary for our compliance with a legal obligation; or
- it is purely voluntary and there are no implications for you if you do not wish to provide us with it.

Unless otherwise indicated, you should assume that we require the personal data for business and/or compliance purposes.

Some of the personal data we request is necessary for us to perform our contract with you and if you do not wish to provide us with this personal data, it will affect our ability to provide our services to you and manage your investment.

8. Sending your personal data internationally

We will transfer your personal data to our group members, members of the Fund's partnership and related parties, and to third party service providers outside of the European Economic Area (**EEA**), which do not have similarly strict data protection and privacy laws.

Where we transfer personal data to other members of our group, or our service providers, we have put in place data transfer agreements and safeguards using European Commission approved terms.

Please contact us if you would like to know more about these agreements or receive a copy of them. Please see below for our contact details.

9. Consent – and your right to withdraw it

We do not generally rely on obtaining your consent to process your personal data.

If we do, you have the right to withdraw this consent at any time.

Please contact us or send us an email at RE_Legal@aventicumcapital.com at any time if you wish to do so.

10. Retention and deletion of your information

We keep your personal data for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, or where longer, such longer period as is required by law or regulatory obligations which apply to us.

- We will generally retain information about you throughout the life cycle of any investment you are involved in
- Some personal information will be retained after your relationship with us ends

As a general principle, we do not retain your personal data for longer than we need it.

We will usually delete your personal information 10 years after you cease to be an investor in one of our funds, unless there is a particular reason to hold the records for longer, including legal hold requirements, which require us to keep records for an undefined period of time.

11. Your rights

You have certain data protection rights, including:

- the right to access your personal data
- the right to restrict the use of your personal data
- the right to have incomplete or inaccurate data corrected
- the right to ask us to stop processing your personal data
- the right to require us to delete your personal data in some limited circumstances

From 25 May 2018, you also have the right in some circumstances to request for us to "port" your personal data in a portable, re-usable format to other organisations (where this is possible).

12. **Concerns or queries**

We take your concerns very seriously. We encourage you to bring it to our attention if you have any concerns about our processing your personal data.

This Data Privacy Notice was drafted with simplicity and clarity in mind. We are, of course, happy to provide any further information or explanation needed. Our contact details are below.

If you want to make a complaint, you can also contact the body regulating data protection in your country, where you live or work, or the location where the data protection issue arose. A list of the EU data protection authorities is available by clicking this link: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

13. **Contact us**

Please contact us if you have any questions about this Data Privacy Notice or the information we hold about you.

Contact us by **email** at RE.Legal@aventicumcapital.com.

Contact us in **writing** using these addresses:

<i>Address</i>	6 Rue Lou Hemmer L-1748 Senningerberg, Grand Duchy of Luxembourg
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14. **Changes to this Data Privacy Notice**

We keep this Data Privacy Notice under regular review.

This Data Privacy Notice was last updated on 7 August 2018.