

General Privacy Policy

This General Privacy Policy (the “**Policy**”) applies to all present and future members of Invest Europe AISBL (“**Invest Europe**”) and all present and future attendees of Invest Europe’s events, including courses given in the framework of Invest Europe Training. In addition, this Policy also applies to the processing carried out by Invest Europe in the context of its communications, research and public affairs activities as well as its processing of any information relating to representatives of associations, companies or other partners cooperating with or providing services to Invest Europe. Please make sure you communicate it and make it available to all your employees and other representatives, where relevant.

The purpose of the Policy is to describe (a) the conditions under which Invest Europe, as controller (i.e. the legal entity that decides on the purposes and means of personal data processing) processes personal data (i.e. data relating to an identified or identifiable individual, such as yourself and your relevant employees and other representatives) and (b) your rights and our obligations in relation to such processing.

Until 24 May 2018, the above processing is subject to the Belgian Law of 8 December 1992 on the protection of privacy with regard to the processing of personal data, as modified by the law of 11 December 1998 transposing Directive 95/46/EC.

As from 25 May 2018, the above processing shall be subject to EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**GDPR**”).

1. Which information does Invest Europe collect?

In general, Invest Europe collects general identification information about all individuals with whom Invest Europe interacts, such as the name, title, position, company name, professional and/or private email and/or postal address, fixed and/or mobile phone number as well as any information provided directly by such persons (e.g. by email or through providing business cards).

In addition, Invest Europe collects the following information about the specific categories of individuals listed below.

If you are a member of Invest Europe or an attendee at an event or meeting organised by Invest Europe, Invest Europe will collect the following categories of personal data relating to you, as part of its activities:

- your identification data (as listed above and supplemented by your IP address, as the case may be);
- your education and experience;
- your profession and function;
- your membership status;
- your participation in our events; and
- where applicable, your participation in our working groups and committees (including the fact of your attendance at related meetings and any personal information required by public or official authorities (e.g. date of birth) to facilitate such attendance) and your involvement in any document they produce.

Invest Europe may also process so-called sensitive personal data about yourself (i.e. your dietary requirements which may infer health-related and/or religious data).

If you are an official, a policy maker or an assistant to an official or a policy maker, Invest Europe may collect the following categories of personal data relating to you, most of which being publicly available on the websites of the institutions in which you are involved, in the framework of its public affairs activities:

- your identification data (such as your name, phone numbers, email address);
- your profession and function;
- the country you are representing as part of your functions.

If you are a journalist, Invest Europe collects from its media database provider, currently Gorkana, the following categories of personal data relating to you, in the framework of its communications activities:

your identification data (such as your name, phone numbers and professional email address);

- your education and experience;
- your profession and function;
- your communications with Invest Europe; and
- other professional information relating to your activities as journalist.

If you are a representative of associations, companies or other partners cooperating with or providing services to Invest Europe, Invest Europe collects the following categories of personal data relating to you in the framework of such cooperation:

- your identification data (such as your name, phone numbers and professional email address);
- your profession and function; and
- any other information required for the above cooperation with or the provision of the services to Invest Europe.

If you are a fund manager, a representative of a company involved in the private equity and venture capital industry (whether you or your company is a member of Invest Europe or not) or if you are an individual who wants to submit a request for specific research through

Invest Europe's research helpdesk, Invest Europe collects the following categories of personal data relating to you:

- your identification data (such as your name, professional phone number, professional address and professional email address);
- your profession and function;
- the logs relating to your use of, and submission of information to, Invest Europe's database, where applicable; and
- any other information you may provide to Invest Europe in the framework of business research.

Such processing shall be made in compliance with applicable data protection law and include the information you voluntarily provide when answering questions in our registration forms or otherwise as well as any information we receive from third parties.

If you provide Invest Europe with the personal data of another person belonging to any of the categories of individuals listed in this Section 1, you acknowledge having informed this person beforehand of this General Privacy Policy and, where required, having obtained the consent of this person for this communication.

2. What does Invest Europe do with this information?

2.1. Present and future members

Invest Europe only handles personal data relating to you as a member (present and future) for specific purposes, based on your consent or our legitimate interest, which is to manage the relationship with you, and in particular for:

- membership administration (including sending you requests for information for research purposes);
- networking and sharing the information with other members or official and public bodies;
- setting up of a directory and making it available (in hard copy and on Invest Europe's website); and
- marketing purposes (including emailing of information about our activities).

2.2. Events and courses including in the framework of our Training

Invest Europe only handles personal data relating to present and future attendees of events and courses provided in the framework of the Training for specific purposes based on your consent or our legitimate interest, and in particular for:

- the organisation of these events and courses;
- attendees' administration;
- networking;
- sharing certain details with the Sponsors of the event to which you participate;
- administration of mobile networking applications; and
- marketing purposes (including emailing of information about our activities).

2.3. Public affairs

Invest Europe only handles personal data relating to officials, policy makers and their assistants for specific purposes based on its legitimate interest, which is to participate in the policy debate regarding private equity and venture capital in Europe, and in particular for:

- contacting relevant officials and policymakers engaged in policy debates impacting Invest Europe's members and improving their understanding of private equity/venture capital and its contribution to the economy;
- organising meetings and events with officials and policy makers involved in various workstreams and policy debates of interest to Invest Europe and its members; and
- providing position papers and written communications (reports) about private equity and venture capital.

2.4. Communications

Invest Europe only handles personal data relating to journalists for specific purposes based on its legitimate interest, which is to participate in the policy debate regarding private equity and venture capital actors in Europe, to improve the reputation and understanding of the private equity industry and to promote European private equity to global investors, and in particular:

- in the framework of the operation of the media database, currently Gorkana, and other relevant databases;
- for communicating (in written or oral form) about private equity and venture capital.

2.5. Cooperation with or provision of services to Invest Europe

Invest Europe handles personal data relating to representatives of associations, companies and other partners cooperating with or providing services to Invest Europe for the following purpose based on Invest Europe's legitimate interest, which is to communicate with contact persons in cooperating associations, companies and other partners: for communications with respect to such cooperation and provision of services.

2.6. Research

Invest Europe handles personal data relating to (i) fund managers, (ii) representatives of companies involved in the private equity and venture capital industry or (iii) individuals who submitted requests for specific research through Invest Europe's helpdesk, for specific purposes based, as the case may be, on the consent of the data subjects or on Invest Europe's legitimate interests (i.e. to carry out research regarding private equity and venture capital in Europe, improve the reputation and understanding of the private equity industry) and, in particular, for:

- the creation of a database of the information collected;
- the performance of research in the above areas; and
- the creation of statistics and reports regarding private equity and venture capital in Europe.

2.7. General purposes

More generally, Invest Europe processes personal data of contacts on the basis of its legitimate interest, which is to communicate with relevant stakeholders about its core activities in relation to the private equity and venture capital sector, or on the basis of its legal obligations, for the following purposes:

- processing contact details (e.g. business cards and email signatures);
- managing and administering the relationship between Invest Europe and its contacts;
- complying with any legal obligations imposed on Invest Europe in relation to its activities;
- replying to any official request from public or judicial authorities with the necessary authorisation; and
- archiving and record-keeping.

3. Invest Europe's undertaking when handling your personal data

Taking into account the state of the art of the technology, the costs of its implementation and the nature of the personal data it processes about you, Invest Europe has implemented appropriate technical and organisational measures to ensure a level of security and confidentiality to your personal data so as to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal data, Invest Europe:

- only collects and processes personal data which is adequate, relevant and not excessive as required to meet the above purposes;
- ensures your personal data is not kept for longer than necessary; unless otherwise legally required, your personal data will be stored for a period not exceeding the following:
 - for representatives of member firms, as soon as possible after (i) the firm you are working for is no longer a member of Invest Europe or (ii) Invest Europe becomes aware that you are no longer working for a member firm;
 - for attendees at Invest Europe's events, three years from your latest participation in one of our events;
 - for attendees at Invest Europe's courses for which there is a form of certification, ten years from your participation to such course;
 - for dietary requirements, two months after the event for which you specified such dietary requirements;
 - for those seeking to participate in a meeting between Invest Europe and public or official bodies and who have provided additional personal information (e.g. date of birth) in order to facilitate this, two months after the meeting in question;
 - for fund managers, representatives of a company involved in the private equity and venture capital industry (whether the company is a member of Invest Europe or not),

the period during which the firm you are working for has active investment funds;

- for individuals who submit a request for specific research through Invest Europe's research helpdesk, your contact details will be deleted five years as from such a request being made. Other data you may have provided in your request will be kept for no longer than one month or until such data remains necessary to answer your request;
- for Members of the European Parliament (MEPs) and their assistants as well as European Commissioners and their members of cabinets, five years (this being the normal term of office) unless you leave your role before the formal end of your mandate (e.g. if a Commissioner resigns or if an MEP leaves the European Parliament);
- for other officials or policy makers, as long as you remain in a post or position that is relevant to the area of activities of Invest Europe. The data will be deleted as soon as possible after Invest Europe becomes aware that you left your position;
- for data relating to Invest Europe's communications activities (i.e. journalists), your personal data is subject to the retention policy of our database supplier, currently Gorkana;
- for representatives of associations, companies or other partners cooperating with or providing services to Invest Europe, for 24 months after the end of the agreement between Invest Europe and your company/association.

- ensures that your personal data remains up to date and accurate. For that purpose, Invest Europe may request you to review and update the personal data it holds about you. You are also invited to spontaneously inform our events and membership team and other Invest Europe representatives whenever there is a change in your personal circumstances to ensure your personal data is kept up-to-date; and
- may process certain sensitive data about yourself (i.e. dietary requirements which may infer health-related and religious data) you voluntarily provide to us in the framework of events and courses, in compliance with applicable data protection rules and strictly as required for the relevant purposes listed under Section 2, the data being accessed and processed solely by the personnel in charge of these events and courses, under the responsibility of a representative of Invest Europe who is subject to an obligation of confidentiality. Access and transfer of personal data.

3.1. Events and Membership

Invest Europe may disclose your personal data only to the following specific categories of recipients: our IT and personal assistance service providers, sponsors, other members, official and public bodies, and event organisers. Whenever required, such data may also have to be communicated to relevant public authorities in Belgium and abroad as they may so require in compliance with applicable law.

When you registered to an event including a course given in the framework of the Training organised by Invest Europe, you may have given your consent so that Invest Europe shares your contact details with the sponsors of the event and the other attendees, including attendees coming from countries outside the European Economic Area or "EEA" (i.e. the EU Member States plus Iceland, Liechtenstein and Norway) which do not necessarily offer an

adequate level of personal data protection and therefore present certain risks in relation to the processing of, and access to, the personal data e.g. by local public authorities.

In the framework of the administration of our mobile networking application, Invest Europe transfers personal data relating to you to the supplier running the mobile networking application in the USA. For that purpose, Invest Europe has entered into the standard data protection clauses (controller to processor) adopted by the EU Commission (Decision 2010/87/EU) with the supplier of the mobile application.

3.2. Public Affairs

If you are an official, a policy maker or an assistant to an official or a policy maker, Invest Europe may disclose your personal data to the following categories of recipients: our IT service providers, other associations having the same object as (or a similar one to) Invest Europe (including associations located outside the EEA), as well as some official and public bodies. Where required to allow the transfer outside of the EEA, Invest Europe shall enter into the standard data protection clauses (controller to controller) adopted by the EU Commission (Decision 2004/915/EC) with the relevant recipients. Whenever required, such data may also have to be communicated to relevant public authorities in Belgium and abroad as they may so require in compliance with applicable law.

3.3. Communications

If you are a journalist, Invest Europe may disclose your personal data to the following categories of recipients: our IT service providers email marketing services providers and consultants which may be located outside the EEA. Invest Europe has entered into standard data protection clauses (controller to processor) adopted by the EU Commission (Decision 2010/87/EU), when required, with the above categories of recipients. Whenever required, such data have to be communicated to relevant public authorities in Belgium and abroad as they may so require in compliance with applicable law.

3.4. Cooperation with or provision of services to Invest Europe

If you are a representative of associations, companies or other partners cooperating with or providing services to Invest Europe, Invest Europe may disclose your personal data to the following categories of recipients: our IT service providers.

3.5. Research

If you are a fund manager, a representative of a company involved in the private equity and venture capital business who agreed to provide information for research purposes or if you are an individual who submitted a request for specific research through Invest Europe's helpdesk, Invest Europe may disclose your personal data to the following categories of recipients: our IT service providers and other national venture capital associations. If this is the case, Invest Europe will make sure that appropriate safeguards are in place with such recipients to protect your personal data and their confidentiality.

4. Your rights in respect of your personal data

You may exercise the following rights with respect to your personal data under the conditions and within the limits set forth in the applicable data protection law:

- to access it and if you believe that any information relating to you is incorrect, incomplete or not up to date, to request its correction;
- to request its erasure or the restriction of its processing, or to object to such processing; and
- to request its portability, i.e. by obtaining that the personal data you have provided to Invest Europe be returned to you or transferred to someone else of your choice, in a structured, commonly used and machine-readable format.

If the processing of personal data relating to you is based on your consent, you also have the right to withdraw it at any time, without affecting the lawfulness of our processing before such withdrawal.

If we transfer personal data relating to you outside of the EEA to a country which is not recognised as offering an adequate level of data protection by the European Commission, you may obtain a copy of the safeguards (such as the standard contractual clauses referred to in Section 4) we have put in place to enable such transfer in compliance with the data protection law.

You can exercise the above rights by either sending an email to Invest Europe at chiefexecutive@investeurope.eu or by sending a dated and signed letter addressed to The Chief Executive, Invest Europe, Place du Champ de Mars, B-1050, Brussels, Belgium. A scan or hard copy of your identity card or passport should be included for identification purposes.

If you are not satisfied with the way we process your personal data, please let us know and we will investigate your concern using the above communication means. You have also the right to make a complaint to the competent [data protection authority](#).

Changes or additions to the processing of your personal data as described in this policy, such as other purposes for processing your personal data or new recipients of such data, may be notified to you through amendments to this policy or through individual notice.