



DATA PROTECTION POLICY (GDPR)

Last update: 2024-03

HI INOV is committed to protecting privacy and confidentiality of personal data (“Personal Data”). The following policy (the “Policy”) defines how HI INOV deals with data in compliance with the EU General Data Protection Regulation (GDPR).

The Policy is applicable to both visitor to HI INOV’s website, clients, co-investors, employees, candidates and service providers of HI INOV (the “Data Subject”).

What Personal Data is collected?

HI INOV is able to collect Personal Data directly from Data Subjects:

- via subscription forms;
- at the time of any contact request;
- when making a request for documentation;
- when applying for a job through HI INOV’s website;
- when entering into a work relationship with HI INOV and
- when entering into a commercial or investment relationship with HI INOV

Moreover, HI INOV collects automatically certain data and information about Data Subjects or their computer and electronic devices using cookies each time they visit HI INOV’s website such as data about the activities on the website. More information on how HI INOV uses cookies are available on: <https://www.hiinov.com/legal-notice>

HI INOV may also obtain Personal Data about Data Subjects from third parties such as public services (RCS), investment advisers, agents, lawyers and introducers acting on their behalf, etc.

How Personal Data are used?

Legal basis for Personal Data processing: HI inov process Personal Data only if and to the extent that at least one of the following applies:

- the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes (request for information or documents, application);
- processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract (a subscription form, service provision agreement, hiring, employment contract, sale purchase agreement, shareholders agreement, investment contracts, etc.);
- processing is necessary for compliance with a legal obligation to which HI INOV is subject (KYC, AML, labor law, etc.);
- processing is necessary for the purposes of the legitimate interests pursued by HI INOV.

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Category of Data Subjects	Type of Personal Data	Processing Purpose	Legal basis for data processing
Website users	Websites and Social Networks (cookies and trackings)	Supervision of advertising campaigns and social network prospection Supervision of statistics concerning consultation of our website	Users' consent
Clients	<p>Clients - natural persons: Civil status, email, tax, marital status, residence, IBAN, telephone number, address, national ID card, passport, proof of address, any documents required in the framework of LCB/FT diligences, KYC, etc.</p> <p>Clients - legal entities: KIBS, powers and national ID card of the signatory, balance sheet, profit and loss account and any document required in the framework of LCB/FT diligences, KYC, etc.</p>	KYC, management and supervision of customer relations	Clients' consent + legal requirements and contract performance
	Client claims (surname, forename, email address)	Processing customer claims, mediation with regulators, quality control of supervision of client relations	Performance of a contract concluded with Client
Prospective clients	<p>Prospective clients - natural persons: Civil status, email, tax, marital status, residence, IBAN, telephone number, address, national ID card, passport, proof of address, any documents required in the framework of LCB/FT diligences, KYC, etc.</p> <p>Prospective clients - legal entities: KIBS, powers and national ID card of the signatory, balance sheet, profit and loss account and any document required in the framework of LCB/FT diligences, KYC, etc.</p>	KYC, management of contacts with prospective clients	Prospective clients' consent + legitimate interest
Service Providers	Contact and supervision file (Surname, forename, email, KIBS, and all documents required by the	Contact, supervision of relations, contract, dispute	Legal requirements and performance of contract



	contact file with the partner to fulfil legal obligations)		
Employees and candidates	Civil status, email, tax, residence, IBAN, telephone number, address, national ID card, passport, proof of address, any documents required in the framework of LCB/FT diligences, KYC, etc.	KYC, management of contacts with candidates, management of labor contracts	Employee or candidate's consent + legitimate interest, legal requirements and performance of contract
Co-investors	<p>natural persons: Civil status, email, tax, residence, IBAN, telephone number, address, national ID card, passport, proof of address, any documents required in the framework of LCB/FT diligences, KYC, etc.</p> <p>legal entities: KIBS, powers and national ID card of the signatory, and any document required in the framework of LCB/FT diligences, KYC, etc.</p>	KYC, management of relationship with co-investors	Co-investors consent + legitimate interest, legal requirements

How are Personal Data stored?

Personal Data are processed in a manner that ensures their appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

Personal Data are stored only for as long as is necessary for the purpose for which we process it and in any event for the period necessary to comply with a legal or regulatory requirement in applicable jurisdiction. The retention periods are generally of a minimum of 5 years after the end of the relationship (for AML-CTF purpose for example).

How are Personal Data shared?

Personal Data may be shared in the following situations:

- Within HI INOV to departments that need to process the Personal Data;
- To service providers with such as IT partners, marketing partners, host or service providers who assist us in data management, distribution of emails, analysis of information, banks/depositary, human resources, investment advisors, tax and/or regulatory advisors, auditors, lawyers or other external professional advisors.
- To comply with legal obligations as when requested from regulatory authority (AMF, CNIL, etc.) or if the law requires to do so, or in order to protect our interests, our property and/or our security and/or those of a third party.
- In relation to the fight against fraud, money laundering and terrorist financing.

Each time, only the Personal Data strictly needed will be disclosed to recipient.

No Personal Data will be disclosed to third parties for their own marketing or commercial purposes.

Are Personal Data transferred outside of the EU?

In the case where Personal Data have to be transferred outside of the EU, such transfer of Personal Data will be possible only if the transfer is to a country listed by the European Commission as providing



sufficient protection for data and/or is covered by appropriate guarantees based on standard contract clauses published by the European Commission and/or recognized certification.

Data subjects' rights under GDPR

Data Subjects have the right under this Policy and GDPR:

- To access Personal Data held by HI INOV;
- To rectify incomplete or incorrect Personal Data;
- To restrict or object to the processing of Personal Data or request they being erased;
- To receive a copy of the Personal Data provided by them (portability of Data);
- To request erasure of Personal Data;
- To withdraw their consent;

Exercising GDPR Data Protection Rights:

Data Subjects may exercise their rights of access, rectification, cancellation and opposition by sending an e-mail to privacy@hiinov.com or a letter to HI INOV S.A.S. 30 Bis Rue Sainte H el ene 69002 LYON – France.

HI INOV may ask Data Subjects to verify their identity before responding to their request.

Data Subjects have the right to complain to a Data Protection Authority about HI INOV's collection and use of their Personal Data. For more information, they can contact the CNIL: www.cnil.fr

Changes to this Policy

HI INOV may update this Policy from time to time.