

PRIVACY NOTICE - IGNITE CAPITAL MANAGEMENT AS

The information contained below is provided to fulfil the information requirements under Articles 13-14 of the General Data Protection Regulation (regulation 2016/679, the “GDPR”).

This privacy notice applies to you if:

- (i) you are an investor in a company managed by Ignite Capital Management AS (Fund Manager); or
- (ii) your personal data has been provided to a company in the Ignite Capital sphere in connection with an application for, or investment in, the Fund (e.g. if you are a director, partner, employee, or direct or indirect owner) or
- (iii) Visitor to our website.

What personal data do we process and what are the sources.

The Fund Manager is the data controller and will process, by collecting, and storing certain categories of data and as further detailed below:

Information	Description	Source
Identity data	Name of the Investor (if a natural person) or the Investor's representatives, passport number(s), other government issued number(s) (if any), nationality, images of passports and other identification documents,	We collect this information directly from you
Contact data	Contact details (including postal and/or e-mail address), date of birth, tax residency and identification numbers	We collect this information directly from you
Financial data	Banking details, invested amount and holdings of the Investor in the Fund	We collect this information from you, or it is a result of your investment in the Fund
Use Data when accessing our website	Usage, browser and online behaviour information through cookies, IP address	We collect this information when you visit our web page
KYC / Ultimate Beneficial Owners	Source of funds and any applicable restrictions on your investment such as political exposure or sanctions) and any other information used for monitoring and background checks to comply with laws and	We collect this information directly from you

	regulations, including know-your-client (KYC), anti-money laundering, Politically Exposed Person (PEP) and sanctions checks	
--	---	--

The Investor may refuse to submit Personal Data to the Fund Manager. In such case, however, the Fund Manager may reject the Investor's subscription of Shares in the Fund or take other appropriate measures.

How do we process your Personal Data and what are our legal basis?

Processing Activity	Legal Basis
Processing the Subscription Documentation distribution of payments etc	Fulfilling the services requested by you (GDPR Art. 6.1 (b))
Managing the affairs of the Fund including Shareholder's Agreement	Fulfilling the services requested by you (GDPR Art. 6.1 (b))
Maintaining records and correspondence relating to the Investor's participation in the Fund	Fulfilling the services requested by you (GDPR Art. 6.1 (b)) as well as legal obligation under applicable company law to maintain list of shareholders (GDPR Art. 6.1 (c))
Identity check and detecting and preventing crime (including inter alia money-laundering)	Our legal obligation to comply with applicable anti money laundry obligations (The Norwegian Anti Money Laundry Act, GDPR Art. 6.1 c).
Communication with you and ensuring and maintaining information security	Our legitimate interest (GDPR Art. 6.1 (f))
Visitors to our website	Our legitimate interest to operate and maintain our website (GDPR Art. 6.1 (f)). Non-essential cookies are based on consent (GDPR Art. 6.1 (a))

Retention of Personal Data

The Personal Data will be processed during the time that the Investor holds interests in the Fund, and to the extent required thereafter for archiving purposes under mandatory legal and regulatory obligations.

Transfers of Personal Data

The Fund Manager may transfer the Investor's Personal Data to third parties to meet mandatory legal and regulatory requirements, such as to governmental or regulatory agencies, including to tax authorities.

The Fund Manager may also transfer Personal Data to other entities in the Ignite Capital sphere, sub-contractors and certain third-party services providers, acting as data processors on behalf of the Fund Manager ("Processors").

The Personal Data may be transferred to Processors located inside or outside the European Economic Area, provided, in the latter instance, that such country where the Processor is domiciled has been determined to offer an adequate level of data protection, or that a sufficient level of protection under the GDPR is achieved by

entering into the EU Commission's Standard Contractual Clauses for transfer of personal data to third countries, or the same level of protection is achieved by other means under the GDPR.

Your Rights

You have the right under the GDPR to (1) access your Personal Data, (2) correct your Personal Data where it is inaccurate or incomplete, (3) object to the processing of your Personal Data, (4) ask for erasure of your Personal Data, (5) withdraw your consent (if this is the applicable legal basis) and (6) ask for Personal Data portability.

You may exercise the above rights by writing to the Fund Manager at CEO Magnus Baumann Pettersen, magnus.baumann@ignitecapital.no You also have the right to lodge a complaint with the Norwegian data protection Authority (*Datatilsynet*), the contact details of which can be found at www.datatilsynet.no.