

# WARBURG PINCUS PRIVACY NOTICE

## Warburg Pincus' commitment to data privacy principles

This Privacy Notice is provided by Warburg Pincus LLC and its affiliates listed in *Appendix 1* ("Warburg Pincus", "we", "our", and "us"). We are firmly committed to ensuring compliance with our data protection obligations. Through this Privacy Notice, we wish to inform you about the ways in which we interact with individuals ("Data Subjects") in connection with our business and describing in general terms how we collect, use, store, process, disclose and transfer information that we may collect from Data Subjects. For the purpose of this Privacy Notice, Data Subjects may include, without limitation:

- Employees, contractors, consultants, and other representatives of Warburg Pincus;
- Candidates for employment at Warburg Pincus;
- Investors in Warburg Pincus Funds, including but not limited to registered users of our Investor Reporting Portal;
- Prospective Investors in Warburg Pincus Funds and their representative agents;
- Visitors to our website;
- Directors, officers, employees, and other representatives of portfolio companies in which we have invested or are considering making an investment;
- Individual representatives of third party sellers, placement agents, deal finders, investment bankers, consultants, accountants, advisers, lawyers and other service providers, whether engaged or not by Warburg Pincus.

This Privacy Notice will be updated from time to time in order to reflect any changes to the data privacy laws or changes to our practices. We will also issue additional notices to certain categories of Data Subjects.

## 1. Collection of Personal Data

Personal Data as defined under the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> April 2016 ("GDPR") is any information relating to an identified or identifiable natural person.

### 1.1 Types of Personal Data collected

During the course of regular business, we collect (purposefully or incidentally) many types of Personal Data, including but not limited to the following:

- Identification information (e.g. name, passport number, national ID number, nationality, place and date of birth, gender, your image, IP address);
- Contact information (e.g. residence / mailing address, personal / professional e-mail address, phone numbers);
- Family situation (e.g. marital status, number of dependents, number of children);
- Tax status (e.g. tax identification number, tax residence, tax jurisdiction);
- Education and Employment information (e.g. level of education, employment history, employers' names, salary information);
- Financial data (e.g. bank account details, wire instructions, money transfers, your financial advisor information, investor profile, credit history);
- Background data (e.g. criminal history, unlawful conduct)

## **1.2 Means of collecting Personal Data**

- Personal Data provided by the Data Subject (e.g. you provide us with the information as a candidate for employment or consultant role; as an employee; as a potential or existing investor; as a visitor to our website);
- Personal Data obtained from other sources (e.g. from public records, bankruptcy registers, tax authorities, government and competent regulatory authorities, credit agencies, fraud prevention and detection agencies and organizations).

## **1.3 Cookies**

In addition to the means described under 1.2 above, we automatically collect certain data from Data Subjects who visit our external website [www.warburqpincus.com](http://www.warburqpincus.com) by using cookies. Cookies are files or parts of files stored on any machine connected to the internet that contain personal information such as IP address, customized preferences, or a record of your browsing history. Through the use of cookies, we are able to track certain statistics such as the number and frequency of visitors to our external website. Our separate [Website Privacy Notice](#) provides a detailed description of how we use Cookies.

## **2. Use of Personal Data**

We use your Personal Data for business purposes, including, but not limited to:

- Compliance with various legal and regulatory obligations (e.g. Know-Your-Client and Anti-Money Laundering laws and regulations, the Foreign Corrupt Practices Act, the UK Bribery Act 2010, as well as various rules and regulations imposed on us by the SEC from our role as a registered Investment Adviser, such as the Pay-to-Play Rule);

- Legitimate purpose (e.g. communications with you, the Data Subject, or your representatives and agents appointed by you; performance of activities relating to client management, financial management, and administration of the funds; legal disputes; monitoring and auditing compliance with internal policies and procedures, legal obligations and requirements and orders of regulatory authorities; consideration of applications for employment or an investment into our funds that will include evaluation of your suitability and accuracy of any information submitted;
- Performing a contract with you, the Data Subject, in furtherance of your employment or your status as an investor.

### **3. Sharing Personal Data**

**3.1 Internal sharing** - Within Warburg Pincus we share Personal Data for legitimate business purposes. In order to afford you the same protection in the jurisdictions outside of the EU, Warburg Pincus' global offices have signed agreements adopting the principals of GDPR, which shall govern your Personal Data unless such agreements conflict with national law in which case, the national law shall prevail.

**3.2 External sharing** – We share Personal Data with third parties, when they are acting as Service Providers that perform services on our behalf (e.g. hosting service for our website, investor portal). These service providers may have access to your Personal Data but will process your data only on the basis of the contract with the scope of processing limited by the contract and bound by confidentiality of the contract. A Transaction / Corporate Event may reveal your Personal Data in pursuit of execution of corporate transactions, when you act as a representative of our firm or are a party to an agreement, such as a merger, acquisition, joint venture, financing or sale of Portfolio Company. Your Personal Data may also be disclosed in the event of insolvency, bankruptcy or receivership. Legal Requirement may compel us to disclose your Personal Data in order to make disclosures by applicable law to the government or private parties in connection with a lawsuit, subpoena, investigation or legal proceeding, or as part of our legislative and / or regulatory reporting.

### **4. Protection of Personal Data**

We take our data protection and information security responsibilities very seriously and are committed to the protecting of your Personal Data. We have policies and procedures that govern access to your Personal Data. We make all reasonable efforts to ensure that (i) all Personal Data is kept secure and safe from loss or unlawful or unauthorized destruction, alteration, access, disclosure, or use, and (ii) that any Personal Data held by us is stored in a secure and safe place,

and only accessible by persons, who have a legitimate business or need to know (whether Warburg Pincus employees or third parties).

If you are located outside of the United States, please be aware that the Personal Data we collect may be processed and stored in the United States or other jurisdiction in which the data protection and privacy laws may be less stringent as those in the country where you reside or are a citizen of. To extend the level of protection regarding Personal Data, we have executed a series of agreements between our global affiliates and our European offices that adopt the principals outlined in the GDPR.

## **5. Keeping your Personal Data accurate and up to date**

In general, we seek to ensure that we keep your Personal Data accurate and up to date. This entails taking all reasonable measures to ensure that inaccurate Personal Data, having regard to the purposes for which they are processed, are erased, or rectified without delay. Nonetheless, you are responsible for any changes to your Personal Data (such as a change in your contact details). Please contact us by sending an e-mail to [PersonalData@warburgpincus.com](mailto:PersonalData@warburgpincus.com) in case you want to update or edit your Personal Data that we have on file, including your communication preferences.

## **6. Timeframe for retaining Personal Data**

In general, we will process and store your Personal Data for as long as it is necessary in order to fulfill our contractual, regulatory, and statutory obligations. Our goal is to keep Personal Data for no longer than is necessary for the purposes for which the Personal Data is processed. Personal Data will be kept in accordance with our data retention policies. In case you have any questions in relation to our data retention policies, please contact us by sending an e-mail to [PersonalData@warburgpincus.com](mailto:PersonalData@warburgpincus.com).

## **7. Data Subjects who are Residents of the European Economic Area (the “EEA”) and the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 (“GDPR”)**

Warburg Pincus LLC is headquartered at 450 Lexington Avenue, New York, NY 10017, United States of America. As a data controller, we are accountable for deciding how we store, use, process and how long we keep your Personal Data.

## **7.1 GDPR Data Protection Principles govern the collection, holding, storage, use, and processing of your Personal Data and as such:**

- We will process the data lawfully, fairly and in a transparent way;
- We will obtain the data only for valid purposes that we described above and will not use the data in any way that is not compatible with those purposes;
- The data we collect will be relevant to the purposes we have told you about and limited only to those purposes;
- We will take steps to ensure that the data is accurate and kept up to date;
- Subject to applicable legal or other requirements; we will keep the data only as long as it is necessary;
- We will use appropriate technical and / or organizational measure to ensure security of the data.

## **7.2 Transfer of Personal Data outside of the EEA**

The transfer of Personal Data from and to our affiliates located in the UK/EEA is governed by agreements which incorporate the principals of GDPR and the execution of Standard Contractual Clauses approved by the European Commission.

In case Personal Data is processed on our behalf by third parties outside the UK/EEA, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law, including adoption of GDPR principles and execution of Standard Contractual Clauses if the recipients are not located in a country with adequate data protection laws (as determined by the European Commission).

## **7.3 Data Subject's rights under GDPR**

GDPR grants an EEA-resident Data Subjects certain individual rights with the respect to the Personal Data that our firm can hold about them. These include:

- the right to request access to your personal information and obtain a copy of the information we hold about you;
- the right to correct your personal information that we hold where it is incomplete or inaccurate;
- the right to have your personal information erased where there is no good reason for us continuing to use or retain it;
- the right to request that your personal information is used only for restricted purposes;
- if the lawful basis for processing your personal information is either our or a third party's legitimate interests, the right to object to your personal information being processed;

- the right to require certain parts of your personal information to be transferred to you or a third party;
- the right to withdraw consent, at any time, to our use of your personal information where our use is based solely on your consent; and
- the right to lodge a complaint with the relevant data protection authority in your jurisdiction (for example, the Information Commissioner's Office in the United Kingdom).

In order to exercise these rights please contact [PersonalData@warburgpincus.com](mailto:PersonalData@warburgpincus.com). Although, we will not charge you a fee to access your Personal Data or exercise any of your rights under GDPR, we reserve the right to charge you a reasonable fee if your request for access is clearly unfounded or excessive.

#### **7.4 Automated decision-making process**

During our regular course of business, we do not utilize automated decision making as described by GDPR. However, under our current legal and regulatory obligations to combat money laundering, terrorism financing, and offenses that pose a danger to our clients and assets under our management, we may process some of your Personal Data automatically with a goal of assessing certain personal aspects as outlined by those legal and regulatory measures.

### **8. Contact us**

Questions, comments, requests, and complaints regarding this Privacy Notices and/or use of your Personal Data should be addressed to [PersonalData@warburgpincus.com](mailto:PersonalData@warburgpincus.com). Any Personal Data you provide us by filing a complaint will be treated in accordance with this Privacy Notice and only processed in review of your complaint.

## Appendix 1

### **Warburg Pincus LLC**

Address: 450 Lexington Avenue, New York, NY 10017, USA

### **Warburg Pincus (Texas) LLC**

Address: 4400 Post Oak Parkway, Suite 1900, Houston, TX 77027, USA

### **Warburg Pincus S.a R.L.**

Address: 46 A, Avenue J.F. Kennedy, L-1855 Luxembourg

### **Warburg Pincus Asia LLC**

Address: Two International Finance Centre, 8 Finance Street, Suite 6703, Hong Kong

### **Warburg Pincus do Brasil Ltda.**

Address: Avenida Brigadeiro Faria Lima 2277, 9º andar, Jardim Paulistano, 01451-001, São Paulo–SP, Brazil

### **Warburg Pincus B.V.**

Address: Atrium, Strawinskylaan 3051, 1077 ZX Amsterdam, The Netherlands

### **Warburg Pincus Deutschland GmbH**

Address: Fasanenstrasse 65, 10719 Berlin, Germany

### **Warburg Pincus India Private Limited**

Address: 7th Floor Express Towers, Nariman Point, Mumbai 400 021, India

### **Warburg Pincus International LLC**

Address: 28 King Street, St. James, SW1Y 6QW London, United Kingdom

### **Beijing Warburg Pincus Investment Consulting Company Limited**

Address: 26/F, China World Tower A, 1 Jianguomenwai Avenue, Beijing 100004, China

### **Warburg Pincus Singapore Pte. Ltd**

Address: 50 Collyer Quay, #06-04, OUE Bayfront (Level 6), Singapore 049321, Singapore