

<b>Procedure name</b>	<b>Data Protection and Cookie Management Poolicy:</b>
<b>Objective</b>	<ul style="list-style-type: none"> <li>• In accordance with the regulations and in particular with EU legislation, Jolt Capital has set up a procedure for the Data Protection and Cookie Management for information processed by the Management Company.</li> <li>• This Procedure describes the rules and regulates the processing by Jolt Capital of personal data relating to individuals in the EU.</li> </ul>
<b>Content owner</b>	CCO
<b>Concerned staff</b>	
<b>Regulatory framework:</b>	EU Regulation 2016/679

Version #:	Date:	Prepared by:	Reviewed by:	Approved by:	Comments:
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## **I. Purpose of the Policy:**

The processing of personal data is subject to EU Regulation 2016/679 of April 27, 2016 (“GDPR”) relating to the protection of individuals with regard to the processing of personal data and the free movement of such data.

This policy aims to provide the reader with detailed information on how Jolt Capital collects, protects and maintains personal data, as well as the reasons for its use and sharing. This policy also aims to inform the reader of his/her rights regarding the collection and processing of personal data and the procedures for exercising these rights.

## **II. Background:**

### **A. The Team:**

Jolt Capital a fully independent French Private Equity fund that specialises in Growth Capital Technology Investing, authorised, and regulated by the AMF (Autorité des Marchés Financiers).

We generate returns for our investors by enabling growth stage technology-rich companies with strong fundamentals to execute their growth strategies, in sectors that offer strong exit potential across Hardware-Driven solutions and Software-Driven Solutions.

In providing growth capital to the portfolio companies, we transform their value by enabling them to reach critical mass and supporting their growth in new global markets, new product markets and via new acquisitions & build-ups, while mitigating risks.

These ambitious projects are led by a team of five partner’s who have outstanding track records with international careers as C-suite executives and Board Members and have led various trade sales and IPOs (Euronext, NASDAQ) in Europe, US, Japan and China.

### **B. The Website:**

Jolt Capital’s website and services provided are fully managed by Jolt Capital.

The Data Controller at Jolt Capital is the Director of Engineering. This data controller determines the purposes for which and the means by which personal data is processed.

The Data Protection Officer is the Chief Technology Officer. The primary role of the data protection officer (DPO) is to ensure that Jolt Capital processes the personal data of all data subjects (also referred to as data subjects) in compliance with the applicable data protection rules.

Compliance with the Data Protection Policy and the applicable data protection laws is checked regularly through this data protection team in place.

The results of the data protection controls performed by Data Protection Controller are reported to the Data Protection Officer. The performance of these controls is the responsibility of Data Protection Controller and Data Protection Officer.

In addition to this, the Chief Risk Compliance Officer is informed of the primary results as part of the related reporting duties. On request, the results of data protection controls will be made available to the responsible data protection authority.

## **III. Personal Data Usage:**

Jolt Capital may collect different types of personal data about you, including:

- identification information (surname, first name, nationality, gender).
- contact details (postal address and email address, telephone number).
- time of access.

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- name of the file downloaded, as well as the amount of data transmitted and the access result,
- web browser, browser language, and the re-questing domain and IP address.

#### **IV. Purpose of Usage:**

Jolt Capital may collect different types of personal data to:

- comply with our legal or regulatory obligations.
- at the initiative of the interested party, to request to contact this person or enter into a transactional relationship.
- to communicate periodically on its news or that of its portfolio companies.
- to invite individuals to participate in the events we organize.
- to respond to legal claims or requests from authorities and regulators

#### **V. Sharing of Personal Data:**

The personal data collected by Jolt Capital is used exclusively by Jolt Capital and will not be sold, transmitted to third parties, or transmitted outside Europe. However, they may be disclosed in certain cases, namely:

- to judicial or financial authorities, state agencies or public bodies, at their request and within the limits of what is authorized by the regulations.
- to service providers performing services on behalf of Jolt Capital (custodians, chartered accountants, auditors, etc.).

#### **VI. Storage and Retention**

Jolt Capital may store personal data:

- for as long as necessary for the achievement of the purposes for which they were collected and processed.
- for the duration necessary to comply with the applicable regulations and in particular the applicable limitation periods.
- for a period defined with regard to its operational constraints (life of funds, customer relationship management, etc.).
- to respond to legal claims or requests from authorities and regulators.

#### **I. Individual Rights:**

Depending on the legislation applicable to the situation in question, individuals may exercise the following rights:

- Right to information: All individuals from whom personal data has been collected have the right to be informed in a precise, exact, transparent and accessible manner.
- Right of access: Individuals may obtain information concerning the processing of their personal data as well as a copy of this data.
- Right of rectification: If concerned individuals believe that the personal data is inaccurate or incomplete, they can request that this data be rectified or completed accordingly.
- Right to erase: Individuals may request the deletion of personal data, within the limits of what is permitted by the regulations.
- Right to limitation of processing: In certain cases, individuals may request the limitation of the processing of personal data.

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- Right to withdraw your consent: If the concerned party has given their consent for the processing of their personal data, they may withdraw this consent at any time. Jolt Capital may, however, invoke legitimate and compelling reasons to keep this data.
- Right to the portability of your data: When this right is applicable, the concerned person may ask Jolt Capital for the communication of their personal data, or, when technically possible, the transfer of these to a third party. In such instances, Jolt Capital cannot oppose this.

Concerned parties may also have a right of opposition, allowing them to oppose the processing of their personal data for reasons relating to a particular situation. As a matter of principle, all individuals concerned shall have the absolute right to object at any time to data being used for commercial prospecting purposes, or for profiling purposes if this profiling is linked to commercial prospecting.

Individuals wishing to exercise the aforementioned rights or who may have questions concerning the processing of personal data, may contact Jolt Capital through the following ways:

- by email: [legal@jolt-capital.com](mailto:legal@jolt-capital.com)
- by letter:

Jolt Capital,  
56-58 rue de Ponthieu,  
75008, Paris, France.

However, in order to guarantee the concerned persons identity, the individual concerned will be asked to attach a copy of proof of identity to this request.

For the avoidance of doubt and in accordance with applicable law, in addition to the rights mentioned above, the person concerned shall have the right to contact a data protection authority, such as the CNIL in France.