

POLICY RELATING TO THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF BPIFRANCE INVESTISSEMENT'S ACTIVITY

1. WHO IS THIS POLICY FOR?

This policy (the "**Policy**") is intended for all persons whose data is processed by Bpifrance Investissement, the management company of the Bpifrance Group, or by investment vehicles managed and/or advised by Bpifrance Investissement (existing or future companies or holding companies).

Indeed, Bpifrance Investissement is required to process personal data in the context of its various direct or indirect investment activities, in equity and quasi-equity.

You are covered by this Policy if you are ("**You**")

- Legal representative, authorised person, point of contact, beneficial owner or shareholder/partner of a Prospect;
- Legal representative, authorised person, point of contact, beneficial owner or shareholder/partner of a Subscriber or any natural person;
- Legal representative, authorised person, point of contact, beneficial owner or shareholder/partner within a Target Company or any other person whose data collection is necessary for the investigation of a transaction (in particular the contact points of the service providers used by the Target Company);
- Legal representative, authorised person, point of contact, beneficial owner or shareholder/partner in an Entry or any other person whose collection of data is necessary for the conclusion and monitoring of a transaction (in particular the contact points of the service providers used by the Participation);
- Point of contact for investors wishing to invest in a Target Company or having invested in it;
- Point of contact for investors wishing to acquire securities of a Shareholding;
- Point of contact for investors who have invested alongside a Fund in an Investment;
- Legal representative, authorised person, point of contact, beneficial owner, of a management company that plans to manage or advise a future Partner Fund;
- Legal representative, authorised person, point of contact, beneficial owner, of the management company that manages or advises the Partner Fund;
- Point of contact for subscribers who have co-invested in the Partner Fund;
- Point of contact for a company that operates in the world of private equity (banks, distributors, intermediaries, law firms, insurance companies, consulting firms, etc.)
- Any other person whose data collection is strictly necessary for Bpifrance Investissement in order to carry out its activities.

The purpose of the Policy is to inform you about the processing of personal data implemented by Bpifrance Investissement in the context of its various activities.

When you provide personal data relating to other persons, it is your responsibility to duly inform these persons of the transmission of their data to Bpifrance Investissement and to make available to them the information contained in this Policy.

For certain specific activities, Bpifrance Investissement may be required to provide you, if necessary, with additional information adapted to the processing implemented.

The data of the representatives of the service providers/partners used by Bpifrance Investissement are collected and processed in accordance with what is provided for in the privacy policy dedicated to Bpifrance's suppliers and partners, which can be accessed at the following address: [Data protection | Bpifrance](#)

2. WHO IS RESPONSIBLE FOR THE PROCESSING CARRIED OUT?

Bpifrance Investissement, 27-31 avenue du Général Leclerc 94710 Maisons Alfort, is deemed to be acting as the data controller (the "**Company**") when it processes your Personal Data for the purposes detailed below.

3. WHAT DATA DOES BPIFRANCE INVESTISSEMENT PROCESS, FOR WHAT PURPOSES AND FOR HOW LONG IS THIS DATA KEPT?

In accordance with the applicable regulations, in particular European Regulation 2016/679, known as the General Data Protection Regulation (GDPR) and the national provisions relating to information technology, files and freedoms, Bpifrance Investissement, as data controller, collects and processes your personal data for the purposes listed below.

Bpifrance retains your personal data for the time necessary to implement the purposes set out and applies the retention periods below.

We invite you to refer to the information adapted to your particular situation.

3.1 CASE N°1: PROCESSING RELATED TO THE "DIRECTE" ACTIVITY OF BPIFRANCE INVESTISSEMENT

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
On the basis of the execution of the pre-contractual measures and the contract	1- Contact and exchanges with the Target Companies 2- Carrying out non-regulatory due diligence (legal, financial, tax, strategic, and ESG), 3- Contractualization: negotiation and signature of pre-contractual and contractual legal documentation in the context of investment in the capital of Target Companies or reinvestment in the capital of Participations)	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company, professional experience, dates of employment, employment contract, remuneration.	5 years from the sale or exit of the investment 5 years from the end of the relationship or the last contact in the absence of investment
	4- The operational monitoring of the Shareholdings, including the exercise of mandates in the Shareholdings by Bpifrance Investissement employees within the governance bodies (general meeting, board of	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the sale or exit of the investment

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
	directors, supervisory board, other committee), the use of experts in the context of a Fund's investment strategy		
	5- The completion of divestment transactions in the Investments , including the preliminary analysis of the exit opportunity and the selection of potential buyers	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the sale or exit of the investment
	6- In the case of electronic signature of legal documentation, overall management of the electronic signature and, establishment of the body of evidence contributing to the reliability of the electronic signature process	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional telephone number, professional e-mail address, function/position within the company.	5 years from the sale or exit of the investment
On the basis of a legal obligation to which Bpifrance	7- Carrying out regulatory due diligence on Target Companies, Participations, co-investors or acquirers if applicable and partners in the event of a joint venture:	Identification data: title, surname, first name, date and place of birth, personal postal address, mobile phone number, nationality, country of residence, identity documents (including passport and ID card), photo, signature (electronic or handwritten).	5 years from the termination of the business relationship with regard to identification documents, assessment of the risk of money laundering and all

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
Investissement is subject	Know Your Customer (KYC), anti-money laundering and countering the financing of terrorism, anti-corruption, anti-fraud, carrying out due diligence on international sanctions and embargoes	Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company, professional experience. Data relating to offences, convictions and security measures <u>within the limits of the legal obligations to which Bpifrance Investissement is subject and only in the context of carrying out due diligence.</u>	information relating to the knowledge of the business relationship
	8- Complaint management in accordance with the regulatory framework applicable to the Bpifrance group	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the sale or exit of the investment
	9- Compliance with any other legal, tax or regulatory provision to which Bpifrance Investissement is subject	Identification data : title, surname, first name, signature (electronic or handwritten). Personal data: Postal address, date and place of birth, country of tax residence, tax identification number. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	For a period not exceeding that necessary for the achievement of the specified purposes, increased, where applicable, by the French and European legal and regulatory limitation periods
On the basis of Bpifrance Investissement's legitimate interest in	10- Identification of investment opportunities	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the relationship or the last contact

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
managing and developing its relationships with Target Companies and Investments	11- Event organization and management	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact
	12- Presentation of the offers of the companies of the Bpifrance group, Sending of newsletters on Bpifrance news, Visibility of Bpifrance offers	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact
	13- Participation in studies or surveys in relation to the Target Company or the Participation	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	2 years from the completion of the study
On the basis of Bpifrance Investissement's legitimate interest in ensuring the defence of its rights	14- Management of possible pre-litigation and litigation	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the operation concerned

3.2 CASE N°2: PROCESSING RELATED TO THE FUND OF FUNDS ACTIVITY OF BPIFRANCE INVESTISSEMENT

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
On the basis of the performance of the contract	1- Carrying out initial or additional investment operations in Partner Funds	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the investment
On the basis of Bpifrance Investissement's legitimate interest in implementing "non-regulatory measures in the context of an investment	2- Carrying out legal, financial, tax, strategic, and ESG due diligence on Partner Funds and Potential Partner Funds	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from: - of the end of the investment - or the last exchanges with the potential fund in the event of non-completion of the investment.

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
On the basis of a legal obligation to which Bpifrance Investissement is subject	3- Carrying out regulatory due diligence on Partner Funds and their management companies: Know Your Customer (KYC), anti-money laundering and countering the financing of terrorism, anti-corruption, anti-fraud, carrying out due diligence on international sanctions and embargoes	Identification data: title, surname, first name, date and place of birth, personal postal address, mobile phone number, nationality, country of residence, identity documents (including passport and ID card), photo, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company, professional experience. Judicial data and data relating to offences, convictions and security measures <u>within the limits of the legal obligations to which Bpifrance Investissement is subject and only in the context of the performance of due diligence.</u>	5 years from the termination of the business relationship with regard to identification documents, assessment of the risk of money laundering and all information relating to the knowledge of the business relationship
	4- Complaint management within the framework of the regulations applicable to the Bpifrance group	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the investment
	5- Compliance with any other legal, tax or regulatory provision to which Bpifrance Investissement is subject	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company	For a period not exceeding that necessary for the achievement of the specified purposes, increased, where applicable, by the French and European legal and regulatory limitation periods

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
On the basis of Bpifrance Investissement's legitimate interest in managing and developing its relationships with partner funds and potential partner funds	6- Investment monitoring (including participation in the advisory committees of the Partner Funds)	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the investment
	7- Exchanges with the management teams of the Partner Funds	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	5 years from the end of the investment
	8- Identification and search for new Partner Funds or new business opportunities	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the relationship or the last contact
	9- Event organization and management	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention periods
	10- Presentation of the other offers of the Bpifrance group and sending of newsletters	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact
	11- Participation in Bpifrance studies or surveys	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	2 years from the completion of the study
On the basis of Bpifrance Investissement's legitimate interest in defending its rights in court	12- Management of possible disputes	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the operation concerned

3.3 CASE N°3: PROCESSING RELATED TO THE MANAGEMENT OF FUND LIABILITIES

If you are an actor acting on behalf of the State or affiliated authority (in particular the General Secretariat for Investment) in connection with the monitoring of the State's investment policy through the Investments for the Future Programmes (PIA), you are also concerned by the purposes described below.

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
On the basis of the execution of the pre-contractual measures and the contract	1. Exchanges during the pre-marketing or marketing phase of the Fund	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from: - of the Managed Fund's end-of-life - the last exchanges with the potential Subscriber in the event of abandonment of the project to create the Fund or failure of subscription by the potential Subscriber.
	2. The preparation and conclusion of subscription forms with the Subscribers	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the fund's life
	3. The organization of committees bringing together Subscribers, which may include, the sending of the convocation, the communication of files and the drafting of the Minutes	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the fund's life

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
On the basis of a legal obligation to which Bpifrance Investissement is subject	4. Carrying out regulatory due diligence on potential Subscribers: Know Your Customer (KYC), anti-money laundering and countering the financing of terrorism, anti-corruption, anti-fraud, compliance with international sanctions and embargo regulations	Identification data: title, surname, first name, date and place of birth, personal postal address, mobile phone number, nationality, country of residence, identity documents (including passport and ID card), photo, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company, professional experience. Data relating to offences, convictions and security measures <u>within the limits of the legal obligations to which Bpifrance Investissement is subject and only in the context of carrying out due diligence.</u>	5 years from the termination of the business relationship
	5. Client categorisation: gathering information from potential investors in order to determine whether they have the level of experience and knowledge required to understand the risks inherent in the product	Identification data: title, surname, first name, telephone and email, nationality, postal address, date and place of birth, signature Personal life data: knowledge and experience in financial investment, data relating to the assessment of risks involved, Economic and financial data: country of tax residence, information relating to the investment project, Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the fund's life

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
	6. Complaint management in accordance with the General Regulations of the Autorité des Marchés Financiers (AMF)	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the fund's life
	13- In the case of electronic signature of the subscription form, overall management of the electronic signature and, establishment of the body of evidence contributing to the reliability of the electronic signature process	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional telephone number, professional email address, position/position within the company, identity document.	5 years from the end of the fund's life
	14- Compliance with any other legal, tax or regulatory provision to which Bpifrance Investissement is subject	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	For a period not exceeding that necessary for the achievement of the specified purposes, increased, where applicable, by the French and European legal and regulatory limitation periods
On the basis of Bpifrance Investissement's legitimate interest in managing and	15- Prospect Research and Identification	Identification data : title, surname, first name Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
developing its relationships with subscribers and potential subscribers	16- Management of the relationship between Bpifrance Investissement and its Prospects	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact
	17- Event organization and management	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact
	18- Presentation of the other offers of the Bpifrance group and sending of commercial newsletters	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	3 years from the end of the relationship or the last contact
	19- Carrying out studies, surveys or statistics	Identification data : title, surname, first name Data relating to professional life : professional e-mail address, position/position within the company.	2 years from the completion of the study

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
On the basis of Bpifrance Investissement's legitimate interest in offering the "Open Innovation" support system to certain subscribers	20- Integration of the "Open Innovation" program	Identification data: title, surname, first name Data relating to professional life: professional email address, professional number, position/position within the company.	Until the end of the Fund's life
On the basis of Bpifrance Investissement's legitimate interest in defending its rights in court	21- Management of possible disputes	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	5 years from the end of the fund's life

Please note that, in accordance with the principle of minimisation, Bpifrance Investissement only collects the personal data it needs for the above-mentioned purposes.

When you do not provide personal data identified as mandatory, Bpifrance Investissement is not able to carry out its activities and carry out the operations concerned.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

Your personal data is collected by Bpifrance Investissement directly from you or from a third party who has duly informed you of the transmission of your information to Bpifrance Investissement.

In some cases, Bpifrance Investissement also collects personal data about you indirectly from:

- Other entities of the Bpifrance group in compliance with the legal, regulatory or contractual confidentiality obligations that apply to third parties;
- Co-investors of Bpifrance Investissement or any other financier in the context of the transactions;
- Freely accessible sources on the internet, professional social networks, professional directories, company websites and other official databases made available by authorities or official third parties (e.g. the Official Journal of the French Republic, the Trade and Companies Register, databases managed by financial sector supervisory authorities);
- Data brokers, a list of which can be found here <https://urlr.me/j2c3vs> .
- IT service providers whose solution integrates a database that may hold information about you.

5. TO WHOM IS YOUR PERSONAL DATA DISCLOSED?

Your data is intended for Bpifrance Investissement and may also be communicated:

- To the other entities of the Bpifrance group, as soon as this transmission is necessary to enable these entities to meet their legal, regulatory or contractual obligations or to ensure the deployment of the proposed system. This transmission of intra-group information does not in any way exempt the entities of the Bpifrance group from the legal, regulatory or contractual confidentiality obligations that apply to them with regard to third parties;
- Professional advisors (advisors, experts, law firms, investment banks) and statutory auditors of Bpifrance Investissement;
- IT service providers, or any other service provider (including lawyers) or subcontractors providing services in connection with all or part of the processing identified above on behalf of Bpifrance Investissement;
- To any French or European administrative, judicial, or supervisory authority that needs to be aware of it in the context of an administrative or judicial procedure that benefits from a right of communication based on a legislative provision, at their request.

In addition, your data may also be communicated in the following cases:

- **With regard to the data of subscribers and potential subscribers:**
 - To the Depositary of the vehicle in which a Subscriber has subscribed, who carries out the missions incumbent on him in application of the laws and regulations in force as well as those contractually entrusted to him by Bpifrance Investissement;
 - To the Accounting Delegate of the vehicle in which a Subscriber has invested, to whom Bpifrance Investissement has delegated the accounting management of its funds;
 - To the Statutory Auditor of the said vehicle, who, in particular, certifies the sincerity and regularity of the accounts;
 - Credit institutions in the event of the implementation of financing in the vehicle to which a Subscriber has subscribed;
 - To the competent tax authorities, in order for Bpifrance Investissement to comply with its legal obligations, including in particular those arising from the DAC 2 Directive as transposed into French law and the Foreign Account Tax Compliance Act (FATCA).

- **With regard to data collected in the context of investments in Target Companies and Participations and subscriptions to Partner Funds:**
 - In the context of investment operations (initial or additional) or divestment, to any co-investors or any other financier within the limits of the confidentiality commitments made by Bpifrance Investissement.

Bpifrance Investissement is committed to limiting the transfer of personal data outside the European Union. When such transfers are to be implemented, Bpifrance Investissement relies on the following to carry out these transfers:

- A decision issued by the European Commission, attesting to the level of adequacy of the regulations of the country to which your data is transferred;
- One of the derogations provided for by the GDPR (in particular when the transfers are implemented because they are necessary for the conclusion or performance of a contract concluded in your interest between Bpifrance Investissement and the legal entity to which you are linked).

In other cases, Bpifrance Investissement ensures that the transfer is supervised in accordance with the GDPR and implements the appropriate guarantees with regard to the protection of personal data, by means of legal, technical and organisational measures.

6. WHAT ARE YOUR RIGHTS?

In accordance with the applicable regulations, and subject to the conditions set out therein for the exercise of these rights, you benefit from:

- The right to access, rectify, delete, and portability of your personal data.
- The right to request the limitation of the processing concerning you and to object to receiving commercial prospecting.
- The ability to provide Bpifrance Investissement with instructions relating to the fate of his or her personal data in the event of death.

To exercise your rights, you can contact the data protection officer of the Bpifrance group, using the contact details provided in Section 7 ("*How to contact Bpifrance Investissement?*") below.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).

7. HOW TO CONTACT BPIFRANCE INVESTISSEMENT?

Please send all correspondence to the Data Protection Officer (DPO) of the Bpifrance group using the contact details below:

- Via our online form accessible here: <https://bpifrance.app.witik.io/fr/form/bpi/formulaire-rgpd-bpifrance>
- By post by writing to Bpifrance - DCCP - Data Protection Officer Address: 27-31 avenue du Général Leclerc 94 710 Maisons Alfort

After receiving your request, it will be answered within a maximum period of one month, except for derogations provided for by the GDPR.

If there is reasonable doubt as to the identity of the person concerned by the request to exercise the right, you may be asked to provide additional information necessary to confirm your identity.

9. UPDATING THE POLICY

This Policy may be amended and updated periodically to reflect legislative or regulatory developments or to meet our information obligations under applicable regulations on the protection of personal data.

We invite you to refer to it regularly on the Bpifrance website. The Policy is available at the following address: [Data Protection | Bpifrance](#)

In the event of substantial changes, Bpifrance Investissement will make this Policy available, specifying the changes relating to the processing of your personal data at the address above.