

**IMPORTANT INFORMATION ON
HOW WE COLLECT, USE AND STORE INFORMATION ABOUT YOU**

25.05.2018

At Northern Horizon Capital Group we care about protection of your information. We follow the requirements of the European Union General Data Protection Regulation (GDPR)¹ and other laws protecting information about you at our company and the group, therefore, we would like to provide you with certain information about data we process in relation to you. [If you are interested in more detailed information, you will find it on our group website.]

1. How to read this notice

This notice will answer the most important questions about how we collect, use and store information about you. In case you have any other questions or find any part of this notice unclear, our Data Protection Officer is ready to help you as described in Section 13 of this notice. Please note that any form of the word 'we' in this notice stands for our company specified in Section 2 of the notice.

2. Data controller

We are: **Northern Horizon Capital AS**
Our identification number is: 11025345
Our address is Tornimäe 2, (24th floor), Tallinn, Estonia 10145
Our e-mail address is: tallinn@nh-cap.com
Our telephone number is: +372 674 3200

3. Why we collect information about you

You are included into the list of permanent insiders² of Baltic Horizon Fund managed by us, therefore, for the purposes of complying with the legal obligations (notably Market Abuse Regulation³), we collect, use and store some information related to you. You can find the more detailed information in the table enclosed to this notice.

4. Types of data we collect

For the above purposes we collect certain personal data on you: name, surname, address, your contact details (personal phone number (home and mobile), personal identification code, date of birth, number of Baltic Horizon Fund units owned, data and time at which you was included into the permanent insider list, reason why you was included into this list. We receive such information directly from you in case you hold managerial position with us, or from persons discharging managerial position with us, if you are close associate of them.

5. Information we collect about you from other sources

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), which is effective as of 25 May 2018.

² Persons discharging managerial responsibilities in relation to Baltic Horizon Fund or close associates of those persons as those terms are defined in Article 3(1) (25-26) of Market Abuse Regulation.

³ Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC

Persons discharging managerial position with us provide us information on you, if you are close associate of them.

6. Grounds for collecting information

When processing personal data for the purposes explained in this notice, we rely on requirements of law, in particular Market Abuse Regulation.

In addition to aforementioned legal grounds we also rely on our legitimate interest in maintaining communication with you, also ensuring the possibility to establish, exercise and defend the legal claims, should it be the case. We consider that our legitimate interests comply with the law and the legal rights and freedoms of the persons considered to be insiders of Baltic Horizon Fund.

7. Sensitive information

We do not process any sensitive information on you.

8. Automatic decision making or profiling

Please note that no automatic decision making or profiling is used with us.

9. How do we share information about you

Please note that only people who need to process your personal data for the purposes mentioned in this notification have the access to your personal data.

We may need to share your personal data with our suppliers or sub-suppliers when they perform services on our behalf, including persons providing compliance services (currently Northern Horizon Capital AIFM OY, Finland), certain fund administration and routine services (currently Northern Horizon Capital UAB, Lithuania), companies supporting and maintaining our IT systems or archiving service providers. We may also need to share your personal data with Estonian Financial Supervisory Authority.

10. Transfers of data outside the European Economic Area⁴

We do not transfer your data outside the EU/EEA.

11. Storage

Your personal data will be stored for above-specified purposes for as long as you are considered to be insider of Baltic Horizon Fund and ten (10) years after termination of your insider status.

12. Your rights

In order to assist you in implementing your rights please contact our Data Protection Officer as described below. You have the right to know what information we have about you. You are also entitled to request us to correct incorrect information about you and in some cases you may also request us to delete your information or restrict use or deletion of your information. You can also object to collection, use and storage of your certain information at our company. You also have the right to request us to export your data to you or transfer it to other companies.

If you are dissatisfied with how we process your personal data, you are also entitled to submit a complaint to Estonian Data Protection Inspectorate (<http://www.aki.ee/en/inspectorate>).

⁴This is all members of the European Union plus Iceland, Lichtenstein and Norway.

13. Assistance of Data Protection Officer

If you have any inquiries or comments regarding how we collect, use and store information about you, Northern Horizon Capital Group has the Data Protection Officer to help you. Please feel free to contact us at dataprotection@nh-cap.com.

**DETAILED DESCRIPTION
OF HOW WE COLLECT, USE AND STORE DATA INFORMATION ABOUT YOU**

Why you collect information about me?	Which information you collect about me?	Why you are legally allowed to collect my information? Which provisions of GDPR and other laws apply?
For the purposes of preventing insider dealing as envisaged in Market Abuse Regulation	Name, surname Personal identification code Date of birth Number of BHF units owned Date and time at which a person was included in the permanent insider list Reason why a person was included in the permanent insider list	Legal obligation (Art. 6(1)(c) of GDPR)
For the purposes of maintaining communication with you	Address Personal phone number (home and mobile)	Legitimate interest (Art. 6(1)(f) of GDPR)
For the purposes of establishing, exercising and defending of legal claims	Any relevant information we have on you, as the case might be	Legitimate interest (Art. 6(1)(f) of GDPR)