

**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.

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 have invested into Baltic Horizon Fund managed by Northern Horizon Capital AS, therefore, for the purposes of performance of contractual obligations, complying with legal obligations (notably anti money-laundering and counter terrorist financing), also for the purposes of developing the business relationship 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 process certain personal data on you: name, surname (including representatives), address, your contact details (telephone number, e-mail address), personal identification code, banking details (bank account number, bank, SWIFT code), investment size. We receive such information either directly from you or from Estonian central securities depository or Swedish central securities depository. In cases where you seek our assistance for the purposes of enjoying your tax benefits or fulfilling tax-reporting obligations, we may receive certain information directly from you, i. e. personal identification code, investment and bank account numbers, e-mail address, residency information.

For the purposes of the monitoring compliance with the applicable international sanctions and anti-money laundering and counter-terrorist financing laws (AML/CTF), we may process AML/CTF related information.

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.

We receive (or may get access to) information on you from Estonian central securities depository or Swedish central securities depository, i.e. account number, holder name, personal identification code, residence, investor type (retail/company), balance, percentage of ownership, account operator, gross amount, TAX amount, NET amount, investment account information.

6. Grounds for collecting information

When processing personal data for the purposes explained in this notice, we rely on the need to perform the contractual obligations between you and us based on the fund rules and prospectus. We also need your information to comply with the law, in particular tax laws and anti-money laundering and counter terrorist financing laws.

In addition to aforementioned legal grounds, we also rely on our legitimate interest in maintaining business relationship and 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 our investors.

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 accountants, persons providing compliance services (currently Northern Horizon Capital AIFM OY, Finland), certain fund administration and routine service providers (currently Northern Horizon Capital UAB, Lithuania), companies supporting and maintaining our IT systems or archiving service providers. Central securities depositories, banks, stock exchanges, insurers, legal advisors or auditors are the separate controllers who process your data according to their own internal policies and procedures.

10. Transfers of data outside the European Economic Area²

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 investor of Baltic Horizon Fund and ten (10) years after termination of investor relationship.

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

²This is all members of the European Union plus Iceland, Lichtenstein and Norway.

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>).

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 performing contractual obligations as envisaged in fund rules (including arranging dividend distribution, convocation of general investor meetings).	Name, surname (including representatives) Residency Address Contact details (e-mail address) Investment size (balance, percentage of ownership) Banking details (account number, bank, SWIFT code No) Personal ID	Performance of contract (Art. 6(1)(b) of GDPR) Legal obligation (Art. 6(1)(c) of GDPR)
For the purposes of preparing tax declarations (only in respect to Estonian investors)	Name, surname Personal ID Residence Address Investor type (retail/company) Investment size (balance) Banking details (account number, bank, SWIFT code No) Investment account number GROSS amount TAX amount NET amount	Legal obligation (Art. 6(1)(c) of GDPR)
For the purposes of developing business relationship	Name, surname Contact details (telephone number, e-mail address)	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)
For the purposes of anti-money-laundering and counter-terrorist (AML/CTF) financing	All AML/CTF information as established by legal acts	Legal obligation (Art. 6(1)(c) of GDPR)