

PRIVACY NOTICE (INVESTORS)

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

1. Introduction

This Privacy Notice explains how Baltic Horizon Capital AS (the Fund Manager) processes personal data relating to investors and prospective investors of Baltic Horizon Fund, in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and applicable financial services legislation.

2. Data Controller

The data controller is:

Baltic Horizon Capital AS

Registry code: 11025345

Address: Roseni 7

E-mail: info@baltichorizon.com

Telephone: 372 674 3200

The Data Protection Officer can be contacted at: compliance@baltichorizon.com

3. Categories of Data Subjects

This notice applies to:

- investors in Baltic Horizon Fund;
- prospective investors;
- representatives and beneficial owners of legal entity investors.

4. Purposes of Processing

Personal data is processed for the following purposes:

- onboarding and identification of investors;

- compliance with legal obligations, including AML/CFT, sanctions, tax reporting and financial supervision requirements;
- administration of investments and investor relations;
- fulfilment of contractual obligations;
- establishment, exercise and defence of legal claims.

5. Categories of Personal Data

The Fund Manager may process the following categories of personal data:

- identification and contact details;
- financial and investment-related information;
- AML/KYC documentation and verification data;
- information on beneficial ownership and control;
- communication and transaction records.

6. Legal Basis for Processing

Personal data is processed on the following legal bases:

- compliance with legal obligations (Article 6(1)(c) GDPR);
- performance of a contract or pre-contractual measures (Article 6(1)(b) GDPR);
- legitimate interests of the Fund Manager (Article 6(1)(f) GDPR), such as ensuring effective investor communication and legal protection.

7. Recipients of Personal Data

Personal data may be disclosed to:

- competent supervisory and tax authorities;
- depositaries, fund administrators and auditors;
- external service providers providing IT, compliance, legal or administrative services, acting under confidentiality obligations.

8. Transfers Outside the EU/EEA

Where personal data is transferred outside the EU/EEA, such transfers are carried out in accordance with Chapter V GDPR, using appropriate safeguards.

9. Data Retention

Personal data is retained for as long as necessary to fulfil the purposes described above and in accordance with applicable legal retention requirements, including AML/CFT legislation.

10. Data Subject Rights

Investors have the right to access their personal data, request rectification, request erasure or restriction of processing, and object to processing, subject to applicable legal limitations.

Where processing is based on legal obligations, certain rights may be restricted in accordance with GDPR.

11. Complaints

If you believe your personal data has been processed unlawfully, you have the right to lodge a complaint with the Estonian Data Protection Inspectorate.

12. Contact

For questions regarding this Privacy Notice or the processing of personal data, please contact the Data Protection Officer at compliance@baltichorizon.com.