

## PRIVACY NOTICE (INSIDERS)

### 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*) collects, uses and protects personal data relating to persons included in the insider lists of Baltic Horizon Fund, in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – *GDPR*) and Regulation (EU) No 596/2014 (*Market Abuse Regulation – MAR*).

#### 2. Data Controller

The data controller is:

##### **Baltic Horizon Capital AS**

Registry code: 11025345

Address: Roseni 7

E-mail: [info@baltichorizon.com](mailto:info@baltichorizon.com)

Telephone: 372 674 3200

The Data Protection Officer can be contacted at: [compliance@baltichorizon.com](mailto:compliance@baltichorizon.com)

#### 3. Categories of Data Subjects

This notice applies to:

- Persons discharging managerial responsibilities; and
- Persons closely associated with such persons, who are included in the permanent or event-based insiders lists of Baltic Horizon Fund.

#### **4. Purpose of Processing**

Personal data is processed for the following purposes:

- o compliance with legal obligations under the Market Abuse Regulation, including maintaining insider lists and preventing insider dealing;
- o operational communication related to insider obligations;
- o establishment, exercise and defence of legal claims.

#### **5. Categories of Personal Data**

Depending on the circumstances, the Fund Manager processes the following personal data:

- o identification data (name, personal identification code, date of birth);
- o contact details (address, telephone number, e-mail address);
- o insider-related information (reason for inclusion on the insider list, date and time of inclusion, status as PDMR or close associate);
- o information on holdings of Baltic Horizon Fund units, where required by law.

#### **6. Legal Basis for Processing**

Personal data is processed primarily to comply with legal obligations under MAR, in accordance with Article 6(1)(c) GDPR.

Certain limited processing activities, such as operational communication and handling of legal claims, are carried out based on the legitimate interests of the Fund Manager pursuant to Article 6(1)(f) GDPR.

#### **7. Recipients of Personal Data**

Personal data may be disclosed to:

- o competent supervisory authorities (including the Estonian Financial Supervisory Authority and other EU authorities);
- o group companies and external service providers providing compliance, administration, IT or archiving services, acting under contractual confidentiality obligations.

## **8. Transfers Outside the EU/EEA**

Personal data is not transferred outside the European Union or the European Economic Area.

## **9. Data Retention**

Personal data relating to insider lists is retained for the duration of the insider status and thereafter for ten (10) years, in accordance with MAR and applicable national legislation, unless a longer retention period is required for legal claims.

## **10. Data Subject Rights**

Data subjects have the right to access their personal data, request rectification of inaccurate data, and, where applicable, request restriction of processing.

Please note that certain rights, including the right to erasure and the right to object, may be restricted where processing is necessary for compliance with a legal obligation or for the prevention of market abuse, in accordance with Articles 17(3)(b) and 21 GDPR.

The provision of personal data for inclusion in insider lists is mandatory. Failure to provide such data may prevent the Fund Manager from fulfilling its legal obligations.

## **11. Complaints**

If you believe that 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](mailto:compliance@baltichorizon.com)**.