

Privacy and Cookie Statement – Synova Capital B.V.

This privacy and cookie statement (hereinafter: “Privacy Statement”) applies to the processing of personal data by Synova Capital B.V. (hereinafter: “Synova Capital”, “we”, “us”).

In this Privacy Statement, we explain which personal data we process, for what purposes we do so, and what rights you have.

1. Company Information

Synova Capital B.V. ("Synova Capital") refers to all entities in which Synova Capital B.V. holds a majority interest or in which Synova Capital is part of the management.

Contact details

Synova Capital B.V.

Amaliaaan 126B, 3743KJ, Baarn

Chamber of Commerce (KvK): 93278071

invest@synovacap.com

2. Changes

This Privacy Statement may be amended by us at any time. The most current version can always be found on our website (www.synovacap.com).

3. Whose Personal Data Do We Process

We process personal data from various categories of individuals, including but not limited to:

- **Investors:** individuals or employees of legal entities intending to invest via Synova Capital
 - **Applicants:** individuals applying for a job or internship at Synova Capital
 - **Suppliers:** individuals representing parties from whom Synova Capital purchases products or services
 - **Website visitors:** visitors to www.synovacap.com
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3.1 Investors

We process personal data such as identifying information and financial data for the following purposes:

- a) To identify and verify your identity
- b) To conduct client due diligence under sanctions and anti-money laundering legislation
- c) To manage and execute investments
- d) To keep you informed about relevant information and developments
- e) To attract investment for our projects
- f) To contact you by phone for marketing purposes
- g) To conduct statistical analyses for project management, investment strategies, and service improvement
- h) To comply with legal obligations
- i) To share your experience on our website or with prospective investors

Processing for purposes a, c, and d is necessary for the preparation or execution of an (investment) agreement with you.

Processing for purposes b and h is based on legal obligations or Synova Capital's legitimate interest in complying with such obligations. These obligations include preventing fraud, money laundering, and other unlawful practices to protect the integrity of Synova Capital and its investors. Partners such as notaries and banks may also require our cooperation in due diligence.

Purposes e and f are based on Synova Capital's legitimate interest in direct marketing, unless we ask for your consent, in which case consent is the legal basis.

Purpose g qualifies as compatible further processing or is based on legitimate interest—namely monitoring and improving investments and services.

Purpose i is based on your consent, either given directly or after submitting a review following an email request.

3.2 Applicants

We process identifying and career-related data of applicants to:

- a) Communicate about and assess suitability for a role at Synova Capital
- b) Comply with legal requirements

Processing is based on pre-contractual necessity and Synova Capital's legitimate interest in properly assessing candidate suitability.

3.3 Suppliers

We process personal data such as contact details, job-related data, and financial information for the following purposes:

- a) Communication regarding the delivery of products or services
- b) Accounting and payments
- c) Compliance with legal obligations

Processing under a and b is necessary for (pre-)contractual performance or based on legitimate interest. Purpose c is based on legal obligations.

3.4 Website Visitors

We process contact and technical data of website visitors for the following purposes:

- a) Handling contact requests
- b) Sending newsletters and relevant updates
- c) Website analytics and service optimisation
- d) Providing insight into our offerings

Purposes a and b are based on consent provided via the website. Purpose c is based on our legitimate interest in improving our website.

For cookie use, see our separate cookie statement.

4. Withdrawing Consent

Where processing is based on your consent, you may withdraw it at any time by emailing invest@synovacap.com or writing to our address. Withdrawal does not affect processing prior to withdrawal.

5. Sharing Personal Data with Third Parties

We share data only when:

- a) You have given consent
- b) It is necessary for service delivery (e.g., suppliers)
- c) Required by law

d) We suspect rights violations, in which case data may be shared with parties having a legitimate interest or authorities

In the event of a merger, acquisition, or restructuring, personal data may be transferred as part of business assets.

6. Transfer of Personal Data Outside the EEA

If data is transferred to countries outside the European Economic Area with a lower level of data protection, we ensure appropriate safeguards (e.g., EU Standard Contractual Clauses). Copies may be requested via invest@synovacap.com.

7. Security

Synova Capital values your privacy and ensures appropriate technical and organisational measures to prevent unauthorised access or unlawful processing of personal data.

8. Retention Periods

We retain personal data only as long as necessary or as legally required. Specific retention periods include:

- **Rejected investors:** data deleted 36 months after rejection
 - **Accepted investors:** data deleted 36 months after the end of the last loan agreement or withdrawal
 - **Website visitors (non-investors):** data deleted within 36 months
 - **Former investors:** data retained for 7 years
 - **Applicants:** data deleted 1 month after application unless hired or consent is given to retain longer
 - **Financial records:** retained for 7 years due to tax obligations
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9. Your Rights

You have the right to:

- Access your data
- Rectify inaccuracies
- Delete your data
- Restrict processing
- Object to processing
- Request data portability (if based on consent or contract)

Objection to Direct Marketing

You may object at any time to processing for direct marketing. For other purposes, we will weigh our interests against yours.

Exercising Your Rights

You can email invest@synovacap.com. We may request identification to verify your request. If legal obligations prevent us from acting, we will inform you. You will receive a response within one month.

10. Questions or Complaints?

For questions, comments, or complaints, contact us via the details under ‘Company Information’. You may also file a complaint with the Dutch Data Protection Authority or the relevant authority in your country of residence or work.

11. Cookie Statement

A cookie is a small file placed on your device that can collect personal data.

You can choose to accept or block cookies or receive a notification when one is set by adjusting your browser settings. You may delete cookies at any time.

When visiting our website, a cookie banner appears. Under ‘show details,’ you can find information about the cookies used, including purpose, provider, and retention. Once consent is given, cookies are placed accordingly.

Social Media and Third-Party Sites

Our website contains links to third-party websites and social media buttons (Facebook, LinkedIn). We are not responsible for how these parties handle your data. Please consult their privacy and cookie policies.

Google Analytics

We use Google Analytics in compliance with Dutch privacy guidelines. IP addresses are anonymised, no data is shared, and a processing agreement is in place. This makes our Analytics cookie a privacy-friendly, first-party cookie used solely to monitor site quality and security. It is valid for 6 months.

Date: April 7, 2025