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## PATRIA'S DATA PROTECTION & PRIVACY POLICY

This Data Protection Policy is an integral part of Patria's ethical standards, and the compliance framework outlined in Patria's Ethical Code of Conduct.

Patria is committed to conducting business ethically and in compliance with the laws and regulations in all the countries where Patria operates. Patria's zero tolerance for corruption and bribery is expressed in Patria's Ethical Code of Conduct and reflected and confirmed in this Policy. Patria does not accept unethical or corrupt behavior by its employees and expects similar compliant business conduct from its business partners.

This Policy and Patria's ethical standards (including specifically the Patria Ethical Code of Conduct) shall always govern Patria's business in all stages of the co-operation, and compliance to this shall be enforced also on Business Partners, regardless of local laws or customs.

Patria will only engage and transact with Business Partners of known integrity, who will not expose Patria to unacceptable reputational or legal risks. The professional skills of reliable partners must bring additional knowledge and value to Patria.

Arrangements without clearly determined roles and deliverables are against Patria's principles and are not acceptable, neither are situations, where a partner would receive payments or other benefits, without providing to Patria any actual business services.

### **Scope of this Data Protection Policy.**

This policy applies to all employees and Board members of Patria Group, including wholly owned subsidiaries, all Controlled Companies (majority owned companies) within the Patria Group (the "Company"). Patria encourages all Affiliated Companies (50% or minority owned companies) to implement compliance policies and procedures in line with this Policy. If conflicts arise between this policy and any local policy, this policy takes priority unless the local policy is stricter as required by local laws or regulations.

### **General principles of processing personal data.**

At Patria, personal data is processed in accordance with data protection legislation, including the EU General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council, GDPR), its national implementations and good processing and management practices. By way of good and secure practices it is ensured that personal data is processed only to the extent needed for the legal purposes of processing and is available only to authorised persons. The correct level of data protection is implemented through training and guidance of employees and by ongoing monitoring and evaluation of processes that deploy personal data. In all Patria's operations, the processing of personal data is done in a systematic and documented

way following the principles of lawfulness, fairness and transparency. Rights of the persons subject to processing are implemented.

### **Administration of data protection.**

Responsibilities for lawful processing of personal data and for ensuring sufficient resources are with the organisation's management. Adequate expertise and guidance are ensured, and appropriate tools and methods are made available to employees and functions. All persons taking part in processing of personal data in Patria's organization as either employees or in another role have an obligation to act in accordance with data protection legislation, this Data Protection Policy and other guidelines and instructions. In relations with subcontractors and other data processors as defined in the GDPR the principle of accountability is followed by executing and documenting Data Processing Agreements.

Information about processing of personal data is provided to the persons subject to processing on this Data Protection Policy and separate privacy notices of Patria's respective functions. In the privacy notices information is provided about the processing activities and rights of the person. Any deviations from adequate processing of personal data are handled as personal data breaches and managed in security incident procedure according to the GDPR. Employees and other persons processing personal data are obliged to report personal data breaches immediately. Risks for safe processing of personal data are evaluated and the risks managed in accordance with classification and purpose of processing.

The Data Protection is responsible of everyone in Patria. The Patria employees and subcontractors (EXT) must follow the principles of the GDPR and taking part of the data protection process according to their responsibilities, participate in the trainings and be aware of the data protection policy, guidelines and internal processes in practice.

Roles and responsibilities are defined internally in the **Compliance Manual**, which outlines the various tasks, allocation of responsibilities, and actions to be taken to ensure compliance with Data Protection regulations through a proactive, integrated, and by-default design approach.

In the same direction, to ensure accurate data protection, Patria will conduct regular risk assessments and implement procedures for regular data evaluation and update. The restrict access to data is based on role and responsibilities. At the same time, only the necessary data for the intended purpose will be collected.

Effective communication and transparency are crucial components of our data protection policy, ensuring individuals understand how their data is processed and [have the ability to](#) exercise their rights. This involves providing clear, concise, and easily accessible information about data collection, usage, storage, and sharing, along with the individuals' rights to access, rectify, and erase their data.

Patria will not transfer personal data to a third country outside of the EEA that does not provide adequate protection of personal data unless appropriate safeguards are adduced, or the transfer otherwise takes place in accordance with applicable data protection legislation. Patria will ensure personal data is transferred securely and legally between countries, complying with regulations. This involves implementing safeguards, like Standard Data Protection Clauses (SCCs), to maintain data protection standards in the receiving country. The data will be deleted or destroyed when they are not necessary in accordance with the purpose for which they were collected. Employees

are trained for the correct, secure and definitive destruction of personal data. Patria will allocate the necessary resources for the safe removal and/or destruction of the data.

Update control

Version	Update	Author	Reviewer	Next review
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