

<b>1</b> <b>Filing system</b>	<b><i>Due Diligence and Business Partner Selection</i></b>
	Patria Plc
	Arkadiankatu 2 FI-00100 Helsinki, Finland
	Other contact information info@patriagroup.com
<b>3</b> <b>Data protection officer / contact person in matters relating to the filing system</b>	Azahara González Compliance Manager for Internal Controls
	Address Hatanpään Valtatie 30 FI-33100 Tampere, FINLAND
	Other contact information security@patriagroup.com
<b>4</b> <b>Purpose of processing personal data, legal basis for processing and information on the source of the personal data</b>	<p>The processing is required to allow Patria keeps audit trail of searches and queries conducted on databases in line with its compliance efforts with respect to third parties know your customer (KYC), compliance with sanctions, anti-money laundering (AML) and anti-bribery and corruption (ABC) research, client / supplier onboarding and customer /supplier due.</p> <p>Patria performances a due diligence investigation in relation to their customers,or potential customers, suppliers, or potential suppliers, third parties or those with whom they are looking to do business, some of which are companies, associations, foundations, organizations or other legal entities, and some are individuals or sole traders.</p> <p><b>Purposes for processing personal data, legal basis for processing and data collection:</b></p> <p><b>Purpose of process:</b> To perform a due diligence investigation of the third parties that potentially do or could do business with Patria, in line with its compliance efforts. It includes the identification of the ultimate beneficial owners.</p> <p><b>Legal basis:</b></p> <ul style="list-style-type: none"> <li>- <u>Legal obligation</u>: Directive 2024/1226, Regulation (EU) No 833/2014, Finnish Criminal Code, Anti-money laundering laws.</li> <li>- <u>Legitimate interest</u>: Patria asks for information about delayed payments or the company's credit rating, to reduce financial or unpayment risk. In case an UBO, director or representative is also forming part of another due diligence file, the personal data of the persons may be used under certain circumstances for new/other due diligence reviews, as this has the same legal grounds but then for another file. If you object to the reuse, please let us know in advance.</li> </ul> <p><b>Data collected from:</b> the companies or entities representative or point of contact will fill a digital form or PDF form with the name, surname, nationality and date of birth of the Ultimate Beneficial Owners of the company or entity.</p> <p>The details of actual beneficial owners are registered based on notifications submitted by companies.</p>
<b>5</b>	The following personal data is collected for this filing system:

<b>Description of the categories of data subjects and categories of personal data</b>	<p><b>The data subjects are</b> the ultimate beneficial owners and key persons of the Patria's third parties or potential third parties in preliminary contact with Patria or Patria's partners or potential partners in preliminary contact with Patria.</p> <p><b>The following information is stored about the data subjects:</b> first name, last name, date of birth, nationality, education history, previous professional experience, current role in the company, previous roles, country of residence.</p>
<b>6 Legitimate interests of the controller or a third party</b>	<p>Legitimate interest in accessing information held by the registers through the platform. The data obtained from the register are only used for the performance of tasks related to preventing and fighting money laundering, its predicate offences and terrorist financing.</p> <p>Patria asks for information about delayed payments or the company's credit rating, to reduce financial or unpayment risk.</p> <p>In case an UBO, director or representative is also forming part of another due diligence file, the personal data of the persons may be used under certain circumstances for new/other due diligence reviews, as this has the same legal grounds but then for another file. If you object to the reuse, please let us know in advance.</p> <p>Balancing test has been conducted.</p>
<b>7 Recipients and disclosure of personal data</b>	<p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, personal data in the filing system can be disclosed as necessary:</p> <ol style="list-style-type: none"> <li>1) for executing orders issued by the authorities, to the authority requesting the data;</li> <li>2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management;</li> <li>3) to suppliers investigating security incidents or nonconformities;</li> <li>4) with consent of the registered person to supplier of employee health services</li> <li>5) to attorneys and law firms providing legal services;</li> <li>6) courts.</li> </ol>
<b>8 Transfer of personal data to a third country or an international organisation</b>	<p>According to Article 45(1) of the GDPR, the transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. Such a transfer does not require any specific authorisation.</p>

	<p>The personal data in Patria's Corporate Security filing system may be transferred outside the EU/ETA on the following conditions:</p> <ul style="list-style-type: none"><li>- <b>In accordance with Article 46 of the GDPR:</b> Transfers (of personal data) subject to appropriate safeguards. Data will not be disclosed outside the EU, European Economic Area or countries decided by the Commission to provide an adequate level of protection unless an adequate level of protection is ensured through contracts or otherwise as required by law.</li></ul>																		
<b>9</b> <b>Data retention period</b>	<p>Data collected for Patria's Corporate Security filing systems will only be stored for as long as and to the extent necessary in relation to the original and compatible purposes for which the personal data was collected.</p> <p>Personal data will be deleted from the filing system when the business relationship and other related legal obligations end.</p>																		
<b>10</b> <b>Principles of data protection; description of technical and organisational security measures</b>	<p>Personal data will remain confidential. Patria Plc's data network or server environment or the cloud services in which the filing systems are located are protected by the necessary technical and organisational measures.</p> <p>Organizational security measures are applied by way of limiting access to data to those persons working for data controller's organization who have a role-based need and purpose to process the data.</p>																		
<b>11</b> <b>Rights of the data subject</b>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject's request to exercise their rights within one month of receipt of the request.</p> <p>All requests should be sent in writing to one of the following Patria offices. The data subject must prove their identity when requesting access or rectification.</p> <table><tr><th>Country</th><th>Patria premises</th><th>Opening hours</th></tr><tr><td>Belgium</td><td>Rue du Fond des Fourches 23, 4041 Herstal</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Finland</td><td>Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli</td><td>Mon–Fri at 8-16  Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Germany</td><td>Brunnenweg 4, 48465 Quendorf</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Latvia</td><td>Duntes 23A, 1005 Riga</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Sweden</td><td>Helikoptervägen 1, StockholmArlanda</td><td>Requires appointment – contact security@patriagroup.com</td></tr></table>	Country	Patria premises	Opening hours	Belgium	Rue du Fond des Fourches 23, 4041 Herstal	Requires appointment – contact security@patriagroup.com	Finland	Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli	Mon–Fri at 8-16  Requires appointment – contact security@patriagroup.com	Germany	Brunnenweg 4, 48465 Quendorf	Requires appointment – contact security@patriagroup.com	Latvia	Duntes 23A, 1005 Riga	Requires appointment – contact security@patriagroup.com	Sweden	Helikoptervägen 1, StockholmArlanda	Requires appointment – contact security@patriagroup.com
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	The Netherlands	Aalsbergen, 2 6942 SE Didam	Requires appointment – contact <a href="mailto:security@patriagroup.com">security@patriagroup.com</a>
	<p><b>A. Right of access to personal data</b></p> <p>Data subjects have right of access to any personal data stored on them in Patria's personal data filing system.</p> <p><b>B. Right to rectification and restriction of processing</b></p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none"> <li>- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</li> <li>- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;</li> <li>- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;</li> <li>- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.</li> </ul> <p>The request to rectify or restrict the processing of personal data in Patria's filing system should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when making the request for rectification or restriction.</p> <p><b>C. Right to erasure</b></p> <p>Data subjects have the right to have the personal data concerning them erased from filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none"> <li>- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;</li> <li>- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;</li> <li>- the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);</li> <li>- the personal data has been unlawfully processed;</li> <li>- the personal data has to be erased to comply with a legal obligation in European Union or national law.</li> </ul>		
<p><b>12</b> <b>Right to object</b></p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data</p>		

	concerning them which is based on Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.														
<b>13</b> <b>Data portability</b>	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p> <ul style="list-style-type: none"> <li>a) the processing is based on the data subject's consent or on a contract between the controller and data subject; and</li> <li>b) the processing is carried out by automated means; and</li> <li>c) the transfer is technically feasible.</li> </ul>														
<b>14</b> <b>Right to withdraw consent</b>	Not applicable.														
<b>15</b> <b>Right to complain to the supervisory authority</b>	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations.</p> <table border="1"> <thead> <tr> <th>Country</th><th>Contact info</th></tr> </thead> <tbody> <tr> <td>Finland</td><td>The Office of the Data Protection Ombudsman Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Phone number: + 358 29 566 6700 Email: tietosuoja@om.fi</td></tr> <tr> <td>Sweden</td><td>Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 Email: imy@imy.se</td></tr> <tr> <td>Belgium</td><td>Autorité de protection des données Website: <a href="https://www.autoriteprotectiondonnees.be/citoyen">https://www.autoriteprotectiondonnees.be/citoyen</a> Phone number: +32 (0)2 274 48 00 Email: contact@apd-gba.be</td></tr> <tr> <td>Latvia</td><td>Data Sate Inspectorate Republic of Latvia Elijas 17, Riga, Latvia Website: <a href="https://www.dvi.gov.lv/en">https://www.dvi.gov.lv/en</a> Email: pasts@dvi.gov.lv</td></tr> <tr> <td>The Netherlands</td><td>Autoriteit Persoonsgegevens Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands Website: <a href="https://autoriteitpersoonsgegevens.nl">https://autoriteitpersoonsgegevens.nl</a> Phone number: +31 88 1805 250</td></tr> <tr> <td>Germany</td><td>Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI) Husarenstraße 30, 53117 Bonn, Germany Website: <a href="http://www.bfdi.bund.de">www.bfdi.bund.de</a> Phone number: +49 (0)228-997799-0</td></tr> </tbody> </table>	Country	Contact info	Finland	The Office of the Data Protection Ombudsman Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Phone number: + 358 29 566 6700 Email: tietosuoja@om.fi	Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 Email: imy@imy.se	Belgium	Autorité de protection des données Website: <a href="https://www.autoriteprotectiondonnees.be/citoyen">https://www.autoriteprotectiondonnees.be/citoyen</a> Phone number: +32 (0)2 274 48 00 Email: contact@apd-gba.be	Latvia	Data Sate Inspectorate Republic of Latvia Elijas 17, Riga, Latvia Website: <a href="https://www.dvi.gov.lv/en">https://www.dvi.gov.lv/en</a> Email: pasts@dvi.gov.lv	The Netherlands	Autoriteit Persoonsgegevens Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands Website: <a href="https://autoriteitpersoonsgegevens.nl">https://autoriteitpersoonsgegevens.nl</a> Phone number: +31 88 1805 250	Germany	Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI) Husarenstraße 30, 53117 Bonn, Germany Website: <a href="http://www.bfdi.bund.de">www.bfdi.bund.de</a> Phone number: +49 (0)228-997799-0
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## PRIVACY NOTICE

EU General Data Protection Regulation (GDPR)  
(679/2016), Articles 12–14 and Data Protection Act  
(1050/2018)

**1.7.2025**

		Email: <a href="mailto:poststelle@bfdi.bund.de">poststelle@bfdi.bund.de</a>	
<b>16</b> <b>Automated decision-making and profiling</b>	The personal data in the filing system will not be used for automated decision-making or profiling.		
<b>17</b> <b>Additional information</b>	We reserve the right to update this Privacy Notice.		
<b>18</b> <b>Updates</b>	The document was last updated on 1.7.2025		
<b>19</b> <b>Appendices</b>	Balancing test. Transfer Impact Assessment.		