

## **Privacy Policy for IFU – Investment Fund for Developing Countries**

This Privacy Policy explains how IFU - Investeringsfonden for Udviklingslande ("IFU", "We" or "us") processes your personal data in connection with our investment projects or the like.

### **1 DATA CONTROLLER**

The entity responsible for the processing of your personal data is:

IFU - Investeringsfonden for Udviklingslande

Company number 23 59 86 12

Fredericiagade 27

1310 Copenhagen K

Denmark

IFUHR@ifu.dk

Tel: +45 33 63 75 70

## 2 DESCRIPTION OF THE PROCESSING

<b><u>Purpose</u></b>	<b><u>Categories of personal data</u></b>	<b><u>Sources of the personal data</u></b>	<b><u>Legal basis for the processing</u></b>	<b><u>Recipients</u></b>	<b><u>Data retention</u></b>
<p><b><u>Compliance with legal and other requirements</u></b></p> <p>We process your personal data in connection with e.g. compliance with legal and other requirements such as, compliance with money laundering act, CSR, conduction audits, compliance with government inspections and other requests from government or other public or regulatory authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claim.</p>	<p>We process the following categories of personal data about:</p> <p><b><u>Ordinary personal data:</u></b></p> <p><u>Personal details and contact information</u>, e.g. name, e-mail and telephone details, home address, date of birth, personal identification number or identification address, gender, marital status, passport and visa information and photo.</p> <p><u>Qualifications</u>, e.g. details contained in resume/CV, details on previous employment and references, education history, professional qualifications, language and other relevant skills.</p> <p><u>Employment and employment history</u>, e.g. description of current position, title, details in CV etc.</p> <p><u>Pictures</u>, e.g. pictures of you.</p>	<p>We collect your personal data from the following sources:</p> <p>a) Directly from you, e.g. in connection with a specific investment project.</p> <p>b) From group entities or the like, e.g. in connection with a specific investment project.</p> <p>c) During your activities, e.g. in connection with a specific investment project.</p> <p>d) From third parties which may include:</p> <p>a) Present and former employers.</p> <p>b) Other third parties, including background check companies.</p>	<p>We process your personal data on the following legal bases:</p> <p>a) Article 6.1.c (Necessary for IFU to comply with legal obligations, including as a result of the companies act or the money laundering act).</p> <p>b) Article 9.2.f (necessary for the establishment, exercise or defence of legal claims).</p> <p>c) Article 9.2.g (necessary for important public interests based on EU law or the national law of the member states).</p> <p>d) Article 10, cf. section 8 of the Danish Data Protection Act.</p>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Suppliers and vendors, including IT suppliers, support, suppliers of goods and financial institutions that we cooperate with to assist our company.</li> <li>• IFU’s regional offices.</li> <li>• Partners or the like in connection with our investment projects.</li> <li>• Public authorities.</li> </ul>	<p>We will store personal data as long as it is necessary in order to fulfil the purposes mentioned.</p> <p>In general, personal data will be deleted in accordance with the companies act and the money laundering act, unless there are special reasons for a longer retention period.</p>

	<p><b><u>Information about criminal convictions and offences:</u></b></p> <p><u>Data related to violations of laws subject to criminal liability, including criminal code</u></p> <p><u>Criminal record</u></p>				
<p><b><u>Investment projects</u></b></p> <p>We process your personal data in connection with e.g. administration and carrying out of IFU's projects all over the world, including as part of board and management registrations, setting up of companies, due diligences, background checks.</p> <p>Furthermore, we process your personal data in connection with the administration of group entities.</p>	<p>We process the following categories of personal data about:</p> <p><b><u>Ordinary personal data:</u></b></p> <p><u>Personal details and contact information</u>, e.g. name, e-mail and telephone details, home address, date of birth, personal identification number or identification number, proof of address, gender.</p> <p><u>Qualifications</u>, e.g. details contained in resume/CV, details on previous employment and references, education history, professional qualifications, language and other relevant skills</p> <p><u>Employment and employment history</u>, e.g. description of current position, title, details in CV etc.</p>	<p>We collect your personal data from the following sources:</p> <ol style="list-style-type: none"> <li>a) Directly from you, e.g. in connection with a specific investment project.</li> <li>b) From group entities or the like, e.g. in connection with a specific investment project.</li> <li>c) During your activities, e.g. in connection with a specific investment project.</li> <li>d) From third parties which may include: <ol style="list-style-type: none"> <li>a) Present and former employers.</li> <li>b) Other third parties, including</li> </ol> </li> </ol>	<p>We process your personal data on the following legal bases:</p> <ol style="list-style-type: none"> <li>a) Article 6.1.a (consent).</li> <li>b) Article 6.1.c (necessary for IFU to comply with legal obligations, including as a result of the companies act or the money laundering act).</li> <li>c) Article 6.1.f (necessary for the pursuit of legitimate purposes of IFU to effectively managing the administration and implementation of investment projects all over the world).</li> <li>d) Article 9.2.a (express consent)</li> </ol>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Suppliers and vendors, including IT suppliers, support, suppliers of goods and financial institutions that we cooperate with to assist our company.</li> <li>• IFU's regional offices.</li> <li>• Partners or the like in connection with our investment projects.</li> <li>• Public authorities.</li> </ul>	<p>We will store personal data as long as it is necessary in order to fulfil the purposes mentioned.</p> <p>In general, personal data will be deleted in accordance with the companies act and the money laundering act, unless there are special reasons for a longer retention period.</p> <p>However, the following exemptions apply:</p> <p>Personal data that are part of IFU's project documentation will be deleted if a) it has been decided not to continue the investment project or in connection with b) an exit from investment project.</p> <p>Certain details will not be deleted as they form an</p>

	<p><u>Pictures</u>, e.g. pictures of you.</p> <p><b><u>Sensitive personal data:</u></b></p> <p><u>Data concerning race or ethnic origin, political views, religion or philosophical views.</u> <u>Union membership.</u></p> <p><b><u>Information about criminal convictions and offences:</u></b></p> <p><u>Data related to violations of laws subject to criminal liability, including local laws</u></p>	background check companies.	<p>e) Article 9.2.f (necessary for the establishment, exercise or defence of legal claims).</p> <p>f) Article 9.2.g (necessary for important public interests based on EU law or the national law of the member states).</p> <p>g) Article 10, cf. section 8 of the Danish Data Protection Act.</p>		essential part of IFU's historic project documentation (sensitive personal data are not part of the essential part of the project documentation).
<p><b><u>All other processing</u></b></p> <p>We furthermore process your personal data in connection with your requests via our homepage and furthermore when you subscribe to our newsletter as well as we potentially also process your personal data in connection with video surveillance of IFU's entrance areas when/if you visit us.</p>	<p>We process the following categories of personal data about:</p> <p><b><u>Ordinary personal data:</u></b></p> <p><u>Personal details and contact information</u>, e.g. name, e-mail and telephone details, home address, date of birth.</p> <p><u>Employment and employment history</u>, e.g. description of current/former position, title, duration of agreement etc.</p>	<p>We collect your personal data from the following sources:</p> <p>a) Directly from you, e.g. through the application process or information you provide to the Company in connection with consultant work etc.</p> <p>b) From group entities or subsidiaries e.g. through the application process or other processes or</p>	<p>We process your personal data on the following legal bases:</p> <p>a) Article 6.1.f (necessary for the pursuit of legitimate purposes of IFU to effectively managing your requests, administrating your subscription to our newsletter etc.).</p>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Suppliers and vendors, including IT suppliers, support, suppliers of goods and financial institutions that we cooperate with to assist our company.</li> <li>• IFU's regional offices.</li> <li>• Partners or the like in connection with our investment projects.</li> <li>• Public authorities.</li> </ul>	<p>We will store personal data as long as it is necessary in order to fulfil the purposes mentioned.</p> <p>In general, in connection with general requests, personal data will be deleted 1 year after final communication, unless there are special reasons for a longer retention period.</p> <p>In general, personal data related to your subscription to our newsletter will be deleted 1 year after you have</p>

	<p><u>Pictures and video</u>, e.g. video of you from video surveillance.</p>	<p>other forms or information you provide to the group entity or subsidiary in connection with consultant work etc.</p> <p>c) During your activities in the course of your consultant work, e.g. through your performance and interaction with other employees, cooperation partners and other individuals.</p> <p>d) From third parties which may include:</p> <ul style="list-style-type: none"> <li>a. References</li> <li>b. Former employee, or</li> <li>c. Other third parties, including background check companies or recruitment agencies.</li> </ul>			<p>unsubscribed to our newsletter.</p> <p>Video recordings will be deleted after 30 days in accordance with the guidelines of The Danish Data Protection Agency (video recording is only done as crime prevention measure).</p>
--	--	--	--	--	---

### **3 CONSEQUENCES OF THE PROCESSING**

IFU's business means that we will be transferring your personal data to a number of countries outside the EU / EEA. Please see item 4 below for further information. Furthermore, and as part of its investment projects IFU will in some cases process sensitive personal data as part of due diligences and background checks.

#### **4 TRANSFERS TO COUNTRIES OUTSIDE THE EU / EEA**

As part of our processes we can transfer your personal data to IFU's regional offices, including IFU's regional offices located outside the EU / EEA. This means that your personal data can be transferred to the following countries outside the EU / EEA: Singapore, India, China, Ukraine, Colombia, Brazil, South Africa, Nigeria, Ghana and Kenya.

Furthermore, and as part of our projects, we can also transfer your personal data to other countries outside the EU / EEA. In each particular case we will inform you about such transfers.

Transfers to third countries will only be done in connection with specific purposes, mentioned in item 2, and we will also see to it, that all guaranties necessary will be in place before any transaction to a country outside the EU / EEA, due to the following:

- (a) According to the Commission's rating, these countries do not have a sufficient protection level of personal data. We shall therefore see to it that the necessary guaranties are available when we use
  - The Commission's standard contracts, published by the Commission, or other contracts approved by the competent authorities. You can get a copy of this contract/agreement by contacting us at IFUHR@ifu.dk.

#### **5 YOUR RIGHTS**

You have the following rights:

- You have the right to request access to and rectification or erasure of your personal data.
- You also have the right to object to the processing of your personal data and to have the processing of your personal data restricted.
- **In particular you have the unconditional right to object to the processing of your personal data for marketing purposes.**
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- You have the right to receive your personal data in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

There may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case - this depends on the specific circumstances of the processing activity.

*Latest update 24 September 2018*