

Privacy Policy

Last Updated: February 21st, 2025

1. Purpose

This privacy policy governs the processing of personal data carried out through the website <https://inveready.com> (hereinafter, the "website").

2. Data Controller

The data controller responsible for processing personal data through this website is:

Inveready, S.A. (hereinafter referred to as "**Inveready**"), a Spanish company with its registered office at Zuatzu Kalea 7, Edificio Urola, Planta Baja, Local 1, San Sebastián (20018), Guipúzcoa. Inveready is registered with the Commercial Registry of Guipúzcoa under Volume 3,036, Sheet SS-4,598, Page 174, and holds Tax Identification Number (C.I.F.) A-09.754.177.

Inveready is the parent company of the Inveready Group, which consists of a group of management companies, investment vehicles and other entities, including two Closed-End Investment Entity Management Companies (*Sociedades Gestoras de Entidades de Tipo Cerrado - SGEIC*) and one Collective Investment Institution Management Company (*Sociedad Gestora de Instituciones de Inversión Colectiva - SGIIC*)—namely: Inveready Asset Management, S.G.E.I.C., S.A.U., Arraigo V&P, S.G.E.I.C., S.A., and True Value Investments, S.G.I.I.C., S.A.

You may contact Inveready at any time by sending an email to info@inveready.com or by calling +34 93 180 72 60.

3. Data Protection Officer

Inveready has a Data Protection Officer who can be contacted at:

Address: Calle Cavallers, 50 (08034) Barcelona.

Email: dpo@inveready.com

4. Personal Data

Inveready will collect only the personal data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed, as applicable in each case.

The user guarantees the authenticity of the data provided and will be solely responsible for any false or inaccurate statements.

5. Purposes of Processing

Personal data will be processed by the data controller for the following purposes, as applicable in each case:

- i. Responding to individuals who have contacted Inveready with a potential interest in becoming clients or suppliers.
- ii. Managing commercial and administrative aspects of the contractual relationship with clients and suppliers, including the issuance and management of contractual documentation as well as the issuance and control of invoice payments.
- iii. Maintaining the contractual relationship with the data subject or with the company or organization where they work or collaborate.
- iv. Managing the registration, maintenance, and deactivation of user access through the investor portal on this website.
- v. Preventing, detecting, and controlling fraud and abuse committed on or through the website.
- vi. Managing compliance with legally established obligations.

6. Legal Basis for Processing

The legal basis for processing personal data will be the user's consent, if given, for the following purposes:

- i. Sending communications regarding updates, promotions, contests, sweepstakes, events, and/or corporate information about Inveready
- ii. and its products and/or services.
- iii. Managing the registration, maintenance, and deactivation of user access through the investor portal on this website.

The user has the right to withdraw their consent at any time, without affecting the lawfulness of processing carried out before its withdrawal.

The legal basis for processing personal data will be compliance with a legal obligation, if provided for the following purposes:

- i. Administrative management related to the existing contractual relationship with clients.
- ii. Ensuring compliance with legally established obligations.

Processing personal data for these purposes is necessary for Inveready to comply with the obligations imposed by applicable legislation.

Additionally, the legal basis for processing personal data will be the application of pre-contractual measures requested by the data subject, the intent of the data subject to enter a contract with the data controller, or the execution of a contract, if provided for the following purposes:

- iii. Responding to individuals who have contacted Inveready with a potential interest in becoming clients, distributors, or suppliers.
- iv. Managing the commercial and administrative aspects of the existing contractual relationship with clients, including the issuance and management of contractual documentation.
- v. Managing the commercial and administrative aspects of the existing contractual relationship with suppliers, including the issuance and management of quotations and other contractual documentation, as well as controlling invoice payments.

Processing personal data for these purposes is necessary to apply the requested pre-contractual measures and to enter and execute the contract between Inveready and its suppliers.

Finally, the legal basis for processing personal data will be the legitimate interest of the data controller, if provided for the following purposes:

- i. Maintaining the contractual relationship with the data subject or with the company or organization where they work or collaborate. The legitimate interest of the data controller is recognized under applicable regulations.
- ii. Preventing, detecting, and controlling fraud and abuse committed on or through the website. The legitimate interest is based on the data controller's intent to maintain the website as a secure environment.

7. Recipients

Inveready will not disclose personal data to third parties, except in cases of legal obligation or to subcontracted third parties.

Inveready may be required to share data with the relevant public authorities in accordance with legal provisions or official requests.

Inveready intends to transfer personal data outside the European Economic Area. These international data transfers will be regulated through the appropriate safeguards established by applicable regulations. For more information or to obtain a copy of these safeguards, please contact the Data Protection Officer at dpo@inveready.com.

8. Retention Periods

If the legal basis for processing is the user's consent, the data will be retained until such consent is withdrawn.

For all other legal bases, personal data will be retained for as long as necessary to fulfill the stipulated processing purposes.

In any case, personal data will be stored for the period during which the data controller may be held liable, as stipulated by applicable law. If necessary, data will be blocked until the corresponding statute of limitations has expired.

9. User Rights

You are hereby informed that you may exercise your rights of access, rectification, erasure, restriction, objection, and data portability concerning your personal data, as provided under data protection regulations, at any time by sending a written request to the Data Protection Officer at the postal address Calle Cavallers, 50 (08034) Barcelona or via email at dpo@inveready.com.

Specifically, you may exercise the following rights:

- i. Access your personal data.
- ii. Rectify inaccurate or incomplete data.
- iii. Request the erasure of your data when, among other reasons, they are no longer necessary for the purposes for which they were collected.
- iv. Restrict the processing of your data when any of the conditions set forth in data protection regulations are met.
- v. Object to processing under certain circumstances and for reasons related to your situation. In such cases, Inveready will cease processing your data, except for compelling legitimate reasons or for the exercise or defense of potential legal claims.
- vi. Obtain human intervention, express your point of view, and challenge automated decisions made by Inveready, if applicable.

Request the portability of your data.

If you disagree with how your data is being processed, you may file a complaint with the Spanish Data Protection Agency (AEPD) at www.aepd.es.

10. Data Transfers Outside the European Economic Area

At Inveready, we process data within the European Economic Area (EEA) and, as a rule, engage service providers that are also located within the EEA or in countries that have been declared as having an adequate level of protection.

If Inveready needs to use service providers that process data outside the EEA or in countries that have not been declared as having an adequate level of protection, we will ensure that appropriate safeguards are in place to guarantee the security and legitimacy of your data processing.