

BASALT WEBSITE GDPR PRIVACY NOTICE

OUR COMMITMENT TO PRIVACY

Your privacy is important to **Basalt Infrastructure Partners LLP** and our affiliates (together, 'our', 'us', 'we' or 'Basalt'). To better protect your privacy, we are providing information to explain our personal data handling practices.

This Privacy Notice describes how we gather and use personal data that we collect:

- on or through www.basaltinfra.com;
- when you opt to receive communications from Basalt;
- when you visit our offices;
- about representatives of our vendors, business partners or portfolio companies;
- to conduct business with you;
- when you apply for a job with us; and
- through other data collection points where we refer to this Privacy Notice.

This Privacy Notice does not apply to any processing of personal data by or on behalf of Basalt that is covered by a more specific privacy notice. Please read this Privacy Notice carefully.

For the purposes of applicable UK and EU data protection laws ('the UK and EU Privacy Laws'), including Regulation (EU) 2016/679 (the 'EU GDPR'), the UK equivalent of the EU GDPR (the 'UK GDPR') and the Data Protection Act 2018 ('DPA 2018'), **Basalt Infrastructure Partners LLP** and/or **Basalt Infrastructure Partners LLC** will each be a controller of any personal data collected by us. If you have any questions regarding our use of your personal data, or this Privacy Notice, please contact Michael Cowell (data protection officer) at info@basaltinfra.com.

We rely on various legal bases under the UK and EU Privacy Laws in order to process your personal data (including basic contact and identifying information and IP addresses, and, where appropriate, more sensitive types of personal data such as passport information and financial information, etc.), including our legitimate interests, contractual necessity and as required by law. We use the personal data we collect to operate our business, conduct business with you and perform essential or legitimate business operations. We do not collect any information about criminal convictions and offences. We also do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

If we require your personal data due to a legal requirement or obligation or in order to perform a contract with you, we will make you aware of this at the time we collect your personal data, and the possible consequences of you failing to provide this personal data (e.g., we may require your passport details to verify your identity for the purposes of anti-money laundering regulations). Failure to provide this information means that we cannot conduct business with you. In this case, we may have to cancel an existing business arrangement with you but we will notify you if this is the case at the time.

Further information about why we process your personal data, the legal bases under which we process your personal data, and the justifications we rely on in the limited cases where we need to process any special category personal data, is included in the section headed "*Why we use your personal data*" below.

You do not need to take any action as a result of this Privacy Notice, but you do have certain rights as described below in the section headed “*Your rights*”.

THE PERSONAL DATA WE PROCESS AND HOW WE COLLECT IT

We collect your personal data in the following ways, and we only collect the personal data necessary to carry out our business for the purposes set out in the next section headed “*Why we use your personal data*”:

Information you provide to us and our service providers

We collect your personal data when you decide to interact with us (e.g., via the “*Contact Us*” section of the website, when you visit our offices, when you communicate with us over email or the telephone, when you apply for a job with us, etc.) including your name, email address, postal address, title, job title, telephone number, passport or other government issued identification, financial information and/or CV information, as appropriate.

We may also collect personal data about you such as your IP address through automated technology when you access and use our website, such as cookies and similar technology - please see the *Cookies* section below for information about how we use such technologies.

Information provided by third parties or publicly available sources

We collect personal data from third parties, such as a CV sent to us by a recruiting firm, background information from a background check provider, personal data we viewed on social media (e.g., LinkedIn) or information obtained from publicly available lists of individuals subject to sanctions or trade restrictions.

If you represent one of our vendors, business partners or portfolio companies, we may also collect your personal data (i.e., basic identifying and contact information, including your name, title, work email address, work postal address, job title and/or work telephone number, as appropriate) from the entity that you work for where this is necessary to receive products or services from, or otherwise conduct business with, such third party.

We process information in relation to companies that we are evaluating in connection with a corporate transaction or potential investment. This information may include your personal data including name, title, email address, postal address, job title, telephone number, passport or other government issued identification, financial information and/or job and benefits information, as appropriate.

WHY WE USE YOUR PERSONAL DATA

We may use your personal data for the following purposes:

Purpose	Legal Basis
To conduct business with you or to provide you with the services you have requested	Contractual necessity; and/or our legitimate interest in operating our business and providing investment services
To communicate with you, to operate schedule and facilitate meetings (in-person and online) and to administer your participation in any of our events	Our legitimate interest in operating our business and providing investment services

To keep a record of your relationship with us	Our legitimate interest in operating our business and providing investment services; and/or legal requirement
To verify your identity (including to conduct anti-money laundering or KYC checks and to enable you to access our offices) or to evaluate a potential investor, business partner or supplier	Legal requirement; and/or our legitimate interest in operating our business and providing investment services securely
To protect against, identify and prevent, fraud, money-laundering, cyber-attacks, theft of our property and other unlawful activity	Legal requirement; and/or our legitimate interest in operating our business and providing investment services securely and safely
To conduct conflicts checks	Legal requirement
To conduct due diligence activities in connection with an actual or prospective corporate transaction or investment which are evaluated by Basalt or which we are party to	Our legitimate interest in operating our business and providing our investment services; contractual necessity; and/or legal requirement
Corporate transaction and investment reporting	Legal requirement
Litigation management and conducting internal audits and investigations	Legal requirement; and/or our legitimate interest in operating our business
To obtain advice from our professional advisors, including lawyers and accountants	Our legitimate interest in operating our business
To administer and protect our business and this website	Our legitimate interest in operating our business
To make suggestions and recommendations to you, or to provide you with updates or other information, about our business and services that may be of interest to you	Our legitimate interest in operating our business
For statistical analysis and market research	Our legitimate interest in operating our business

Note that we may process your personal data on more than one legal basis depending on the specific purpose for which we are using your personal data.

No solely automated decision-making, including profiling, is used when processing your personal information.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

MARKETING COMMUNICATIONS

We will send you direct marketing communications (e.g., marketing newsletters, updates, and alerts) where we have obtained your prior consent to keep you informed of our services in which you might be interested, or based on our legitimate business interests where we have an existing relationship with you and we wish to contact you about similar products or services in which you may be interested. You may request that we stop sending you marketing communications by clicking the unsubscribe link in the marketing email, or by emailing ir@basaltinfra.com, at any time.

DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION

Unfortunately, the transmission of information and data via the Internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of any information or data transmitted to or through our website; any transmission of information or data by you to or through this website is at your sole risk.

Your personal data will be shared with and processed by our affiliates and certain service providers as necessary to fulfil the purposes set out in this policy. We use a number of service providers that provide a wide range of services including legal, tax and financial professional advisors, our auditors, recruitment firms, consultants, office management companies and security providers, IT and data security providers, data hosting providers and in some instances, placements agents, administration agents, depositaries, investment managers and other fund administrators. We make sure anyone who provides a service to, or for us, enters into an agreement with us and meets our standards for data security. To the extent your personal data is transferred to countries outside of the UK or the European Economic Area, such transfers will only be made in accordance with the UK and EU Privacy Laws. For further information about the safeguards used, please contact Michael Cowell at info@basaltinfra.com.

We reserve the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us. Should we, or any of our affiliated entities, be the subject of a takeover, divestment or acquisition we may disclose your personal data to the new owner of the relevant business and their advisors.

SECURITY AND RETENTION OF PERSONAL DATA

We are committed to protecting the personal data you entrust to us. We adopt robust and appropriate data security technologies, measures and policies, so the information we have about you is protected to the extent possible from unauthorized access and disclosure, improper use and accidental loss. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality and required to keep your personal data secure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will keep your personal data only for as long as is reasonably necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required by law. We will not keep more personal data than we need for those purposes. For further information about how long we will keep your personal data, please contact Michael Cowell at info@basaltinfra.com.

CAPACITY

This website is only intended for individuals who are at least 13 years of age. We do not knowingly encourage or solicit visitors to this website who are under the age of 13 or knowingly collect personal data from anyone under the age of 13 without parental consent. If we learn we have collected or received personal data from an individual under the age of 13, we will delete that information.

COOKIES

Information regarding how you access this site (e.g., browser type, access times, and Internet Protocol (IP) address) and your hardware and software is automatically collected through the use of cookies (a small text file placed on your hard drive) or other technologies or tools. This information is used to improve website performance and for our business purposes. Where cookies are not necessary for us to provide the products or services you have requested or for the functioning of this site, we will ask you to consent to their use. You may opt-in to accept cookies automatically by changing the settings on your browser. If you opt-out of certain cookies, you may not be able to access certain parts of this site.

On the website we use the cookies listed below:

Cookie	Name	Type / Purpose	More Information
Google	rc::a	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	This cookie is a persistent cookie. Learn more about this provider here .
	rc::c		This cookie is a session cookie. Learn more about this provider here .
Cookie Consent	cookieconsent_status	Stores the user's cookie consent state for the current domain.	Cookie expires after 1 year. Learn more about this provider here .

You may wish to visit www.aboutcookies.org, which contains comprehensive information about types of cookies, how they are used, and how you manage your cookie preferences.

YOUR RIGHTS

You have the right to access the personal data we hold about you, and there are a number of ways you can control the way in which and what personal data we store and process about you. To exercise these rights and controls, please contact Michael Cowell at info@basaltinfra.com.

- **Access**: You have the right to ask for a copy of the personal data that we hold and process about you free of charge, however we may charge a 'reasonable fee', if we think that your request is excessive, to help us cover the costs of locating the information you have requested.
- **Correction**: You may notify us of changes to your personal data if the information we hold and process about you is inaccurate or it needs to be updated.
- **Deletion**: If you think that we shouldn't be holding or processing your personal data any more, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- **Restrictions on use**: You may request that we stop processing your personal data (other than storing it), if: (i) you contest the accuracy of it (until the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your personal data for the purposes for which it was collected, but you still need your personal data to establish or defend a legal claim; or (iv) you object to the processing, and we are verifying whether our legitimate grounds to process your personal data, override your own rights.
- **Object**: You have the right to object to processing, including: (i) for direct marketing; (ii) for research or statistical purposes; or (iii) where processing is based on legitimate interests.
- **Portability**: If you wish to transfer the personal data that we hold and process about you on the legal ground of contractual necessity to another organisation (and certain conditions are satisfied), you may ask us to do so, and we will send it directly if we have the technical means.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

NOTIFICATION OF CHANGES

We reserve the right to amend this Privacy Notice from time to time by updating this Privacy Notice. If we decide to change our Privacy Notice, we will post those changes so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any point we decide to collect personal data or use any collected personal data in a manner different from that stated at the time it was collected, we will notify applicable users. We will use information only in accordance with the Privacy Notice under which the personal information was collected.

CONTACT US

If you have any questions or concerns about this Privacy Notice, please contact Michael Cowell at info@basaltinfra.com.

COMPLAINTS

Should you wish to lodge a complaint with regards to how your personal data has been processed by us under:

- the UK GDPR and/or Data Protection Act 2018, please contact the UK Information Commissioner's Office – <https://ico.org.uk/global/contact-us>,
- the EU GDPR, please contact your local supervisory authority in particular in the EU Member State of your habitual residence, place of work, or place of the infringement, concern or complaint.

Last Updated: 8 September 2023