

PRIVACY NOTICE

1. GENERAL INFORMATION

Armada Credit Partners is an independent financing provider investing in small and medium-sized companies and buy-outs in the Nordic countries. Armada manages four private debt funds with a combined capital base of over €400 million and has offices in Helsinki and Stockholm. Armada is registered as an Alternative Investment Fund Manager by the Financial Supervisory Authority in Finland.

The purpose of this Privacy Notice is to inform how Armada Credit Partners and its affiliates (later “**Armada**” or “**we**”) process your personal data; what personal data we collect, how the data is used and to whom the data is disclosed. In addition, we tell you how you can control the processing of your personal data. “*Personal data*” refers to any information about natural person (later “**data subject**”), which allows a person to be directly or indirectly identified as an individual person, as defined in the EU General Data Protection Regulation.

This Privacy Notice is applicable to all funds related services offered by Armada, to our websites, social media services and our events. The Privacy Notice applies to processing of personal data of our customers and potential customers and any personal data related to portfolio companies of our funds, our business partners and service providers as well as job applicants and other people involved in recruitment processes. We are dedicated to processing the personal data in compliance with the European Union’s General Data Protection Regulation (2016/679) and other applicable privacy laws (together as “**data protection legislation**”).

2. CONTROLLER AND CONTACT INFORMATION

Controller:

Controller: Armada Credit Partners Oy
Bernhardinkatu 5 A, FI-00130 Helsinki
Point of contact: Saija Lehtonen,
Contact details: saija.lehtonen@armadacredit.com

3. LEGAL BASIS AND PURPOSES OF PROCESSING

The legal basis for the processing of the personal data is the contract between Armada and our client. In addition, when we inform the data subject about our services, deliver and maintain our services, ask feedback, or provide other relevant marketing information about our services and maintain the customer relationship, our legitimate interest constitute a legal basis for the processing. In this respect, processing of personal data is related to our customers, potential customers, our funds, service providers and other business partners. When we rely on our legitimate interests as a legal basis for processing the personal data, we have considered whether or not those interests are overridden by the rights and freedoms of the data subjects and have concluded that they are not. Also, the legal basis for the processing concerning recruitment procedure is based primarily on our legitimate interest.

The processing of personal data is also based on our statutory obligations such as accounting and tax related obligations and obligations arising from the Act on Detecting and Preventing Money Laundering and Terrorist Financing (28.6.2017/444) and from the Finnish Act on Alternative Investment Funds Managers (162/2014).

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We are processing the personal data for example for the following purposes:

- Maintaining, developing and assuring quality of our services and customer relationship
- Ensuring the security of our services and preventing frauds
- Carrying out statutory obligations such as KYC process
- Business planning and development
- Communication, information and marketing
- Risk management and preventing abuses
- Recruitment
- Organising events

4. CATEGORIES OF PERSONAL DATA, DATA CONTENT AND SOURCES OF DATA

We only collect the personal data which is relevant and necessary for the purposes outlined in this Privacy Notice.

The following information is being gathered from and processed on the data subjects:

Categories of personal data	Examples of data content
Contact information	Data subject's name, address, phone number and email.
Identity information	Personal identity code or equivalent foreign identity identifier and date of birth.
Information concerning the customer relationship	Account number, billing and payment information, and other information identifying the customer, as well as contact information of customer and other business partners representatives.
Know Your Customer (KYC) information	The name, date of birth and personal identity code of the data subject; full names, birth dates and nationalities of the legal entity's board members or the corresponding decision-making body; the name of the document used to authenticate the identity, the document number or other identifying information and the issuer, or a copy of the document or, if the customer has not been physically present for the identification, information about the procedure or sources used for authentication; name, date of birth and personal identity code of the beneficial owners of the customer; information about the customer's business, the quality and scope of the business, the financial position, the basis for the use of the transaction or service, and information on the origin of the assets.
Fit & proper information	Information regarding the fit and proper assessment required by the Finnish Financial Supervisory Authority.
Data concerning target companies	Due diligence data of the portfolio companies of Armada and prospective target companies and other investment opportunities.
Recruitment information	Job applications, curriculum vitae and other recruiting material and data collected during the recruitment process. In addition, information about other people involved in recruitment processes.

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Providing the above-mentioned information is necessary to fulfil the obligations of the contract between Armada and the client, which the data subject represents, and statutory obligations as well as for providing Armada's services (including web services and social media) and handling the recruitment processes.

The personal data is mainly collected from the data subjects themselves, for example, in connection with marketing or in connection with entering into an agreement, during the customer relationship and if required by the law also from other sources. Our business partners may also provide personal data to us in respect of marketing activities.

5. RETENTION OF PERSONAL DATA

We will retain the personal data for as long as it is necessary to fulfil the purposes outlined in the Privacy Notice unless a longer retention period is required by law (for example regarding obligations and responsibilities related to accountancy or reporting) or unless the data is needed for drafting or presenting a claim or for a legal defence or for resolving any disputes.

Regarding our clients and other business partners, the retention of the data subject's personal data is linked to the length of time the data subject is acting as a representative towards Armada. The personal data will be deleted within a reasonable time after the concerned role ends unless it is required by law to retain the data for a longer period of time.

The personal data necessary for marketing purposes will be maintained for as long as the data subject has not objected the use of personal data for the marketing.

Know Your Customer (KYC) information will be retained in compliance with the Act on Detecting and Preventing Money Laundering and Terrorist Financing for at least five (5) years after the end of the customer relationship.

Armada will retain the accounting materials for as long as is required by law.

Targeted job applications and other relevant recruiting material will be retained for the period of one (1) year from the final recruitment decision. Open job applications and the relevant recruiting material will be retained for one (1) year from the receipt of the application. After that the data may be retained on the basis of a separately given consent by the data subject.

When the personal data is no longer needed as defined above, data is deleted within a reasonable time.

6. PROCESSORS AND OTHER RECIPIENTS OF PERSONAL DATA

The personal data can be transferred within Armada.

We utilise service providers and third parties to carry out our business and have delegated some of the operations to our service providers. As an example, we use IT service providers to e.g. host the web site and deliver office and communications software and equipment. We also use marketing, legal, accounting and other service providers. With adequate contractual obligations we ensure that personal data is processed properly.

The personal data may also be disclosed to the competent authorities such as tax authorities in Finland and other countries where Armada is required to fulfil statutory and contractual obligations. The data may not be disclosed for the purposes of direct marketing.

- List of the recipients that process personal data can be provided upon request.

We may also have to disclose the personal data of data subjects' in case of emergencies or in other unexpected situations to protect health and property. Additionally, we may have to disclose the personal data of the data subjects if Armada is part of any legal or other dispute resolution proceedings.

In addition, we may share your information in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business and in connection with other similar arrangements.

2. Transfer of personal data outside EU/EEA

Personal data will not be transferred outside the European Union or the European Economic Area.

3. PROTECTION OF PERSONAL DATA

We commit to follow the security provisions of applicable data protection regulations, as well as to process personal data in compliance with good processing practices. We process the personal data in a manner that seeks to ensure in every situation the proper security and privacy of personal data, including the protection against unauthorized processing and accidental loss, destruction or damage.

We use appropriate technical and organizational safeguards to protect this, including the use of firewalls, encryption techniques and safe device facilities, proper access control and guidance for personnel and subcontractors involved in processing of personal data. Documents retained as original copies shall be kept in locked premises.

Our personnel and processors that process personal data are obliged to keep the personal data strictly confidential. Access to personal data is only granted to those employees that need the information to perform their work duties.

4. YOUR RIGHTS

The data subjects have the rights set out in the data protection legislation.

Right of access

The data subject has the right to obtain a confirmation if his or her personal data is processed.

The data subject has the right to access the personal data about himself/herself and to request to receive the data in a paper copy or in an electronic form.

Right to correct and erase data

The data subject has the right to demand to correct any incorrect or incomplete personal data. The data subject has also the right to request to remove his/her data under the current data protection legislation.

Right to data portability and to restrict and object processing

The data subject has the right to request to transmit his/her data to another controller under the applicable data protection legislation.

The data subject has the right to request to restrict processing of personal data in accordance with the conditions set out in the data protection legislation. Additionally, in case where the personal data is suspected to be incorrect and cannot be corrected or removed or there is confusion about the removal request, Armada will restrict access to the data.

The data subject has the right to object processing personal data for certain purposes, such as direct marketing.

Right to withdraw consent

If the processing of personal data is based on data subject's consent, the data subject has the right to withdraw consent at any time. The withdrawal does not affect the process based on consent before the withdrawal.

How to use of these rights

You can use your rights by submitting a request to the contact information in the beginning of this Privacy Notice. (Please, check the [contact information in the section 2](#)).

After receiving all the required information of your request (incl. confirmation of identity), we will start the processing of your request. We will contact you at latest within a period of one month.

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If your request is denied, you shall be informed about the refusal in writing. We may refuse the request (such as deleting the data) because of the statutory obligation or right such as a claim related to our services.

5. RIGHT TO LODGE COMPLAINT TO SUPERVISORY AUTHORITY

In case you consider our processing activities of your Personal data to be inconsistent with the applicable data protection legislation, you have the right to lodge a complaint to the competent data protection supervisory authority.

6. CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time, whenever necessary. The changes might also be based on the amendments of the legislation. All changes will be made available on our website where we publish this Privacy Notice.

This Privacy Notice has been published on 17.12.2018 and revised on 24.9.2020.

Version 1.1.