

## FRONTENAC PRIVACY NOTICE

Frontenac collects personal data about you from your use of this website. We are a controller under the General Data Protection Regulation (“GDPR”) and process Personal Data provided by you through your use of our website. This Privacy Notice explains how we collect Personal Data obtained from you through your use of our website.

### **1. What Personal Data do we collect?**

Personal Data is any information relating to you or that we can otherwise link to you. The Personal Data we collect on this website may include your name, email address, address and other contact information.

We may also collect information about your use of the website when you enter and browse the website through the use of “cookies,” web server logs and other electronic tools. This information may include, without limitation, the number and frequency of your visits to the website, the websites accessed before and after you visit the website, the internet browsers used by you and your IP addresses.

### **2. How do we collect Personal Data?**

We collect Personal Data that you voluntarily provide to us, such as through forms you choose to submit to contact us to obtain more information about Frontenac. We may also collect Personal Data through the use of a cookie on our website.

This Privacy Notice does not address our privacy practices with respect to any Personal Data we may collect from an investor in funds that we sponsor or manage. We address these practices in separate notices to investors as required by law.

### **3. How do we use your Personal Data?**

We use the Personal Data we collect from you on our website for communication purposes, such as (i) to send you information about Frontenac and (ii) to maintain our list of contacts.

### **4. Why do we process your Personal Data?**

We process your Personal Data for communication and marketing purposes.

### **5. What legal basis do we use to process your Personal Data?**

We rely on our legitimate business interests in maintaining business relationships and communicating about Frontenac’s business.

### **6. Is it necessary to provide Personal Data?**

You are not required to submit information to us through this website. However, we may collect cookies, which do not require your consent.

### **7. With whom do we share your Personal Data?**

We will not share your Personal Data with third parties except in the context of those third parties acting as data processors. For example, we may use a customer relationship manager software platform to organize our business contacts, and your Personal Data may reside on that software. Where relevant, we will ensure that contractual safeguards are implemented with these third-party data processors to ensure the protection of your Personal Data.

#### **8. How long do we retain your Personal Data?**

Your Personal Data will be retained for as long as you are a business contact to us, or longer as required by applicable law. Your Personal Data may be deleted when it is no longer relevant or when you withdraw consent (see below), again within the parameters of applicable law. You may unsubscribe at any time from communications from us, and we will cease sending you further communications.

#### **9. What are my rights with respect to my personal data?**

You have the right to know what Personal Data we process about you and have the right to obtain specific information about such Personal Data and to request a copy of your Personal Data, free of charge. You are also entitled to correct or supplement inaccurate Personal Data without delay, unless the request is excessive or unfounded. You have the right to request that your Personal Data be deleted if it is no longer necessary for the purposes it was originally collected or processed, subject to applicable law. You have the right to restrict processing of your Personal Data in some circumstances, subject to any legal obligations of Frontenac. You have the right to receive your Personal Data in a machine-readable format and request a transfer of the Personal Data to another party responsible for data processing to the extent that the processing was carried out by automated means. You have the right to object to processing your Personal Data for marketing purposes and the right to opt out of such marketing. You also have the right to lodge a complaint with the relevant data protection authority.

#### **10. What security do we have in place over your personal data?**

Frontenac has implemented appropriate technical security measures to help protect your Personal Data against loss and to safeguard your Personal Data against access by unauthorized persons. We consider the protection of sensitive information to be a sound business practice, and to that end we employ physical, electronic and procedural safeguards to protect your Personal Data obtained through use on this website.

#### **11. What are our procedures in the event of a breach to your Personal Data?**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data, we will notify the applicable supervisory authority in the European Union within 72 hours of discovering the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of natural persons. We will also notify each affected subject of a breach without undue delay if the breach is likely to result in a high risk to the rights and freedoms of natural persons. We are not required to notify you of a breach if the breached data is encrypted, if we have taken measures, such as wiping the data remotely, and such breach is unlikely to result in a material adverse effect, or if providing notice requires disproportionate efforts, in which case a public communication should be made, rather than notice to each person.

#### **12. Updates to this privacy statement**

This Privacy Notice was updated in May 2018. We may amend this notice from time to time to reflect changes in our practices with respect to the processing of Personal Data or changes in applicable law.

#### **13. Contact information**

If you have any questions about how we process your Personal Data, please contact us at [reception@frontenac.com](mailto:reception@frontenac.com).