



## Privacy Notice

### General Information

- 1 Partners Group is committed to protecting your privacy and take the greatest care to use your information only for legitimate and specified business purposes. Our global data protection framework – which includes policies, information security measures, a Data Protection Officer, training and awareness and business relevant procedures – relies on the following key principles:
  - We respect the privacy rights of Partners Group employees, customers, clients, business partners and other individuals whose personal data we have and use;
  - We implement appropriate technical and organizational measures in our data processing operations to protect personal data;
  - We obtain personal data fairly and transparently, and only use it for legitimate purposes;
  - We hold ourselves accountable for demonstrating compliance with the data protection requirements where we operate.
- 2 These principles apply to all Partners Group entities worldwide. They are based on internationally recognized privacy principles and the foundational principles of the European Union’s General Data Protection Regulation (GDPR). Partners Group has implemented enhanced processes in compliance with the GDPR as described in our [Code of Conduct](#). Additionally, we take care to understand relevant laws and regulations that may apply and assess the risks that may impact personal data in our global operations.
- 3 For the purpose of this Privacy Notice, “Partners Group”, “our”, “we”, or “us” refers to the Partners Group entity processing your personal data.
- 4 This Privacy Notice outlines how we collect and process personal data about you and it explains your rights and obligations. Processing will include all actions that can be performed on personal data such as collection, recording, organization, structuring, storage, adaptation / alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### What information do we have about you?

- 5 The nature of the personal data depends on your relationship with Partners Group. In many cases, if we are handling your personal data as part of our role as asset manager, we may process the following:
  - Contact information – in some cases, for example, we may receive your email, address, postcode and phone number.
  - Online information – for example cookies and IP address (your computer’s internet address), if you use our websites. Please see our [Cookies Policy](#).
  - Financial information – we may process information related to payments you make or receive in the context of an investment.

- Contractual information – for example details about your subscriptions.
- 6 We primarily obtain your personal information directly from you, however, some information may be inferred from the information you provide or arise in the context of managing our relationships with you. Additionally, Partners Group may receive personal information about you from third parties. For example, we may obtain information about you from third-party providers who assist us in carrying out our anti-money laundering legal obligations.

#### How do we process your personal information and why is this justified?

- 7 We always process your personal data for a specific purpose and only process the personal data, which is relevant to achieve that purpose. In particular, we process your personal data to:
- Manage our relationship with you;
  - Assess, improve, and develop our services;
  - Enhance our knowledge of markets in general;
  - Fulfill legal or regulatory obligations and to protect ourselves against fraud.

#### Who has access to your personal data and to whom are they transferred?

- 8 We will never sell your personal data.
- 9 In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data may be accessed by or transferred to the following categories of recipients on a need to know basis to achieve such purposes:
- our personnel;
  - suppliers and service providers;
  - technology systems providers, including cloud and database providers, and related consultants; and
  - professional advisors and external lawyers.

Such recipients are obligated to protect the confidentiality and security of your personal data. We regularly check who has access to our systems and data.

- 10 In certain limited circumstances, your personal data may be accessed by or transferred to law enforcement, regulatory bodies, or judicial authorities. This will occur only when legally required.
- 11 The personal data we collect from you may be processed by Partners Group in a different country than where you are based and, if you are located in the European Economic Area (i.e., the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA"), outside of the EEA. Specifically, your personal data may be processed by Partners Group in one of its many international offices. For an updated list of Partners Group office locations, you can visit our webpage: <https://www.partnersgroup.com/en/about/our-offices/>. This may result in your data being processed in a country which may not offer the same level of protection as your country.
- 12 If we transfer your personal data to an external company in a country that does not offer adequate protection, we will make sure to protect your personal data by (i) requiring that the third party apply the same level of protection required under the applicable local data

protection; (ii) requiring that the third party acts in accordance with our written instructions and our policies and standards and; (iii) unless otherwise specified, only transferring your personal data on the basis of an appropriate contractual mechanism (such as the standard contractual clauses approved by the European Commission).

- 13 For intra-group transfers of personal data to entities located in countries that do not offer adequate protections, Partners Group has adopted standard contractual clauses. Standard contractual clauses are a set of contract terms approved by certain jurisdictions and deemed to provide “adequate protections” to cross-border transfers.
- 14 You may request additional information in relation to such cross-border transfers and obtain a copy of the adequate safeguard put in place by Partners Group as described in the section titled "[Who can I contact if I have any questions or concerns?](#)".

### How do we protect your personal data?

- 15 We have implemented appropriate technical and organizational measures to provide a level of security and confidentiality to your personal data. These measures consider the state of the art of the technology; the costs of its implementation; the nature of the data; and the risk of processing.
- 16 The purpose of these measures is to protect your personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access, and against other unlawful forms of processing.
- 17 While we take reasonable care to implement such measures, remember that the internet is inherently unsafe, and we cannot guarantee the security of your personal data when transmitted over the internet or email.
- 18 Moreover, when handling your personal data, we:
  - only collect and process personal data which is adequate, relevant, and not excessive, as required to meet the related purposes; and
  - ensure that your personal data remains up to date and accurate
- 19 We may request that you confirm the personal data we hold about you to ensure its accuracy.

### How do we store your personal data?

- 20 We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements. This includes keeping your information for a reasonable period of time after your relationship with us has ended.
- 21 If you need more information about our retention or deletion practices, please contact us.

### What are your rights and how can you exercise them?

- 22 We recognize that you may have rights with regard to our processing of your data. While the nature and extent of these rights will differ from location to location, we have processes in place that allow us to respond in a timely manner to any valid request. Your rights include:

- the right to access the personal data about you that we process;
- the right to request the correction of personal data that you believe is incorrect, obsolete, or incomplete;
- the right to request the erasure of your personal data;
- the right to restrict the use of your personal data to specific categories of processing;
- if your personal data is processed based on your consent, you have the right to withdraw your consent at any time (please note that if you withdraw your consent, processing based on your consent that took place before your withdrawal will remain lawful);
- the right to object, in whole or in part, to the processing of your personal data; and
- the right to request that the personal data you provided us be returned to you or transferred to the person or entity of your choice in a structured, commonly used and machine-readable format without hindrance from us.

23 The easiest way to exercise your rights is to contact us. We will respond promptly.

#### **Who can I contact if I have any questions or concerns?**

- 24 If you have any questions about how your personal data is processed (including if you are unsure of which Partners Group entity is the controller), if you are not satisfied with how we process your personal data, or if you want to exercise the above rights, you may contact our Data Privacy Officer by email at [DPO@partnersgroup.com](mailto:DPO@partnersgroup.com). You may be requested to verify your identity. Please make sure that you redact any photographs if you submit a copy of an identity document; we will only use the information you provide to verify your identity and will not keep a copy of it after verification is completed.
- 25 In any case, and in addition to your rights above, you have the right to file a complaint with the competent data protection authority in your country as identified in the Country Specific Addendum.

#### **How will you be informed of the changes to our Privacy Notice?**

- 26 Any future changes or additions to the processing of your personal data as described in this Privacy Notice will be notified to you in advance through our website. This Privacy Notice has an effective date as shown at the end of the document.