

PRIVACY POLICY

1. PURPOSE AND SCOPE

- 1.1 Raft Capital Management, UAB, legal entity code 305885743, registered address at Gedimino ave. 50, Vilnius Lithuania, data is kept and stored at the State Register of Legal Entities (hereinafter referred to as “RCM”, „we“ or „us“) is a company concentrating on investing in growth and expansion-stage companies across the Baltic states. RCM has also established and manages related investment funds (e.g. Raft Capital Baltic Equity Fund (KUB)). The company is also administering a website at www.raftcapital.eu.
- 1.2 We respect your privacy and pledge to process and protect your personal data in a fair and lawful way in accordance with the applicable legal requirements, such as the EU General Data Protection Regulation No. 2016/679 (“GDPR”), Law on the Legal Protection of Personal Data of the Republic of Lithuania and other applicable legal acts.
- 1.3 This Privacy Policy explains RCM's main data processing purposes (i.e., why we collect your data in our daily business activities, including your data collection via this website) and privacy rights you have in respect of your personal data.

2. PRINCIPLES OF PROCESSING OF PERSONAL DATA

- 2.1 We are responsible for ensuring security of your personal data made available to us, in particular to prevent unauthorized access to your data.
- 2.2 When processing personal data, we follow the principles of:
 - legality, fairness and transparency;
 - purpose limitation;
 - data minimisation;
 - accuracy;
 - storage limitation;
 - integrity and confidentiality.

3. WHAT ARE THE PURPOSES AND LEGAL BASES OF DATA PROCESSING

Purpose	Legal basis	Retention period
To take steps at your request prior to entering into a contract	<ul style="list-style-type: none">• Taking necessary steps before conclusion of the contract and/or conclusion of the contract;• Legal obligations - Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania, if applicable	The personal data collected for the implementation of the obligations under the Law on the Prevention of Money Laundering and Terrorist Financing shall be stored up to 8 (eight) years as provided in the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania. The retention period may be extended for a period not exceeding 2 (two) years, provided there is a reasoned request from a competent authority.
To perform the contract concluded with you, including (but not limited to) provision of our services	<ul style="list-style-type: none">• Performance of the contract;• Legal obligations - Law on Prevention of Money Laundering and Terrorist	Up to 8 (eight) years as provided in the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania. The retention period may be extended for a period not exceeding 2 (two) years,

	Financing of the Republic of Lithuania; and Order of the Financial Investigations Unit No V-314	provided there is a reasoned request from a competent authority.
To comply with legal obligations (e.g., implementation of the obligations under the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania and other fraud and crime prevention purposes) and risk management obligations	<ul style="list-style-type: none"> Legal obligations - Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania 	Up to 8 (eight) years after the contractual relationships end, as provided in the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania. The retention period may be extended for a period not exceeding 2 (two) years, provided there is a reasoned request from a competent authority.
To identify you remotely	<ul style="list-style-type: none"> Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania Order No. V-314 of the Director of the Financial Crime investigation service under Ministry of the Interior of the Republic of Lithuania dated 30 November 2016 	Up to 8 years post contractual relationship.
To prevent, limit and investigate any misuse or unlawful use or disturbance of the services or to establish, exercise and defend legal claims	<ul style="list-style-type: none"> Performance of the contract; Legitimate interest – defend against legal claims and prevent fraud; Legal obligations – Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania; Order of the Financial Investigations Unit No V-314 . 	Up to 8 years post contractual relationship (+2-year extension).
To prevent fraud (in case you are rejected, we will keep your onboarding results for the purposes of future applications)	<ul style="list-style-type: none"> Legal obligations – Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania; Order of the Financial Investigations Unit No V-314 	Up to 5 years
For our internal business purposes, such as statistics, analysing and	<ul style="list-style-type: none"> Our legitimate interest – to develop our services 	Data shall be anonymized as necessary and stored until necessary for the purpose.

managing our businesses, business mergers and acquisitions, market research, audits, developing new products/services		
Enhancing our website, identifying usage trends, analyzing statistical data	<ul style="list-style-type: none"> • Our legitimate interest – to develop our website 	For this purpose we use cookies and similar technologies. Retention period depends on the type of cookies used (please see section 11 “Cookies” below)
To provide you with the possibility to apply for an open job positions through our career section of the website	<ul style="list-style-type: none"> • Our legitimate interest – to optimize the recruitment process 	We will keep your data 3 months after the specific recruitment process is over.

If you provide us personal data about other people (such as your spouse or family) or you ask us to share their personal data with third parties, you confirm that you have brought this Privacy Policy to their attention beforehand.

4. OUR IDENTIFICATION TOOLS

We are currently performing a physical identity verification procedure. In case we start carrying out remote identification, we will notify you.

DIRECT MARKETING In case you are an existing client (i.e., you already use our services), we may use your e-mail address for direct marketing purposes, but only with regard to our products and/or services that are similar or related to the services you have obtained, and only if you do not object to such use of your e-mail address. You are also granted a clear, free of charge and easily enforceable possibility to object or withdraw from such use of your contact details.

In other cases, we may use your personal data for the purpose of direct marketing, only if you give us your prior explicit consent regarding such use of the data.

We are entitled to offer the services provided by our business partners or other third parties to you or find out your opinion on different matters in relation to our business partners or other third parties only if you will specifically consent to this.

You have a right to withhold your consent without suffering any adverse effect. If you provide your consent, you can withdraw it at any time.

We shall state in each notification sent by e-mail that you are entitled to object to the processing of the personal data, and to refuse receiving messages from us. You shall be able to refuse receiving our marketing messages by clicking on the respective link in each marketing e-mail received from us.

AUTOMATED DECISION MAKING

We do not use automated decision making technologies.

HOW WE SHARE YOUR PERSONAL DATA

We may disclose your personal information to the recipients of the following categories:

- a) public authorities, institutions, organisations, courts and other third parties, but only upon request and only when required by applicable laws, or in cases and under procedures provided for by applicable laws;
- b) third parties providing services to us including providers of legal, financial, auditing, tax, business management, personnel administration, remote identification, accounting, advertising (including online advertising), direct marketing, communications, data centers, hosting, cloud and/or other services. In each case, we provide such third parties with only as much data as necessary to provide their services. Service providers engaged by us may process your personal data only in accordance with our instructions and may not use them for other purposes;
- c) third parties for the purpose of performance of the contract concluded with you;
- e) third parties, when we intend to enter into a business sale transaction and/or to perform legal and/or financial due diligence of us prior to such transaction;
- f) other persons with your consent.

INTERNATIONAL TRANSFER OF PERSONAL DATA

We do not usually transfer data outside the EU.

In case your personal data must be transferred outside the European Economic Area (EEA), we will take necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy and we will ensure that it is protected and transferred in a manner consistent with the legal requirements applicable to the personal data. This can be done in a number of different ways, for example:

- a) the country to which we send the personal data, a territory or one or more specified sectors within that third country, or the international organization is approved by the European Commission as having an adequate level of protection;
- b) the recipient has signed or contains in its terms of service (service agreement) standard contractual clauses adopted by the European Commission;
- c) special permission has been obtained from a supervisory authority.

HOW WE PROTECT YOUR PERSONAL DATA

Please note that, although no system of technology is completely secure, we have to implement appropriate security measures in order to minimize the risks of unauthorized access to or improper use of your personal information.

We and our third-party service providers that may be engaged in the processing of personal data on our behalf (for the purposes indicated above) are contractually obligated to respect the confidentiality of the personal data.

A variety of logical and physical security measures are used to keep your personal data safe and prevent unauthorized access, usage, or disclosure of it (the list indicated below is not exhaustive): we use antivirus software, access control policies, we review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems, we use data encryption, etc.

YOUR RIGHTS

- a) **The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data.
- b) **The right to access.** You have the right to request from us copies of your personal data. Where your requests are excessive, in particular if they are being sent with a repetitive character, we may refuse to act on the request or charge a reasonable fee taking into account the administrative costs for providing the information. An assessment of the excessiveness of the request will be made by us.
- c) **The right to rectification.** You have the right to request us to correct or update your personal data at any time, in particular if your personal data is incomplete or incorrect.
- d) **The right to data portability.** The personal data provided by you is portable. You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- e) **The right to be forgotten.** When there is no good reason for us to process your personal data anymore, you can ask us to delete your data. We will take reasonable steps to respond to your request. If your personal data is no longer needed and we are not required by law to retain it, we will delete it or destroy it.
- f) **The right to restrict processing.** You have the right to restrict the processing of your personal data in certain situations (e. g. you want us to investigate whether it is accurate; we no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim).
- g) **The right to object processing.** Under certain circumstances you have the right to object to certain types of processing (e. g. receiving notification emails). However, if you object to us using personal data which we need in order to provide our Services, we may need to close your payment account as we will not be able to provide the Services.
- h) **The right to file a complaint with a supervisory authority.** You have the right to file a complaint directly the State Data Protection Inspectorate of Lithuania if you believe that the personal data is processed in a way that violates your rights and legitimate interests stipulated by applicable legislation. You may apply in accordance with the procedures for handling complaints that are established by the State Data Protection Inspectorate, and which may be found by this link: <https://vdai.lrv.lt/lt/veiklos-sritys-1/skundu-nagrinejimas>.
- i) **Right to withdraw your permission.** If you have given us consent for processing of your data, you can withdraw your consent at any time. It will have been lawful for us to use the personal data up to the point you withdrew your permission. You also have a right to withhold your consent without any adverse effect.

If you would like to exercise any of these rights, please contact us via e-mail: info@raftcapital.eu For security reasons, we will not be able to process your request if we are not sure of your identity, so we may ask for your ID as proof.

COOKIES

We use cookies in a range of ways to improve your experience on our website, including: keeping you signed in, understanding how you use our website.

There are a number of different types of cookies, however, our website uses:

- **Necessary Cookies.** Necessary cookies help us to make the websites available to you by providing the basic functions such as page navigation and access to secure areas of the website. Without these cookies, our website will not perform as smoothly for you as we would like, and we may not be able to provide certain core functions and features of our website. These cookies enable our website to remember choices you make while actively using and navigating through the website during a single session. With regard to personal data collected by the necessary cookies our legal basis for processing such personal data is our legitimate interest in providing the proper functioning and safety of the website. We do not provide an opt-out option for necessary cookies. You can set your browser to block the necessary cookies, but then the website will not function properly.
- **Functionality Cookies.** We use these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and the location you are in. These cookies are activated on the website only after you have given your consent.

The cookies used in our websites:

Cookie Name	Domain	Valid until	Description
Strictly necessary			
cmplz_policy_id	raftcapital	12 months	Stores user consent status for cookie compliance, ensuring compliance with legal regulations.
Wordpress_logged_in_37acb	raftcapital	session	Tracks the user's login session to maintain authentication throughout their visit.
Wordpress_sec_37acb	raftcapital	Session	A secure cookie for authenticating logged-in users and protecting their sessions.
Wordpress_test_cookies	raftcapital	Session	Checks if cookies are enabled in the user's browser for proper functionality.
Et-editor-available-post-475-fb	raftcapital	24 hours	Used by the WordPress editor to manage access to specific post editing features.
Functionality			

Et-editor-available-post-475-fb	raftcapital	24 hours	Used by the WordPress editor to manage access to specific post editing features.
Wp-settings-1	raftcapital	8 months	Stores user preferences for customizing the WordPress admin interface and the website display.
Wp-settings-time-1	raftcapital	8 months	Records the time when the user settings were last saved to apply configurations consistently.

When you enter our website for the first time, we provide you with an opportunity to accept or decline the usage of cookies. You can also delete and block cookies at any time from this site through your browser, but some features on this site will not function without cookies.

You can change the preferences or settings in your web browser to control cookies. In some cases, you can choose to accept cookies from the primary site but block them from third parties. In others, you can block cookies from specific advertisers or clear out all cookies.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites which are not operated by us. When you decide to click on these links and be led to such websites, we recommend familiarising yourself with their privacy policies or notices, cookie policies and/or other documents. We assume no responsibility for the content, policies or practices of such third-party websites or services.

CHANGES TO THIS PRIVACY POLICY

We regularly review this Privacy Policy and reserve the right to modify it at any time in accordance with applicable laws and regulations. We will inform you of any material changes in advance.

CONTACT US

You may contact us by e-mail info@raftcapital.eu