

Privacy Policy

Turnstone Alternative Investments AS

1. About this Privacy policy

This Privacy Policy, established by Turnstone Alternative Investments AS (hereinafter referred to as "Turnstone", "we", or "us"), includes information on how we process your personal data and your data protection rights.

Turnstone and its funds under management process your personal data in accordance with the Norwegian Personal Data Act and the **GDPR**. The Privacy Policy governs our processing of personal data of visitors to our website (www.turnstone.no), our investors, and any other third parties. Turnstone has a separate privacy statement regarding handling of personal data for our employees.

In the privacy policy, we use several terms from GDPR, for example "processing", "controller" and "data processor". The terms have the same meaning here as in the GDPR. You can find more information about the terms on the Norwegian Data Protection Authority's website (www.datatilsynet.no).

2. Who is responsible for processing your personal data?

We are the controller of the personal data we process when you are in contact with us or when providing our services. This means that we are responsible for ensuring that the processing is compliant with the data protection legislation.

Our contact information is:

- Business registration no.: 913 937 864
- Address: Haakon VII's gate 1, 0161 Oslo, Norway
- E-mail: ou@turnstone.no

3. What personal data do we process and for which purposes?

In any case where we store and/or process your data, we must have a legal basis for this. Which personal data we collect, the purpose, and the legal basis for such processing depend on our relationship to you and your contact with us. Below is an overview of the personal data we process.

3.1 We process personal data to respond to you

When you contact us, we will process personal data about you. The personal data we collect will include contact information such as your name, email address, and any other information you provide to us, which is necessary for us in order to respond to you.

Our legal basis for this processing is our legitimate interest. The legitimate interest is our need to be able to respond to you.

3.2 We process personal data to fulfil the agreement with you

We process personal data about our investors, which includes, but is not limited to, contact information such as name, role, phone number, address, and email, as well as national identity number (and tax identification number if different), for the purpose of fulfilling our contractual obligations.

We also process personal data of other contractual partners, including, but not limited to, name, phone number, and email, in connection with investments we make, and contact persons at our suppliers and service providers. The legal basis for this processing is our agreement with you or the company you are affiliated with.

3.3 We process personal data to comply with legal obligations

The core business of Turnstone is the management of alternative investment funds. As a result, we are obliged to process personal data to comply with statutory requirements in a range of legal acts.

The legal basis for such processing is the legal obligation to which we are subject at any given time. Examples of some legal acts and the categories of data we process include:

- (i) The Securities Trading Act and the accompanying regulations: Turnstone will process data about your investment history, experience, and financial situation, including assets and liabilities, among other things.
- (ii) The Norwegian Anti-Money Laundering Act: We perform customer due diligence, confirm and verify identities, and screen against sanctions lists. The personal data processed may include, but is not limited to, name, national identity number, address, and proof of identity.
- (iii) The Management of Taxes Act: We may process personal data that includes, but is not limited to, name, national identity number, citizenship, tax residence, and financial information.
- (iv) The Norwegian Alternative Investment Funds Management Act: We conduct “professional client” checks, which may involve processing personal data such as investment experience, financial information, and information about profession and education.

3.4 We process data for HR purposes

We process personal data about applicants, such as CV, names, education, experience, phone and email. This processing of personal data is carried out on the basis of our legitimate interest in hiring new personnel. The personal data are necessary to process in order to evaluate which applicants are suitable for the specific position.

- We will only keep documentation on the person who has been hired. CV’s and other documentation about other applicants will be deleted or shredded as soon as the hiring process has been closed.
- It will in some cases be relevant to evaluate a candidate for other vacant positions. All information will be deleted as soon as the information is no longer necessary.

3.5 We process personal data for marketing purposes

If you wish, you can subscribe to receive news, marketing information, and other communications from us, for example via our website or by signing a consent form. The data we process includes your name and email address. The basis for processing is the consent you provide when you sign up to receive news.

You can withdraw your consent at any time by following the procedure described at the bottom of all our newsletters. When you withdraw your consent, we will remove you from the recipient list.

If you have been contacted by us without providing prior consent or having entered into an agreement with us, we have decided to contact you for sales/marketing purposes based on a legitimate interest assessment. In such cases, we have a legitimate interest in conducting our business as we do. The decision to contact you specifically may for example be based on publicly available information that leads us to consider you as a potential investor in one of the funds under our management. Turnstone

will not market any funds managed or proposed to be managed by Turnstone to non-professional investors without having applied for authorisation by the Financial Supervisory Authority of Norway. Funds (without authorisation by the Financial Supervisory Authority of Norway for marketing to non-professional investors) will only be marketed to professional investors as defined in section 10-6 of the Securities Trading Act.

3.6 We process personal data for organizing events

If you register for any of our events, we may collect personal data such as your name, contact information, and if you wish, preferences related to the event's execution, dining, accommodation, and travel. Our legal basis for this processing is your consent.

The information will be deleted after the event has concluded, unless we have another legal basis for retaining the information for a longer period.

4. What is the source for the personal data we process?

The personal data is collected directly from you, or from the company you are affiliated with. In some cases, we may also collect personal data from other sources, including publicly accessible sources such as public registers and the internet, within the framework of applicable law.

5. Who do we share your personal data with?

5.1 Data processors

Your personal data will be accessible to those of our suppliers and service providers who process personal data on our behalf. To secure your rights, we have entered into data processing agreements with them.

Some of our suppliers and service providers are located in countries outside the EU/EEA. In case of a transfer personal data to a country or area outside the EEA, we will ensure that the transfer is in accordance with the GDPR.

5.2 Other third parties

We will not disclose your personal data to others unless there is a legal basis for such transfer. For example, if the disclosure is required by law, necessary to fulfil our agreement with you or to achieve a legitimate interest pursued by the company. Such third parties can be banks, financial and legal advisers, insurance companies and public authorities.

In certain instances, we transfer personal data to recipients who are considered new data controllers. A third party is considered a new controller if they use the personal data for their own purposes.

In the event that a third party is located outside of EU/EEA, Turnstone will ensure that sufficient safeguards are implemented in order to ensure that such disclosure is safe and in accordance with the Norwegian personal data regulations.

5.3 Turnstone Private Equity

We collaborate with Turnstone Private Equity AS ("TPE") and, from time to time, it may be necessary to share personal data with TPE. TPE is a company within the Turnstone group dedicated solely to providing services to us. Sharing personal data may be necessary to fulfill your request, for TPE to deliver its services to us, or because we share IT systems.

When TPE acts as our data processor, we will handle your personal data as described above under "Data Processors." When TPE acts as a data controller, the section "Other Third Parties" will apply.

5.4 Use of Cookies on our website

Cookies are small text files that are placed on your computer when you download our website. We only use cookies that are necessary for the website to function properly.

The necessary cookie we use is:

Name	Storage period	Purpose
Resolution	Will be deleted after each session.	This is a functionality cookie used to collect the horizontal resolution value of the visitor's screen. It helps to optimize the display of the website for the user.

6. When do we delete your personal data?

Turnstone will not retain personal data longer than necessary and will assess the need for retention of personal data on an ongoing basis. We are required by law to retain certain personal data for a longer period. For example, personal data collected pursuant to the Norwegian Money Laundering Act and the Taxes Management Act.

Any personal data collected with consent as legal basis, will be deleted if you withdraw your consent, unless statutory retention obligations apply.

7. Your rights

You have data protection rights as listed below. To enforce some of these rights, specific conditions must be met. Additionally, there may be some exceptions to the rights.

- **Access:** you have the right to request information about how we process your personal data and to obtain a copy of that personal data.
- **Rectification:** you have the right to request the rectification of inaccurate personal data about you and for any incomplete personal data about you to be completed.
- **Objection:** you have the right to object to the processing of your personal data, which is based on our legitimate interests.
- **Erasure:** you have the right to request the erasure of your personal data (subject to certain conditions).
- **Automated decision-making:** you have the right not to have a decision made about you that is based solely on automated processing if that decision produces legal effects about you or significantly affects you. We do not undertake profiling or take any decisions with legal or similar material effect based on fully automated processing of your personal data.
- **Restriction:** you have the right to ask us to restrict our processing of your personal data, so that we no longer process that information until the restriction is lifted.
- **Portability:** you have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that information transmitted to another organisation in certain circumstances.

- **Compliant:** you have the right to lodge a complaint with the Data Protection Authority (Datatilsynet) if you have reason to believe that processing of your personal data does not comply with the data protection legislation.

8. Contact information

We would like to hear from you if you have questions or objections to how we process your personal data, or if you wish to make use of any of the rights described above. You contact us by sending an email to ou@turnstone.no.

9. Changes to this policy

We update this privacy policy if there are changes in how we process personal data. You will always find the most recently updated privacy policy on our website, www.turnstone.no.

Date of last update: 25.06.2024

This policy is governed by Norwegian law.