

## Privacy and Cookie Policy

Tower Peak Partners LLP (“Tower Peak”, “we”, “us”, or “our”) respects your privacy and is deeply committed to protecting your Personal Data. This Privacy and Cookie Policy (“Policy”) is designed to provide a detailed explanation of how we collect, use, share, and safeguard your Personal Data when you interact with our websites, utilize our services, or engage in our business activities. It also outlines how Cookies and similar technologies are employed to enhance your online experience.

This Policy applies to individuals visiting our websites, engaging with our marketing initiatives, or whose Personal Data is processed during our professional and operational activities. Please note that it does not cover our investors or limited partners, whose Personal Data is addressed in a separate Investor Privacy Notice.

### Scope of Data Collection and Processing

This Policy applies to the various interactions you may have with Tower Peak and the Services we provide. The term “Services” encompasses our websites, the investment and related services we conduct in our business operations, and our marketing and business development efforts, including emails, events, and social media engagement.

Personal Data refers to information that can identify an individual either directly or indirectly or is otherwise linked to an identifiable person (“Data Subject”). Examples of Personal Data we collect include:

Identifiers such as your name, address, contact information, nationality, and date of birth. For business purposes, we may also process professional data, including your employment history, job title, and affiliations. Financial details like bank account information, investment profiles, and communications related to financial transactions may also be collected. In certain circumstances, we process health-related information—for instance, dietary preferences or accessibility requirements provided for event participation.

Personal Data may be gathered from a diverse range of individuals, including directors, officers, employees, and representatives of entities in which we invest or consider investing; professional advisors, service providers, and counterparties engaged with Tower Peak; individuals applying for roles within Tower Peak; and visitors to our websites and digital platforms.

### How We Collect Personal Data

Personal Data is collected through multiple means to ensure compliance with applicable data protection laws, including the UK General Data Protection Regulation (“UK GDPR”) and the EU General Data Protection Regulation (“GDPR”), as well as to maintain efficient and professional business operations. First, we gather information directly from you. For example, when you complete forms on our websites, correspond with us via email, apply for a role, or provide your information during an event we host, this constitutes direct interaction. Such data collection is performed in accordance with principles of transparency, fairness, and lawfulness as required under GDPR and UK GDPR.

Additionally, we may receive Personal Data indirectly through third-party sources. These include professional

advisors, service providers, and other entities that supply us with information as part of investment evaluations and due diligence processes. Where we receive such data indirectly, we ensure that the original collector has obtained the information in compliance with GDPR and UK GDPR requirements, including providing appropriate notices to the Data Subjects.

Automated tools also play a role in data collection, as Cookies and similar technologies gather technical data about how you interact with our websites. This automated collection is conducted with your consent where required by law and is in line with the data minimization and purpose limitation principles set out under GDPR and UK GDPR.

### **How We Use Personal Data**

The processing of Personal Data is fundamental to Tower Peak's ability to deliver its Services and achieve its business objectives. Our processing activities are conducted in accordance with GDPR and UK GDPR, ensuring a legal basis for every action. Personal Data is primarily used to evaluate and manage investment opportunities and portfolio companies. This includes conducting comprehensive due diligence and assessing associated business risks. Such processing typically relies on our legitimate interests as the legal basis, balanced against the rights and freedoms of Data Subjects.

We also use Personal Data to facilitate communications with our clients, service providers, and professional contacts, ensuring compliance with applicable laws and regulations, including GDPR and UK GDPR obligations related to accountability and data security. Tower Peak relies on Personal Data to manage job applications, employment matters, and other internal administrative tasks. These activities are conducted under lawful bases such as fulfilling contractual obligations or compliance with legal requirements.

Additionally, Personal Data enhances the functionality and security of our digital platforms, providing users with a seamless and secure experience. For such processing, we ensure that appropriate safeguards are in place to protect the confidentiality and integrity of the data.

Marketing is another area where we process Personal Data. Through direct communications, we inform you about updates, newsletters, and invitations to events. Where required by GDPR or UK GDPR, we seek your explicit consent before engaging in such activities. We also utilize your data to improve our understanding of how our Services are accessed and to investigate and mitigate unauthorized access, fraud, or other security threats. Data Subjects have the right to object to processing for marketing purposes at any time.

### **Cookies and Automated Data Collection**

Tower Peak's websites make use of Cookies and similar technologies to improve user experience, analyze website performance, and ensure compliance with applicable privacy regulations, including the UK GDPR and the GDPR. Cookies are small files stored on your device that enable the website to recognize your preferences, deliver a personalized browsing experience, and provide insights into site usage. These tools play a crucial role in tracking website traffic, analyzing usage patterns, and understanding user behaviors.

The Cookies we employ serve several important purposes. They allow us to identify returning visitors, personalize their experience by storing preferences, and enhance the security and overall functionality of our platforms.

Additionally, by analyzing how visitors engage with our websites, we can implement data-driven improvements to optimize performance and user satisfaction.

Tower Peak ensures that the use of Cookies complies with GDPR and UK GDPR requirements. Where required by law, we will obtain your consent before deploying non-essential Cookies on your device. Visitors are informed about the categories of Cookies used and their purposes through our Cookie banner or similar mechanisms. We strive to ensure transparency in how Cookies are utilized and respect your choices regarding their use.

Most web browsers allow users to manage their Cookie preferences, including enabling, disabling, or deleting Cookies. However, please note that disabling certain Cookies may affect the functionality of our websites and limit your ability to access certain features. We encourage users to explore their browser settings to make informed decisions about their Cookie preferences and to refer to our Cookie Policy for more detailed information

### **Sharing Personal Data**

Tower Peak employs comprehensive security measures to protect your Personal Data from unauthorized access, misuse, or disclosure. This includes implementing advanced physical safeguards, such as restricted access to our facilities, electronic protections including encryption and firewalls, and procedural protocols designed to ensure data security in line with industry best practices. These measures are continuously reviewed and updated to address emerging security threats and vulnerabilities, ensuring the highest standard of protection. In addition, we perform regular audits and risk assessments to maintain the integrity and confidentiality of Personal Data.

We ensure that your Personal Data is only retained for as long as necessary to fulfill the purposes outlined in this Policy, or to comply with applicable legal or regulatory obligations. Once the relevant retention period has expired, we take steps to securely delete, anonymize, or de-identify the data, ensuring it cannot be reconstructed or further processed. This retention strategy is supported by robust data management systems and policies to prevent any unauthorized retention or use of Personal Data.

### **International Data Transfers**

As Tower Peak operates on a global scale, your Personal Data may be transferred to jurisdictions outside your country of residence. These transfers occur to ensure seamless business operations and compliance with international regulations. Whenever data is transferred across borders, Tower Peak implements robust safeguards to protect your information and comply with applicable data protection laws.

### **Data Security and Retention**

Tower Peak employs comprehensive security measures to protect your Personal Data from unauthorized access, misuse, or disclosure. This includes physical, electronic, and procedural safeguards aligned with industry best practices. While no system can guarantee absolute security, we continually assess and update our measures to address emerging threats.

Your Personal Data is retained only for as long as necessary to fulfill the purposes outlined in this Policy or as required by applicable law. Once the retention period expires, we securely delete or anonymize the data to ensure it cannot be reconstructed or used further.

## **Your Privacy Rights**

Depending on your jurisdiction, you may have specific rights regarding your Personal Data. These rights can include accessing your data, correcting inaccuracies, requesting deletion, or restricting processing. In some cases, you may also request that your data be provided in a portable format.

To exercise these rights, you can contact Tower Peak at [compliance@tower-peak.com](mailto:compliance@tower-peak.com). We may request additional verification to confirm your identity and ensure compliance with applicable laws when processing your request.

## **Children's Privacy**

Tower Peak's Services are not directed at individuals under the age of 18, and we do not knowingly collect Personal Data from minors. If we become aware of any such data being collected, we will promptly take action to delete it.

## **Updates to This Policy**

This Policy is subject to periodic updates to reflect changes in our data practices or regulatory obligations. When significant changes occur, we will update the effective date and provide notice through our websites. We encourage users to review this Policy regularly to stay informed.

## **Contact Us**

If you have any questions, concerns, or requests regarding this Policy or how we handle your Personal Data, please contact us at [compliance@tower-peak.com](mailto:compliance@tower-peak.com) or write to us at:

**Tower Peak Partners LLP**  
78 Pall Mall, London SW1Y 5ES  
United Kingdom

We are committed to addressing your inquiries promptly and transparently, ensuring that your privacy rights are respected and upheld.