ALFI Renewables, Management of Alternative Investment Funds, Ltd.

PRIVACY POLICY
(information for investors, clients and delegates under article 58 of ZUAIS regarding the processing of personal data)

(last updated: July 2026)

ALFI Renewables, Management of Alternative Investment Funds, Ltd., Verovškova ulica 55A, 1000 Ljubljana (“**Controller**”), as a manager of alternative investment funds (“**funds**”, individually “**fund**”) in accordance with the Alternative Investment Fund Managers Act (Official Gazette of the Republic of Slovenia, No.32/15, as amended; “**ZUAIS**”) respects individual's right to privacy and handles personal data responsibly, in accordance with Personal Data Protection Act in force (Official Gazette of the Republic of Slovenia, No. 163/22, as amended; “**ZVOP-2**”) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**GDPR**”). This Privacy Policy applies to investors in funds, managed by the Controller, as well as to clients (suppliers and service providers, and contractual partners in the purchase or sale of investments) and to the Controller’s and/or the funds’ delegates under Article 58 of the ZUAIS. In this document Controller discloses all information that individuals need to be aware of regarding the processing of their personal data.

Information about the Controller

The Controller of personal data is ALFI Renewablees, Management of Alternative Investment Funds, Ltd., Verovškova ulica 55A, Ljubljana.

All request regarding the processing of personal data or the exercise of data protection rights may be addressed to the Controller by poste at its registered office at Verovškova ulica 55A, 1000 Ljubljana, marked *“Request - Personal Data”*, or by email at vop-renewables@alfi.si.

Legal Grounds for Data Processing

The Controller processes your personal data based on the following legal grounds:

- **An investment agreement, cooperation agreement, or other contract concluded between you and the Controller governing the mutual rights and obligations of the parties** (Article 6(1)(b) GDPR).
- **National or European legislation (i.e., the performance of a legal obligation) and related implementing acts** (Article 6(1)(c) GDPR).
- **Legitimate interest** pursued by the Controller (Article 6(1)(f) GDPR). For each processing activity based on legitimate interest, the Controller has carried out a legitimate interest assessment, taking into account the necessity, fairness, and proportionality of the processing, and has determined that such processing does not disproportionately interfere with the rights and freedoms of individuals.
- **Explicit written consent** (Article 6(1)(a) GDPR) provided by the individual for a specific processing activity. The Controller’s position is that the scope of personal data collected on the basis of consent is kept to a minimum. An individual may withdraw their consent at any time, without affecting the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

Purposes, Types, and Retention of Personal Data

I.	INVESTORS

Purposes for which the Controller processes Personal Data of Individuals

A. **Conclusion, execution, and termination of an investment agreement**, which includes but is not limited to: preparation for concluding the investment agreement, signing the investment agreement, communication with the investor, capital call, unit transfer, unit payout, dividend payment, informing investors about asset valuation and calculated unit value of the fund, and informing about other significant events in accordance with the Fund's Management Rules or Partnership Agreement. The legal basis for processing personal data is investment agreement (Article 6(1)(b) GDPR). In case you would not allow this processing, it would not be possible to conclude and perform the investment agreement.
B. **Fulfillment of obligations under ZUAIS and the Decision on defining individual terms related to marketing and marketing communications concerning units of alternative investment funds** (Official Gazette of the Republic of Slovenia, No. 155/2022; "**Decision**"), which mainly means processing personal data for the purpose of classifying the Investor as a professional or non-professional Investor (ZUAIS) and obtaining a foreign investor's statement on joining the fund on their own initiative (Decision). The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
C. **Processing orders for subscription and redemption of fund units** is based on legal obligations (Article 6(1)(c) GDPR), specifically Article 65 of the Commission Delegated Regulation (EU) No. 231/2013 of December 19, 2012 as amended ("**Delegated Regulation 231/2013**"), and is carried out to ensure immediate and accurate recording of each order received.
D. **Implementation of measures in accordance with the Prevention Of Money Laundering and Terrorist Financing Act;** "**ZPPDFT-2**"**)** and other applicable laws and regulations in the Republic of Slovenia ("**RS**") and the European Union ("**EU**"), including processing personal data for identification purposes, verification of investor data (periodic reviews), investor risk assessment, monitoring of suspicious transactions, clients and their related persons, collecting data on the origin of assets, particularly of politically exposed persons, and other similar actions in accordance with legislation stated above. The legal basis for processing these personal data is compliance with obligations under ZPPDFT-2 (Article 6(1)(c) GDPR).
E. **Implementation of required procedures and reporting under the Tax Procedure Act** ("**ZDavP-2**") in connection with the Foreign Account Tax Compliance Act ("**FATCA**") – E1, and the Common Reporting Standard ("**CRS**") – E2. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
F. **Implementation of required procedures** under the Act Regulation Restrictive Measures Introduced or Implemented by the Republic of Slovenia in Accordance with Legal Acts and Decisions Adopted by International Organizations ("**ZOUPAMO**") **to verify transaction compliance with restrictive measures**. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
G. Investors may access information on their investment activity through **the access and use of the my.alfi application.** Processing for this purpose is based on the investment agreement (Article 6(1)(b) GDPR). The processing of such personal data is necessary for the fulfilment of contractual obligations related to the use of the application.
H. **The transfer of investor's data and reported changes to such data to other fund managers in the ALFI group** is carried out to prevent individuals from having to repeatedly complete all documentation for application suitability verification and to avoid reporting changes to all group managers separately. The legal basis for processing these personal data is your consent (Article 6(1)(a) GDPR).
I. **The handling of investor complaints** is based on the investment agreement (Article 6(1)(b) GDPR), as the content of the complaints relates to the fulfillment of obligations of one or both parties to the contractual relationship. If you do not wish to provide your personal data, we will not be able to process your complaint.
J. **Occasional non-marketing communication** is based on the legal basis of legitimate interest (Article 6(1)(f) GDPR) and is carried out to maintain good business relationships.
K. **The recording of incoming and outgoing postal mail** is based on the legal basis of legitimate interest (Article 6(1)(f) GDPR) and is conducted for the purpose of monitoring and managing incoming and outgoing postal mail.
L. **Ensuring the security of the my.alfi application** is based on the legitimate interest (Article 6(1)(f) GDPR) for the purpose of maintaining security and preventing random events or

unlawful or malicious actions that could compromise the security of the application and information.

M. **The detection and handling of suspicious transactions** is based on the ZPPDFT-2 (Article 6(1)(c) GDPR) for the purpose of fulfilling the Controller's legal obligations as an obliged entity under ZPPDFT-2.
N. **The disclosure of personal data to natural persons, legal entities, or public sector bodies** on the basis of Articles 40 and 41 of the ZVOP-2 (Article 6(1)(c) GDPR) for the purpose of fulfilling legal obligations, where a legal basis for obtaining the data exists and the request is duly justified.
O. **Keeping processing logs in application app.alfi** on the basis of Article 22 of the ZVOP-2 (Article 6(1)(c) GDPR) and legitimate interest (Article 6(1)(f) GDPR) for the purpose of extending retention, in order to fulfil legal obligations (systematic and regular processing).
P. **Recording and maintaining data in the application app.alfi** for the purpose of fulfilling obligations under ZUAIS and Delegated Regulation 231/2013 (Article 6(1)(c) GDPR).

<u>**Types of personal data processed for the purposes stated above**</u>

A. **For the purpose of conclusion, execution, and termination of the investment contract**

A.1 <u>Conclusion of the contract:</u> (i) name and surname of the investor and/or their authorized representative if the investor is an individual, or name and surname of the legal representative or authorized representative if the investor is a legal entity, (iii) address, (iv) tax number and personal identification number, (v) contact details, (vi) bank name and investor's bank account number, (vii) amount of the investor's commitment.

A.1.1 If the investor acts as a special purpose vehicle (SPV) of indirect investors, the following data of indirect investors are also collected: (i) name of the SPV of indirect investors, (ii) data on the investment agreement, (iii) name and surname, (iv) address, (v) personal identification number, (vi) tax number, (vii) share in the SPV of indirect investors (%).

A.1.2 For each investor or investor's legal representative or authorized representative or other relevant person, a check of publicly available data on the internet (Google) is also carried out.

A.2 <u>Implementation of the investment agreement:</u>

A.2.1 Capital call: (i) name and surname of the investor, (ii) address, (iii) tax number, (iv) data on the capital call and commitment.

A.2.2 Partial transfer of units: (i) data on the business relationship, (ii) name and surname of the investor, (iii) address, (iv) contact details, (v) tax number, (vi) personal identification number, (vii) data on fund units, (viii) data on the commitment, (ix) transaction value, (x) name of the bank and bank account number of the investor, (xi) data on the transferee.

A.2.3 Partial redemption of fund units: (i) data on the business relationship, (ii) name and surname of the investor, (iii) address, (iv) tax number, (v) status and value of fund units, (vi) commitment amount, (vii) summary of executed transactions (deposits/withdrawals), (viii) name of the bank and bank account number of the investor, (ix) if the recipient of the payment is not the investor: the recipient's name and surname, address, bank, and bank account number.

A.2.4 Dividend payout: (i) name and surname of the investor, (ii) address, (iii) tax number, (iv) share in the fund's assets (%), (v) payout amount (gross, net).

A.3 <u>Termination of the investment agreement:</u>

A.3.1 Transfer of fund units: (i) name and surname of the investor, (ii) address, (iii) contact details, (iv) tax number, (v) personal identification number, (vi) data on fund units, (vii) data on the commitment, (viii) transaction value, (ix) name of the bank and bank account number of the investor.

A.3.2 Final redemption of fund units: (i) name and surname of the investor, (ii) address, (iii) tax number, (iv) status and value of fund units, (v) amount of commitment, (vi) summary of executed transactions (deposits/withdrawals).

B. **Implementation of obligations in accordance with the provisions of ZUAIS and the Decision**

B.1 <u>Classification of investor as professional or non-professional investor:</u>

B.1.1 Classification of the investor as a non-professional investor: (i) data on the business relationship, (ii) name and surname, (iii) personal identification number or tax number.

B.1.2 Classification of an individual investor as a professional investor: (i) data on the business relationship, (ii) name and surname, (iii) personal identification number or tax number, (iv) data from the questionnaire completed by the investor.

B.1.3 Classification of a legal entity investor as a professional investor: (i) name and surname of the authorized representative/legal representative, (ii) data from the questionnaire related to the authorized representative/legal representative.

B.2 <u>Data on a foreign investor related to Declaration on acquisition of the fund's unit on their own initiative:</u> (i) name and surname, (ii) address, (iii) personal identification number, (iv) tax number, (v) name of the fund, (vi) name and surname of the legal representative (if the investor is a legal entity), (vii) Declaration on acquisition of the fund's units on investor's own initiative.

C. **Processing of orders for subscription and redemption of units:** (i) name of the fund, (ii) ordering party, (iii) order recipient, (iv) date and time of the order, (v) payment terms and method, (vi) type of order, (vii) execution date of the order, (viii) number of units subscribed or redeemed, (ix) subscription/redemption price, (x) total subscription or redemption value of units, (xi) gross order value including commission or net value excluding commission.

D. **Implementation of measures in accordance with the provisions of ZPPDFT-2:**

D.1 <u>Data on the investor (if the investor is an individual), data on the legal representative (if the investor is a legal entity), and data on the authorized representative (if applicable):</u> (i) name and surname, (ii) address, (iii) birth details, (iv) tax number or other identification number, (v) personal identification number, (vi) personal identification document details, (vii) citizenship, (viii) residency, (ix) data on the business relationship, (x) transaction details, (xi) information on the origin of assets/funds, (xii) data on political exposure.

D.2 <u>Data on the beneficial owner (if the investor is a legal entity):</u> (i) name and surname, (ii) address, (iii) date of birth, (iv) citizenship, (v) tax number or other identification number, (vi) residency, (vii) manner and scope of control over the legal entity, (viii) data on political exposure.

E. E1 – **Implementation of procedures and reporting in accordance with ZDavP-2 and FATCA:** (i) name and surname, (ii) address, (iii) date of birth, (iv) contact details, (v) country of tax residence, (vi) individual identification number, (vii) U.S. citizenship (YES/NO), (viii) U.S. taxpayer status (YES/NO), if the individual is subject to mandatory reporting:

E.1.1. Data on the beneficial owner (Form W-8BEN): (i) name and surname, (ii) citizenship, (iii) address, (iv) U.S. taxpayer identification number, (v) foreign tax number, (vi) indication if the person is not required to obtain a foreign tax number, (vii) reference (e.g., relevant bank account), (viii) date of birth, (ix) information on tax benefits under a treaty with the U.S. and other details required by the applicable form.

E.1.2. Data on the beneficial owner (Form W-8BEN-E): (i) name and surname, (ii) address, (iii) taxpayer identification number, (iv) country of tax residency and other details required details by the applicable form.

E.1.3 Data on an individual/sole proprietor (Form W-9): (i) name and surname, (ii) address, (iii) designation as an individual or sole proprietor, (iv) social security number or employer identification number, (v) other details required by the applicable form.

E2 – **Implementation of reporting in accordance with CRS**: (i) name and surname, (ii) address, (iii) date, place, and country of birth, (iv) contact details of the controlling person, (v) country of tax residency, (vi) taxpayer identification number of the country of residence (Slovenian/foreign), (vii) if the taxpayer identification number is not available, one of the two given reasons must be selected and explained with appropriate documentation, (viii) indication of whether the account is reportable under CRS (YES/NO).

F. **Verification of transaction compliance with restrictive measures**: (i) name and surname of the investor, (ii) country, (iii) address, (iv) date of birth, (v) compliance with restrictive measures.

G. **Assignment and use of the my.alfi application:**

G.1 <u>For access allocation</u>: (i) username, (ii) password.

G.2 <u>For the purpose of managing and updating the application my.alfi:</u> personal data about investors and their transactions are processed (recorded, maintained, and stored).

H. **The transfer of investor's data and reported changes to such data to other fund managers in the ALFI group:** (i) Information on the given or refused consent of the individual for transferring data from the “Investor Information” form and its updates to other administrators within the ALFI group.
I. **Handling Investor complaints:** (i) name and surname of the investor (or legal representative or authorized investor), (ii) date and method of complaint receipt, (iii) content of the complaint, (iv) date and type of decision, (v) date and method of decision notification.
J. **Occasional non-marketing communication**: (i) name and surname, (ii) indication that the person is a business client of the Controller or the fund, (iii) email or address.
K. **Recording of incoming and outgoing postal mail:** (i) name and surname, (ii) address, (iii) date of sending, (iv) date of receipt, (v) method of sending, (vi) subject of the mailing.
L. **Ensuring the security of the application my.alfi:** (i) username, (ii) information on access attempts to the application my.alfi (successful/unsuccessful login attempts), (iii) date and time of the access attempt, (iv) IP address.
M. **Detection and handling of suspicious transactions:** (i) name and surname, (ii) date of birth, (iii) tax number, (iv) address, (v) nationality, (vi) personal identification document details, (vii) bank and account number, (viii) investor status, (ix) details of the contractual relationship (contract number and title, date of conclusion, purpose/nature of the relationship), (x) information on politically exposed persons, (xi) source of funds/assets; for a legal entity investor, information on the beneficial owner (name and surname, address, date of birth, tax number, nationality, method of control, information on politically exposed status).
N. **Transfer of personal data to natural persons/legal persons/public sector entities:** (i) date of the request, (ii) legal basis for the request or transmission, (iii) applicant of the request (name and surname, title), (iv) type of personal data provided, (v) to whom the personal data was provided, purpose/reason or for the purposes of which procedure the personal data were provided, (vi) date of transmission, (vii) employee who provided personal data, (viii) notes.
O. **Keeping processing logs in application app.alfi:** personal data of investors and data relating to their transactions.
P. **Recording and maintaining data in the application app.alfi:** personal data of investors and data relating to their transactions.

Data retention periods

A. Conclusion, implementation, and termination of the investment agreement - 10 years after the termination of the business relationship or the transaction carried out, except for personal data on communications not related to the conclusion and performance of the investment contract, which are stored for 5 years from the end of the year in which the contractual relationship was terminated.
B. Implementation of obligations in accordance with the provisions of ZUAIS and the Decision - 10 years after the termination of the business relationship or completed transaction.
C. Processing of orders for subscription and redemption of units - 10 years from the end of the year in which the contractual relationship terminated.
D. Implementation of measures in accordance with the provisions of ZPPDFT-2 - 10 years after the termination of the business relationship or completed transaction.
E. Implementation of procedures and reporting in accordance with ZPPDFT-2 and ZdavP-2 (FATCA and CRS) - 10 years from the end of the year in which the contractual relationship ended or from the date of the last transaction.
F. Verification of transaction compliance with restrictive measures - 10 years after the end of the year in which processing was conducted.
G. Assignment and use of the my.alfi application - for a username: 5 years from the end of the year in which the contractual relationship was terminated; for password: after providing the password to the applicant, the password is deleted or not stored; for data and documentation in the application: 10 respectively 5 years from the end of the year in which the contractual relationship was terminated.
H. The transfer of investor's data and reported changes to such data to other fund managers in the ALFI group - until the withdrawal of consent.
I. Handling investor complaints - 5 years after the resolution of the complaint or the conclusion of any administrative or judicial proceedings.

J. Occasional non-marketing communication - 3 months after the occasional communication is conducted or until the individual objects.
K. Recording of incoming and outgoing postal mail - 5 years after the end of the year in which processing was conducted.
L. Ensuring the security of the my.alfi application - by the end of January of the current year, all data older than the previous calendar year shall be deleted.
M. Detection and handling of suspicious transactions - 10 years after the termination of the business relationship/transaction or after the detection of the suspicious transaction and notification of the Office for Money Laundering Prevention ("**UPPD**").
N. Provision of personal data to natural persons/legal persons/public sector entities - 2 years, unless another law prescribes a different retention period for the disclosure of specific types of data.
O. Keeping processing logs in application app.alfi - 5 years from the end of the calendar year in which processing activities were recorded.
P. Recording and maintaining data in the application app.alfi - 10 years from the end of the year in which the contractual relationship ended or from the date of the last transaction (in relation to points A, E and F).

If data from any section is obtained from a copy of an identification document, such a copy is destroyed immediately after the data is collected.

II. CLIENTS

i) Suppliers and service providers

Purposes for which the Controller processes personal data of individuals

A. Processing of data necessary for the **conclusion and execution of the cooperation agreement** is based on a contract (Article 6(1)(b) GDPR). Without processing such personal data, it would not be possible to conclude or execute the business for which the cooperation agreement was made.
B. **Determining the (non-)existence of a conflict of interest** between the interests of the client, their related persons, management, employees, and beneficial owners on one side, and the interests of the fund or investors in the fund on the other side is based on the legal obligation from ZUAIS (Article 6(1)(c) GDPR) and is conducted for the purpose of identifying, managing, monitoring, and disclosing conflicts of interest.
C. **Recording issued and received invoices/delivery notes/purchase orders** for the purpose of regulating rights and obligations arising from business relationships. Processing for this purpose is based on a cooperation agreement (Article 6(1)(b) GDPR). Without processing such personal data, it would not be possible to conclude or execute the business for which the cooperation agreement was made.
D. **Occasional non-marketing communication** is based on legitimate interest (Article 6(1)(f) GDPR) and is conducted to maintain good business relationships.
E. **Recording incoming and outgoing postal mail** is based on legitimate interest (Article 6(1)(f) GDPR) and is conducted for the purpose of monitoring and managing incoming and outgoing postal mail.
F. **The registration of clients is based on a contract** (Article 6(1)(b) GDPR) and the AIFM, Commission Regulation 231/2013 (Article 6(1)(c) GDPR) for the purpose of record keeping.
G. **The organization of ICT incident management** is based on the fulfillment of the obligations under Regulation (EU) 2022/2554 ("**DORA**") and subordinate acts (Article 6(1)(c) GDPR) and on the basis of consent (Article 6(1)(a) GDPR) for the home telephone number or other private data that further facilitate communication with the employee, for the purpose of identifying, dealing with and remedying security or technical incidents in information systems and ensuring the continuous and secure operation of the ICT environment.
H. **The organization of crisis communication** is based on the fulfillment of obligations under DORA and subordinate acts (Article 6(1)(c) GDPR) for the purpose of ensuring fast, coordinated and effective notification of employees, partners and other relevant stakeholders in the event of emergencies or crisis situations.

I. **The organization of business continuity** is based on the fulfillment of the obligations set out in DORA and subordinate acts (Article 6(1)(c) GDPR) for work data and on the basis of consent (Article 6(1)(a) GDPR) for the home telephone number or other private data that further facilitate communication with the employee, for the purpose of ensuring the continuity of work processes, preventing business disruptions and effective response to any emergencies or crisis situations.

J. **The transfer of personal data to natural persons/legal persons/public sector entities** is based on Articles 40 and 41 of the ZVOP-2 (Article 6(1)(c) GDPR) for the purpose of fulfilling legal obligations, if there is a legal basis for obtaining the data and the justification of the request.

<u>Types of personal data processed for the purposes mentioned above</u>

A. **Conclusion and execution of a cooperation agreement**: (i) name and surname, (ii) job title, (iii) telephone number, email, address, and/or other contact addresses, (iv) name of the bank and account number of the client, if there is an obligation to make a payment to the client based on a contract or other legal transaction, (v) data on any termination proceedings (insolvency proceedings, liquidation).

B. **Determining the (non)existence of conflicts of interest:**
B.1 <u>Clients who are natural persons</u>, as well as management and employees of a client who is a legal entity, and their related persons or third parties (related persons and third parties only in the case of specific circumstances): (i) name and surname, (ii) employment details, (iii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest completed by the individual), (iv) description of circumstances, if they exist, (v) date of occurrence/discovery of the conflict of interest, (vi) date and person who reported/discovered the conflict of interest, (vii) determination of whether it is an actual or potential conflict of interest, (viii) identification of the parties affected by the conflict of interest, (ix) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (x) record of personal transactions, permissions, and prohibitions related to them, (xi) date of termination of the conflict of interest, (xii) data on the completion/non-completion of the declaration of conflicts of interest.
B.2 <u>Clients who are legal entities:</u> (i) name and surname of the legal representative, (ii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest), specifically related to management, employees, and related persons, (iii) description of circumstances, if they exist, (iv) date of occurrence/discovery of the conflict of interest, (v) date and person who reported/discovered the conflict of interest, (vi) determination of whether it is an actual or potential conflict of interest, (vii) identification of the parties affected by the conflict of interest, (viii) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (ix) date of termination of the conflict of interest, (x) data on the completion/non-completion of the declaration of conflicts of interest.

C. **Recording issued and received invoices/delivery notes/purchase orders:** (i) name and surname, (ii) company name, (iii) address or registered office, (iv) tax number, (v) invoice amount, (vi) type of service provided, (vii) date.

D. **Occasional non-marketing communication:** (i) name and surname, (ii) information that the individual is a business client of the controller or the fund, (iii) email or address.

E. **Recording incoming and outgoing postal mail:** (i) name and surname, (ii) address, (iii) date of sending, (iv) date of receipt, (v) method of sending, (vi) subject of the mailing.

F. **Registration of clients:** (i) name and surname, (ii) address, (iii) contact details, (iv) registration number (sole trader), (v) job position/function, (vi) date of conclusion/termination of the cooperation agreement.

G. **Organisation of ICT incident management:** (i) name and surname, (ii) e-mail, (iii) telephone number, (iv) other means of communication, (v) role of the individual in responding to the incident.

H. **Organisation of crisis communication:** (i) name and surname, (ii) title, (iii) role in crisis communication.

I. **Organization of business continuity:** (i) name and surname, (ii) e-mail, (iii) telephone number, (iv) other means of communication, (v) role in business continuity, (vi) substitutes.

J. **Transfer of personal data to natural persons/legal persons/public sector entities:** (i) date of the request, (ii) legal basis for the request or transmission, (iii) applicant of the request (name and surname, title), (iv) type of personal data provided, (v) to whom the personal data was provided, purpose/reason or for the purposes of which procedure the personal data were provided, (vi) date of transmission, (vii) employee who provided personal data, (viii) notes.

Data retention periods

A. Conclusion and execution of a cooperation agreement - 5 years from the end of the year in which the contractual relationship terminated.
B. Determining the (non)existence of conflicts of interest - for the duration of the fund or a maximum of 5 years.
C. Recording issued and received invoices/delivery notes/purchase orders - 10 years after the end of the year to which the invoice/delivery note/purchase order relates.
D. Occasional non-marketing communication - 3 months after the occasional communication is conducted or until the objection.
E. Recording incoming and outgoing postal mail - 5 years after the end of the year in which processing was conducted.
F. Registration of clients - 5 years after the termination of the business relationship.
G. Organization of ICT incident management - 5 years from the expiry of the individual's application or until the withdrawal of consent for data based on consent.
H. Organization of crisis communication - 5 years from the end of the year in which the individual's role changed.
I. Organization of business continuity - 5 years from the end of the year in which the individual's role changed for work-related data, and until the consent is withdrawn for data of a private nature.
J. Transfer of personal data to natural persons/legal persons/public sector entities - 2 years, unless another law prescribes a different retention period for the disclosure of specific types of data.

ii) Contractual partners in the purchase or sale of investments

The Controller processes the personal data of contractual partners in the purchase or sale of investments for the same purposes, to the same extent, and for the same retention period as the personal data of suppliers and service providers mentioned in point (i) of this document. Therefore, the provisions of point (i) apply accordingly also to this point (ii). Additionally, the Controller processes the personal data of contractual partners in the purchase or sale of investments for the purposes, to the extent, and for the retention period specified below.

Purposes for which the Controller processes personal data of individuals

A. Processing of data necessary for the **conclusion and execution of a cooperation agreement** is based on the contract (Article 6(1)(b) of the GDPR). Without processing such personal data, it would not be possible to conclude or execute the transaction for which the cooperation agreement is concluded.
B. **Implementation of measures in accordance with the ZPPDFT-2** and other applicable laws and regulations in the RS and the EU, including processing personal data for identification purposes, monitoring of suspicious transactions, clients and their related persons, collecting data on the origin of assets, particularly of politically exposed persons, and other similar actions in accordance with legislation stated above. The legal basis for processing these personal data is compliance with obligations under ZPPDFT-2 (Article 6(1)(c) GDPR).
C. Implementation of required procedures under the ZOUPAMO to verify **transaction compliance with restrictive measures**. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
D. Implementation of required procedures under the ZDavP-2 and other applicable laws and regulations in the RS and the EU, which especially involves the processing of personal data to **verify the business activities of clients in non-cooperative jurisdictions.** The legal basis for this processing is compliance with legal obligations (Article 6(1)(c) of the GDPR).

E. **Keeping processing logs in application app.alfi** on the basis of Article 22 of the ZVOP-2 (Article 6(1)(c) GDPR) and legitimate interest (Article 6(1)(f) GDPR) for the purpose of extending retention, in order to fulfil legal obligations (systematic and regular processing).
F. **Recording and maintaining data in the application app.alfi** for the purpose of fulfilling obligations under ZUAIS and Delegated Regulation 231/2013 (Article 6(1)(c) GDPR).

Types of personal data processed by the Controller for the purposes stated above

A. **Data required for the conclusion and execution of a cooperation agreement**:
A.1 For each client or client's legal representative, guarantor, pledger, other creditor(co-signer) and other relevant persons, a check of publicly available data on the internet (Google) is also carried out.
If guarantors and pledgers are also part of the legal transaction:
A.2 Data on guarantors: (i) name and surname of the guarantor, (ii) name and surname/registered name of the creditor, (iii) name and surname/registered name of the debtor, (iv) type of guarantee, (v) content of the guarantee, (vi) data on potential insolvency or termination proceedings.
A.3 Data on pledgers: (i) name and surname of the pledger, (ii) name and surname/registered name of the creditor, (ii) name and surname/registered name of the debtor, (iv) data on the debt, (v) data on the pledged asset, (vi) data on potential insolvency or termination proceedings.
B. **Data required for the implementation of measures in accordance with the ZPPDFT-2:**
A1. Data on the client or authorized representative (if the client is a natural person) or data on the legal representatives (if the client is a legal entity): (i) name and surname or registered name, (ii) date and place of birth, (iii) identification number (optional) and tax number or foreign tax number, (iv) address or registered office and business address, (v) citizenship, (vi) personal document details, (vii) name of the bank and bank account number, (viii) client's business activity, (ix) data on the concluded contract, (x) data on political exposure, (xi) data on the client's financial status and sources of funds involved in the business relationship.
A.2 Data on the beneficial owner (if the client is a legal entity): (i) name and surname, (ii) permanent and temporary residence address, (iii) tax number, (iv) date of birth, (v) citizenship, (vi) method of control over the legal entity, (vii) information on political exposure.
A.3 Data on guarantor:
(i) name and surname (ii) address, (iii) tax number, (iv) date and place of birth, (v) citizenship, (vi) indicative amount of the contract/transaction and currency, (vii) details of the purpose and intended nature of the transaction/business relationship, (viii) details of the origin of the property and assets.
C. **Verification of transaction compliance with restrictive measures:** (i) name and surname of the client/guarantor, (ii) country, (iii) address, (iv) date of birth, (v) data on compliance with restrictive measures.
D. **Data required for implementation of required procedures under the ZDavP-2**: data on potential business operations in non-cooperative jurisdictions.
E. **Keeping processing logs in application app.alfi:** personal data relating to the fund's investments (e.g. special purpose vehicles and portfolio companies of the fund) and their transactions.
F. **Recording and maintaining data in the application app.alfi:** personal data relating to the fund's investments (e.g. special purpose vehicles and portfolio companies of the fund) and their transactions.

Data retention periods

A. Conclusion and execution of a cooperation agreement - 5 years after the termination of the business relationship.
B. Implementation of measures in accordance with the provisions of the ZPPDFT-2 - 10 years after the termination of the business relationship or the completion of a transaction.
C. Verification of transaction compliance with restrictive measures - 10 years after the end of the year in which the processing was conducted.
D. Implementation of required procedures under the ZDavP-2 - 5 years after the end of the year in which the processing was conducted.

E. Keeping processing logs in application app.alfi - 5 years from the end of the calendar year in which processing activities were recorded.
F. Recording and maintaining data in the application app.alfi - 10 or 5 years from the end of the year in which the contractual relationship ended or from the date of the last transaction (in relation to points A, B, C, and D).

III. DELEGATES UNDER ARTICLE 58 OF ZUAIS

Purposes for which the Controller processes personal data of individuals

A. The Controller, in accordance with the requirements of ZUAIS and Delegate Regulation 231/2013, must conduct **a preliminary due diligence competency assessment** before delegating fund management services or tasks to a delegate. This assessment ensures professional, correct, timely, and independent execution of the delegated tasks. It applies to both the delegate and delegate's employees or individuals performing the delegated tasks. Additionally, the Controller also conducts **regular and extraordinary periodic due diligence reviews**. Questionnaire, report and data processed for this purpose include: professional competencies, experience, reputation, certificates, issued by competent authorities, curriculum vitae, place of business activity, financial capability to ensure uninterrupted service execution. Legal basis for processing of these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
B. For the conclusion and execution of the cooperation agreement the Controller processes **contact details of delegate's employees, payment-related data** and **data on possible termination proceedings** (insolvency, liquidation). Legal basis for processing of these personal data is the contract (Article 6(1)(b) GDPR). Without processing these personal data, contract conclusion and execution would not be possible.
C. **Determining the (non-)existence of a conflict of interest** between the interests of the delegate, their related persons, management, employees, and beneficial owners on one side, and the interests of the fund or investors in the fund on the other side is based on the legal obligation (Article 6(1)(c) GDPR) from ZUAIS and is conducted for the purpose of identifying, managing, monitoring, and disclosing conflicts of interest.
D. **Recording of issued and received invoices, delivery notes and purchase orders** for the purpose of regulating rights and obligations arising from business relationships. Processing for this purpose is based on a contract (Article 6(1)(b) GDPR). Without the processing of such personal data, it would not be possible to perform the cooperation agreement.
E. **Recording incoming and outgoing postal mail** is based on legitimate interest (Article 6(1)(f) GDPR) and is conducted for the purpose of monitoring and managing incoming and outgoing postal mail.
F. **Reporting to supervisory authorities** is based on the fulfilment of the ZUAIS, ZOAIS and ZPPDFT-2 (Article 6(1)(c) GDPR) for the purpose of fulfilling legal reporting obligations to supervisory authorities.
G. **Calculation of variable remuneration** is based on the employment contract (Article 6(1)(b) GDPR) and the ZUAIS (Article 6(1)(c) GDPR) for the purpose of payment of variable remuneration of employees of the delegate under Article 58 of the ZUAIS.
H. **Organization of ICT incident management** is based on the fulfilment of the obligations set out in DORA and subordinate acts (Article 6(1)(c) GDPR) and on the basis of consent (Article 6(1)(a) GDPR) for the home telephone number or other private data that further facilitate communication with the employee, for the purpose of identifying, dealing with and eliminating security or technical incidents in information systems and ensuring the continuous and secure operation of the ICT environment.
I. **Organization of crisis communication** is based on the fulfillment of obligations under DORA and subordinate acts (Article 6(1)(c) GDPR) for the purpose of ensuring fast, coordinated and effective notification of employees, partners and other relevant stakeholders in the event of emergencies or crisis situations.
J. **Organization of business continuity** is based on the fulfillment of the obligations set out in DORA and subordinate acts (Article 6(1)(c) GDPR) for work data and on the basis of consent (Article 6(1)(a) GDPR) for the home telephone number or other private data that further facilitate communication with the employee, for the purpose of ensuring the continuity of

work processes, preventing business disruptions and effective response to any emergencies or crisis situations.

K. **Operational risk management** is based on the fulfilment of obligations under the ZUAIS (Article 6(1)(c) GDPR) for the purposes of managing operational risks.
L. **Keeping processing logs in application app.alfi** on the basis of Article 22 of the ZVOP-2 (Article 6(1)(c) GDPR) and legitimate interest (Article 6(1)(f) GDPR) for the purpose of extending retention, in order to fulfil legal obligations (systematic and regular processing).
M. **Assignment in use of the application app.alfi** for the purpose of fulfilling obligations under ZUAIS and Delegated Regulation 231/2013 (Article 6(1)(c) GDPR).
N. **Ensuring security of the application app.alfi** based on the legitimate interest (Article 6(1)(f) GDPR), in order to prevent accidental events or unlawful or malicious acts that could compromise the security of the app and information.
O. **Reducing the volume of unsolicited email** based on the legitimate interest (Article 6(1)(f) GDPR), in order to prevent accidental events or unlawful or malicious acts that could compromise the security of email and information.
P. **Ensuring the security of the communication network** based on the legitimate interest (Article 6(1)(f) GDPR), in order to prevent accidental events or unlawful or malicious acts that could compromise the security of the network and information.

<u>Types of personal data processed by the Controller for the above-mentioned purposes</u>

A. **Data required for preliminary and periodic due diligence of the delegate:** (i) full name, (ii) address, (iii) contact details, (iv) professional title and qualifications, (v) curriculum vitae, (vi) reputation and work experience, (vii) professional license issued by a competent authority, including issue and expiration dates, (viii) confirmation (yes/no) of any final criminal conviction or pending criminal/administrative proceedings for offenses related to economic crimes, labor and social security, legal transactions or property, applicable to delegates who are natural persons or employees in designated roles as required by ZUAIS, (ix) confirmation (yes/no) of any imposed security measure prohibiting the performance of a profession for delegates who are natural persons, (x) confirmation (yes/no) whether the individual is an investor in the fund, (xi) whether the employee has a fixed salary agreement for carrying out delegated tasks, (xii) place of business activity, (xiii) financial capacity to ensure uninterrupted service execution, (xiv) other relevant data and information necessary to assess the suitability of the delegate for performing delegated services.
B. **Employee contact details, payment- related data and data on termination proceedings**: (i) full name, (ii) job title, (iii) telephone number, (iv) contact details, (v) name of the bank and account number (if a payment obligation exists based on a contract or other legal transaction), (vi) information on any termination proceedings (insolvency, liquidation).
C. **Data required for determining of the (non-)existence of conflicts of interest:**
<u>C.1 Delegates, who are natural persons, as well as management and employees of a delegate who is a legal entity, and their related persons or third parties</u> (related persons and third parties only in the case of specific circumstances): (i) name and surname, (ii) employment details, (iii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest completed by the individual), (iv) description of circumstances, if they exist, (v) date of occurrence/discovery of the conflict of interest, (vi) date and person who reported/discovered the conflict of interest, (vii) determination of whether it is an actual or potential conflict of interest, (viii) identification of the parties affected by the conflict of interest, (ix) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (x) record of personal transactions, permissions, and prohibitions related to them, (xi) date of termination of the conflict of interest, (xii) data on the completion/non-completion of the declaration of conflicts of interest.
<u>C.2 Delegates who are legal entities:</u> (i) name and surname of the legal representative, (ii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest), specifically related to management, employees, and related persons, (iii) description of circumstances, if they exist, (iv) date of occurrence/discovery of the conflict of interest, (v) date and person who reported/discovered the conflict of interest, (vi) determination of whether it is an actual or potential conflict of interest, (vii) identification of the parties affected by the conflict of interest,

(viii) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (ix) date of termination of the conflict of interest, (x) data on the completion/non-completion of the declaration of conflicts of interest.

D. **Data required for recording issued and received invoices/delivery notes/purchase orders**: (i) full name, (ii) company name, address, or registered office, (iii) tax number, (iv) invoice amount, (v) type of service provided, (vi) date.
E. **Data required for recording incoming and outgoing postal mail:** (i) full name, (ii) address, (iii) date of sending, (iv) date of receipt, (v) method of sending, (vi) subject of the mail.
F. **Reporting to supervisory authorities:** Securities Market Agency ("**ATVP**"): data from the Questionnaire for the Assessment of the Suitability of Persons who will effectively conduct the business of the Controller; UPPD: data relating to the deputy anti-money laundering officer, including: (i) first and last name, (ii) job title, (iii) date of appointment, (iv) date of termination of the function, (v) the address where the deputy performs their duties, if different from the registered office of the Controller, (vi) telephone number and email address, and any other contact details.
G. **Calculation of variable remuneration:** (i) name and surname, (ii) job title, (iii) date of payment decision, (iv) amount of payment, (v) date of payment.
H. **Organisation of ICT incident management:** (i) name and surname, (ii) e-mail, (iii) telephone number, (iv) other means of communication, (v) role of the individual in responding to the incident.
I. **Organisation of crisis communication:** (i) first and last name, (ii) title, (iii) role in crisis communication.
J. **Organization of business continuity:** (i) name and surname, (ii) e-mail, (iii) telephone number, (iv) other means of communication, (v) role in business continuity, (vi) substitutes.
K. **Operational risk management**: (i) the date of the event, (ii) the method of reporting, (iii) the date of discovery of the event, (iv) the event ID, (v) the name of the fund, (vi) the type of damage event, (vii) the type of operational risk, (viii) the description of the event, (ix) the cause of the event, (x) the consequences, (xi) the actual gross loss in EUR at the end of the damage event, (xii) the final comment of the person responsible for recording the damage event, (xiii) the actions taken by the company's management, (xiv) note, (xv) the person responsible for recording the fund's event of loss/damage, (xvi) the review of the event, (xvii) the risk profile of the event and the impact on the fund, (xviii) additional risk-mitigation measures, (xix) the deadline for the implementation of additional measures, (xx) the person responsible for the implementation of additional measures, (xxi) the establishment of provisions in capital, (xxii) the amount of provisions made.
L. **Keeping processing logs in application app.alfi:** data (username, type of processing, date of processing, etc.) about modification, insight, disclosure (including transfers), deletion of personal data about investors, their transactions, and data about the investors and fund's investments (e.g. special purpose vehicles and portfolio companies of the fund) and their transactions.
M. **Assignment in use of the application app.alfi:** username, password.
N. **Ensuring security of the application app.alfi:** username, information on access attempts to app.alfi (successful/unsuccessful login attempts), date and time of the access attempt, IP address.
O. **Reducing the volume of unsolicited email:** email messages are checked based on their source (e.g. IP address, sender, date and time of receipt) and content using anti-spam software, whereby inappropriate parts of messages or entire messages may be deleted.
P. **Ensuring the security of the communication network:** device identification data (e.g. MAC address, serial number), user names and assigned system roles, data on access attempts (successful and unsuccessful login attempts), network event data (e.g. security alerts, traffic anomalies), and detected threat data (e.g. malware infections, attacks). Email messages are also scanned using antivirus software, whereby inappropriate parts of messages or entire messages may be deleted.

Data retention periods

A. Preliminary competency assessment and periodic reviews - 5 years after the termination of the business relationship.

B. Contact information of employees, payment-related data and data on termination procedures - 5 years after the termination of the business relationship.
C. Determination of (non-)existence of conflicts of interest - for the duration of the fund or a maximum of 5 years.
D. Recording of issued and received invoices/delivery notes/orders - 10 years after the end of the year to which the invoice/delivery note/purchase order relates.
E. Recording of incoming and outgoing postal mail - 5 years after the end of the year in which processing was conducted.
F. Reporting to supervisory authorities - for the duration of the fund.
G. Calculation of variable remuneration - 10 years after the end of the year of the transaction carried out.
H. Organization of ICT incident management - 5 years from the expiry of the individual's application or until the withdrawal of consent for data based on consent.
I. Organization of crisis communication - 5 years from the end of the year in which the individual's role changed.
J. Organization of business continuity - 5 years from the end of the year in which the individual's role changed for work-related data, and until the consent is withdrawn for data of a private nature.
K. Operational risk management - 5 years after the end of the year in which the processing was carried out.
L. Keeping processing logs in application app.alfi - 5 years from the end of the calendar year in which processing activities were recorded.
M. Assignment in use of the application app.alfi - username: 5 years from the end of the year in which the contractual relationship ended; password: after the password is provided, the password is deleted or not stored.
N. Ensuring security of the application app.alfi - by the end of January of the current year, all data older than the previous calendar year shall be deleted.
O. Reducing the volume of unsolicited email - 180 days (Microsoft retention period).
P. Ensuring the security of the communication network - 6 months from the occurrence of the event.

Cookies

Type of cookies we use

The website https://alfi.si/en/alfi-renewables/, application "my.alfi" and application "app.alfi" use only cookies, essential for operation. These cookies make the website functional by enabling basic features such as site navigation, access to secured areas, language selection, font preferences, and similar functions. Without these cookies, the website would not function properly, so they cannot be disabled.

Cookie Name	Controller	Purpose	Validity	Type
elementor	ALFI Renewables Ltd.	Stores actions performed on the website https://alfi.si/en/alfi-renewables/	Permanent	First-party
_Fb63a	ALFI Renewables Ltd.	Automatically generated cookie for session identification in the "my.alfi" application	Session	First-party
_Fe6ba	ALFI Renewables Ltd.	Automatically generated cookie for session identification in the "my.alfi" and "app.alfi" application	Session	First-party
_2f7ea	ALFI Renewables Ltd.	Automatically generated cookie for session identification in the "app.alfi" application	Session	First-party
auth.lang	ALFI Renewables Ltd.	Tab display settings for the "my.alfi" application menu	Session	First-party
auth.firstName	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" and "app.alfi" application	Session	First-party
auth.jwtToken	ALFI Renewables Ltd.	User authorization for the "my.alfi" and "app.alfi" application	Session	First-party
auth.lastName	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" and "app.alfi" application	Session	First-party
auth.roles	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" and "app.alfi" application	Session	First-party
authloggedin	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" and "app.alfi" application	Session	First-party

auth.username	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" and "app.alfi" application	Session	First-party
auth.email	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" and "app.alfi" application	Session	First-party
networkId	ALFI Renewables Ltd.	Authorization mechanism operation for the "my.alfi" application	Session	First-party

Individuals' Rights Regarding the Processing of Personal Data

An individual may at any time exercise the following rights concerning their personal data, namely the right:

- To be informed about and access one's personal data.
- To rectification or supplement personal data.
- To request the deletion of personal data when there is no longer a legal basis for retention (e.g., when consent is withdrawn, and no other legal obligation applies).
- To limit data processing in certain cases.
- To object to data processing if it is based on legitimate interest.
- To data portability, when processing is based on a contract or consent and where the processing is carried out by automated means).

If an individual exercises their right to rectify inaccurate personal data, the Controller reserves the right to request documentation proving the changes. If an individual requests a transcript or copy of personal data, they are entitled to one free copy. For any additional copies, the Controller may charge a reasonable fee taking into account administrative costs.

When exercising their rights, the Controller may require individuals to provide specific information to verify their identity. This security measure ensures that personal data is not disclosed to unauthorized persons.

To exercise any of the aforementioned rights, individuals may submit a request via email to vop-renewables@alfi.si or by regular mail to the Controller's address, marked *"Request – Personal Data"*.

Complaint Procedure: If an individual believes that the Controller is not adequately enforcing their rights, they are encouraged to first contact the Controller. If the issue remains unresolved, a complaint can be filed with the Information Commissioner of the RS.

Automated Decision-Making or Profiling

The Controller does not use any system that would automatically make individual decisions or create profiles based on the personal data of investors, clients, or delegates, as referred to in Article 58 of the ZUAIS.

Sharing of Personal Data with Third Parties

The Controller treats personal data as confidential and processes it in compliance with applicable regulations. Personal data may be shared with Controller's data processors for administrative services as defined by ZUAIS, accounting services, legal and business consulting, IT system developers and maintenance providers, cloud service providers, and business partners of the Controller or the fund, who provide services related to occasional communication (e.g., suppliers and deliverers of occasional greeting cards and small occasional gifts) and postal service providers. The Controller requires all data processors to comply with at least the minimum data processing standards set by the applicable data protection laws.

The Controller also shares personal data upon request from state authorities, including but not limited to UPPD, The Financial Administration of the RS, ATVP, Courts, Court-appointed enforcement officers and other state authorities and institutions, authorized to obtain personal data under applicable regulations.

Additionally, the Controller shares personal data with the Depository of the fund’s assets, as defined by ZUAIS, for the purpose of performing depository services, and with auditors for the purpose of auditing the fund’s financial statements. Both the depository and the auditor act as independent data controllers when processing individuals’ personal data.

The Controller only discloses the necessary personal data required by law or as explicitly requested by an authorized authority in justified cases, in compliance with applicable regulations.

Transfer of Personal Data to Third Countries

The backend of the operational systems operates in the cloud, utilizing rented server capacities within the Microsoft Azure service. As a result, personal data may be transferred to a third country – the United States of America. This transfer is based on the adequacy decision issued by the European Commission, under the EU-US Data Privacy Framework.

General Provisions

The Controller reserves the right to amend or supplement this Privacy Policy at any time. The latest adopted version of the Privacy Policy shall apply. The currently applicable Privacy Policy is published on the Controller's website.

In Ljubljana, 20 July 2026