

**Privacy notice for current and future investors and investor representatives of funds managed by Copenhagen Infrastructure Partners P/S, Copenhagen Infrastructure Partners I K/S and Copenhagen Infrastructure Partners II P/S**

Version: January 2026

As alternative investment fund managers, Copenhagen Infrastructure Partners P/S, Copenhagen Infrastructure Partners I K/S and Copenhagen Infrastructure Partners II P/S (the “**CIP Group**”, “**we**” or “**us**”) we will, as a ‘data controller’, collect and process personal data about you as investor or representative of funds.

The EU Regulation 2016/679 on General Data Protection (the “**GDPR**”) and the new Danish Data Protection Act requires us to provide you with information about how we collect, process, and disclose your personal data, which categories of personal data we process, and the purposes for such processing.

You can always find the most updated version of the privacy notice at our webpage, <https://www.cip.com/policies-investor-information/>

**1. Categories of personal data that we process**

The types of personal data we process depends on your relationship with us (or in the words of the GDPR, which ‘Data Subject’ category you fall within). Below is a list of the categories of personal data that we process, for each ‘Data Subject’:

Categories of Data Subjects and categories of personal data	
‘Data Subject’	Categories of personal data that we process
Persons at managerial levels of investors  Including members of the board of directors and the board of management and members of investment committees of investors (in connection with Know-Your-Customer and Anti-Money Laundering legislative requirements)	<p>Special categories of personal data (tick the boxes)</p> <div> <input type="checkbox"/> Racial or ethnic origin           <input type="checkbox"/> Health data         </div> <div> <input type="checkbox"/> Political opinions           <input type="checkbox"/> Sex life or sexual orientation         </div> <div> <input type="checkbox"/> Religious beliefs           <input type="checkbox"/> Genetic or biometric data for the purpose of identification         </div> <div> <input type="checkbox"/> Philosophical beliefs           <input type="checkbox"/> Criminal convictions and offenses and related security measures         </div> <div> <input type="checkbox"/> Trade union membership         </div> <p><input checked="" type="checkbox"/> Non-sensitive categories of personal data: Name, national identification number (CPR-no. or similar if outside Denmark), passport information, incl. copy of passport, business address, personal address, e-mail address, gender, transcripts from company registers, photos.</p>

Signatory of subscription applications + Ultimate beneficial owners of investors	<div>         Special categories of personal data (tick the boxes)         <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> Racial or ethnic origin</div> <div style="width: 50%;"><input type="checkbox"/> Health data</div> <div style="width: 50%;"><input type="checkbox"/> Political opinions</div> <div style="width: 50%;"><input type="checkbox"/> Sex life or sexual orientation</div> <div style="width: 50%;"><input type="checkbox"/> Religious beliefs</div> <div style="width: 50%;"><input type="checkbox"/> Genetic or biometric data for the Purpose of identification</div> <div style="width: 50%;"><input type="checkbox"/> Philosophical beliefs</div> <div style="width: 50%;"><input type="checkbox"/> Criminal convictions and offenses and related security measures</div> <div style="width: 50%;"><input type="checkbox"/> Trade union membership</div> </div> </div> <div> <input checked="" type="checkbox"/> Non-sensitive categories of personal data:          Name, national identification number (CPR-no. or similar if outside Denmark), passport information, incl. copy of passport, business address, personal address, e-mail address, gender, transcripts from company registers, photos.       </div>
Registered administrative contact persons within investors + Registered commercial contact persons within investors + Investment Committee Members + Investor Panel Members	<div>         Special categories of personal data (tick the boxes)         <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> Racial or ethnic origin</div> <div style="width: 50%;"><input type="checkbox"/> Health data</div> <div style="width: 50%;"><input type="checkbox"/> Political opinions</div> <div style="width: 50%;"><input type="checkbox"/> Sex life or sexual orientation</div> <div style="width: 50%;"><input type="checkbox"/> Religious beliefs</div> <div style="width: 50%;"><input type="checkbox"/> Genetic or biometric data for the Purpose of identification</div> <div style="width: 50%;"><input type="checkbox"/> Philosophical beliefs</div> <div style="width: 50%;"><input type="checkbox"/> Criminal convictions and offenses and related security measures</div> <div style="width: 50%;"><input type="checkbox"/> Trade union membership</div> </div> </div> <div> <input checked="" type="checkbox"/> Non-sensitive categories of personal data:          Name, national identification number (CPR-no. or similar if outside Denmark), passport information, incl. copy of passport, business address, personal address, e-mail address, contact telephone number, title, gender, transcripts from company registers, photos.       </div>

## 2. The purposes of our processing of personal data

We process the personal data for the following purposes:

- To fulfil Know-Your-Customer and Anti-Money Laundering legislative requirements and perform our own internal due diligence
- To report to investors about CIP Group's funds and communicate with investors about CIP Group funds and activities
- To ask day-to-day questions of investors
- To admit members to the Investment Committee, to admit members to the Investor Panel, to admit a Designated Liaison Officer
- To organize meetings and events (including travel) with investors/investor representatives and Investment Committee members
- To invite investors/investor representatives to receptions, events and similar Occasions
- To comply with applicable personal data protection regulation and other regulation/legislation as well as other legitimate interests, e.g.
  - Documentation and record keeping requirements
  - Compliance with basic principles and legal grounds for processing personal data
  - Putting in place, maintaining and testing technical and organisational security measures
  - Investigating and reporting suspected personal data breaches, if any
  - Handling requests and complaints from data subjects and others, if any
  - Establishment, exercise or defence of legal claims
  - Handling inspections and queries by supervisory authorities, if any
  - Handling disputes with data subjects and third parties, if any
  - Complying with regulatory, financial and tax requirements imposed on funds that we manage

### **3. How we collect personal data**

Besides the personal data that we have collected directly from the individual to whom the data relates ("you"), we also collect personal data from:

- Placement agents
- Mutual third party acquaintances
- The potential or actual investors themselves
- The entities who manage company registers, incl. publicly available sources
- Third party entities we engage as part of our investor due diligence
- Publicly accessible information
- Advisors (tax, legal, financial and other professional services providers)
- Other CIP Group entities

When we collect personal data directly from you for any of the purposes outlined above at (2), you provide the personal data on a voluntary basis for us to comply with the law or to enter into or fulfil a contract with us or a third party, e.g., in connection with a secondment. Whether or not you are under an obligation to provide us with such personal data will depend on the specific circumstances.

The consequences of not providing the personal data are that we cannot fulfil the

abovementioned purposes, including that we cannot fulfil our obligations to you and/or that we cannot fulfil our obligations to public authorities.

#### **4. The legal basis for the processing of personal data**

There are several legal bases on which we process your personal data. The legal bases on which we process your personal data are:

- We have a legal obligation to conduct Know-Your-Customer and Anti-Money Laundering procedures, in which we collect and process your name, national identification number (CPR-no. or similar if outside Denmark), passport information, incl. copy of passport, business address, personal address, transcripts from company registers
- We collect and process your personal data based on our legitimate interests in the need to conduct our own due diligence on investors, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.
- We collect and process your personal data, being name, email address, business address and mobile phone number, based on our legitimate interests in fundraising, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.
- We collect and process your contact information based on our legitimate interests in the need to communicate, report and contact our investors on a day-to-day basis, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.
- We collect and process your contact information based on our legitimate interests in the need to comply with regulatory, financial and tax requirements imposed on funds that we manage, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.

#### **5. Disclosure of personal data to other entities**

We may disclose personal data to, and share personal data with, the following recipients in the ordinary course of our business, including:

- Placement agents
- Financial institutions involved in the business of CIP Group or CIP Group funds
- Other CIP Group entities
- Consultants engaged by CIP Group or CIP Group entities
- Consultants engaged by investors
- Other investors in CIP Group funds
- Advisors (tax, legal, financial and other professional services providers)
- Government bodies when required
- Regulatory, judicial and legislative bodies

The legal basis for disclosure of the personal data is the following:

- We have a legal obligation to conduct Know-Your-Customer and Anti-Money Laundering procedures, in which we may disclose your name, photo, national identification number (CPR-no. or similar if outside Denmark), passport

information, incl. copy of passport, business address, personal address, transcripts from company registers

- We may disclose your personal data based on our legitimate interests in the need to conduct our own due diligence on investors, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.
- We may disclose your personal data, being name, photo, email address, business address and mobile phone number, based on our legitimate interests in fundraising, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.
- We may disclose your contact information based on our legitimate interests in the need to communicate, report and contact our investors on a day-to-day basis, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6.
- We may disclose your contact information based on our legitimate interests in the need to comply with regulatory, financial and tax requirements imposed on funds that we manage, cf. GDPR art. 6(1)(f), cf. the Danish Data Protection Act section 6

The personal data is disclosed in connection with fulfilling the purposes described in section 2. The legal bases on which we disclose or share your personal data are the following:

- In cases where the disclosure or sharing involves the processing and publishing of photos/videos in marketing and advertisement campaigns, the legal basis for this is your consent to the disclosure, cf. article 6(1)(a) of the GDPR, section 6(1).
- The disclosure is necessary for the performance of the employment contract or other agreements to which you are a party, cf. art. 6(1)(b) of the GDPR and section 6(1) of the Danish Data Protection Act.
- The disclosure is necessary for the compliance with a legal obligation to which

## **6. Withdrawal of consent**

When the processing or transfer of personal data is based on your consent, which will be collected separately, you have the right to withdraw your consent to the processing, disclosure or transfer of your personal data. If you withdraw the consent, this will not affect the lawfulness of the processing and disclosure prior to the withdrawal, but we will no longer use your consent as a legal basis for any processing of your personal data. Please contact us using the contact details below if you wish to exercise this right related to any consents, which we may have obtained from you.

## **7. Transfer of personal data to 'data processors'**

We may transfer the personal data to our data processors, which process and/or store the personal data on our behalf:

- IT Service Providers
- Providers of online communication
- File storage platforms
- Accountants, legal advisors, other relevant advisors and cooperating partners

**8. International transfers of personal data to recipients (both ‘data controllers’ and ‘data processors’) in countries outside the EU/EEA**

We transfer personal data to the following types of recipients, located in countries outside the EU/EEA:

Transfers of personal data to a third country or an international organisation
<p>Category of recipient: Microsoft, incl. Microsoft’s sub-processors in various countries</p> <p>Country: US, Canada, Japan, South Korea, Australia, Israel, Taiwan</p>
<p>Category of recipient: Placement Agents, accountants, legal advisors, other relevant advisors and cooperating partners</p> <p>Country: Countries where CIP or CIP funds are active, including USA, Canada, Japan, South Korea, Australia, New Zealand, Israel, Taiwan, Chile, Mexico, Malaysia, Oman, Singapore, India, Thailand, Brazil, the Philippines and Vietnam.</p>
<p>Category of recipient: IT Service Providers, providers of online communication, file storage platforms</p> <p>Country: Countries where CIP or CIP funds are active, including USA, Canada, Japan, South Korea, Australia, New Zealand, Israel, Taiwan, Chile, Mexico, Malaysia, Oman, Singapore, India, Thailand, Brazil, the Philippines and Vietnam.</p>

We may transfer your personal data to countries outside EU/EEA, where the European Commission has decided that the country offers an adequate level of data protection, pursuant to article 45 of the GDPR (“**Adequacy Decision**”)

When transferring your personal data to insecure third countries outside the EU/EEA without an adequacy decision, the legal basis for transferring is the European Commission’s Standard Contractual Clauses in order to ensure an adequate level of protection for the personal data equivalent to the level ensured in the EU.

We may also transfer your personal data to third countries outside the EU/EEA when booking travels, hotels and/or CIP related travelling to other events outside EU/EEA. These transfers are based on art. 49.1.b, 49.1.c, and/or 49.1.e of the GDPR.

We note that the US and other third countries usually do not ensure a level of protection essentially equivalent to that ensured within the EU/EEA. Therefore, you must be aware that the third countries may not provide for effective legal remedies to exercise your rights and may allow unjustifiable access to personal data by public authorities.

## 9. Retention period

We store personal data for as long as necessary to fulfil the purposes above.

If personal data are no longer relevant, we regularly delete such data once the specific purpose for processing have been achieved.

Personal data related to Know-Your-Customer and Anti-Money Laundering legislative requirements is stored for current year + 5 years after the termination of the business relationship or the completion of a single transaction.

## 10. Your rights

Subject to the conditions set out in the applicable data protection legislation, you enjoy the following rights in respect of the personal data that we hold:

- The right to request access to the personal data
- The right to rectify or correct the personal data
- The right to erase the personal data
- The right to restrict the processing of the personal data
- The right to have the data provided to you in a portable format
- The right to object to the processing of the personal data

You also have the right to lodge a complaint with the competent supervisory authority, such as the Danish Data Protection Agency. Please consult their website for how to submit a complaint at [www.datatilsynet.dk](http://www.datatilsynet.dk).

You have the right to object, on grounds relating to your particular situation, at any time to our processing of personal data which uses 'legitimate interests' as a legal basis for the processing (as set out in article 6(1)(f) of the GDPR), including where the processing amounts to automated profiling of your personality, preferences or characteristics. Where you have exercised this right to object, we will no longer process the personal data on the legal basis of 'legitimate interests' unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

## **11. Contact**

Please contact us if you have any questions regarding the protection of your personal data or if you wish to exercise any of the legal rights set out in this Privacy Notice.

Copenhagen Infrastructure Partners

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