

OMERS Investments Privacy Statement



Effective
January 1, 2024

OUR COMMITMENT TO YOUR PRIVACY

At OMERS, honesty and integrity are at the core of everything we do. We are committed to building and keeping your trust in all aspects of our operations, including how we handle your personal data. Throughout our investment operations we apply privacy best practices to ensure that your personal data is safe, secure and used appropriately in accordance with applicable data protection legislation. We hope this Privacy Statement will help you to understand our approach to privacy.

This Privacy Statement applies to the collection, use, storage, and disclosure of personal data by and for the investment operations of any of the following OMERS Business Units: Global Credit, Global Equities, Global Multi-Asset Strategies, Infrastructure and Private Equity (including Capital Solutions & Growth Equity and Ventures), collectively (“OMERS Business Unit Investment Entities”). This Privacy Statement does not apply to Employees, prospective Employees or Contractors of OMERS Business Unit Investment Entities as they are governed by OMERS Employee Privacy Statement. This Privacy Statement does not apply to Oxford Investments as they are governed by Oxford Privacy Statement.

WHAT TYPE OF PERSONAL DATA DO WE COLLECT?

In the course of OMERS investment operations, OMERS may collect personal data about you. The types of personal data collected depend on the nature of our investment activities. For example, we may collect a wide range of personal data when we are evaluating investments and complying with sanctions screening, anti-money laundering and other requirements applicable to our business. Examples of the kinds of personal data we may collect include:

- Basic contact information, such as home address, email and telephone number;
- Date of birth, gender, and information relevant to the promotion of diversity and inclusion;
- Identification documents, such as your passport, government identification number, driver’s license or utility bill, and information relevant to our screening for compliance and background checking purposes;
- Job title, work history and salary;
- Customer lists and other information relevant to evaluating a proposed acquisition or investment, completing the acquisition or investment, and evaluating ongoing performance of the investment or acquired business; and
- Any other information you provide us.

When you use our websites, we and our service providers automatically collect information such as type of web browser you use, the type of device you use, your operating system and version, your IP address and inferred location, the pages or features you view or use, referring and exit pages, the date and time of your visit, and the number of clicks to, from, and within the website and the duration of your visits and use of these services.

HOW DO WE USE YOUR PERSONAL DATA?

We use personal information about you to support Business Unit investment operations. Some examples of how we use personal information include:

- Evaluating potential business transactions, including undertaking due diligence and background checks on target management;
- Undertaking activities necessary to transfer businesses such as transferring customer or employee records;
- Monitoring and strategic oversight of our portfolio companies and investments;
- Responding to or conducting Know Your Client and due diligence inquiries;
- Investigating specific transactions or patterns of transactions to detect and report unauthorized or illegal activities;
- Applying advanced analytics, such as content analysis, to derive insights that will help us to improve our investment operations;
- Leveraging technology to enable collaboration, derive insights, and improve our investment operations;
- Maintaining appropriate business records;
- Performing functions required or authorized by law;
- Tracking website usage, transaction history and patterns;
- Facilitating the safety and security of visitors to our offices and our Employees through the use of CCVS cameras; and
- For any other purpose for which you consent.

HOW DO WE COLLECT YOUR PERSONAL DATA?

The personal data that we collect may come from you in response to our requests for information, such as when you provide us with identification information for Know Your Client and due diligence purposes.

We may also collect personal data from third parties. For example, we may collect information about you from reputation and background check providers, transaction counterparties and legal counsel as part of due diligence or closing processes or from our portfolio companies as part of our monitoring and oversight.

We may also collect publicly available information, including information from social media and the internet. When you visit OMERS websites, we may collect information that you enter into the website such as when you sign up to receive communications from us.

If you provide us with personal data about another person such as ownership information of the company you work for, you represent that you have all necessary authority and/or have obtained all necessary consents from that individual to enable us to collect, use and disclose that personal data.

IS YOUR PERSONAL DATA SHARED WITH THIRD PARTIES?

We may share your personal data with our affiliates and service providers who assist us with our business operations.

Below are some examples of third parties with whom we may share your personal information:

- Reputation and background check providers;
- Financial institutions and service providers;
- Government agencies in accordance with their statutory authority;
- Information technology service providers such as cloud hosting or software services;
- Professional service providers such as lawyers, consultants or auditors;
- Transactional counterparties and investment partners; and
- Regulators such as the Securities and Exchange Commission (US) or the Financial Conduct Authority (UK).

DO WE USE ARTIFICIAL INTELLIGENCE AND MACHINE LEARNING TOOLS?

OMERS and our service providers may incorporate artificial intelligence and machine learning tools to process your personal information, including using it to train and refine algorithms. These tools help us, and our service providers, in internal business activities, such as automating tasks, evaluating data, developing new products and services, securing business systems, and other business purposes. OMERS is committed to the ethical use of your personal data and has developed processes and oversight for the development and use of these tools. This may require that OMERS evaluate an artificial intelligence or machine learning tool for its appropriateness, the sensitivity of the personal information processed, the impact on the rights and freedoms of individuals, and the potential for bias in the tools if they are being used to assist in decision-making.

WHAT ABOUT COOKIES?

When you visit our websites, we place files called “cookies” on your internet browser. These files ensure our websites function correctly during your visit and can also help our site remember any preferences you’ve set to assist you during future visits. Cookies used on OMERS websites also help us understand how our websites are used by visitors, including analyzing traffic trends, and how websites perform.

OMERS provides website visitors with notice and choice over the cookies that are placed on their browsers. Upon your first visit to an OMERS website you will be presented with a banner that will allow you to set your cookies preferences. The banner also provides you with more information on the specific cookies in use on our sites which can be reviewed prior to setting your preferences. You may update your preferences at any time by navigating to the bottom of an OMERS web page and selecting the “Cookie Preferences” option.

Our websites may provide links to websites that are operated by third parties external to OMERS. This Privacy Statement does not describe the privacy policies of any third-party websites or their respective privacy practices. We are not responsible for how such third parties collect, use, or disclose your personal data, so it is important to familiarize yourself with their privacy policies before providing them with your personal data.

HOW IS YOUR PERSONAL DATA KEPT SAFE?

Whether in electronic or paper-based format, we implement technical and organizational measures to ensure an appropriate level of security, keeping in mind the nature, scope, context and purpose of processing, cost, and the potential risk to you. We use appropriate technology and efforts designed to safeguard your personal data from loss, theft, and unauthorized access, use or disclosure. We require our service providers and agents to protect personal data processed on our behalf.

WHERE IS YOUR PERSONAL DATA STORED?

We and our service providers may transfer, store or access your personal data outside of the jurisdiction in which it has been collected, used or disclosed. Transfers of personal data will be made in compliance with applicable data protection legislation and will only be made where there are suitable safeguards in place.

When a transfer takes place, personal data may be subject to the laws of those other jurisdictions, and in certain circumstances, the courts, law enforcement agencies, regulatory agencies or security authorities in those other jurisdictions may be entitled to access your personal data.

WHAT ARE YOUR RIGHTS RESPECTING YOUR PERSONAL DATA?

In some jurisdictions you have, subject to some legal limitations, the following rights respecting your personal data:

- **Right of access.** You have the right to access and obtain a copy of your personal information.
- **Right of portability.** You have the right to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- **Right to erasure.** You have the right to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- **Right to restriction.** You have the right to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- **Right to object.** You have a right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.

If you would like to exercise any of these rights, contact our Privacy Officer at the address noted below.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We retain personal data for only as long as it is needed to fulfill the identified purposes or as may be required to comply with applicable laws. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

HOW WE UPDATE THIS PRIVACY STATEMENT

As the law develops and as we evolve, the way in which we collect, use, and disclose personal data may change. When this happens, we will update our Privacy Statement to reflect the changes. You can review our updated Privacy Statement at any time by visiting our website, <http://www.omers.com>, or by requesting a copy from our Privacy Officer.

WHO CAN I CONTACT WITH QUESTIONS OR CONCERNS?

We have appointed a Privacy Officer who is responsible for overseeing our compliance with applicable privacy laws. If you have any comments or questions about our Privacy Statement, or if you believe that we have not complied with our Privacy Statement, please contact our Privacy Officer as follows:

Head of Privacy
900-100 Adelaide Street West
Toronto, ON M5H 0E2
Email: privacy@omers.com

Special Notice for Residents of the European Economic Area and/or the United Kingdom

As a resident of the European Economic Area and/ or the United Kingdom you are entitled to additional information about our data processing practices and you have additional privacy rights as set forth below. If you have questions about any of these rights please feel free to reach out to our Privacy Officer at privacy@omers.com.

WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The controller of your personal information will vary according to the OMERS investment entity that is processing your personal data and the location of that entity. See the chart below to identify the controller responsible for your personal data.

OMERS Investment Entity	Region of Investment Entity	Corporate Entity	Address of Corporate Office	Privacy Contact
OMERS Global Credit, OMERS Global Equities, OMERS Global Multi-Asset Strategies	UK	OMERS Europe Limited	122 Leadenhall Street, 29 th Floor, the Leadenhall Building, London, UK EC3V 4AB	Head of Privacy privacy@omers.com
OMERS Infrastructure	UK	OMERS Infrastructure Europe Limited	6 New Street Square, 12 th Floor, New Fetter Lane, London, UK, EC4A 3BF	Head of Privacy privacy@omers.com
OMERS Infrastructure	Netherlands	OMERS Infrastructure European Holdings B.V.	Muidersstraat 9U 1011 PZ Amsterdam, Netherlands	Head of Privacy privacy@omers.com
OMERS Private Equity	UK	OMERS Private Equity Europe Limited	122 Leadenhall Street, 29 th Floor, the Leadenhall Building, London, UK, EC3V 4AB	Head of Privacy privacy@omers.com

WHAT IS THE LEGAL BASIS FOR OUR PROCESSING YOUR PERSONAL DATA?

Type of Personal Data	How we use it	Legal Basis for Processing
<p>Basic contact information such as home address, email and telephone number</p>	<p>We use this information to communicate with you in connection with:</p> <ul style="list-style-type: none"> • Investment transactions that we are considering or closing • Asset management activities • Board of director appointments and administration • Know Your Client and due diligence inquiries • Other compliance obligations to which we are subject 	<p>You have provided us with consent to process your personal data for communications purposes</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject</p> <p>The processing is necessary for our legitimate interests, namely the operation of our investment business and communicating with relevant stakeholders as required</p>
<p>Demographic information such as date of birth, gender and information relevant to the promotion of diversity and inclusion</p>	<p>We use this information to support diversity and inclusion initiatives in relation to our business partners, third party vendors and investment entities</p> <p>We use this information to comply with regulatory filings, Know Your Client / due diligence, and other compliance inquiries</p>	<p>You have provided us with consent to process your personal data in support of diversity and inclusion initiatives</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject</p> <p>The processing is necessary for our legitimate interests, namely fulfilling diversity and inclusion initiatives pertaining to our business partners, third party vendors and investment entities</p>
<p>Identification documents such as your passport, government identification number, driver's license or utility bill</p>	<p>We use this information to identify you when necessary, to conduct background checks and to comply with Know Your Client/ due diligence/ anti-bribery and corruption/ anti-money laundering and other compliance inquiries to which we are subject</p>	<p>You have provided us with consent to process your personal data in relation to background checks and compliance inquiries</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject</p> <p>The processing is necessary for our legitimate interests, namely the operation of our investment business and conducting required compliance inquiries</p>

Employment information such as job title, work history and salary	We use this information to evaluate a proposed acquisition or investment, to complete an acquisition or investment, or to evaluate ongoing performance of the investment or acquired business	The processing is necessary for our legitimate interests, namely the operation of our investment business including engaging in appropriate due diligence activities and investment oversight
Customer Lists and other information respecting the operation of a business that we are considering acquiring or have acquired	We use this information to evaluate a proposed acquisition or investment, to complete an acquisition or investment, or to evaluate ongoing performance of the investment or acquired business	The processing is necessary for our legitimate interests, namely the operation of our investment business including engaging in appropriate due diligence activities and investment oversight
CCVS Camera Footage	We use this information to investigate or support the investigation of safety and security incidents at our offices	The processing is necessary for our legitimate interests, namely the safety and security of visitors to our offices
Information on website usage, device details, transaction history and patterns	We use this information to improve your website experience and the website experience of other users, to understand how our websites are performing and to measure visitor traffic	You have provided us with consent to process this information through preferences that you have selected on our Cookies Banner

HOW DO YOU FILE A COMPLAINT ABOUT OUR DATA PROCESSING?

If you have a complaint about our processing of your Personal Data you are entitled to file a complaint with the relevant Data Protection Authority. Residents of the European Union can find further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. Residents in the United Kingdom may contact the Information Commissioner's Office: <https://ico.org.uk/>

Special Notice for Residents of California, USA

As a Resident of California, you are entitled to additional information about our data processing practices and you have additional privacy rights as set forth below. If you have questions about any of these rights, please feel free to reach out to our Privacy Officer at privacy@omers.com.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

In the last twelve months we have collected the following categories of personal information:

- Basic contact information, such as home address, email and telephone number;
- Protected Classification Characteristics, such as date of birth, gender, and information relevant to the promotion of diversity and inclusion;
- Identifiers, such as your passport, government identification number, driver's license or utility bill, and information relevant to our screening for compliance and background checking purposes;
- Professional/employment information, such as job title, work history and salary;
- Asset information, such as customer lists and other information relevant to evaluating a proposed acquisition or investment, completing the acquisition or investment, and evaluating ongoing performance of the investment or acquired business;
- Photographic information, such as CCVS footage; and
- Website information, such as website usage, device details, transaction history, inferred geolocation and patterns of usage;

WHAT ARE OUR SOURCES FOR PERSONAL INFORMATION THAT WE COLLECT?

We may collect personal information from the following sources:

- Directly from you;
- Reputation and background check providers;
- Transaction counterparties and legal counsel;
- Portfolio companies;
- Technology embedded in our website; and
- Publicly available sources, such as social media applications and web searches.

WHAT ARE OUR PURPOSES FOR COLLECTING, USING AND DISCLOSING YOUR PERSONAL INFORMATION?

We may collect, use or disclose personal information about you for one or more of the following purposes:

- Evaluating potential business transactions, including undertaking due diligence and background checks on target management;
- Undertaking activities necessary to transfer businesses such as transferring customer or employee records;
- Applying advanced analytics, such as content analysis, to derive insights that will help us to improve our investment operations;
- Leveraging technology to enable collaboration, derive insights, and improve our investment operations;

- Monitoring and strategic oversight of our portfolio companies and investments;
- Responding to or conducting Know Your Client and investment due diligence inquiries;
- Investigating specific transactions or patterns of transactions to detect and report unauthorized or illegal activities;
- Maintaining appropriate business records;
- Performing functions required or authorized by law;
- Tracking website usage, transaction history and patterns;
- Facilitating the safety and security of visitors to our offices and our Employees through the use of CCVS cameras; and
- For any other purpose for which you consent.

WHAT PERSONAL INFORMATION HAVE WE DISCLOSED ABOUT YOU IN THE LAST TWELVE MONTHS?

In the past twelve months we have disclosed all of the categories of personal information listed in this Special Notice. The categories of third parties to whom we disclose your personal information for a business purpose are described in the OMERS Investments Privacy Statement in the question, **Is your personal information shared with third parties?**

We do not sell personal information to third parties for monetary or other valuable considerations.

WHAT ARE YOUR RIGHTS RESPECTING YOUR PERSONAL INFORMATION?

As a resident of California you have, subject to some legal limitations, the following rights respecting your personal information:

- **The Right to Know.** The right to confirm whether we are processing personal information about you and, under California law only, to obtain certain personalized details about the personal information we have collected about you in the last 12 months, including:
 - The categories of personal information collected;
 - The categories of sources of the personal information;
 - The purposes for which the personal information were collected; and
 - The categories of personal information disclosed to third parties (if any), and the categories of recipients to whom the personal information were disclosed.
- **The Right to Access and Portability.** The right to obtain access to the personal information we have collected about you and, where required by law, the right to obtain a copy of the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **The Right to Request Deletion.** The right to request the deletion of personal information that we have collected from you, subject to certain exceptions.
- **The Right to Correction.** The right to request that any inaccuracies in your personal information be corrected, taking into account the nature of the personal information and the purposes of the processing of your personal information.

We do not share personal information for cross behavioral advertising purposes.

You may have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights.

If you would like to exercise any of these rights, contact our Privacy Officer at:

Head of Privacy
900-100 Adelaide Street West
Toronto, ON M5H 0E2
Email: privacy@omers.com