OMERS Infrastructure
Privacy Statement

OMERS INFRASTRUCTURE

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Effective
January 1, 2022

OUR COMMITMENT TO YOUR PRIVACY

At OMERS Infrastructure, we are committed to preserving the privacy of your personal data. This Privacy Statement elaborates on our commitment and helps provide transparency into our operations as they relate to your personal data.

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 and take steps to bring any material updates to your attention. You can review our Privacy Statement by visiting our website or requesting a copy from our Privacy Officer.

This Privacy Statement applies to the collection, use and disclosure of personal data within OMERS Infrastructure, other than to the personal data of OMERS Infrastructure's employees, prospective employees, or contractors, which is governed by *OMERS Employee Privacy Statement*. For purposes of this Privacy Statement OMERS Infrastructure means OMERS Infrastructure Management Inc. and its associated management entities:

- **OMERS Infrastructure Europe Limited**
- **OMERS European Holdings BV**
- **OMERS Infrastructure US Limited**
- **OMERS Infrastructure Asia Holdings Pte. Ltd.**
- **OMERS Infrastructure Australia Pty,Limited**

What is personal data?

Personal data – often referred to as "personal information", "personally identifiable information" or "PII" – is any information relating to an identified or identifiable person. An identifiable person is one who can be identified directly or indirectly from the information, taking into account any other information that OMERS Infrastructure holds or could gain access to (including from public sources).

Underlying our commitment to privacy is the protection of personal data – information relating to an identified or identifiable person.

Personal data that we collect includes your name, contact information, and demographic information, along with other more sensitive information such as your passport, social insurance number or other government identification number or bank account details.

How is my privacy promoted?

Under the guidance of our Privacy Officer, OMERS Infrastructure monitors and promotes compliance with privacy laws in jurisdictions where we operate, and with internal policies and procedures.

We have established processes for identifying potential privacy breaches and providing appropriate notification of any breaches that may cause real risk of significant harm to an individual or that may result in a risk to the rights or freedoms of an individual. Where required by law, we will provide such notification without undue delay to affected individuals and/or any relevant supervisory authorities.

Because your privacy is important to us, we carefully monitor its collection, use and disclosure.

Why is personal data collected and what is it used for?

Reasons we collect your personal data include the following purposes (the "identified purposes"):

- evaluating, establishing, and maintaining commercial relationships and fulfilling contractual obligations;
- researching, developing, managing, protecting, and improving our services;
- investigating and settling complaints and claims;
- tracking website usage, transaction history and patterns;
- investigating specific transactions or patterns of transactions to detect and report unauthorized or illegal activities;
- maintaining appropriate business records;
- facilitating business transactions, including evaluating, effecting, monitoring, and managing investments;
- monitoring and strategic oversight of our portfolio companies;
- responding to inquiries;
- facilitating safety and security;
- performing functions required or authorized by law; and
- for any other purpose to which you consent.

We may combine personal data that we have about you and apply advanced analytics such as content and sentiment analysis to that data to derive insights that will help us to improve our services.

Data collection and use practices may vary from jurisdiction to jurisdiction. For more details on how personal data is collected or used in your jurisdiction contact our Privacy Officer.

What is the legal basis for collection, use and disclosure of my personal data?

We will only collect and use your personal data as reasonably necessary for the identified purposes, and only do so where there is a lawful basis. Sometimes this will be on the basis of your consent. In the EEA and UK, we generally rely upon our legitimate business interests to process your personal data (such as when we use your personal data in the context of an acquisition or transfer of (part of) a business). However, at other times the legal basis will be a contractual obligation to you (such as an obligation to monitor and manage an investment) or for legal obligations (such as when we are obliged to provide your personal data to legal or regulatory authorities). In each case we will only collect, use, or disclose your personal data to the extent necessary for the purposes mentioned above.

Whenever we collect, use, and disclose your personal data, there is a lawful basis for doing so.

Where we do obtain your consent, subject to legal requirements, it can be withdrawn for OMERS Infrastructure's collection, use or disclosure of your personal data by notifying our Privacy Officer in writing. If you withdraw your consent, this does not affect the lawfulness of any processing that we carried out prior to that withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We have set out below further information on our collection, use and disclosure of personal data.

Information You Provide to Us:

Our use of information you provide to us may include sharing it with our affiliates and service providers assist us with our business operations. Some of the categories of service providers we use include: information technology providers (such as cloud hosting services and software services), professional services providers (such as auditors, lawyers and consultants), engagement and marketing service providers (such as online analytics service providers and marketing agencies), and financial service providers (such as banks and payment service providers). If our affiliates and service providers handle personal information on our behalf, they are required to protect that personal information and to use it only to provide the services we request.

If you provide us, our service providers, or our agents with personal data about another person, 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.

Business Transactions:

We strive to limit collection, use and disclosure of personal data in the course of transactions, and do not exchange client lists as a matter of course. However, where reasonably necessary for business transactions, we may collect personal data from, or disclose personal data to third parties. This may include information for background checks as permitted by law (including criminal and credit checks), or for proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance, financing or investment.

We strive to limit collection, use and disclosure of personal data in the course of transactions.

Website:

Use of our website is subject to our policies and procedures.

Through our website, we may place a text file called a “cookie” in the browser directory of your computer’s hard drive. A cookie is a small piece of information that a website can store on a web browser and later retrieve. The cookie cannot be read by any website other than the one that set up the cookie. Most browsers can be set to reject all cookies. If you choose to modify your browser in this manner, some pages of our website may not function optimally, and you may not be able to use all features of our website in the future.

Our website often provides links to or embeds content from websites that are operated by third parties not under our control. This Privacy Statement does not describe the privacy policies of any third-party websites or their privacy practices. OMERS Infrastructure is 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.

Video Surveillance:

For safety and security reasons, we may use video surveillance technologies at our offices and properties to monitor the public areas of those properties as well as internal meeting rooms.

For safety and security purposes, we use video surveillance on our properties.

We may disclose video surveillance footage to law enforcement or other government agencies where we believe such disclosure is: (i) permitted or required by law; (ii)

necessary to protect our properties, visitors, customers or employees; or (iii) reasonable in connection with a law enforcement investigation.

Regulated Disclosures:

Where permitted or required by the law, we may disclose your personal data to government agencies in accordance with their statutory authority.

Where is my personal data stored and how long is it retained?

OMERS Infrastructure or our service providers may 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 privacy law and will only be where there are suitable safeguards in place. For example, personal data collected in the EEA or the UK may be transferred to Canada on the basis of the European Commission's adequacy decision relating to Canada.

Personal data may be stored in, transferred to, and accessed from, a variety of jurisdictions.

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. However, we will always ensure that your personal data is adequately protected. Further information on the appropriate safeguards in place in respect of transfers of your personal data is available on request from our Privacy Officer.

We retain personal data in accordance with our document retention guidelines and 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. Personal data collected by OMERS Infrastructure for closed transactions is generally retained for a period of 10 years from the date the transaction. Personal data collected for transactions that did not close is generally retained for 6 years from the cancellation date. In some jurisdictions the legal requirements for retention may be for longer or shorter periods and OMERS endeavors to ensure that local practices align with local requirements.

We keep your personal data only as long as it is needed.

In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

How is my personal data kept safe?

Whether in electronic or paper-based format, we implement appropriate 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 industry standard technology and efforts to safeguard your personal data from loss, theft, and unauthorized access, use or disclosure. These include secure servers and firewalls. Physical access to those areas where information is gathered, processed, or stored is restricted to authorized employees who require the information to perform a specific function. Appropriate controls are in place over computer systems and data processing procedures and these controls are reviewed on an ongoing basis to ensure compliance with our security and privacy requirements.

We use a variety of mechanisms – including technical and organizational measures – to help keep your personal data secure.

We require our service providers and agents to protect personal data processed on our behalf.

How can I access, correct, transfer or delete my personal data?

We try to ensure that the personal data we collect about you is accurate, complete and up-to-date. However, we rely on you to provide accurate information in the first instance, and to notify us when there is a change in your personal data. In certain circumstances we may verify personal data or obtain additional personal data through third parties.

We rely on you to help us keep our records accurate but may occasionally seek external verification.

In some jurisdictions, such as the EEA and the UK, you have a right to access, correct, transfer or delete your personal data in our possession or control, or to object to our processing of your personal data. This may be done by writing or emailing our Privacy Officer.

Who can I contact with questions or concerns?

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:

Our Privacy Officer is ready to respond to your questions and concerns.

Megan Vesely
900-100 Adelaide Street West
Toronto, ON M5H 0E2
Canada
e-mail: MVesely@omers.com

You also have the right to make a complaint at any time to the relevant supervisory authority for data protection and privacy issues. For more information, contact our Privacy Officer.