

# OMERS Investments Privacy Statement

## PRIVACY



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### OUR COMMITMENT TO YOUR PRIVACY

At OMERS, honesty and integrity are at the core of everything we do. We are committed to building and maintaining trust in all aspects of operations, including the handling of personal data. Across our investment operations, OMERS applies established privacy practices designed to keep personal data safe, secure and used appropriately in accordance with applicable data protection legislation. This Privacy Statement outlines OMERS approach to privacy and individual rights regarding personal data.

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, Private Capital and Private Equity collectively (“OMERS Business Unit Investment Entities”). This Privacy Statement does not apply to employees, prospective employees or Designated 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 the Oxford Privacy Statement.

### What type of personal data do we collect?

In the course of OMERS investment operations, OMERS may collect personal data. 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 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 provided to us.

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

## How do we use personal data?

We use personal data to support the operations of the OMERS Business Unit Investment Entities. Some examples of how we use personal data 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 we obtain consent.

## How do we collect personal data?

The personal data that we collect may be provided to us directly by an individual in response to our requests for information, such as when an individual provides 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 an individual 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. We may collect information that visitors enter into our websites such as when a visitor signs up to receive communications from us.

When OMERS receives personal data through a third party, that party must follow all applicable laws. This may include obtaining authorization or consent from the person whose personal data is being shared.

### Is personal data shared with third parties?

We may share 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 personal data:

- 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 use artificial intelligence and machine learning tools to process personal data, including to train and improve these technologies. These tools support internal business activities such as automating tasks, analyzing data, developing and improving services, detecting fraud, and protecting systems. OMERS is committed to using personal data responsibly and has internal processes to assess and oversee the use of these tools. This includes reviewing their purpose, the type of personal data used, the potential impact on an individual's rights and freedoms, the risk of bias, and the extent of human oversight.

### What about Cookies?

When visitors use our websites, we place files called "cookies" on their internet browser. These files ensure our websites function correctly during their visit and can also help our site remember any preferences they have set to assist them during future visits. Cookies used on OMERS websites also help us understand how our websites are used, 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 a first visit to an OMERS website the visitor will be presented with a banner that will allow the visitor to set their cookies preferences. The banner also provides the visitor with more information on the specific cookies in use on our sites, which can be reviewed prior to setting preferences. Visitors may

update 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 personal data. Visitors to a third-party site should familiarize themselves with the third-party privacy policies before providing those third parties with their personal data.

### How is personal data kept safe?

Whether in electronic or paper-based format, we implement technical and organizational measures designed to provide an appropriate level of security, keeping in mind the nature, scope, context and purpose of processing, cost, and the potential risk to an individual's personal data. We use appropriate technology and efforts designed to safeguard 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 personal data stored?

We and our service providers may transfer, store or access 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 that personal data.

### What rights do individuals have respecting their personal data?

In some jurisdictions, the following rights exist respecting personal data:

- **Right of access.** The right to access and obtain a copy of personal data.
- **Right of portability.** The right to receive a copy of the personal data in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of personal data to another person.
- **Right to rectification.** The right to obtain rectification of any inaccurate or incomplete personal data without undue delay.
- **Right to erasure.** The right to require erasure of personal data without undue delay if the continued processing of that personal data is not justified.
- **Right to restriction.** The right to require the limitation of purposes for which personal data is processed, if the continued processing of the personal data in this way is not justified, such as where the accuracy of the personal data is contested.
- **Right to object.** The right to object to any processing based on legitimate interests where there are grounds relating to a particular

situation. There may be compelling reasons for continuing to process personal data, which will be assessed and communicated if applicable. Objections to marketing activities may be made for any reason.

The rights may be subject to limitations and exceptions or may not be available in certain jurisdictions. Inquiries about rights availability in specific jurisdictions or requests to exercise these rights may be directed to the Privacy Officer at the address noted below.

### How long do we keep personal data?

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 the personal data, the purposes for which we process the 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 our operations, 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. Visitors 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 you 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:

Vice President, Privacy  
900-100 Adelaide Street West  
Toronto, ON M5H 0E2  
Email: [privacy@omers.com](mailto:privacy@omers.com)

## SPECIAL NOTICE FOR RESIDENTS OF THE EUROPEAN ECONOMIC AREA AND/OR THE UNITED KINGDOM

Residents of the European Economic Area and/or the United Kingdom are entitled to additional information about our data processing practices and have additional privacy rights as set forth below. Questions about any of these rights may be directed to our Privacy Officer at [privacy@omers.com](mailto:privacy@omers.com).

### Who is the controller of your personal data?

The controller of your personal data will vary according to the OMERS Business Unit 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 Business Unit Investment Entity	Region of Business Unit Investment Entity	Corporate Entity	Address of Corporate Office	Privacy Contact
OMERS Global Credit, OMERS Global Multi-Asset Strategies	UK	OMERS Europe Limited	122 Leadenhall Street, 29 <sup>th</sup> Floor, the Leadenhall Building, London UK EC3V 4AB	Vice President, Privacy <a href="mailto:privacy@omers.com">privacy@omers.com</a>
OMERS Infrastructure	UK	OMERS Infrastructure Europe Limited	6 New Street Square, 12 <sup>th</sup> Floor, New Fetter Lane, London UK EC4A 3BF	Vice President, Privacy <a href="mailto:privacy@omers.com">privacy@omers.com</a>
OMERS Infrastructure	Netherlands	OMERS Infrastructure European Holdings B.V.	Muiderstraat 9U 1011 PZ Amsterdam, Netherlands	Vice President, Privacy <a href="mailto:privacy@omers.com">privacy@omers.com</a>
OMERS Private Capital	UK	OMERS Private Equity Europe Limited	122 Leadenhall Street, 29 <sup>th</sup> Floor, the Leadenhall Building, London, UK EC3V 4AB	Vice President, Privacy <a href="mailto:privacy@omers.com">privacy@omers.com</a>

## What is the legal basis for our processing of your personal data?

Type of Personal Data	How we use it	Legal Basis for Processing
Basic contact information such as home address, email and telephone number	<p>We use this information to communicate with you in connection with:</p> <ul style="list-style-type: none"> <li>- investment transactions that we are considering or closing</li> <li>- asset management activities</li> <li>- board of director appointments and administration</li> <li>- Know Your Client and due diligence inquiries</li> <li>- other compliance obligations to which we are subject</li> </ul>	<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>
Demographic information such as date of birth, gender and information relevant to the promotion of diversity and inclusion	<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>
Identification documents such as your passport, government identification number, driver's license or utility bill	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>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 information about how to contact their local data protection authority at [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en). Residents in the United Kingdom may contact the Information Commissioner's Office: <https://ico.org.uk/>

## SPECIAL NOTICE FOR RESIDENTS OF CALIFORNIA, USA

California residents are entitled to additional information about our data processing practices and have additional privacy rights as set forth below. Questions about any of these rights may be directed to our Privacy Officer at [privacy@omers.com](mailto: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;
- 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;

- 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.

### What personal information have we disclosed about you in the last twelve months?

In the past twelve months we have disclosed all 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 personal data 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:

Vice President, Privacy  
900-100 Adelaide Street West  
Toronto, ON M5H 0E2  
Email: [privacy@omers.com](mailto:privacy@omers.com).