

## PRIVACY POLICY

This Privacy Policy (hereinafter – the Policy) provides information on how the Invalda INVL group of companies (hereinafter – the INVL Group) processes personal data. It also describes the fundamental rights of the Data Subject enshrined in data protection legislation and provides the contact details of the INVL Group.

This Policy applies to the relationship between the INVL Group and persons who use, have used, have expressed an intention to use or are otherwise related to the services and/or activities provided by the INVL Group, and/or are shareholders of one or more INVL Group companies, and/or are related to target companies in which the INVL Group's collective investment undertakings invest.

In certain cases, where your personal data is processed by a collective investment undertaking (for example, UTIB "INVL Baltic Real Estate" or UTIB "INVL Technology"), the purposes and means of personal data processing are jointly determined by two companies – UAB "INVL Asset Management" and the relevant collective investment undertaking. In such situations, these companies act as joint data controllers pursuant to Article 26 of the GDPR.

The INVL Group ensures the confidentiality of personal data in accordance with the requirements of applicable law and the implementation of appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, accidental loss, alteration or destruction or other unlawful processing. When processing personal data, the INVL Group is guided by the General Data Protection Regulation, the Law on Legal Protection of Personal Data and other legal acts regulating this area.

Please note that the present Policy may be subject to future amendments to reflect changes in the legislation and INVL Group's activities, therefore we encourage you to review it periodically.

### 1. Definitions

**Data Subject** in the INVL Group is a natural person (who uses, has used, has expressed an intention to use the services provided by the INVL Group and/or is a shareholder of one or more INVL Group companies) or a person related to such a person (their representative, spouse, partner, etc.). A Data Subject is also a natural person related to the INVL Group's client and/or shareholder, and/or target company in which the INVL Group's collective investment undertaking invests – a legal entity, for example, the head of such legal entity, shareholder, beneficial owner, etc.

**INVL Group** (hereinafter – INVL) – means any company belonging to the INVL Group that acts as a Data Controller. In the context of this Policy, INVL may mean AB "Invalda INVL", UAB "INVL Asset Management", UTIB "INVL Baltic Real Estate", UTIB "INVL Technology", AB "INVL Baltic Farmland", or all of these companies together. The term INVL Group used in this Policy does not include UAB FMĪ "INVL Financial Advisors", which has its own separate Privacy Policy, which you can review here.

**Data Controller** – a company belonging to the INVL Group whose services you use, have used, have expressed an intention to use, or of which you are a shareholder, or with whose activities you are related. The list of INVL companies and contact details are published on the website [invalidainvl.com](http://invalidainvl.com).

**Joint Data Controllers** – two or more INVL Group companies that jointly determine the purposes and means of personal data processing. When jointly processing, for example, data of investors, shareholders or other subjects of UTIB "INVL Baltic Real Estate" or UTIB "INVL Technology", UAB "INVL Asset Management" and the respective investment company act as joint data controllers. This means that both companies are responsible for the processing of personal data, but the main contact person for all personal data protection matters is UAB "INVL Asset Management".

**Data Processor** – a natural or legal person who processes personal data on behalf of or on instruction from the Data Controller.

**Personal Data** – any information relating to a natural person – Data Subject, whose identity is known or can be identified directly or indirectly using such data as personal identification number, one or more factors specific to the physical, physiological, psychological, economic, cultural or social identity of that person.

**Biometric Data** – personal data (in this case, the Data Subject's facial image) obtained after special technical processing (of the facial image and identity document), by which the Data Subject's identity can be established and/or verified.

**Processing of Personal Data** – any operation performed on personal data: collection, recording, accumulation, storage, classification, grouping, combination, alteration, provision, disclosure, use, logical and/or arithmetic operations, search, dissemination, destruction or any other action or set of actions.

**General Data Protection Regulation** (hereinafter – GDPR) – 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.

Other terms used in the Policy are to be understood as defined in the GDPR and other legal acts.

## 2. Categories of Personal Data

Depending on the services or products that the Data Subject intends to use or uses, INV L processes various categories of personal data. Personal data may be obtained directly from the Data Subject, from the Data Subject's activity when using services and INV L websites, and from external sources such as registers, media sources, search engines and other third parties (for example, the State Social Insurance Fund Board, debtor registers, legal entities where the Data Subject is a shareholder, etc.), if INV L has the Data Subject's consent or if this is required by law.

If the Data Subject does not agree to provide his/her personal data, INV L services may not be provided to him/her.

If the Data Subject provides INV L with data of other persons related to them, the Data Subject must obtain the consent of these persons and familiarize them with this Policy.

### 2.1. Main Categories of Personal Data

The main categories of personal data, including, but not limited to, are:

- Personal identity data, such as name, surname, personal identification number, date of birth, identity document data, photograph, signature.
- Contact information, such as residential or correspondence address, telephone number, email address.
- Data on education, financial experience, investment knowledge and objectives.
- Financial data, such as data on property owned, income, obligations.
- Bank account data.
- Data related to the implementation of the "Know Your Customer" principle, such as data on professional activity, source of funds, beneficial owners, registered tax payment country and taxpayer code, citizenship, information on the Data Subject's participation in politics.
- Data about the Data Subject's relatives, such as information on the participation of close family members in politics.
- Data related to the provision of services and customer satisfaction with them, such as data on the performance or non-performance of contracts, concluded transactions, valid or expired contracts, submitted requests, applications, complaints, Data Subject's feedback on services.
- Data collected using communication and other technical means, such as video surveillance data, data collected by email, data related to the Data Subject's visits to INV L websites or use of self-service portals (for example, Internet Protocol (IP) address, Data Subject's login data to the self-service portal, website browsing history, name on social networks, etc.).
- Data about the Data Subject's interests and needs, provided when communicating with INV L employees.
- Data obtained in compliance with legal requirements, such as data received in response to inquiries from notaries, tax administrators, courts, bailiffs.
- Data related to the application of any sanctions and publication of negative information in the media.
- Data about legal representatives (acting under a power of attorney or on other grounds).
- Data about payers and recipients, including heirs.
- Data about relationships with legal entities, such as data on the legal entity's head, shareholder, board or other governing body member, beneficial owner and similar data required for the purpose of executing a transaction on behalf of a legal entity.

The amount of data processed about a specific Data Subject depends on the types of services used and the relationship with INV L.

### 2.2. Special Categories of Personal Data

In certain cases, personal data processed by INV L may also include special categories of personal data related to criminal convictions and offences. Such data is collected and processed only in cases and to the extent that it is necessary for INV L's collective investment undertakings to make investments in target companies, and to the

extent that this is permitted by law. They are stored for the duration of the collective investment undertaking's existence and for no longer than 2 years after the end of this period.

INVL processes special categories of personal data only after obtaining the Data Subject's consent or if such processing is provided for in legal requirements.

### 3. Purposes and Legal Basis for Processing Personal Data

The basis for INVL's processing of personal data may be the performance of a contract concluded with the Data Subject or the intention to enter into a contract, the Data Subject's consent to process their personal data for a specific purpose, as well as the performance of obligations applicable to INVL established by law. INVL may also process personal data based on the concept of legitimate interest (for example, to strengthen IT security), having implemented the requirements established by the GDPR. Under the conditions provided for in applicable law, one or more of the above-mentioned legal bases may apply to the processing of the same Data Subject's personal data.

INVL may process the Data Subject's data for the following purposes (including, but not limited to, cases where separate consent of the Data Subject is obtained for data processing):

- To provide INVL services (in order to enter into, perform or terminate a contract) and for other activities, including identity verification, suitability and acceptability and risk assessment, as provided for in the legal acts applicable to INVL's activities.
- To inform the Data Subject about their services, purchase-sale, securities management and other contracts with INVL.
- To fulfill legal obligations, including the implementation of the "Know Your Customer" principle and the prevention of money laundering and terrorist financing (ensuring compliance with all requirements related to the application of sanctions, monitoring of operations, determination of beneficial owner and politically exposed person status (by collecting and verifying information on whether the Data Subject, their close family members and/or their close associates are politically exposed persons)).
- To handle Data Subjects' complaints.
- To inform the Data Subject about INVL services and news, provide reports and overviews.
- To maintain relationships with Data Subjects, including query management and communication on social networks.
- To ensure the security of INVL and Data Subjects and their property, by conducting video surveillance.
- To assess the conclusion and performance of INVL contracts and the quality of INVL services, to inquire about opinions on the services provided, service and their quality, to conduct market research, to organize games and promotions for Data Subjects.
- To analyze and forecast the Data Subject's consumption habits and needs for INVL services and operations carried out, in order to ensure the most appropriate service to the Data Subject and the provision of personalized offers.
- For the protection, maintenance and improvement of technical measures and IT infrastructure, carrying out prevention of abuse of services and ensuring proper provision of services.
- To bring, pursue and defend legal claims.
- For other lawful purposes as specified in legal acts.

### 4. Rights of Data Subject

The Data Subject has the right guaranteed by data protection legislation to contact the Data Controller so that the Data Controller, having established the Data Subject's identity:

- Provides information on whether it processes the Data Subject's personal data and, if so, familiarizes the Data Subject with their personal data being processed, informs what personal data, from what sources it has been obtained, for what purpose and how it is processed (including automated decision-making, its significance and consequences for the Data Subject), how long it is stored, to whom it is provided (right of access to personal data).
- Corrects or supplements incorrect, incomplete, inaccurate Data Subject's personal data (right to request rectification of personal data).

- In certain circumstances specified in the GDPR (when personal data was processed unlawfully, the basis for data processing has ceased to exist, etc.), deletes the Data Subject's personal data (right to request erasure of personal data – "right to be forgotten").
- In certain circumstances specified in the GDPR (when personal data is processed unlawfully, during the period while the Data Subject's request regarding data accuracy or data processing is being examined, etc.), restricts the processing of the Data Subject's personal data, except for storage (right to restriction of processing of personal data).
- Provides in writing or in a commonly used electronic format the Data Subject's personal data provided to the Data Controller, which is processed using automated means, on the basis of their consent or performance of a contract, and, where possible, transfers such data to another service provider (right to data portability).

In cases where INVL processes the Data Subject's personal data on the basis of their consent, the Data Subject has the right to withdraw their consent at any time and the data processing based on this consent will be terminated immediately. Please note that upon withdrawal of consent, INVL may not be able to offer the Data Subject certain services or products, but will continue to use the Data Subject's personal data, for example, when performing a contract concluded with the Data Subject or if required by law.

The Data Subject has the right at any time to object to:

- To processing of their personal data and undertakes to submit their legally justified objection to the Data Controller in writing or in another manner by which the Data Subject's identity can be established, if the basis for processing personal data is the Data Controller's legitimate interests.
- To processing of their personal data for direct marketing purposes (including profiling related to such purpose) and has the right not to state the reasons for such objection.
- Being subject to a decision based solely on automated processing, including profiling, if such decision-making has legal effects or similarly significant impact on the Data Subject. This right does not apply where such decision-making is necessary for entering into or performing a contract with the Data Subject, is permitted by applicable law, or the Data Subject has given explicit consent.

If the Data Subject considers that his/her personal data are processed in violation of his/her rights and legitimate interests under applicable legislation, the Data Subject shall have the right to lodge a complaint regarding the processing of his/her personal data with the State Data Protection Inspectorate (address – L. Sapiegos g. 17, 10312 Vilnius, website address: <https://vdai.lrv.lt>). We kindly ask you to first contact INVL with any queries you may have, so that we can resolve them as quickly as possible.

## 5. Procedure for Handling Requests to Exercise Rights of Data Subject

The Data Subject must submit a request to exercise the specified rights to their Data Controller (see Section 1 "DEFINITIONS"). In cases where personal data is jointly processed by UAB "INVL Asset Management" and UTIB "INVL Baltic Real Estate" or UTIB "INVL Technology" as joint data controllers, all requests to exercise rights are received and processed by UAB "INVL Asset Management". Where necessary, UAB "INVL Asset Management" cooperates with the other joint data controller to ensure that data subjects' rights are fully and timely implemented. The Data Subject may also optionally contact the other joint data controller.

The Data Subject is given the opportunity to familiarize themselves with the essential provisions of the joint data controllers' agreement. Essential information is provided in this Privacy Policy, and more detailed information about the Agreement provisions can be provided if you contact UAB "INVL Asset Management".

Contact details of INVL companies are published on the website [invalidainvl.com](http://invalidainvl.com).

In order to protect that personal data processed by INVL is not disclosed to any persons not entitled to receive it, upon receipt of a Data Subject's request to provide data or exercise other rights, their identity will first be established. If the identity verification procedure is successful, INVL undertakes to provide information without undue delay, but in any case no later than one month from receipt of the Data Subject's request, about the actions taken in response to the Data Subject's request. Taking into account the complexity of the request or if the Data Subject has submitted several requests, INVL has the right to extend the one-month period by a further two months, informing the Data Subject before the end of the first month and specifying the reasons for such extension.

The Data Subject does not have to pay any fee to obtain information about their personal data being processed (or to exercise any other rights). However, INVL may charge a reasonable fee if the Data Subject's request is manifestly unfounded, submitted repeatedly, or is disproportionate.

## 6. Recipients of Personal Data

The Data Controller may disclose/transfer the Data Subject's personal data for processing to the following third parties, who, including but not limited to, assist the Data Controller in performing and administering the provision of services:

- Companies providing information technology services (to ensure the maintenance, improvement, updating of information systems).
- Companies providing website administration and related services.
- Companies providing document storage and archival management services.
- Companies providing postal services (for sending reports and other notifications to the Data Subject).
- Auditors.
- Companies belonging to INVL (with the Data Subject's consent or where there is another legal basis, for example, with the client's consent, data may be provided for direct marketing purposes, KYC questionnaire data may be provided for the prevention of Money Laundering and Terrorist Financing, or provided when one of the companies acts as a data processor for another company).
- Credit and financial institutions, including the depository, Nasdaq Vilnius stock exchange, financial services intermediaries, central depository, third parties involved in the execution, settlement and reporting cycle of trading in financial instruments.
- Legal, tax and other consultants whose services are acquired and/or intermediated by INVL under the terms of contracts concluded between INVL and the Data Subject.
- Debtor registers that collect information on missed payments and debt collection companies.
- Companies providing call handling services, if INVL engages such services.
- Companies engaged by INVL that provide quality assessment services for INVL services (including collection of opinions on services, service and their quality), market research, organization of games and promotions for Data Subjects.
- Other third parties engaged by INVL who assist INVL in providing Services, fulfilling obligations arising under applicable laws and other legal acts.

Data is also provided to:

- State authorities and institutions, other persons performing functions assigned to them by law (e.g., law enforcement authorities, bailiffs, notaries, tax administration, institutions supervising INVL or collective investment undertakings managed by INVL, including but not limited to the Bank of Lithuania, the Financial Crime Investigation Service, the Competition Council and corresponding institutions of other countries that supervise collective investment undertakings managed by INVL or companies constituting their assets).
- The State Tax Inspectorate, in order to implement the Agreement between the Government of the Republic of Lithuania and the Government of the United States of America to Improve International Tax Compliance and to Implement the Foreign Account Tax Compliance Act, as well as other international commitments of the Republic of Lithuania in this area.
- The State Social Insurance Fund Board.
- The State Enterprise Centre of Registers.
- In the event of a decision to sell, purchase, merge or otherwise restructure the Data Controller or part of its business, personal data may be disclosed or transferred to a potential or actual buyer or their consultants, and data may also be received from sellers or their consultants.

Please note that data about Data Subjects who are investors in feeder funds and who hold more than 25% (unless a different limit is set, e.g., 10%) of the feeder fund's assets is transferred to managers of master funds, including those established in Luxembourg or other jurisdictions, who provide this data to beneficial owner register administrators, as required by the legal acts applicable to the master fund manager. Data about feeder fund investors may also be transferred to the master fund manager (who in turn may transfer it to supervisory authorities, including in Luxembourg or other jurisdictions) upon determining that the investor is conducting a suspicious transaction or for other reasons when questions arise regarding the implementation of anti-money laundering requirements.

INVL undertakes to take the necessary measures and ensure that other persons to whom personal data may be provided process personal data in accordance with INVL's instructions and applicable law and implement appropriate personal data security measures.

## 7. Personal Data Retention Period

Personal data is processed for no longer than necessary to achieve the purposes of data processing. Personal data retention periods are defined in internal legal acts, taking into account the nature of contracts concluded with Data Subjects, INV'L's legitimate interest or legal requirements (e.g., accounting, anti-money laundering requirements, statute of limitations for claims, etc.).

Personal data collected when providing services is generally processed by INV'L for as long as the Data Subject uses INV'L services, and is stored for a further 10 years after the Data Subject ceases to use those services, unless applicable laws require a longer retention period for personal data, for example, in the case of Alternative Investment Funds, transaction documents and investor requests to acquire or redeem investment units, shares or to make or return contributions would be stored for the entire period of operation of the collective investment undertaking and for at least 5 years after the cessation of this activity.

Personal data collected for the purposes of the prevention of Money Laundering and Terrorist Financing is stored for 8 years from the date of the end of transactions or the business relationship with the client. The retention period may be further extended for no longer than 2 years upon reasonable instruction from a competent authority.

If the Data Subject uses contact forms for inquiries on INV'L company websites, the information provided in such forms, including the Data Subject's contact details, will be stored until the inquiry is processed, and for no longer than 2 years from the submission of the inquiry, unless a longer retention period is legally permitted for other reasons.

INV'L processes consent data for marketing during its validity period and stores it for a further 2 years after the withdrawal/expiration of consent, for the purpose of providing evidence (during dispute/complaint proceedings).

## 8. Geographic Processing Territory

INV'L generally processes the Data Subject's personal data only within the territory of the European Union/European Economic Area (EU/EEA).

Data Subjects' data may be transferred to a data controller or data processor established in another EU/EEA country, for example, when an external service provider or business partner engaged by INV'L (e.g., a fund in which a fund managed by INV'L invests) is established in another country.

In certain cases, the Data Subject's personal data may be transferred and processed outside the EU/EEA where there is a legal basis for transferring personal data and at least one of the following conditions applies:

- The country outside the EU/EEA in which the Data Recipient is located ensures an adequate level of personal data protection by a decision of the European Commission.
- The Data Controller or Data Processor implements appropriate data security measures, for example, Personal Data is transferred on the basis of a concluded contract that incorporates standard clauses approved by the European Commission or other standard clauses approved in accordance with the established procedure, an approved code of conduct, or the data recipient has been issued a certificate;
- Derogation provisions apply, for example, when the Data Subject has explicitly consented to the transfer of personal data, the transfer of personal data is necessary for the performance of a contract with the Data Subject or in order to enter into or perform a contract concluded in the interests of the Data Subject, it is necessary to transfer personal data in order to bring, pursue or defend legal claims, or for important reasons of public interest.

## 9. Automated Decision-Making

In certain cases, INV'L makes decisions using automated means:

- In order to ensure the most appropriate service to the Data Subject and to provide marketing offers that meet the Data Subject's needs, as well as to improve the quality of services provided by INV'L, INV'L may automatically analyze the Data Subject's personal data, including information about the use of services, the Data Subject's needs, behavior on INV'L company websites and self-service portals. Please note that INV'L's actions in analyzing Data Subjects' data do not have any legal or similar significant impact on Data Subjects. The Data Subject may at any time object to their personal data being processed for direct marketing purposes and set their browser to reject all or some browser cookies.

## 10. Video Surveillance

As one of the measures for the protection of persons and property implemented by INVL, based on legitimate interest, video surveillance may be carried out. Locations where video surveillance is carried out are marked with special signs.

When carrying out video surveillance, personal data processed by INVL includes the Data Subject's facial image and video recording when the Data Subject is inside or outside the premises. For the above-mentioned purpose, video recordings are processed for no longer than 14 calendar days from the date of their recording. When investigating an incident, the recording may be retained for as long as the investigation or legal proceedings are ongoing.

Video recording information may be provided to law enforcement authorities when necessary to investigate criminal acts or violations.

## 11. Direct Marketing

Direct marketing activities include – sending newsletters, providing INVL service offers (including personalized offers) and information about new INVL services, ongoing promotions, the opportunity to participate in competitions or marketing campaigns, inquiring about the Data Subject's opinion on the quality of services and service, participation in surveys or market research. On the basis of separate Data Subject consent, INVL may also provide third-party direct marketing offers. Sending electronic letters, activity reports, calls whose content is related to the performance of contracts are not considered direct marketing activities.

INVL processes the Data Subject's personal data for direct marketing purposes based on the Data Subject's consent to such processing of personal data. In cases where the Data Subject has not given consent but uses INVL services and has not objected to the processing of data for direct marketing purposes, during the provision of services INVL may provide the Data Subject by email with offers about similar goods or services.

On the basis of the legitimate interest of knowing whether marketing messages sent to the Data Subject are relevant, INVL collects information about messages sent to the Data Subject, data on whether they read them, when they read them and which links they clicked.

At the end of the validity period of consent for direct marketing, INVL may contact the Data Subject to request consent again.

We may also carry out direct marketing and inform the Data Subject about INVL services and offers by displaying advertising on third-party social network platforms – "Facebook", "Instagram", "Messenger", "LinkedIn":

- When the Data Subject's consent has been given for the transfer of their data for this purpose to the above-mentioned data controllers.
- When INVL, as the account administrator, selects appropriate settings, taking into account its target audience and business management and promotion objectives. In this case, INVL cannot influence which specific social network platform user will be shown the advertisement, and the social network platform operator is responsible for implementing the ability to opt out of such advertising messages.

The personal data provided by the Data Subject and INVL on social networks platforms are processed jointly with the operator of the social networks platform. For more information on the processing of data by the controller of the social networks platform, please refer to the privacy policy of the respective controller:

- Facebook, Instagram, Messenger Privacy Policy is available at <https://www.facebook.com/privacy/explanation>;
- LinkedIn Privacy Policy is available at <https://www.linkedin.com/legal/privacy-policy>.

## 12. Contact Details

- **INVL Asset Management UAB** (code 126263073, address 14, Gynėjų St., Vilnius, tel. +37052790601, email [info@invl.com](mailto:info@invl.com), website address [www.invl.com](http://www.invl.com), email address of the Data Protection Officer [dap@invl.com](mailto:dap@invl.com));
- **INVL Baltic Real Estate UTIB** (code 152105644, address 14, Gynėjų St., Vilnius, tel. +37052790601, e-mail [breinfo@invl.com](mailto:breinfo@invl.com), website address [www.invlbalticrealestate.lt](http://www.invlbalticrealestate.lt));
- **INVL Technology UTIB** (code 300893533, address 14, Gynėjų St., Vilnius, tel. +37052790601, e-mail [info@invltechnology.lt](mailto:info@invltechnology.lt), website address [www.invltechnology.lt](http://www.invltechnology.lt));
- **INVL Baltic Farmland AB** (code 303299781, address 14, Gynėjų St., Vilnius, tel. +37052790601, e-mail [farmland@invaldainvl.com](mailto:farmland@invaldainvl.com), website address [www.invlbalticfarmland.com](http://www.invlbalticfarmland.com));

Where personal data is processed on the basis of joint data controllers (e.g., UAB "INVL Asset Management" and UTIB "INVL Baltic Real Estate" or UTIB "INVL Technology"), the main contact person for the implementation of data subjects' rights, requests, questions and complaints is UAB "INVL Asset Management". However, in all cases the data subject may also contact UTIB "INVL Baltic Real Estate" or respectively UTIB "INVL Technology", but the practical processing of requests and coordination of responses is carried out by UAB "INVL Asset Management".

### 13. Cookies

Cookies are a piece of certain information stored on a visitor's computer when they visit INVL websites. Cookies are used to identify the visitor as a previous visitor to the website and to collect website traffic statistics, to display visitor specific advertising and to improve the functionality of the self-service portal. Please note that visitors can always change their preferences or refuse to accept cookies by changing their browser settings. The option to delete cookies is available in all browsers. You can also configure your browser settings to accept only relevant cookies, or to receive a warning message each time you decide whether you want to store cookies on your computer. Please note that disabling cookies may prevent some features of the websites from working. More information about cookies can be found at:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>  
<https://www.allaboutcookies.org/>

A list of the cookies used by invl.com is provided in the Cookie Policy available at <https://www.invl.com/slapuku-politika/>. This Cookie Policy allows you to change or withdraw your consent to the use of cookies on invl.com at any time.

Cookies used in the websites of other companies of INVL Group is provided in their Cookie policies respectively:

*invltechnology.com* – Cookie Policy – INVL Technology;

*invlsustainable.com* - Cookie Policy – INVL Sustainable;

*invalidainvl.com* – Cookie policy – Invalda INVL;

*invlbalticfarmland.com* – Cookie policy – INVL Baltic Farmland;

*bre.invl.com* – Cookie policy – INVL Baltic Real Estate;

*bsgf.invl.com* – Cookie policy – INVL Baltic Sea Growth Fund;

*invlrenewable.com* – Cookie policy – INVL Renewable Energy Fund I;

*bridge.invl.com* – Cookie policy – INVL Bridge Finance Fund.

These Cookie Policies allow you to change or withdraw your consent to the use of cookies on the websites of other companies of INVL Group at any time. Cookies used by INVL on self-service portals:

Cookie name	Purpose of the cookie	Moment of creation	Period of validity	Data used
invl	Mandatory cookie – to ensure the customer's session with the server.	Establishing a session between the customer's browser and the server.	One session	ID of the customer's session with the server (the cookie does not store any personal information and is automatically deleted when the browser window is closed)
__AntiXsrfToken	Mandatory cookies are used to support the basic functionality of the e-portal. Ensures additional protection	Upon accessing the ePortal	One session	Cookies do not store any personal information and are automatically deleted the browser window is closed.

The websites of INVL may contain links to third-party websites, legislation, as well as to social networks (e.g. an option to share the content of the website on Facebook and LinkedIn, Instagram, as well as YouTube). It should be noted that the third-party websites whose links are included in the websites of INVL are subject to the privacy policies or equivalent documents of those websites, and INVL does not accept any responsibility for the content of the information provided by those websites, their operation or the provisions of their privacy policies. INVL has the right to unilaterally amend the present Privacy Policy at any time by informing Data Subjects of the essential changes via the websites of INVL Group.