

## PRIVACY POLICY

### SUMMARY

**OCM-ECP Management, SA** is an independent investment advisory company, incorporated in July 2014, formed by experienced Portuguese investment managers and real estate industry experts. The managing partners have combined in-depth investment experience in the real estate, infrastructure, transportation, leisure, energy, agriculture, healthcare and financial services sectors and an extensive track record both domestically and globally.

**OCM-ECP Management, SA** has an exclusive partnership with funds managed by Oaktree Capital Management, L.P.'s (Oaktree) European Principal Group, with the aim of building a leading investment platform in Portugal across different instruments (equity, debt) and sectors, including real estate, financial services and non-financial businesses.

### WHO ARE WE?

Your personal data will be processed by **OCM-ECP Management, SA**, with headquarters at Edifício Atlas III, Avenida José Gomes Ferreira, nº13, 5<sup>th</sup> floor, Miraflores, 1495-139, Algés, VAT number 513496912, telephone number + (351) 210 995 450, hereinafter referred to as **OCM-ECP Management, SA**.

**OCM-ECP Management, SA** is responsible for your personal information (and the controller for the purposes of the General Regulation on Data Protection) that **OCM-ECP Management, SA** collects from or about you.

### HOW DO WE USE YOUR PERSONAL INFORMATION?

**OCM-ECP Management, SA** only treats personal data whenever is necessary to comply with legal obligations that apply to us, or such processing operation is necessary for the execution of a contract or pre-contractual procedures associated with it.

We may also handle information if we have a legitimate interest in doing so, provided that in each case our interest is in accordance with applicable law and the rights of the data subject; this may occur, in particular for communication with our clients; recruitment of employees; prevention and detection of fraud or provision of information on investment projects, clarification of additional information, questions or requests for information on investment opportunities.

Should none of the other lawful basis are able to support the data processing operation, **OCM-ECP Management, SA** will only treat the information if we have obtained the consent of the data subject to treat your personal data for specific, explicit and legitimate purposes.

### SHARING AND TRANSFER OF PERSONAL DATA

**OCM-ECP Management, SA** shares data with third parties, under the law, due to cooperation duties, including, but not limited to, the Tax Authority and Social Security.

**OCM-ECP Management, SA** may also transfer data to entities providing services that act exclusively under its guidance or support, and which respect technical and organizational measures equivalent to those to which it is obliged.

## **HOW LONG IS YOUR PERSONAL INFORMATION RETAINED?**

**OCM-ECP Management, SA** will keep your personal information for no more than the time required to fulfil the purposes described in this privacy policy unless a longer retention period is permitted by law.

## **INFORMATION SECURITY**

The security of your personal information is important to **OCM-ECP Management, SA** and we have implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. **OCM-ECP Management, SA** protects your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

**OCM-ECP Management, SA's** service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

## **RIGHTS REGARDING PERSONAL DATA**

At any time, the data subject may:

- Request access to personal information – You have right to access personal information which **OCM-ECP Management, SA** holds about you.
- Request rectification of personal information – You have a right to request **OCM-ECP Management, SA** to correct your personal information where it is inaccurate or out of date.
- Request to be forgotten – You have the right under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and **OCM-ECP Management, SA** have no other legal ground for processing the data; if you have opposed to processing and there are no prevailing legitimate interests justifying said processing; or you have withdrawn your consent for the processing (in cases where the processing is based on consent) and there is no other lawful basis for such processing.
- Request restrict processing – You have the right to restrict the processing of your personal information, but only whereas:
  - o its accuracy is contested, to allow **OCM-ECP Management, SA** to verify its accuracy; or
  - o the processing is unlawful, but you do not want it erased; or
  - o it is no longer needed for the purposes for which it was collected, but **OCM-ECP Management, SA** still need it to establish, exercise or defend legal claims; or

o you have exercised the right to object, and verification of overriding grounds is pending.

- Object to processing – You have the right to object the processing of your personal information at any time, but only whereas that processing has **OCM-ECP Management, SA**'s legitimate interests as its legal basis. If you raise an objection, **OCM-ECP Management, SA** has an opportunity to demonstrate that has compelling legitimate interests which override your rights and freedoms.

Data subjects may, at any time, exercise their rights or withdrawing consent, through the e-mail address [info@estorilcp.com](mailto:info@estorilcp.com) or by letter to the postal address Edifício Atlas III, Avenida José Gomes Ferreira, n°13, 5<sup>th</sup> floor, Miraflores, 1495-139,Algés

Data subjects can also contact the Data Protection Officer at [claudia.salvado@solyd.pt](mailto:claudia.salvado@solyd.pt).

All requests will be treated with special care so that **OCM-ECP Management, SA** can ensure the effectiveness of your rights. You may be required to prove your identity so as to ensure that the personal data is shared only with your cardholder.

You should be aware that in certain cases (e.g. due to legal requirements) your claim may not be met immediately.

In any case, data subjects will be informed of the measures taken to that effect within one month from the moment the request is made.

You also have the right to submit a complaint to the National Data Protection Commission <https://www.cnpd.pt/>.

## **COOKIES**

This website uses cookies. When you visit the website, **OCM-ECP Management, SA** may install small information on your computer, which are known as “cookies”. Cookies are stored by the browser on the hard disk. Cookies help us in many ways. We use cookies to better organize the website or information about our products, and to make that information more tailored to your interests or preferences. Cookies allow us to know who visited which pages and what content, to evaluate the frequency of visits to certain pages, to determine which of the favorite areas of the website and to guide the use of the website more generally. You have the option to prevent cookies from being generated by selecting the corresponding option in your browser (known as the “browser”).

You can check our Cookies Policy here: <http://estorilcp.com/en/cookies.html>