

VISTAONE (LUX) FEEDER, SICAV SA

PRIVACY NOTICE

Effective Date: March 26, 2025

Part A: Non- EU and UK Individuals

Our Commitment to Your Privacy: We have always treated the personal information we receive from all of our Subscribers with sensitivity and we are committed to continuing that practice. We are providing Part A of this notice (the “Privacy Notice”) to individual Subscribers residing outside of the EU and the UK (i.e., Subscribers who are natural persons or “alter egos” of individuals (e.g., revocable grantor trusts, IRAs and certain estate planning vehicles)) in order to help you better understand why and how we collect certain personal information, the care with which we treat that information, and how we use that information.

Information We Collect: In connection with the formation and ongoing activities of our private investment funds (or “funds”), we may collect and maintain nonpublic personal information about our individual Subscribers, including:

- Contact information: name, address, email, telephone number;
- Identification information: signature, date of birth, place of birth, citizenship, location of residence, social security number, taxpayer identification number, driver’s license, passport, other government identification and numbers;
- Background information: information required to perform, or revealed in, know-your-customer (KYC) and anti- money laundering (AML) due diligence, investor accreditation and consents;
- Financial information: assets, income, net worth, amounts and types of investments, risk tolerance, capital account balances, capital commitments, capital contributions, account data, other investment participation information, funds transfer information, beneficiaries, positions, percentages of fund, share or option numbers and values, vesting information, investment history, transaction information, tax status and information;
- Investment information: information about your interest in the relevant Investment, including ownership percentage, capital investment, income and losses; and
- Technical or account information: electronic device and usage information (for example, from cookies and similar technology), registration information and online account data.

Sources of Non-Public Information: We collect non-public personal information from the following sources:

- Information we receive from Subscribers in subscription agreements, investor questionnaires or other forms that Subscribers submit to us (including, without limitation, any anti-money laundering, identification, and verification documentation) or contracts that Subscribers enter into with us;
- Information related to Subscribers’ transactions with us and our affiliates;
- Information related to Subscribers’ transactions with nonaffiliated third parties; and
- Information obtained from Subscribers in meetings, telephone conversations, voicemails, written correspondence and via email or other forms of communication.

- Information captured on our website, fund data room and/or Subscriber reporting portal (as applicable), including registration information, information provided through online forms and any information captured via “cookies.”

Purposes for Collecting Personal Information: We may collect or disclose the personal information we collect about you for one or more of the following business or commercial purposes:

- performing services to you, including but not limited to:
 - the administrative processes (and related communication) in preparing for the admission of Subscribers to the fund(s), including administering, managing and setting up a Subscriber’s account(s) to allow such potential Subscriber to purchase interests in the fund(s);
 - ongoing communication with potential Subscribers, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential Subscribers to the fund and the execution of all relevant agreements;
 - the performance of obligations under the governing documents of the funds (and all applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of potential Subscribers in the applicable fund;
 - ongoing operations, administrative, accounting, reporting, account maintenance and other processes and communication required to operate the business of the funds in accordance with its governing documents and other documentation between the parties, including customer service, processing or fulfilling transactions, verifying personal information, processing contributions and distributions and financing;
 - keeping investors informed about the business of the general partner or managing member of the applicable fund and its affiliates generally, including offering opportunities to make investments other than to the applicable fund and related advertising;
 - facilitating the execution, continuation or termination of the contractual relationship between a Subscriber and the general partner or managing member, the investment adviser and/or the fund(s);
 - facilitating the transfer of fund interests, and administering and facilitating any other transaction, between a Subscriber, the general partner or managing member, the investment adviser and/or the fund(s);
 - auditing and verifications related to Subscriber interactions, including but not limited to, verifying the quality and effectiveness of services and compliance;
 - maintaining the safety, security and integrity of our products and services, databases, technology assets and business, including detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity;
 - enabling any actual or proposed assignee or transferee of the fund(s), to evaluate proposed transactions;
 - facilitating business asset transactions involving the funds; and
 - complying with U.S., state, local and non-U.S. laws, rules and regulations.

Disclosure of Information: We may disclose any of the categories of personal information set out in the “Information We Collect” section above as permitted or required by law or regulation and to our affiliates. We may also disclose personal information about Subscribers to our service providers

and other third parties as permitted by law and in accordance with the agreements governing your investment in our private funds, including:

- Financial service providers, such as broker-dealers, custodians, banks lenders and others used to finance or facilitate transactions by or operations of our investment funds;
- Actual and potential portfolio companies, purchasers thereof and potential co-investors, and each of their respective advisors if requested in connection with an investment or disposition;
- Other service providers to our investment funds and/or their general partners, managers and affiliates, such as those who provide accounting, legal, consulting, administration, auditing or tax preparation services and placement agents;
- Other partners and potential investors in our investment funds; and
- Transfer agents, portfolio companies, brokerage firms and the like, in connection with distributions to our partners.

Former Subscribers: With respect to former Subscribers, we maintain personal information of our former Subscribers and apply the same policies that apply to current Subscribers.

Information Security: To protect your personal information from unauthorized access and use, we use security measures that comply with applicable law. These measures include computer safeguards and secured files and buildings.

Further Information: If required by law, we will notify Subscribers annually of our Privacy Notice. We reserve the right to modify our privacy policies and Part A of this Privacy Notice at any time and will keep Subscribers informed of changes. The examples contained within this Part A of this Privacy Notice are illustrations only and are not intended to be exclusive. Part A of this Privacy Notice complies with the privacy provisions of Regulation S-P under the Gramm Leach Bliley Act and certain privacy provisions of other laws.

A Subscriber may have additional rights under other foreign or domestic laws that may apply to such Subscriber, including as set forth in Part B of this Privacy Notice, the EU-UK Privacy Notice, which shall apply instead of this Part A of the Privacy Notice to the extent EU-UK Data Protection Legislation applies.

Contact Us: If you have any questions or concerns about this Privacy Notice or wish to exercise any rights, submit requests, or appeal any of our decisions in connection with this Privacy Notice (each, a “Communication”) please contact us via email at: privacy@vistaequitypartners.com.

We verify Communications by matching information provided in connection with your Communication to information contained in our records. Depending on the sensitivity of the Communication and the varying levels of risk in responding to such Communications (for example, the risk of responding to fraudulent or malicious communications), we may request further information or your investor portal access credentials, if applicable in order to verify your Communication.

Part B: EU-UK Privacy Notice

Part B of this Privacy Notice (the “EU-UK Privacy Notice”) applies to the extent that EU-UK Data Protection Legislation (as defined below) applies to the processing of personal data by an Authorized Entity (as defined below) (including where such Authorised Entity is established in the European Economic Area (“EEA”)). If this EU-UK Privacy Notice applies, the relevant data subject has certain rights with respect to such processing of their personal data as outlined below.

For the purposes of this EU-UK Privacy Notice: (i) “EU-UK Data Protection Legislation” means all applicable legislation and regulations relating to the protection of personal data in force from time to time in the EEA, EU and UK including (without limitation): (a) Regulation (EU) 2016/679 (the General Data Protection Regulation); (b) the General Data Protection Regulation as it forms part of the laws of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended; or (c) any other legislation which implements any other current or future legal act of the European Union or the United Kingdom concerning the protection and processing of personal data and any national implementing or successor legislation, and including any amendment or re-enactment of any of the foregoing; and (ii) the terms “controller”, “processor”, “data subject”, “personal data” and “processing” shall have the meanings given to them under applicable EU-UK Data Protection Legislation, and “process” shall be construed in accordance with such meaning of processing.

“Sensitive personal data” shall mean special categories of personal data (being personal data revealing race or ethnicity, political opinions, religious or philosophical beliefs or trade union membership; genetic or biometric personal data; and personal data concerning health, sex life or sexual orientation) and personal data relating to criminal convictions and offences.

As applicable, any terms not defined in this EU-UK Privacy Notice shall have the meaning ascribed to them in the Subscription Agreement and Partnership Agreement (as appropriate).

Please contact the General Partner with any queries arising out of this EU-UK Privacy Notice.

Categories of personal data collected and lawful bases for processing

In connection with offering, forming and operating private investment funds for investors, the Partnership, the General Partner, the Portfolio Manager and their affiliates and, in each case, their administrators, legal and other advisors and agents (the “Authorized Entities”) collect, record, store, adapt, and otherwise process and use personal data either relating to investors or their partners, officers, directors, employees, shareholders, ultimate beneficial owners or affiliates, or any other data subjects from the following sources (and all references to “investor(s)” in this EU-UK Privacy Notice shall be to such applicable existing or potential investor(s) and, as applicable, any of these other persons that relate to such investor(s)):

- a) information received in conversations over the telephone, in voicemails, through written correspondence, via email, or on subscription agreements, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, identification, and verification documentation);
- b) information about transactions with any Authorized Entity or others;
- c) information captured on any Authorized Entity’s website, data room and/or investor reporting portal (as applicable) including registration information, information provided through online forms and any information captured via “cookies” or other tracking technologies; and
- d) information containing photographic images or specimen handwriting; and
- e) information from available public sources, including from:
 - publicly available and accessible directories and sources;

- bankruptcy registers;
- tax authorities, including those that are based outside the UK and the EEA if the applicable data subject is subject to tax in another jurisdiction;
- governmental and competent regulatory authorities to whom any Authorized Entity has regulatory obligations;
- credit agencies; and
- fraud prevention and detection agencies and organizations.

Any Authorized Entity may process the following categories of personal data:

- a) names, dates of birth and birth place;
- b) contact details and professional addresses (including physical address, email address and telephone number);
- c) account data and other information contained in any document provided by investors to the Authorized Entities (whether directly or indirectly);
- d) information regarding an investor's status under various laws and regulations, including their social security number, tax status, income and assets;
- e) information regarding an investor's interest in the Partnership and funds, including ownership percentage, capital investment, income and losses;
- f) information regarding an investor's citizenship and location of residence;
- g) source of funds used to make the investment in the Partnership and funds;
- h) anti-money laundering, identification (including passport and drivers' license) and verification documentation;
- i) risk tolerance, transaction history, investment experience and investment activity;
- j) accounts and transactions with other institutions; and
- k) information regarding the use of any Authorized Entity's website, data room and/or investor reporting portal.

One or more of the Authorized Entities are "controllers" of personal data collected in connection with this Subscription Booklet. In simple terms, this means such Authorized Entities: (i) "control" the personal data that they or other Authorized Entities collect from investors or other sources; and (ii) make certain decisions on how to use and protect such personal data.

There is a need to process personal data for the purposes set out in this EU-UK Privacy Notice as a matter of contractual necessity under or in connection with the Partnership Agreement, Subscription Booklet and associated documentation, and in the legitimate interests of the Authorized Entities (or those of a third party) to operate their respective businesses. From time to time, an

Authorized Entity may need to process the personal data on other legal bases, including: with consent; to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest.

To the extent that an Authorized Entity processes sensitive personal data (such as where such personal data is required to comply with relevant legal or regulatory requirements including requirements related to anti-money laundering and combatting the financing of terrorism legislation), the Authorized Entity would do so where there is a lawful basis for doing so, such as when the processing is necessary for reasons of substantial public interest

A failure to provide the personal data requested to fulfil the purposes described in this EU-UK Privacy Notice may result in the applicable Authorized Entities being unable to provide the services in connection with the Partnership Agreement and/or Subscription Booklet.

Purpose of processing

The applicable Authorized Entities will process the personal data for the following purposes (and in respect of paragraphs (c), (d), (f), (h), (i) and (k) in the legitimate interests of the Authorized Entities (or those of a third party)):

- a) the performance of its contractual and legal obligations (including applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of investors in the Partnership;
- b) the administrative processes (and related communication) carried out between the Authorized Entities in preparing for the admission of investors to the Partnership;
- c) ongoing communication with investors, their representatives, advisers and agents, (including the negotiation, preparation and signature of documentation) during the process of admitting investors to the Partnership and execution of the Partnership Agreement, Subscription Agreement and any other related documentation;
- d) the ongoing administrative, accounting, reporting and other processes and communication required to operate the business (including any websites, data rooms and investor reporting portals) of the Authorized Entities in accordance with the relevant Partnership Agreement, Subscription Booklet and other applicable documentation between the parties;
- e) to administer, manage and set up investor account(s) to allow investors purchase a holding of shares or interests in the Partnership (and any other funds or partnership operated by the General Partner or its affiliates);
- f) to facilitate the execution, continuation or termination of the contractual relationship between an investor and the General Partner, Partnership and/or other Authorized Entities (as applicable);
- g) to facilitate the transfer of funds, and administering and facilitating any other transaction, between investors and the applicable Authorized Entities;

- h) to enable any actual or proposed assignee or transferee, participant, or sub-participant of the Partnership or the Partnership's rights or obligations to evaluate proposed transactions;
- i) to facilitate business asset transactions involving the Partnership and/or Partnership related vehicles;
- j) any legal or regulatory requirement;
- k) keeping investors informed about the business of the General Partner, the Partnership and their affiliates generally, including offering opportunities to make investments other than to the Partnership; and
- l) any other purposes notified to the data subject or agreed in writing with the data subject (as applicable) from time to time.

The Authorized Entities monitor communications where the law requires them to do so. The Authorized Entities also monitor communications, where required to do so, to comply with regulatory rules and practices and, where permitted to do so, to protect their respective businesses and the security of their respective systems.

Sharing and transfers of personal data

In addition to disclosing personal data amongst themselves, any Authorized Entity may disclose personal data where permitted by EU-UK Data Protection Legislation, to other service providers, investors, employees, agents, contractors, consultants, professional advisers, lenders, processors and persons employed and/or retained by them in order to fulfil the purposes described in this EU-UK Privacy Notice. In addition, any Authorized Entity may share personal data with regulatory bodies having competent jurisdiction over them, as well as with the tax authorities, auditors and tax advisers (where necessary or required by law).

Any Authorized Entity may transfer personal data to a Non-Equivalent Country (as defined below), in order to fulfil the purposes described in this EU-UK Privacy Notice and in accordance with applicable law, including where such transfer is a matter of contractual necessity to enter into, perform and administer the Subscription Booklet and the Partnership Agreement, and to implement requested pre-contractual measures. Where an Authorized Entity makes such transfer, it shall do so pursuant to a valid transfer mechanism such as, where relevant and applicable, data transfer terms approved by the European Commission and/or UK government. For information on the safeguards applied to such transfers, please contact the General Partner. For the purposes of this EU-UK Privacy Notice, "Non-Equivalent Country" shall mean a country or territory other than (i) a member state of the European Economic Area; (ii) the UK; or (iii) a country or territory which has at the relevant time been decided by the European Commission or the Government of the United Kingdom (as applicable) in accordance with EU-UK Data Protection Legislation to ensure an adequate level of protection for personal data.

Retention and security of personal data

The General Partner and the Authorized Entities consider the protection of personal data to be a sound business practice, and to that end, employ appropriate technical and organizational measures, including robust physical, electronic and procedural safeguards to protect personal data in their possession or under their control.

Personal data may be kept for as long as it is required for legitimate business purposes, to perform contractual obligations, or where longer, as such longer period as is required by applicable legal or regulatory obligations. Personal data will be retained throughout the life cycle of any investment in the Partnership. However, some personal data will be retained after a data subject ceases to be an investor in the Partnership.

Data subject rights

It is acknowledged that, subject to applicable EU-UK Data Protection Legislation, the data subjects to which personal data relates, have certain rights under EU-UK Data Protection Legislation: to obtain information about, or (where applicable) withdraw any consent given in relation to, the processing of their personal data; to access and receive a copy of their personal data to request rectification of their personal data; to request erasure of their personal data; to exercise their right to data portability; and the right not to be subject to automated decision making. Please note that the right to erasure is not absolute and it may not always be possible to erase personal data on request, including where the personal data must be retained to comply with a legal obligation. In addition, erasure of the personal data requested to fulfil the purposes described in this EU-UK Privacy Notice may result in the inability to provide the services required pursuant to the Partnership Agreement and/or Subscription Booklet.

In case the data subject to whom personal data relate disagrees with the way in which their personal data is being processed in relation to the Partnership Agreement and/or Subscription Booklet, the data subject has the right to object to this processing of personal data and request restriction of the processing. The data subject may also lodge a complaint with the competent data protection supervisory authority in the relevant jurisdiction.

The data subject may raise any request relating to the processing of their personal data with the General Partner.

Contact Us: If you have any questions or concerns about this EU-UK Privacy Notice or wish to exercise any rights, submit requests, or appeal any of our decisions in connection with this EU-UK Privacy Notice (each, a “Communication”) please contact us via email at: privacy@vistaequitypartners.com.