

# Data Protection Complaints Policy

## 1. Introduction

Ardian is committed to respecting your privacy and protecting your personal data in accordance with applicable data protection laws. This includes, but is not limited to, the EU General Data Protection Regulation (GDPR), the UK GDPR, and other relevant data protection legislation in jurisdictions where we operate. We also adhere to our Binding Corporate Rules (BCR), which reflect our global commitment to data protection. A summary of our BCR can be found [here](#).

This Data Protection Complaints Policy (hereinafter, the “**Policy**”) explains how you can raise concerns or complaints about how we process your personal data, and how we will respond.

Individuals may submit a complaint to Ardian if they believe that their personal data has been handled in breach of applicable data protection laws or our BCR. Ardian is committed to supporting this process by providing a clear complaints policy and offering multiple ways to submit a complaint, including through an electronic form.

## 2. Scope

Ardian processes the personal data of customers, employees, contractors, suppliers, and other relevant stakeholders. This Policy covers complaints related to any aspect of our processing activities under applicable data protection law.

It applies to all entities within the Ardian Group and its affiliates. Complaints concerning the processing of personal data by any group entity may be submitted to Ardian’s Data Privacy Team (as detailed in this Policy), coordinated by Ardian France as the lead entity.

The team is responsible for recording, assessing, and coordinating all complaints to ensure a consistent and effective response, collaborating with the relevant entity as needed to resolve each case.

## 3. Types of Complaints We Handle

Complaints may relate to, but are not limited to:

- Unlawful or unfair processing of your personal data;

- Unauthorized access or disclosure of your data;
- Inaccurate or incomplete data handling;
- Failure to respond properly to your data subject rights requests (e.g., access, correction, deletion);
- Inadequate data security measures;
- Processing beyond retention periods; and
- Failure to comply with data protection laws, our BCR, or our privacy notices.

If your complaint does not fall within the scope of this Policy, we will advise you of the appropriate process to follow.

## 4. Your Rights

Under certain circumstances and depending on the applicable jurisdiction, you benefit from the following rights regarding the processing of your personal data:

- to access and/or obtain a copy of, your personal data, as well as to receive information regarding the processing of your personal data;
- to require the update or rectification of any inaccurate personal data, or completion of any incomplete personal data;
- under certain conditions, to delete your personal data, restrict or object to the processing of your personal data (including for marketing purposes) and/or require certain of your personal data to be transferred to yourself or a third party;
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- if you were to provide your consent, (for example to receive newsletters from Ardian), to withdraw the consent you gave;
- in certain jurisdictions, such as France, to set guidelines regarding the retention, erasure, and communication of your personal data after your death; and
- to lodge a complaint with the relevant data protection authority in the place of your habitual residence, place of work or place of the alleged infringement (please see Section 8 of this Policy for more information). If you are unsure which data protection

authority applies to you, you may contact us and we will provide you with the name and address of the appropriate authority based on your location.

Under certain circumstances and if you are a California resident, you also have the following rights:

- Right to know about the processing of your information by Ardian in the preceding 12 months, including (i) the categories and specific pieces of personal information Ardian has collected about you; (ii) the categories of sources from which Ardian has collected your personal information, and the business or commercial purpose for the collection; (iii) the categories of third parties with whom Ardian has shared your personal information and the business or commercial purpose for said sharing. Please note that you may only make a 'right to know' request to Ardian up to two times in any twelve-month period.
- Right to deletion of your personal data (subject to Ardian's right to maintain your personal data for specific purposes permitted under the Californian law).
- Right to opt-out of the sale of your personal data to third parties.
- Right to non-discrimination when exercising any of the rights listed above (and any other rights under the California Consumer Privacy Act and all related amendments and regulations).

You can exercise the rights set out above by contacting Ardian using the contact details provided in Section 5.1 of this Policy.

## 5. How to Submit a Complaint

### 5.1 Contact Details

To raise a data protection complaint, please contact us:

- By email: [dataprivacyofficer@ardian.com](mailto:dataprivacyofficer@ardian.com);
- By letter: **Ardian, Data Protection, 20 Place Vendome, 75001 Paris**; or
- Via our online form accessible through this link: [Data Protection Complaint Form | Ardian](#)

### 5.2 Information to Provide

Please include the following information:

- Your full name and contact details
- A detailed description and reasons of your complaint, including dates, locations, and specifics of the data involved
- Any supporting documents or evidence
- Reference to any previous correspondence with us (if applicable)
- A copy of an identity document

## 6. How We Handle Your Complaint

### 6.1 Acknowledgement

We will acknowledge, by letter or e-mail, receipt of your complaint within 5 business days.

Our acknowledgment will confirm that we have begun investigating your complaint and will include: (i) information on the identity of the person handling it; and (ii) an estimated timeline for our response, or an immediate answer, or a request for additional documents or information.

### 6.2 Investigation and Response

Ardian's Data Privacy Team is responsible for managing your complaint and communicating with you as needed throughout the investigation and resolution process.

Ardian will, without undue delay, take appropriate steps to respond to the complaint, and inform you of the outcome.

We will inform you on actions taken in relation to the complaint without undue delay, and in any event within one (1) month. We will keep you regularly informed of the progress of the review of the complaint.

Taking into account the complexity and number of the requests, that one-month period may be extended at maximum by two (2) further months, in which case we will inform you accordingly.

As part of handling your complaint, we will:

- **Review the matter carefully** – including making enquiries or gathering any further information required.
- **Keep you informed** – we will update you on the progress of the complaint and let you know once a decision has been made.

### 6.3 Outcome

Our response will include:

- whether the complaint, after legal analysis, is found justified;
- any remedial actions we will take;
- whether the complaint, after legal analysis, is dismissed, in which case we will inform you of the reasons for dismissal; and
- available remedies available to you, including information on your right to appeal and details on how to escalate your complaint to the applicable data protection authority if unsatisfied

#### **6.4 Confidentiality**

Your complaint and personal data will be handled confidentially in line with applicable data protection law and our internal data protection policies. Only authorized personnel involved in the investigation will have access to your information.

## 7. Appeals Process

If you are not satisfied with our response, you may:

- Submit an appeal by emailing **dataprivacyofficer@ardian.com**, or by letter at **Ardian, Data Protection, 20 Place Vendome, 75001 Paris** with the subject line “Appeal – Data Protection Complaint”, within **30 calendar days** of receiving our response.
- The appeal will be reviewed by Ardian’s Data Protection Officer and the Compliance Team, who are responsible for managing the appeal process.
- We will respond to the appeal within **30 calendar days**.

## 8. Escalation to a Data Protection Authority

If you remain dissatisfied after our appeals process, or if you prefer, you can lodge a complaint directly with the relevant data protection authority in the place of your habitual residence, place of work or place of the alleged infringement. If you need assistance determining which authority applies in your case, please contact us and we will be happy to help. Below are the contact details for two relevant authorities:

#### **In France**

By letter: Commission Nationale de l'Informatique et des Libertés (CNIL), 3 place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France.

By phone: +33 (0)1 53 73 22 22.

### **In the United Kingdom**

By letter: Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By phone: 0303 123 1113

Alternatively, if you believe your rights have been infringed, you may have the right to seek compensation or initiate proceedings before the competent courts for breaches of data protection laws. In certain jurisdictions, authorized non-profit organizations may also act on your behalf or independently, where permitted by law.

Please note that you may in any case apply to a data protection authority or to a competent court, such right being independent on you having used the complaint handling process detailed in this Policy.

Ardian's Data Protection Officer is the main point of contact for data protection authorities in relation to complaints. They are responsible for liaising with the relevant authorities, where required, during the complaint process - particularly in cases involving regulatory oversight, data breaches, or other issues related to compliance with applicable data protection laws.

## **9. Record Keeping and Notification to Regulators**

Ardian maintains a register of all data protection complaints, which is maintained and overseen by the Data Privacy Team. Complaints are recorded and retained for a period of five years, unless a longer retention period is required under local laws or regulations. After this retention period, complaints are securely deleted or anonymized. The Data Privacy Team will report all complaints to Ardian's Privacy Committee on a quarterly basis.

Where required by applicable law or regulatory authorities, we may be obligated to report to relevant regulators the number of data protection complaints we receive within specified timeframes. Should such requirements be introduced in any jurisdiction where we operate, we will comply fully with all notification obligations.