



Data Protection Notice
December 2023



UNITING CAPITAL AND PURPOSE

www.colescocapital.com

1. Introduction

1.1. Scope of Notice

1.1.1. Colesco Private Debt Opportunities Fund I SCSp SICAV-RAIF (the "Fund") acting through and represented by its General Partner, and Colesco Capital Collective S.à r.l. (the "Vehicle") are committed to protecting the privacy of all data subjects whose personal data come into their possession.

1.1.2. Personal data provided to us will be processed in compliance with the requirements of the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data as may be amended from time to time ("GDPR") along with any implementing legislation, guidance from competent data protection authorities, and processing systems have been designed to ensure the highest level of protection for such personal data.

1.1.3. This data privacy notice ("Notice") sets out how we will use (such term including processing operations like recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing, aligning, combining, restricting, erasing and destroying) (to "process") the personal data.

1.1.4. Personal data processed and covered by this Notice will include the personal data of the following data subjects:

- Investor, or, if the investor is a legal entity, its directors, managers, beneficial owners, agents and other representatives or employees (the "Investors"),

- Individuals whose personal data are processed in the context of the management of the assets of the Vehicle (the "Underlying Assets"), (together the "Data Subjects").

1.1.5. If you are one of the above Data Subjects, please read the information below carefully - it explains how and why personal data is processed by us, with whom it will be shared, and contains information about your rights which can be exercised (under certain conditions) in relation to such personal data.

1.2. Definitions and Interpretation

1.2.1 Unless otherwise stated in this Notice or if the context requires otherwise, capitalised terms

used in this Notice shall have the meaning given to these terms in the Fund's constitutive documents, and/or agreements with the relevant Investors, Underlying Assets or their relevant representatives (as the case may be) the ("Fund Documents").

1.2.2 For the purpose of this Notice:

- The terms "controller", "personal data", and any other term expressly defined in article 4 of the GDPR shall have the meaning given to these terms in article 4 of the GDPR;

- Any reference to "you" and "your" shall be construed to include, as appropriate, any and all data subjects listed in Section 1.1.4 above;

- Any reference to "we" and "us" shall refer to the Fund and/or the Vehicle as the context requires.

2. Identity of the controller of your personal data

2.1 The Fund is controller for the personal data collected and processed on the Investors.

2.2 The Fund and the Vehicle are the joint controllers for the personal data collected and processed on the Underlying Assets. The Fund and the Vehicle have concluded an arrangement whereby the Fund will serve as the contact point to data subjects for this processing and whereby the Vehicle assumes the responsibility to inform the Underlying Assets, and the Fund the responsibility of i.a. managing the rights of data subjects, personal data breaches, international data transfers, and observing the retention period of the personal data.

2.3 You may use our contact details which can be found in Section 13 below "How to contact us" for all queries you have in relation to this Notice.

2.4 In certain circumstances, third party service providers to the Fund and/or the Vehicle (such as the Administrator and Depositary) may also act in a capacity as data controller if and when processing personal data of the Investors and the Underlying Assets for the purposes of complying with their own legal and regulatory obligations or for their own legitimate interests (in particular in the context of AML and KYC related processes). Information about the processing activities of these third-party service providers is available in principle on their respective websites.

3. What categories of personal data do we collect

The categories of personal data, which we collect and process are listed in Appendix 1 of this Notice, and vary depending on the category of Data Subjects concerned.

4. Where we obtain personal data from

We will collect information about you from a number of sources, including from you directly, as further detailed in Appendix 2 of this Notice. The categories of personal data collected and processed by us depends on the category of data subjects concerned.

5. Do you have to provide us with personal data?

5.1 Where we collect personal data directly from you, we will indicate:

- if the provision of your personal data is necessary for our compliance with a legal, regulatory or contractual obligation, or

- if the provision of your personal data is purely voluntary, in which case there will be no negative consequences for you if you do not wish to provide us with it.

5.2 Unless otherwise indicated, you should assume that we require the personal data for legal, regulatory or contractual purposes. If you do not wish to provide us with this personal data, it will affect our ability to provide our services to you.

6. Do you have to inform your representative(s) and/or beneficial owner(s)?

6.1 If you act for an undertaking, you shall indeed inform all data subjects concerned (i.e., the representative(s), beneficial owner(s), and all individuals whose information you provide to us in connection with our relationship with the undertaking) about the processing of their personal data for the purposes listed in Appendix 3 of this Notice (as well as on their related rights, see Section 11 below “Your rights in respect of your personal data”) and, where necessary and appropriate, consent for the processing of the personal data must be obtained in advance. The data subjects referred to in this section shall be provided with a copy of this Notice.

6.2 We assume that the undertakings contained herein have been complied with and that your representatives, your ultimate beneficial owner(s) and all individuals whose information you provide to us in connection with our relationship with you, have, where necessary given such consent and have been informed of the processing of their personal data for the purposes described in this Notice.

7. Why we process personal data

We process your personal data for the purposes listed in Appendix 3 of this Notice and according to the legal basis indicated herein.

Where we rely on our legitimate interests to process your personal data, you may request that we provide you with our legitimate interest assessment where we have balanced our legitimate interests against your rights and freedoms and established that our legitimate interests prevail.

8. Who we share personal data with and why

8.1 Your personal data may be shared by us with the following entities for the purposes of providing (as appropriate and depending on) the services required by you and/or for complying with these entities' legal and regulatory obligations (including under company law and anti-money laundering legislation or foreign regulatory requirements):

- the service providers to the Fund and/or the Vehicle, such as those referred to in the Fund Documentation (such as the Depositary, the Administrator, the Investment Advisors such as Colesco Capital Ltd and Colesco BV);

- the professional advisers of the Fund and/or the Vehicle (such as legal and tax counsels, etc.);

- other service providers of the Fund and/or the Vehicle (such as accountants, internal and external auditors, independent appraiser, notaries, banks, other financial institutions and payment services providers, technology service providers, etc.);

- the operator of the Fund's website, as well as any other IT service provider for the purpose of managing the access to the website, as well as when maintenance of/

technical intervention on the website is performed;

- parties involved in connection with any business reorganization, transfer, disposal, merger or acquisition on the level of the Fund and/or the Vehicle;

- the Luxembourg Register of Beneficial Owners;

- other investors;

- potential lenders.

8.2 The Fund and/or the Vehicle as well as the above recipients may further disclose your personal data to their affiliates and other third-party service providers (for instance, the Investment Advisors may disclose to the Sub-Advisor, i.e., Colesco Capital BV) on a need-to-know basis in order to process these data for the purposes listed in Appendix 3 of this Notice and for conducting internal investigations and reporting.

8.3 In addition, your personal data may be shared, in exceptional circumstances, with the courts and/or legal, regulatory, tax and government authorities in various jurisdictions as required by applicable law or regulation (e.g. for the purposes of anti-money laundering, sanctions, terrorism financing, the prevention and detection of crime as amended and applicable tax legislations (including FATCA/CRS laws)).

8.4 We will take all reasonable steps, as required by the GDPR, to ensure the safety, privacy and integrity of your personal data and will, as required by the GDPR enter into contracts with such recipients to protect the privacy and integrity of your personal data supplied.

9. Transfers of personal data outside the european economic area (“eea”)

9.1 In principle, the Fund, the Vehicle and the third-party providers listed in Section 8 above “Who we share personal data with and why” might share and transfer your personal data to other entities of their group and to third party service providers, which may be located outside of the EEA in countries which may not have the same level of data protection as the one afforded in the EEA.

9.2 In case personal data is transferred to third parties located outside the EEA, the Fund and the Vehicle will ensure that your personal data is protected by either:

- an adequacy decision of the European Commission; or

- appropriate safeguards such as EU model contracts, binding corporate rules, approved code of conduct, approved certification mechanisms.

In case personal data is transferred to foreign law enforcement authorities, by request formulated using appropriate procedures, the Fund and the Vehicle will ensure that your personal data is protected additionally by a mutual legal assistance treaty, or equivalent mechanism.

You may contact us using our contact details which can be found in Section 13 below “How to contact us” if you would like to know more about this topic or to obtain a copy of the related safeguards.

10. How long we keep personal data

10.1 In accordance with the GDPR principles and in particular article 5 of the GDPR (which lists the core principles relating to the processing of personal data), we do not keep your personal data for longer than is necessary for the purposes for which they are processed by us.

10.2 When we no longer require your personal data for our business use, we consider whether it is appropriate to delete it, for example where the relevant contract has been performed and our business relationship has ceased, or you have withdrawn your consent to the processing of your personal data (only when consent is relied upon as the legal basis for the processing).

10.3 Frequently, however, there are legal and/or regulatory obligations, which require us to retain our business information and records (including personal data comprised within those) for a specified period. These could include tax laws, audit obligations, anti-financial crime law (money laundering, bribery and corruption, the facilitation of tax evasion), other regulatory requirements relating to our investment business.

10.4 The following retention periods apply:

- Personal Data contained in the documents listed by article 16 of the Luxembourg Commercial Code (namely accounting documents) will be kept for ten (10) years after the closing of the end of the financial year to which they relate.

- Personal Data processed for AML and KYC purposes will in principle be retained for five (5) years after the end of the business relationship with you.

10.5 In general terms, we will retain your personal data according to the limitation period of article 189 of the Luxembourg Commercial Code, which provides for a general retention period of 10 years. In most cases, your personal data will be kept for 10 years following the termination of your relationship with the Fund or the Vehicle. Also, we may need to retain information and records for a certain period of time to protect our business, and defend ourselves against potential legal claims, or allegations of wrongdoing.

10.6 For each processing activity (including personal data processed as a result of that activity) we have considered carefully how long we will need to process the relevant personal data for the intended processing activity, and whether any legal and/or regulatory requirements stipulate a mandatory minimum retention period for the relevant information, documentation and records (including personal data) to be retained.

11. Your rights in respect of your personal data

11.1 You have certain rights under the GDPR, including:

- The right to access your personal data, free of charge, including the right to ask for a copy of your personal data where it does not adversely affect the rights and freedoms of others (please note that if you request any further hard copies later on, we may charge you a reasonable fee based on administrative costs).

- The right to have incomplete or inaccurate personal data corrected (including by means of providing a supplementary statement).

11.2 In some limited circumstances:

- the right to object to the use of your personal data (where processing is based on the Fund's or the Vehicle's legitimate interest);
- the right to restrict the use of your personal data;

- the right to require us to erase/delete your personal data; however, please note that if we process your personal data in particular to comply with a legal obligation (see Appendix 3), we will not be able to respond positively to your request to erase/delete your personal data.

- the right to receive personal data which you have provided to us in a structured, commonly used and machine-readable format and the right to transmit those data to another data controller; however, please note that this right to data portability only arises where: (a) the processing is based on consent or on a contract; and (b) the processing is carried out by automated means, and (c) it does not adversely affect the rights and freedoms of others. This data portability right also only applies to the data that you have provided to us.

11.3 You are hereby informed that no automated decision-making or profiling is conducted.

11.4 You may contact us using our contact details which can be found in Section 13 below "How to contact us" if you would like to exercise such rights. We will respond to you as swiftly as possible.

11.5 In addition, you also have the right to ask questions or lodge a complaint about our processing of your personal data with the relevant data protection authority. You can complain in the EEA Member State where you live or work, or that of the place where the alleged breach of the GDPR has taken place. In Luxembourg, the relevant data protection authority is the Commission Nationale pour la Protection des Données (CNPD).

12. Your marketing preferences

You have the right to object to our use of your personal data for direct marketing purposes at

any time. You may contact us using our contact details which can be found in Section 13 below “How to contact us”.

13. How to contact us

If you want more details on the processing of your personal data, if you have any specific queries or concerns regarding the processing of your personal data, if you want to exercise your rights towards us or if you would like to make a complaint, do not hesitate to contact us at: **info@colescocapital.com**.

14. Amendments to this notice

14.1 This Notice is kept under regular review and may be updated from time to time and you will be notified in writing in case of any changes.

14.2 This Notice was last updated in December 2023.

APPENDIX 1: CATEGORIES OF PERSONAL DATA PROCESSED

Type of personal data	Investors	Underlying Assets
first name, last name, residential address, e-mail address, telephone number and other contact details including that of representatives and contact persons	X	X
date and place of birth, your citizenship and profession	X	X
copies of your identity card/passport number or other national identifier	X	X
tax details (i.e. tax identifier, tax residence, status under dividends and interests withholding tax rules, FATCA rules, CRS rules and any other tax rules)	X	
financial details and situation (i.e. bank account number, data on transactions, financial information including origin of wealth, etc.)	X	
knowledge, investment experience and investment objectives	X	
publicly available information	X	X
functions and powers	X	X
KYC / AML related data (as the case may be)	X	X
pictures of yourself as provided on an ID or passport	X	X
Personal data contained in the copy of your declaration of honour, of beneficial owner declarations and similar documents	X	X
authentication information (e.g. passwords, user ID)	X	X
other personal data generated while you visit the Fund's website (incl. IP addresses, country, region, city, approximate latitude and longitude, screen resolution of your device, files that were accessed and downloaded, ...)	X	X

APPENDIX 2: WHERE WE OBTAIN YOUR PERSONAL DATA

	Investors	Underlying Assets
Information that you provide us with		
in the Subscription Agreement, and any other forms and any associated documentation that you complete when opening an Investor account with the Fund and subscribing for an investment in Interests of the Fund	X	
in correspondence and conversations	X	X
when you make transactions with respect to the Fund, including in particular - but not limited to - the cases where you subscribe, redeem and convert Interests in the Fund and/or tell us where to transfer money to, among others, payments of dividends and redemption proceeds	X	
when you submit or we otherwise receive information in view of the negotiation and/or execution of the Fund transactions or any event potentially leading thereto		X
when you submit information to us in view of establishing a business relationship with us	X	X
when you visit or access the Fund's website	X	X
publicly available and accessible registries and third-party sources	X	X
Information that we obtain from others		
Bankruptcy or other public registers	X	X
tax authorities, including those that are based in and outside the EEA	X	X
governmental and competent regulatory authorities to which we have regulatory reporting obligations	X	X
fraud prevention and detection agencies and organisations	X	X
cookies from our website provider and generated by your visit of the Fund's website	X	X

APPENDIX 3:

PURPOSES AND LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

Important note: Given the specific purposes for which the Fund envisages processing your personal data, the Fund does not anticipate obtaining your consent to do so. If we were to rely on consent to process your personal data, we will contact you to obtain this consent. In case consent is relied upon to legitimate a data processing, you will have the right to withdraw this consent at any time.

Purposes of processing	Legal Basis (under the GDPR)	Data Subjects	Controller
1. Own functions of the Fund			
Carry out the Fund's activity, i.e. collecting monies from investors for investment purposes, in accordance with the Luxembourg laws and regulations and the terms of the Fund documentation (e.g. prospectus, instrument of incorporation, subscription documents, KIID/PRIIP KID (if any), relevant agreements with service providers and other relevant documents of the Fund such as internal procedures/policies, factsheet, etc.) (the "Fund Documentation")	Necessary for the performance of a contract (article 6(1)(b))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Place the shares and accept subscription, redemption, conversion and/or transfer orders placed by investors in the Fund, issue, redeem convert and/or accept transfer of shares accordingly	Necessary for the performance of a contract (article 6(1)(b))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Market the Fund and ensure that facilities are available in the country of registration for making payments to shareholders, placing, repurchasing or redeeming shares and making available the information which Fund is required to provide	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Persons related to the underlying assets of the Fund	Fund and Vehicle
Convene and hold general meeting (including also drafting and holding of proxies and attendance lists), arranging for publication of the convening notices and the minutes of the meeting	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors any other as the case may be	Fund
Ensure corporate actions are validly taken, communicated and implemented (e.g. mergers, liquidations, launch/creation of new share class, sub-fund, suspension of voting rights if applicable, modification of Fund Documentation as applicable, etc.)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Representatives of the AIFM Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Ensure the appointment, initial due diligence and ongoing supervision by the Fund over the Management Company and, in particular, ensure that the Fund is being managed in the best interests of the investors (monitoring of the portfolio management, risk management, administrative and marketing services provided by the management company as well as other day-to-day management services provided by the Management Company (if any), spot checks, review the Management Company's reports, etc.)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Ensure the appointment, and to the extent as applicable the initial due diligence and ongoing supervision of, any parties contracting directly with the Fund (e.g., depository, auditor, lending agents, derivatives counterparties, etc.)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors	Fund

APPENDIX 3:

PURPOSES AND LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

Purposes of processing	Legal Basis (under the GDPR)	Data Subjects	Controller
Processing of data for the sake of the drafting and approval of the Fund's documentation (e.g. prospectus, instrument of incorporation, subscription documents, KIID/PRIIP KID (if any), relevant agreements with service providers and other relevant documents of the Fund such as internal procedures/policies, factsheet, etc.)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Release, publish and disseminate the Fund Documentation and any other relevant information to be published/made available in accordance with applicable laws and regulations	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Issue the annual, semi-annual reports, the report of the approved statutory auditor ("réviseur d'entreprises agréé"), the management report and any other reports of the Fund	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Release the annual, semi-annual reports, the report of the approved statutory auditor, the management report and any other reports of the Fund	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Processing of data in accordance with FATCA/ CRS legislation applicable to the Fund	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
2. Delegated functions of the Fund			
Portfolio management function			
Review, negotiate and execute agreements relating to transactions in underlying assets (e.g. for portfolio and risk management purposes in relation to real estate and infrastructure funds)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Persons related to the underlying assets of the Fund	Fund and Vehicle
Appoint local facility and paying agency agents in the country of registration for making payments to shareholders, repurchasing or redeeming shares and making available the information which data subjects shall receive	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Representatives of paying agents	Fund

APPENDIX 3:

PURPOSES AND LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

Purposes of processing	Legal Basis (under the GDPR)	Data Subjects	Controller
Marketing function			
Distribute the Fund (respectively, ensure distribution of the Fund) to investors	Necessary for the performance of a contract (article 6(1)(b))	Investors	Fund
Sale support (communication with potential and existing clients)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors	Fund
Communicate marketing material with existing and potential investors	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors	Fund
Appoint distributors and sub-distributors to facilitate the distribution and marketing strategy of the Fund including performing initial due diligence on distributors and sub-distributors to perform delegated tasks (completion of due diligence questionnaire, conflict of interest assessment form, gathering of the relevant legal documentation, e.g. organizational chart of the delegate, negotiation and execution of the relevant service agreement, SLA, operating memorandum with delegates for terms of service and monitoring purposes)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Representatives of distributors or sub-distributors	Fund
Ensure supervision, oversight and effective monitoring over the marketing agents (spot checks, reporting, regulatory notification, inquiries and instructions to the delegates)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Representatives of marketing agents	Fund
Administration Services			
Ensure maintenance of the unlimited and limited partners register (registre des associés)	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors	Fund
Identification of beneficial owners in compliance with the AML/CTF legislation (spot check, reporting)	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Ensure that subscriptions/redemptions/conversion and transfer are handled according to the Fund's documentation (e.g. prospectus, instrument of incorporation, subscription documents, KIID/PRIIP KID (if any), relevant agreements with service providers and other relevant documents of the Fund such as internal procedures/policies, factsheet, etc.) (spot check, reporting)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle

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PURPOSES AND LEGAL BASIS TO PROCESS YOUR PERSONAL DATA

Purposes of processing	Legal Basis (under the GDPR)	Data Subjects	Controller
Ensure valuation of the Fund's assets, ensure calculation of the NAV and bookkeeping services (external valuer, spot check, reporting)	Necessary for compliance with a legal obligation (article 6(1)(c))	Persons related to the underlying assets of the Fund	Fund and Vehicle
Appoint the central administration and perform initial and on-going due diligence on the administration to perform delegated tasks (completion of due diligence questionnaire, conflict of interest assessment form, gathering of the relevant legal documentation, e.g. organizational chart of the delegate, negotiation and execution of the relevant service agreement, SLA, operating memorandum with delegates for terms of service and monitoring purposes)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Representatives of central administrators	Fund
Complaint handling			
Handle investors complaints and inform the regulator and the Fund	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors	Fund
Defense of legal claims	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Day-to-day management services			
Communicate with investors for general and specific requests resulting from regulatory obligations (e.g. regulatory reporting)	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors	Fund
Communicate with investors for general and specific requests (e.g. request to obtain specific portfolio holdings)	Necessary for the performance of a contract (article 6(1)(b))	Investors	Fund
Data protection and cybersecurity obligations			
Processing of Personal Data in accordance with GDPR and other legislation requiring notification and recording of personal data breaches and similar IT incidents.	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Processing of Personal Data in compliance with obligations under the GDPR along with any implementing legislation (including responding to data subject access requests along with the exercise of other data subjects rights).	Necessary for compliance with a legal obligation (article 6(1)(c))	Investors Persons related to the underlying assets of the Fund	Fund Fund and Vehicle
Performing transactions for the portfolio management of underlying assets			
Review, negotiate and execute agreements relating to transactions in underlying assets (e.g. for portfolio and risk management purposes in relation to real estate and infrastructure funds)	Necessary for the performance of a contract (article 6(1)(b))	Persons related to the underlying assets of the Fund	Fund and Vehicle
Other services performed under the delegated functions			
Perform initial due diligence on any counterparties to investment transactions for non-traditional assets (e.g. real estate, private equity, infrastructure assets) (completion of Due Diligence Questionnaire, know-your-counterparty process)	Necessary for the purposes of the legitimate interests (article 6(1)(f))	Persons related to the underlying assets of the Fund	Fund and Vehicle



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