

## **Data Protection & Cookie Notice**

*Last updated: 10 December 2025*

This website is operated by Rubicon Partners LLP which is a limited liability partnership registered in England and Wales under Company No. OC423907 and with a registered address at 8-12, York Gate, London, United Kingdom, NW1 4QG.

Rubicon Partners LLP and Rubicon Partners Advisory Ltd are appointed representatives of Langham Hall Fund Management LLP, an entity which is authorised and regulated by the Financial Conduct Authority under register number 452198. Rubicon Partners LLP is the adviser to Rubicon Partners GP V Sarl (Luxembourg), the sole General Partner to Rubicon Partners V SCSp (Luxembourg) ("**Related Companies**").

This data protection and cookie notice ("**Notice**") describes how Rubicon Partners LLP and its Related Companies ("**Rubicon**" or "**we**" or "**us**" or "**our**") collect, use and share personal data of users ("**you**") of this website, <https://www.rubiconpartners.com/en/> (the "**Site**"). We are the controller of personal data obtained via our website, meaning we are the organization legally responsible for deciding how and for what purposes it is used. This Notice also applies to any of our other websites that post this Notice. This Notice does not apply to websites that post different statements.

This Notice aims to give you information on how we collect and process your personal data through your use of our Site and through other interactions with us.

It is important that you read this Notice together with any other fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Notice supplements other notices and is not intended to override them.

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### **1. THE DATA WE COLLECT ABOUT YOU**

We may collect and otherwise process different types of personal data from multiple sources, including: (i) collecting personal data directly from you; (ii) personal data that is automatically generated about you; and (iii) personal data that we receive about you from others.

The personal data that we collect includes:

**Contact Information:** such as name, email, phone number, company name, company website. We collect this information directly from you.

**Cookie Information:** as you interact with our website we will automatically collect certain information via cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following types of cookies:

- (a) **Essential cookies.** These are cookies that are strictly necessary for the operation of our website..
- (b) **Analytical cookies.** These allow us to recognise and count the number of visitors and to distinguish users.
- (c) **Functionality cookies.** These are used to record your cookie preference.

For further information on cookies generally, including how to control and manage them, visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) or <https://ico.org.uk/your-data-matters/online/cookies/>.

## 2. USE & LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Under certain data protection laws, we can only use your personal data if we have a valid reason. With respect to the processing of your personal data in the context of the Site and through other interactions covered by this Notice, this is generally because:

- 1. you have given consent ("**Consent**"); or
- 2. it is in our legitimate interests or those of a third party ("**Legitimate Interests**").

We do not conduct any processing activities relating to your personal data that involves any automated decision-making (including profiling).

The nature of your interaction with us will determine how we will process your personal data. The relevant specific purposes and lawful bases for which we will process your personal data are set out below in the relevant tables:

- **For Users of the Contact Feature**
- **For Visitors to our Offices**
- **For Investors, Representatives, or other Third Parties or Counterparties**
- **For Visitors and Users of our Site**
- **Cookies**

### For Users of the Contact Feature

| Purpose of Processing                                                                             | Category of Personal Data | Lawful Basis                                                                                                                        |
|---------------------------------------------------------------------------------------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| To respond to you when you contact us via our website, send us an email or otherwise get in touch | Contact Information       | It is in our <b>legitimate interests</b> to process such data in order to respond to you and provide you with the expected service. |

#### For Visitors to our Offices

| Purpose of Processing                      | Category of Personal Data | Lawful Basis                                                                               |
|--------------------------------------------|---------------------------|--------------------------------------------------------------------------------------------|
| To register your attendance at our offices | Contact Information       | It is in our <b>legitimate interests</b> to ensure the safety and security in our offices. |

#### For Investors, Representatives, or other Third Parties or Counterparties

| Purpose of Processing                                   | Category of personal data | Lawful Basis                                                                                        |
|---------------------------------------------------------|---------------------------|-----------------------------------------------------------------------------------------------------|
| To conduct business with you/the business you represent | Contact Information       | Where it is in our <b>legitimate interests</b> (i) to contact you; (ii) to manage our relationship. |

#### For Visitors and Users of our Site

| Purpose of Processing                                  | Category of Personal Data | Lawful Basis                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To operate our Site and improve our sites and services | Cookie Information        | <p>Where your <b>consent</b> is required in connection with the use of analytical or functionality cookies.</p> <p>In all other cases, where it is in our <b>legitimate interests</b> to process such data in order to operate its website and business, to place cookies or similar technologies on our webpages for the purposes as set out in more detail below.</p> |

#### Cookies

The table below provides more detailed information about the cookies we use and why:

| Cookie Owner | Cookie Name       | Type                   | Purpose                                                                                                                                                                                                                     | Duration |
|--------------|-------------------|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| CookieYes    | Cookieyes-consent | Functional (essential) | CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about the site visitors. | 1 year   |

|                  |        |            |                                                                                                                                                                                                                                                       |                       |
|------------------|--------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Google Analytics | __utma | Analytical | Google Analytics sets this cookie to distinguish users and sessions. The cookie is created when the JavaScript library executes and there are no existing __utma cookies. The cookie is updated every time data is sent to Google Analytics.          | 1 year 1 month 4 days |
| Google Analytics | __utmc | Analytical | Google Analytics sets this cookie to enable interoperability with urchin.js, an older version of Google Analytics and is used in conjunction with the __utmb cookie to determine new sessions/visits. It is deleted when the user closes the browser. | session               |
| Google Analytics | __utmb | Analytical | Google Analytics sets this cookie to determine new sessions/visits. __utmb cookie is created when the JavaScript library executes and there are no existing __utma cookies.                                                                           | 30 minutes            |
| Google Analytics | __utmz | Analytical | Google Analytics sets this cookie to store the traffic source or campaign by which the visitor reached the site.                                                                                                                                      | 6 months              |
| Google Analytics | __utmt | Analytical | Google Analytics sets this cookie to inhibit the request rate.                                                                                                                                                                                        | 10 minutes            |

### 3. DISCLOSURES OF YOUR PERSONAL DATA

We do not disclose any personal data about you to any third parties, except:

- as reasonably necessary or appropriate in connection with the promotion or management of our portfolio;
- as required by law or any applicable regulatory authority;
- to protect the rights, property, or safety of our business, its clients, investors or others; and
- as otherwise set out in this Notice, together with any other fair processing notice.

We may share your personal data with our Related Companies who may also act as data controllers

with respect to the personal data we collect about you (and in those cases, this Notice is also provided on their behalf.

When we transfer personal data outside of the UK for the purposes set out in this Notice, we ensure a similar degree of protection is afforded to it by ensuring that there are appropriate safeguards that comply with applicable data protection laws are in place. This might be ensuring personal data is transferred to a country that has been deemed to provide an adequate level of protection for personal data by the UK's Information Commissioner's Office, or having specific contracts in place that have been approved by the UK's Information Commissioner's Office, we may transfer the personal data we collect about you to other jurisdictions.

#### **4. DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. Information as to retention periods for cookies is set out above.

#### **5. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may have the right to request us to:

- (a) **provide access** to personal data we hold about you;
- (b) **rectify** any inaccuracies in your personal data that we hold;
- (c) **delete** any of your personal data that we no longer have a legitimate interest to process;
- (d) where we process your personal data based on your consent, **withdraw your consent** so that we stop that particular processing;
- (e) **port** your personal data and to request the transmission of such data to another organization;
- (f) **object** to any processing of your personal data based on our "legitimate interests" unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- (g) **object** to any processing of your personal data for direct marketing purposes (including any profiling activities in connection with direct marketing); or
- (h) **restrict** how we process your personal data whilst a data protection complaint is being investigated.

If you wish to exercise any of the rights set out above, please contact us using the details below.

## **Turning Off Cookies**

In addition to using the options in the cookie banner, if you do not want to accept any cookies, you may be able to change your browser settings so that cookies (including those which are essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our Site.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>

## **Complaints**

You also may have the right to make a complaint to applicable data supervisory authorities for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach such authorities so please contact us in the first instance using the contact details at the end of this Notice.

## **6. HOW TO CONTACT US**

You can contact us about any query or concern or complaint in relation to this Notice by emailing [info@rubiconpartners.com](mailto:info@rubiconpartners.com)

## **7. CHANGES TO THIS NOTICE**

We may update this Notice to reflect changes to our information practices. We encourage you to periodically review this page for the latest information on our Notice. When we make changes to this Notice we will revise the revision date at the top of the Notice. The date this Notice was last updated is set out at the top of this Notice.