



Prosus Privacy Statement

This Privacy Statements applies to the processing of personal data by Prosus Services B.V. and its group companies, hereafter Prosus, we or us.

1. When does this privacy statement apply?

This Privacy Statement is applicable to the processing of personal data in the context of:

- Your visit to our websites, in particular through www.prosus.com (the Websites);
- Your interactions with Prosus in your capacity as a potential, present or past shareholder, investor or other party involved in our investment activities;
- Your interactions with Prosus as an auditor, journalist, participant to events organised by Prosus or other Party interested in Prosus activities as an investor;
- Your engagements with Prosus as an individual representing a business partner and/or vendor providing products and/or services to us;

If you are a candidate participating in our recruitment activities, please refer to our [Talent Acquisition Privacy Statement](#).

2. Who is responsible for your personal data?

Prosus Services BV is the controller responsible for processing of personal data collected as a part of our engagements described in Section 1 above. This Privacy Statement provides you with the information on what personal data we may collect, for which purposes and under which legal grounds, as well as whom may have access to your personal data. Please read the sections below.

We collect your personal data:

- directly from you, when you have provided us with your (business) contact details, attended our events or requested to be contacted by us; and/or
- through your visits to our Websites; and/or
- from third parties, including trade registers, tax offices, financial institutions or public sources related to your business activities, but only if the nature of our relationship with you requires the collection of such information.

3. For which purposes do we process your personal data?

3.1 For the technical and functional management of the Websites.

I. What does this purpose entail?

When you visit our Websites, our website administrators process technical data linked to the use of the Websites to enable us to deliver the functionalities of the Websites. This technical data enables our Websites' administrators to manage the Websites; for instance by resolving technical difficulties or improving the accessibility of certain parts of the Websites. This way, we ensure that you can (continue to) find the information on the Websites in a quick and simple manner. We also use cookies to support these technical aspects of our Websites (for more information please consult our [Cookie Notice](#)).

Please note that we do not sell or otherwise monetise your personal data collected as part of your visit to our Websites.

You have the option to reject all cookies except for those which are necessary to run our Websites.

II. [On what legal ground do we process this personal data?](#)

We process your personal data based on our [legitimate interest](#) to provide you information on us through our Websites in the most efficient and seamless manner.

III. [Which personal data do we process for this purpose?](#)

We process technical data like the IP-address of the device you use to access this website, the webpages you visit, the internet browser you use, previous/next visited Websites, the duration of a session and your country when landing on our Websites.

IV. [For what period do we retain your personal data for this purpose?](#)

We retain technical data for different periods of time depending on which cookie is used.

Please refer to our [Cookie Notice](#) for the different cookies and corresponding retention periods.

3.2 To answer questions and to communicate with you

I. [What does this purpose entail?](#)

If you communicated with Prosus via email, similar contact channel and/or a part of a videoconference/videorecording, we will process your personal data in order to communicate with you, provide you with appropriate materials regarding our investment activities and/or respond to any questions you may have.

II. [On what legal ground do we process personal data for this purpose?](#)

Depending on the nature of your communication, we may process your personal data as necessary for such communication either (i) based on our [legitimate interest](#) to communicate with our prospective or present investors, business partners or other interested parties; (ii) [or in order to comply](#) with the legal obligations applicable to the companies of our Group that are listed entities.

III. [Which personal data do we process for this purpose?](#)

We process your name, email address, phone number (if provided) and any other information you provide to us in your communication and any other personal data that is necessary to answer your question. If your communication has taken place through videoconference and you have consented to the recording, we may process your personal data as part of the recording.

IV. [For what period do we retain your personal data for this purpose?](#)

Depending on the nature of the communication we may retain the data for up to a period of six years, if required by applicable statutory records retention requirements. You have the right to request us to remove your data and depending on the nature of the communication, we will remove your personal data partially or completely.

3.3 To protect our website from fraud and to enforce our Terms of Use

I. [What does this purpose entail?](#)

We process your personal data to monitor whether you comply with our Terms of Use.

II. [On what legal ground do we process this personal data?](#)

We process your personal data based on our [legitimate interest](#) to protect our Websites.

III. Which personal data do we process for this purpose?

We process technical data like the IP-address of the device you use to access the websites, the webpages you visit, the internet browser you use, previous/next visited Websites, the duration of a session and the country when landing on our Websites.

IV. For what period do we retain your personal data for this purpose?

We retain technical data for different time periods depending on which cookie is used. Please see our [Cookie Notice](#) for the different cookies and corresponding retention periods.

3.4 To comply with the law

I. What does this purpose entail?

We process your personal data to comply with legal obligations, such as financial supervision laws, corporate governance requirements and/or requirements to determine ultimate beneficiary owners (UBO) – to the extent these apply to the nature of your interaction with us.

II. On what legal ground do we process this personal data?

We process your personal data to comply with legal obligations to which we are subject as a group.

III. Which personal data do we process for this purpose?

We may process information about your shareholders and financial interests, your address and identification and business registration details for completion of Know-Your-Customer (KYC) checks, your position and affiliation.

IV. For what period do we retain your personal data for this purpose?

For Personal Data that we collect and process for these purposes, we will typically retain such Personal Data for as long as it is necessary to fulfil the purposes outlined in this Privacy Statement and as otherwise specified in applicable retention policies.

3.5 To manage our relationship with our suppliers and business partners (including a due diligence procedure)

I. What does this purpose entail?

We process your personal data to manage our relationships with our suppliers and business partners and to complete due diligence processes when required. We share Personal Data with suppliers and service providers to enable such parties to perform functions on our behalf and under our instructions to carry out the purposes identified above.

II. On what legal ground do we process this personal data?

We process your personal data based on our legitimate interests to manage our procurement activities and to comply with applicable legal obligations with regard to the due diligence process. If you are a party to a contract with us, your personal data is required for the performance of a contract with us.

III. Which personal data do we process for this purpose?

We may process your contact details, such as your (business) e-mail address, department, company/home address and your (business) phone number. We may also process Information from trade registers and other public/private sources regarding your business activity. We will process your payment details, tax identification or VAT number, only if it is necessary for invoicing or payment purposes.

IV. For what period do we retain your personal data for this purpose?

For Personal Data that we collect and process for these purposes, we will typically retain such Personal Data for as long as it is necessary to fulfil the purposes outlined in this Privacy Statement and as otherwise specified in applicable retention policies.

3.6 To organise and co-organise events and other engagements with you

I. What does this purpose entail?

We process your personal data to enable your attendance in events that we organise or co-organise.

II. On what legal ground do we process this personal data?

We process your personal data based on our legitimate interest to organise or co-organise events related to our activities, in particular our investments, in a safe and efficient manner. For events that may involve the collection of special categories of data (for instance regarding your dietary restrictions), we shall collect such information only with your consent.

III. Which personal data do we process for this purpose?

Depending on the nature of the event we may collect your name, gender, (business) e-mail, business contact details, affiliation and position. If the organisation of the event requires such data, we may collect information about your dietary preferences and/or restrictions as well as information regarding your disability only if this required to enable your attendance in the event.

For what period do we retain your personal data for this purpose?

If your participation in the event is part of your continuous engagement with us, we shall retain your contact information and the details of your participation in the event. Otherwise, we will remove the information upon completion of the event.

4. Who has access to your personal data?

4.1 Access to your personal data within Prosus

As a global company, data we collect may be transferred internationally (also outside the European Economic Area) across our organisation. Your personal data may be exchanged within the group of companies to which Prosus belongs, including its affiliates, subsidiaries and parent companies, which you can view [here](#). Such international transfers shall take place in accordance with applicable data privacy requirements, particularly in conformity with the European Commission Standard Contractual Clauses (SCCs) (for more information on SCCs please read [here](#)). You may request access to our SCCs, by contacting us at privacy@prosus.com

Employees in the group are authorised to access your personal data only to the extent necessary to serve the applicable purposes we describe above and to perform their jobs.

4.2 Access to your personal data by our suppliers

If the nature of services provided by our suppliers requires access to your personal data, we will take the appropriate contractual, technical and organisational measures to ensure that your personal data is only processed to the extent that such processing is necessary for the provision of such services.

If such third parties act under our instructions (as data processors), we enter into an agreement with such a data processor and include obligations to ensure that your personal data is processed by the data processor solely to provide products or services to us.

In particular, the following categories of third parties may have access to your personal data while provisioning services to Prosus:

- Forensic specialists
- Website developer
- IT Suppliers
- Events' organisers
- Communication agencies
- Auditors, consultants and law firms
- Financial institutions

If your personal data needs to be transferred internationally to a recipient in a country that does not provide an adequate level of protection for personal data under the terms of the European Union General Data Protection Regulation (GDPR), Prosus will take appropriate measures to ensure that your personal data remains adequately protected, in particular through entering into the European Commission Standard Contractual Clauses (SCCs) (for more information on SCCs please read [here](#)). You may request access to our SCCs, by contacting us at privacy@prosus.com

4.3. Access to your personal data by other third parties

We may share your personal data if it is required by applicable law or agreement, legal process or a binding governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This also includes sharing data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

5. How are your personal data secured?

Prosus has taken adequate safeguards to ensure the confidentiality and security of your personal data. Prosus has implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing.

6. The use of cookies

The Prosus website (www.prosus.com) uses cookies. A cookie is a small text file that we send to your internet browser which enables us to recognise your browser when you return. Cookies can collect data on the use of the website such as which pages are visited and the duration of a user session. When you use the website, the cookie sends data to Prosus. You have the option to reject all cookies except for those necessary to run our Websites.

[Here](#) you can find more information on the use of cookies by Prosus.

7. Your rights

Under applicable data protection and privacy laws, you may have rights to:

- [Access your personal data](#)
You may ask us whether we process any personal data that relates to you. If this is the case, you may ask us to provide you with a copy of the personal data we process of you insofar as required by applicable data protection laws.
- [Correct and erase your personal data](#)
You may request us to correct any inaccurate personal data we process about you. Also, you may ask us to erase the personal data that relate to you if it is no longer necessary for the purposes for which we processed them, if you have withdrawn your consent and we do not have another legal ground for processing your personal data, if your personal data have been unlawfully processed, or if your personal data must be erased following applicable EU or EU member state laws.
- [Object to processing your personal data](#)
You may object to our processing of your personal data based on our legitimate interest. We will then no longer process your personal data for this purpose, unless we have an overriding legitimate interest to do so. You may also ask us to erase your personal data, unless there is an overriding legitimate interest for the processing.
- [Data portability](#)
Where applicable, you may request the receipt or transmission to another organisation, in a machine-readable form, of the personal information that you have provided to Prosus.
- [Lodge a complaint with the Dutch Data Protection authority \(Autoriteit Persoonsgegevens\)](#)
If you feel that we do not comply with the applicable data protection and privacy laws, you have the right to lodge a complaint with your local supervisory authority. In the Netherlands this would be the Autoriteit Persoonsgegevens.

How to exercise your data protection rights

If you would like to exercise any of your data protection rights, please contact us at privacy@prosus.com. Your request should contain a description of the personal data you want to access to and/or other right you want to exercise. You may be asked to provide a copy of an identification document as a means to authenticate your identity.

8. Contact information and changes to this privacy statement

Should you have any questions regarding the processing of your personal data by Prosus, or if you want to exercise any of your individual rights, please send us an email at privacy@prosus.com

This Privacy Statement may be changed over time. The most up-to-date Privacy Statement is published on our website, so we invite you to visit our Privacy Portal to read about how your personal data is processed. This Privacy Statement was last changed in June 2023.