



Data Protection Policy of
Camco Management
Limited

25 May 2018

1. Camco Management Limited

Camco Management Limited is a fund advisory business focused on renewable energy in emerging markets. The Camco group has offices in Nairobi, Accra, Johannesburg, London and Helsinki. (“Camco”, “we” or “us”).

2. Protecting Your Personal Data

Camco is committed to keeping your personal data secure. Under the new General Data Protection Regulation¹ (“the Regulation”) Camco acts as the controller of your personal data and has an obligation to process your personal data in a lawful, transparent and fair manner.² Where you provide us personal data of any individual other than yourself, you undertake that this information is provided with the consent (for collection, use and disclosure) of such individual and you will inform them of this Policy.

3. Information We May Collect

In our work with renewable energy we may collect certain information in relation to you. Examples of the information we may collect include: your name, telephone number, email address, date of birth, business profile/history, professional qualifications, education details and/or employment details. In

addition, we may collect information on your in the fulfillment of certain legal obligations (for example anti-money laundering legislation). Examples of the information we may collect in this manner include: your home address or a copy of your passport. We will try to avoid collecting sensitive data³ but this may be necessary on occasions (such as determination of PEPs) and if so we will ensure that such sensitive data is protected in accordance with the Regulation.

4. On What Basis Do We Collect Your Personal Data?

We are required by the Regulation to have “lawful” grounds for collecting your personal data. The basis on which we collect, store, use, disclose and/or destroy (“processing”) your personal data include the following:

- a. Your consent;
- b. Processing is necessary for compliance with our legal obligations; and/or
- c. Processing is necessary for implementing the terms of any contract between Camco and any entity that you represent and/or control.

5. Where Do We Keep Your Personal Data?

¹ EU 2016/670

² Article 5 of the Regulation

³ As determined by Article 9 of the Regulation

We are committed to the security of your data and it is accessed on a “need to know” basis. All third parties that process or store data on our behalf have entered data processing agreements designed to keep your data safe. Due to the geographic focus of Camco your data may be transferred outside the European Economic Area (“EEA”) and may be processed by our staff based outside the EEA. We will take all reasonable steps to ensure your personal data is treated securely.

6. Disclosure of Your Information

We may share your information with selected third parties including:

- d. Suppliers and sub-contractors for the performance and execution of any contract we enter into with them or any entity that you represent and/or control;
- a. The Renewable Energy Performance Platform when acting as the REPP Manager;
- b. As necessary to prevent, detect and/or investigate fraud; or
- c. As necessary to recover any debt owed to us or in relation to your insolvency.

7. Your Rights

The Regulation gives you certain rights in relation to your personal data, including:

- a. The right to know if we hold your personal data, and, if we do, the right to access and, if necessary, correct the information if it is inaccurate, incorrect or out of date;
- b. The right to ask us to delete your personal data provided that we do not have a legal obligation to retain your personal data;
- c. The right to withdraw your consent to us processing your personal data; and
- d. The right to have your information transferred to another data controller.

8. Our Webpage and Cookies

If you wish to subscribe to the newsletter found on our website, you are requested to submit your email address at our webpage. This personal data is used for the purpose of sending the type of content you have requested and for marketing our services. You can terminate your subscription with us at any time by clicking the "unsubscribe" button in any of our send outs or by contacting us at email address dpo@camco.energy.

We may also obtain information about your use of our website through "cookies" which enable us to make certain parts of the site easier to use. When you enter our website, we may also collect information about your computer, IP address,

operating system and browser type, for example, for statistical purposes or for the purposes of system administration. This information generally comprises data which does not allow individual identification of information related to a specific user.

This Policy is effective from 25 May 2018 and shall be reviewed as appropriate.

9. Data Retention

We will not retain your information for any longer than is necessary, but we may need to retain your information to comply with certain legal obligations.

10. Contact

We are committed to the principle of transparency and ensuring that your information is kept accurate and up to date. We invite you to assist us to comply with this obligation by ensuring that you inform us of any changes to your information by contacting our Data Protection Officer at dpo@camco.energy.

If you wish to file a complaint with a national supervisory authority regarding our processing of your personal data, you may do so by contacting your local data protection authority. The relevant authority in the UK is the Information Commissioner's Office <https://ico.org.uk/>.

11. Date of Effect and Review