GA Website Privacy Notice

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| On 1 October 2024, the Actis Group[[1]](#footnote-1) (Actis) joined the General Atlantic family .This Privacy Notice replaces the Actis website privacy notice. References in this Privacy Notice to General Atlantic also means the Actis Group. |

(Rev.1 October 2024)

At General Atlantic, we are committed to handling information about you responsibly and we recognize and respect your right to privacy.

This General Privacy Notice (the “**Privacy Notice**”) describes the types of personal information we collect about you, how we may use that information and with whom we may share it.  It also describes the measures we take to protect the security of your personal information and how you can reach us to answer any questions you may have about our privacy practices.

Unless otherwise indicated, this Website Privacy Notice applies only to information collected with your use of the public sections of our Website or from interactions we may have with you directly at conferences, meetings, events, our office or your office, or otherwise in other public places. In addition to this General Privacy Notice, different privacy notices may apply to you depending on your relationship with General Atlantic and location. If you are an investor or prospective investor in GA funds, you will be subject to our Limited Partner Privacy Notice. If you are an employee, you will be subject to our Employee Privacy Notice. If you are a job applicant or included in our Global Talent Bank, you will be subject to our Applicant Tracking Privacy Notice. If you are based in California, please refer to the California Notice of Collection below.

**About Us**

We are General Atlantic Service Company L.P.  Our principal place of business is at Park Avenue Plaza, 55 East 52nd Street, 33rd Floor, New York, NY 10055 (**“GA”**).  GA has a number of subsidiaries and offices located in various jurisdictions, details of which can be found on the GA website at generalatlantic.com/offices and the Actis website (<https://www.act.is/contact/>) (collectively, “**we**”, “**us**” or “**our**”).

We are a data controller for the purposes of the applicable privacy laws in the jurisdictions in which we operate, including, but not limited to, the General Data Protection Regulation 2016/679 (“GDPR”), the UK GDPR and the UK Data Protection Act, the California Consumer Privacy Act of 2018 and any applicable national data protection acts (the “Data Protection Laws”). This means in relation to the personal information you provide to us, we will determine why and how it is used.

**What personal information we collect**

When you use our website or during the course of our business dealings with you or your employer, or when you interact with us at conferences, meetings, events, our office or your office, or otherwise in other public places, we may collect your “personal information”.

Personal information is information that either alone or in combination with other information can directly or indirectly identify you.

Examples of personal information collected by us include your name, employer/company, job title, telephone number, business and/or personal address(es), email address, information regarding your job, identification numbers (such as a passport number or other government issued ID), CCTV footage, and/or other information regarding your preferences where it is relevant to the services that we provide to our portfolio companies and/or investors, or your employment or potential employment with us, our affiliates or our portfolio companies.

We  may  also  ask  you  to  provide  sensitive  types  of personal  data  such  as  any  data  about  religious,  ideological,  political  or  trade  union  views  or  activities,  your  health,  private  life,  the  intimate  sphere  or  racial origin, social security measures or inferences we make from meetings with you (“**Sensitive Personal Data**”).

Further, when you use our Website, we may (ourselves or through a third-party vendor) automatically gather information about your devices and usage of the Website, such as your IP address, identifies associated with your device, browser and device characteristics, website preferences, information regarding websites accessed immediately before and after you visit the Website, the date and time of your visit to the Website, and information about how you navigate the Website. GA collects this information by using cookies, web pixels and other similar automated technologies (collectively, “Tools”). We use this information to better understand, customer and improve the user experience with our Website and our services. For more information about these Tools, please see our [Cookie](https://www.act.is/cookie-policy/) Policy (<https://www.act.is/cookie-policy/>).

**How we collect your personal information**

We may collect your personal information in circumstances such as:

when **you provide it to us** directly (i.e. directly or indirectly through this Website, when you contact us via email or provide us with a business card, or when you invest in one of our investment funds); and

from a **third-party source**(e.g. from a company for whom you work, other organizations with whom you have dealings, government agencies, a credit reporting agency, a recruitment agency, an information or service provider or from a publicly available record).

If you do not provide information requested by us from time to time, we may not be able to provide services to you or your employer, or otherwise fulfill the purpose for which we have requested the information.

In addition, when you use the Website, we may (ourselves or through a third party vendor) automatically gather information regarding websites accessed immediately before and after your visit to our Website. We collect this information by using “cookies”, web pixels, and other similar automated technology. We use this information to better understand, customize and improve the user experience.

Sensitive Personal Data will only be collected by us if you have provided it to us directly.

**How we use your personal information**

We will only process your personal information, where:

* you have given your consent to such processing (which you may withdraw at any time);
* the processing is necessary to fulfill a contract we have with you or your employer;
* the processing is necessary for compliance with our legal obligations; and/or
* the processing is necessary for our legitimate commercial interests or those of any third party recipients that receive your personal data.

By “processing”, we mean the collection, recording, storage, use, disclosure and any other form of operations or dealings with your personal information.

We may use personal information about you:

* to provide you with our investment advisory services and information (in which case, you should also refer to the Limited Partner Privacy Notice);
* to assess potential transactions and in connection with our evaluation of an investment or prospective investment in a portfolio company;
* in connection with our evaluation of whether to accept an investment or prospective investment from a prospective investor (in which case, you should also refer to the Limited Partner Privacy Notice);
* to establish and manage our business relationships;
* to send you newsletters or other marketing or promotional materials;
* to send you information on news, publications, seminars and events;
* to communicate with you (including to answer questions you may have) and improve our services and communications to you;
* for the purposes of employment, partnership or the supply or retention of services to process your requests of, and applications to, us;
* to consider you for potential roles, opportunities or jobs at General Atlantic, or one or more of its portfolio companies or investment prospects;
* to share contact details and other information to facilitate introductions with General Atlantic portfolio companies and investment prospects;
* to comply with local laws and regulations or where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;
* for insurance purposes;
* to send you invoices or reminder notices;
* to perform analytics (including market research, trend analysis and anonymization of personal information);
* to operate, evaluate, develop, manage and improve our business (including operating, administering, analyzing and improving our Website, products and services; developing new products and services; managing and evaluating the effectiveness of our communications; and performing other internal functions);
* protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
* for any other purpose for which this information was provided to us or for any purpose related or ancillary to any of the above.
* managing and maintaining records of services or advice we have received, and commissioning further services
* seeking and obtaining advice from our professional advisors, including lawyers, accountants and other consultants
* inviting you to presentations and events and organising meetings between you and General Atlantic’s representatives;
* providing you with analysis of the markets General Atlantic operates in;
* maintaining records of investments and administering any transaction that one of our funds (or parties related to it) enters into;
* assessing your suitability for involvement in a transaction, including verifying your identity and source of funds;
* complying with our (and our funds’) regulatory and legal obligations, including tax reporting and assessing and managing risk;
* for our own administrative purposes or conducting internal audits;

Sensitive Personal Data may be held for statistical analysis and reporting.

We will use the personal data we collect from you only for the purposes described herein or for purposes that we explain to you at the time we collect your personal data. However, we may also use your personal data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) in accordance with any applicable data protection laws, acts or regulations.

In general, we will process your personal data to carry out our legitimate business interests, where such interests do not override your fundamental rights and liberties.  Where required, we will ask you to provide your consent for specific types of personal data (e.g. special categories of personal data). We may also be required to process your personal data in order to comply with local laws and regulations, for example where we are required to disclose certain information to the local authorities.

**Lawful basis for processing**

There is a need to process personal information for the purposes set out in this Privacy Notice as a matter of contractual necessity under or in connection with your applicable agreement with General Atlantic, and/or in the legitimate interests of General Atlantic to operate its business.. From time to time, we may need to process the personal information on other legal bases, including: to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest. We use your personal information to send direct marketing materials only where you have provided your consent or otherwise when we are permitted by applicable law to do so.

**Who else might receive your personal information**

We may share your personal data within the General Atlantic group in other locations around the world to the extent legally permitted . Please see *Transferring information about you abroad*.

We may share your personal data with third-party service providers, for example, to host your data, to pay for services, analytics providers, for the purposes described above, and for security purposes. General Atlantic will ensure that third parties accessing your personal data shall comply with the same data protection requirements as General Atlantic and the personal data will be used exclusively for the purposes set out in this Privacy Notice.

We may also collect, use and disclose personal data or information to our professional advisors such as lawyers and accountants, fund administrators and other consultants and where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process.  We may share your personal data with authorities to the extent deemed necessary by General Atlantic for the purpose of this Privacy Notice, in particular, for security reasons or as required by mandatory laws and regulations.

**Transferring information about you abroad**

Your data may be transferred to our international offices and the various entities that make up the General Atlantic group and accessed by authorized General Atlantic personnel outside the EEA and/or the UK as well as within it.

You should be aware that in territories outside the EEA and the UK, laws and practices relating to the protection of personal data are likely to be different and in some cases may be weaker than those within the EEA and the UK.

We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by applicable data protection law. To find out more about the safeguards we have in place to protect your personal information please contact us as privacy@generalatlantic.com.

**Keeping your personal information secure**

We will take appropriate technical and organizational measures to keep your information confidential and secure in accordance with our internal procedures covering the storage, access and disclosure of information. Information may be kept on our information technology systems, in the information technology systems of our third party service providers, or in paper files.

**What Rights Do You Have?**

Depending on your jurisdiction you may have some or all of the rights listed below. For example, under the GDPR and the UK Data Protection Act, residents domiciled in the EU, EEA or the UK have certain rights with respect to their personal information. In particular, EU, EEA, and UK residents  have the right to:

* Request access to your personal information;
* Ask to have inaccurate data amended;
* Ask to have your personal information deleted;
* Withdraw your consent to the processing of your personal information;
* Request the prevention or restriction of processing of your personal information for any purpose; and
* Request transfer of personal information to a third party when feasible.

You have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us.

Additionally, in the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless required by law. Please email us at compliance@act.is to exercise your rights.

**How long do we keep your personal data?**

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Notice.  For example, we may retain personal data we obtain from you when we have an ongoing legitimate business need to do so, or to fulfil an ongoing contract with you or your employer.

When we have no ongoing legitimate business need or legal obligation to process your personal data, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), we will store your personal data securely and isolate it from further processing until deletion is possible.

**Updates to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material changes if and where this is required by applicable data protection laws, acts or regulations.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

**How to contact us**

If you have any questions or concerns concerning this Privacy Notice or the way we process your personal data, please contact us at:

**Email:** compliance@act.is.

**Mail:** 2 More London Riverside, London, SE1 2JT (or such other address where we have an office in your home country. For further information, see [www.generalatlantic.com/offices](http://www.generalatlantic.com/offices) and <https://www.act.is/contact/>).

**Anonymous Hotline:** via <https://www.act.is/whistleblowing/>.

**Complaints**

If you wish to make a complaint about how we have handled your personal information, please contact us at the details above and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you can escalate your complaint to the data protection authority in your jurisdiction, details of which can be found online.

1. **“Actis Group”** means (i) Actis LLP; (ii) Actis GP LLP; and (ii) any unincorporated body, body corporate or partnership which is the subsidiary or subsidiary undertaking or holding company or parent undertaking of any of the parties referred to in (i) and (i) above and each unincorporated body, body corporate or partnership which is a subsidiary or subsidiary of the holding company or parent undertaking of any of the parties referred to in (i) and (ii) above. [↑](#footnote-ref-1)