

In context with its business activities, Orlando Management AG, Platzl 4, 80331 Munich, Germany, processes personal data of various persons. In the following, we inform you about the processing of personal data in the context of our **website** ([www.orlandofund.com](http://www.orlandofund.com)) and about the processing of personal data of our **applicants**.

The protection of personal data is important to us. We process personal data only in accordance with the applicable data protection requirements, in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (*Bundesdatenschutzgesetz* - BDSG).

In **Section A** of this Data Protection Information we provide you with information about the **controller** responsible for the processing of your personal data.

In **Section B** you find detailed information about the **processing of personal data in context with the informational use of our website**.

In **Section C** you find more detailed information on the **use of cookies or similar technologies on our website**.

In **Section D** you also find information on the **processing of personal data of our applicants**.

In **Section E** you further find information on **your rights regarding the processing of your personal data**.

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**A. Information on the controller**

**Identity and contact details of the controller:**

Orlando Management AG  
Platzl 4, 80331 Munich, Germany  
E-mail: [privacy@orlandofund.com](mailto:privacy@orlandofund.com)  
Phone: +49 89 29 00 48 – 50

## B. Information on the processing of personal data in context with the informational use of our website

For the purely informational use of the website, certain information, for example your IP address, is sent to our server by the browser used on your device for technical reasons. We process this information in order to provide the website content requested by you. To ensure the security of the IT infrastructure used to provide the website, this information is also stored temporarily in what is referred to as a so-called “web server log file”.

In order to provide the language selection function, data from strictly necessary cookies (→ **Section C**) are temporarily processed on our web server in order to display the website to you in the language of your choice, also at your next visit.

You receive more detailed information on this below:

### 1. Details on the personal data which are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
HTTP Data.	<p>Protocol data which accrue when visiting the website via the Hypertext Transfer Protocol (Secure) (HTTP(S)) for technical reasons.</p> <p>These include IP address, type and version of your internet browser, operating system used, last site accessed before visiting the site (referrer URL), date and time of visit.</p>	User of the website.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>If the data is not provided, we cannot provide the requested website content.</p>	<p>Data are stored in server log files in a form allowing the identification of the data subject for a maximum period of 7 days, unless a security-relevant event occurs (e.g. a DDoS attack).</p> <p>If there is a security-relevant event, server log files are stored until the security-relevant event has been eliminated and completely resolved.</p>
Language Selection Cookie Data.	<p>Data stored on the user's device in strictly necessary cookies to provide the language selection function of the website.</p> <p>These include the language you</p>	User of the website.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p>	<p>We do not store this data on our systems.</p> <p>(→ <b>Section C.III.</b> for more detailed information about the validity period of the</p>

	<p>have selected.</p> <p>(→ <b>Section C.III.</b> for more detailed information about the contents of the cookies used).</p>		<p>If the data is not provided, we cannot provide the requested contents of the website in the language of your choice.</p>	<p>cookies used)</p>
<p>Security Cookie Data.</p>	<p>Data stored on the user's device in strictly necessary cookies for securing our website.</p> <p>These include a unique identifier created by us.</p> <p>(→ <b>Section C.III.</b> for more detailed information about the contents of the cookies used)</p>	<p>User of the website.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>If the data is not provided, we cannot provide our website.</p>	<p>We do not store this data on our systems.</p> <p>(→ <b>Section C.III.</b> for more detailed information about the validity period of the cookies used)</p>

## 2. Details on the processing of the personal data

Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient
<p>Provision of the website content requested by the user:</p> <p>For this purpose, data are temporarily processed on our web server.</p> <p>For the operation of the web server, we use a specialized hosting provider that processes data on our behalf.</p>	<p>HTTP Data.</p>	<p>No automated decision-making takes place.</p>	<p>Article 6 paragraph 1 point (f) of the General Data Protection Regulation (balancing of interests).</p> <p>Our legitimate interest is the provision of the website content requested by the user.</p>	<p>Hosting Provider.</p>
<p>Provision of the website's</p>	<p>Language Selection Cookie Data.</p>	<p>No automated decision-making</p>	<p>Article 6 paragraph 1 point (f) of</p>	<p>Hosting Provider.</p>

<p>language selection function:</p> <p>For this purpose, data from strictly necessary language selection cookies are temporarily processed on our web server in order to provide you with the contents of the website you have requested in the language of your choice.</p>		takes place.	<p>the General Data Protection Regulation (balancing of interests).</p> <p>Our legitimate interest is the provision of the contents of the website accessed by the user in the language selected by the user.</p>	
<p>Ensuring the security of the IT infrastructure used for the provision of the website, in particular for the detection, elimination and conclusive documentation of incidents (e.g. DDoS attacks):</p> <p>For this purpose, data are temporarily stored and evaluated in log files on our web server.</p>	<p>HTTP Data, Security Cookie Data.</p>	No automated decision-making takes place.	<p>Article 6 paragraph 1 point (f) of the General Data Protection Regulation (balancing of interests).</p> <p>Our legitimate interest is ensuring the security of the IT infrastructure used for the provision of the website, in particular for the detection, elimination and conclusive documentation of incidents (e.g. DDoS attacks).</p>	<p>Hosting Provider.</p>

### 3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Hosting Provider	Processor.	EU.	-

## C. Information on the use of cookies on our website

We use cookies in connection with the website and the offers made on the website. We use the processing and storage functions of your device's browser and collect information from the memory of your device's browser.

You will find more detailed information on this below.

### I. General information on cookies

Cookies are small text files with information that can be placed on a user's device through its browser when a website is visited. When the website is visited again with the same device, the cookie and the information it contains can be retrieved.

#### 1. First-party and third-party cookies

Depending on where a cookie comes from, a distinction can be made between first-party cookies and third-party cookies:

<b>First-party cookies</b>	Cookies that are placed and accessed by the operator of the website as the controller or by a processor engaged by the controller.
<b>Third-party cookies</b>	Cookies that are placed and accessed by controllers other than the operator of the website that are not processors engaged by the operator of the website.

#### 2. Transient and persistent cookies

A distinction can be made between transient and persistent cookies depending on how long they remain active:

<b>Transient cookies (Session cookies)</b>	Cookies that are automatically deleted when you close your browser.
<b>Persistent cookies</b>	Cookies that remain stored on your device for a certain period of time after the browser is closed.

### 3. Consent-free cookies and cookies requiring consent

Users' consent is required for some cookies depending on their function and purpose of use. Thus, a distinction can be made between cookies that require users' consent and those that do not:

<b>Consent-free cookies</b>	Cookies that have as their sole purpose to transmit a message using an electronic communication network.
	Cookies that are necessary so that the party offering a service that has been expressly requested by a participant or user can provide this service ("strictly necessary cookies").
<b>Cookies requiring consent</b>	Cookies for all purposes of use other than the aforementioned.

### II. Management of the cookies used on this website

You can manage the use of cookies in your browser's settings. Different browsers have different ways to configure cookie settings. You can find more extensive information on this, for example at <http://www.allaboutcookies.org/manage-cookies/>.

However, we would like to point out that some functions of the website may not work properly or at all if you deactivate cookies in general in your browser.

### III. Cookies used on this website

The following cookies may be used on this website:

Name	First-party / third-party	Purpose of use and content	Effective term	Consent necessary?
Language Selection Cookie (_icl_current_language)	First party	This cookie is strictly necessary to save your individual language selection for the website in order to provide you with the content of the website in the language you have selected.	Persistent: 24 hours	No.
Security Cookie (wordfence_verifiedHuman)	First party	This cookie is strictly necessary for securing our website (→ <b>Section B</b> ). We use this cookie to distinguish human access from access by robots/bots, that may attack our website.	Persistent: 24 hours	No.



#### **D. Information on the processing of personal data of our job applicants**

In connection with our business activities, we process the personal data of persons applying for jobs with us, Orlando Management AG, or with a portfolio company supported by us.

We process data of our job applications for the following purposes:

- Conducting the application process, in particular reviewing applications, contacting the applicant and conducting job and reference interviews to evaluate and select suitable applicants,
- Considering the applicant for future job offers, in particular storing data collected in the course of the application process, evaluating suitability for future job offers and to contact the applicant to initiate an application process,
- Storage for a transitional period for evidence purposes for the possible establishment, exercise or defence of legal claims.

You receive more detailed information on this below:

I. Details on the personal data which are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Master Data.	Name, age and, if applicable, further information from the CV.	Applicants or recruitment agencies instructed to act on behalf of applicants.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, if the data is not provided, it will not be possible to conduct the application process and, if applicable, to hire an applicant.</p>	<p>If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the information on the processing of the personal data of our employees.</p> <p>If the relevant applicant consents to this, in the event that the applicant is not hired, the data will be stored for a period of 24 months (or until a possible prior revocation of consent) after completion of the application procedure for considering the applicant for future job offers.</p> <p>Otherwise the data will be stored only for evidence purposes for the possible establishment, exercise and defence of legal claims for a period of six months after completion of the application process.</p>
Contact Data.	Private address, e-mail address,	Applicants or recruitment agencies instructed to act on	Provision is not a statutory or contractual requirement, or a	If an applicant is hired, the data will be entered in the

	<p>telephone number.</p>	<p>behalf of applicants.</p>	<p>requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, If the data is not provided, it will not be possible to conduct the application process and, if applicable, to hire an applicant.</p>	<p>personnel file. Information on the storage duration is provided in the information on the processing of the personal data of our employees.</p> <p>If the relevant applicant consents to this, in the event that the applicant is not hired, the data will be stored for a period of 24 months (or until a possible prior revocation of consent) after completion of the application procedure for considering the applicant for future job offers.</p> <p>Otherwise the data will be stored only for evidence purposes for the possible establishment, exercise and defence of legal claims for a period of six months after completion of the application process.</p>
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Application Data.	<p>Content of application documents, in particular CV and certificates,</p> <p>contents of written correspondence (including electronic correspondence) relating to the application.</p>	<p>Applicants or recruitment agencies instructed to act on behalf of applicants.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, If the data is not provided, it will not be possible to conduct the application process and, if applicable, to hire an applicant..</p>	<p>If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the information on the processing of the personal data of our employees.</p> <p>If the relevant applicant consents to this, in the event that the applicant is not hired, the data will be stored for a period of 24 months (or until a possible prior revocation of consent) after completion of the application procedure for considering the applicant for future job offers.</p> <p>Otherwise the data will be stored only for evidence purposes for the possible establishment, exercise and defence of legal claims for a period of six months after completion of the application process.</p>
	<p>Consent to the storage of personal data collected during the application process for the purpose of considering the applicant for future job offers in the event that the applicant is not hired.</p>	<p>Applicants.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>However, If the data is not provided, we may consider your application only for the position for which you have applied and, in the event that you are not hired, not for any future positions.</p>	
	<p>Contents of recruitment tests, perceptions from interviews, feedback and evaluations,</p> <p>documentation of any consents given by the applicant to the storage of personal data collected during the application process for the consideration of the applicant for future job offers in the event that the applicant is not hired, in particular the time of consent and</p>	<p>Generated by us or collected by recruitment agencies instructed by us.</p>	<p>-</p>	

	any revocation.			
	Results from reference interviews regarding the applicants (reference persons will be contacted in consultation with the applicant).	Reference person or generated by us.	-	

## II. Details on the processing of the personal data

Purpose of processing the personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipient
Conducting the application process for Orlando Management AG and, if applicable, for portfolio companies advised by Orlando Management AG, in particular reviewing applications, contacting the applicant and conducting job and reference interviews to evaluate and select suitable applicants.	Master Data, Contact Data, Application Data.	No automated decision-making takes place.	Decision on the establishment of an employment relationship (Article 88 paragraph 1 of the General Data Protection Regulation, sec. 26(1) of the German Federal Data Protection Act).  Taking steps prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Portfolio Companies.
In the event that the applicant is not hired:  Considering the applicant for future job offers, in particular storing data collected in the course of the application process, evaluating suitability for future job offers and to contact the	Master Data, Contact Data, Application Data.	No automated decision-making takes place.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	-

applicant to initiate an application process.				
Storage for evidence purposes for the possible establishment, exercise or defence of legal claims.	Master Data, Contact Data, Application Data.	No automated decision-making takes place.	The legal basis for the storage for evidence purposes is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise and defence of legal claims.	-

### III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Portfolio Companies:  Transmission to portfolio companies, provided that the application process is, according to the job description, carried out for a portfolio company advised by Orlando Management AG.	Controller.	EU.	-

## E. Information on the rights of data subjects

As a data subject, you have the following rights with regard to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (“right to be forgotten”) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data portability (Article 20 of the General Data Protection Regulation)
- Right to object (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7 paragraph 3 of the General Data Protection Regulation)
- Right to lodge a complaint with a supervisory authority (Article 77 of the General Data Protection Regulation)

You may contact us for the purpose of exercising your rights using the contact information in **Section A**

Where applicable, you find information on any specific modalities and mechanisms which facilitate the exercise of your rights, in particular the exercise of your rights to data portability and to object, in the information on the processing of personal data in **Section B to D** of this Data Protection Information.

You can find the full extent of your rights in Article 7, 15 – 21 and 77 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

**F. Effective date of and changes to this Data Protection Information**

The effective date of this Data Protection Information is 30/10/2018.

It may be necessary to modify this Data Protection Information due to technical developments and/or amendment of statutory or official requirements.

An up-to-date version of this Data Protection Information can be retrieved at any time [here](#).