

# DATA PROTECTION NOTICE

## FOR VIDEO SURVEILLANCE

Apollo Global Management, Inc., its affiliates and subsidiaries (collectively, “**Apollo**” or “**we**”), is committed to the protection of your personal data in accordance with data protection legislation, especially the General Data Protection Regulation EU 2016/679 (the **GDPR**).

In this Data Protection Notice, “**the Companies**” mean AMI (Luxembourg) S.à r.l. and Apollo Investment Management Europe (Luxembourg) S.à r.l.

This Data Protection Notice is intended to inform the Companies, the board members, directors, officers, partners, employees of, as well as any other workers, contractors, consultants, or other self-employed individuals performing work or providing services to or on behalf of the Companies and visitors of its buildings, infrastructure and site (“**you**”) on the use of a video surveillance system (the “**video surveillance system**”), how long we keep data, what rights you have and how you can exercise them.

### 1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The Companies are responsible, as joint controllers, for collecting and processing your personal data under the video surveillance system, determining the purposes of means of such processing.

### 2. WHAT PERSONAL DATA DO WE PROCESS?

We collect and use your image when you enter or circulate in the office or areas covered by our video surveillance system (the “**premises**”). Pictograms are displayed at the entrance of, and around the premises. The data we collect include the following categories of data:

- images caught on cameras installed in monitored premises indicated by pictograms (no sound is recorded),
- dates and hours of recordings.

### 3. WHY DO WE PROCESS YOUR PERSONAL DATA (PURPOSE AND LEGAL BASIS)?

We collect and use your personal data for the following purposes:

- to control access to and to ensure the security of the premises, the safety of the Companies staff and visitors, as well as property, assets and information located or stored in the premises;
- to prevent, detect, and if necessary, investigate unauthorised access, including unauthorised access to secure premises and protected rooms, IT infrastructure, or operational information. Whilst our video surveillance system is used to control access and secure monitored areas, it contributes to the prevention of potential danger for our employees’ or visitors’ health and safety (in case of e.g. fire, accident or physical assault) and to the protection of our assets (including against theft of equipment or assets).

The video surveillance system is not used for purposes that are incompatible with those detailed above.

Where allowed by law, the video surveillance system may be used as an investigative tool or to obtain evidence in internal investigations or disciplinary procedures, including in case of a security incident.

We collect your personal data to pursue the Companies’ legitimate interests (art. 6.1f GDPR), including access control, security of premises, safety of staff and visitors, protection of interest

and rights in the event of investigated, suspected or actual violations or criminal offences.

Where applied to the Companies' staff, video surveillance systems comply with article L. 261-1 of the Luxembourg Labour Code.

#### **4. WHO CAN ACCESS YOUR PERSONAL DATA?**

In order to fulfil the aforementioned purposes, your personal data can be accessed by our management, Enterprise IT Services, Corporate Services, HR/Compliance (as required).

We may also communicate your personal data to:

- service providers/vendors (such as a contracted security company) that perform services on our behalf,
- other Apollo Group entities,
- the Police, law enforcement or other government and regulatory bodies or agencies, upon request and to the extent permitted by law.

#### **5. WHERE DO WE TRANSFER YOUR PERSONAL DATA?**

We may transfer and maintain your personal data covered by this Data Protection Notice on servers or databases outside the European Union/European Economic Area ("EU/EEA").

Data protection law does not allow organisations to transfer personal data outside the EU/EEA, except where they can ensure this will be appropriately protected. In any instances where we transfer personal data outside the EEA, we will ensure this in compliance with one of the safeguards set out in data protection law (e.g., risk assessed standard contractual clauses approved by the European Commission as per art. 46 GDPR) in order to ensure that data is protected. The standard contractual clauses are available at the following links:

- [https://commission.europa.eu/document/download/eeeabfc3-93e9-4be9-92da-7faf87f8aff3\\_en?filename=Standard%20Contractual%20Clauses%20Word%20%28all%20languages%29](https://commission.europa.eu/document/download/eeeabfc3-93e9-4be9-92da-7faf87f8aff3_en?filename=Standard%20Contractual%20Clauses%20Word%20%28all%20languages%29)

#### **6. SECURITY OF YOUR PERSONAL DATA.**

The processing of your personal data is carried out through IT, electronic and manual tools, with logics strictly related to the aforementioned purposes and, in any event, in compliance with the appropriate technical and organisational measures required by law to ensure a level of security that is adequate to the risk, in order to avoid unauthorised loss or access to your data.

#### **7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We will retain your personal data for 8 days from their recording, except in the event of an incident or legal proceedings. At the end of that period, your personal data being processed, your personal data will be deleted or destroyed.

#### **8. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?**

In accordance with applicable data protection law (and subject to conditions and restrictions set forth therein), you may exercise at any time in respect of us, the following rights in relation to your personal data:

- *right to access*, which enables you to obtain from us confirmation on whether your personal data is being processed or not and, if so, obtain access to such data; we process a large quantity of information, and can thus request, in accordance with GDPR, that before the information is provided, you specify the transaction, information or processing activities to which your request relates;
- *right to rectification*, which enables you to obtain from us the correction and/or integration of any of your personal data that are incorrect and/or incomplete; and

In certain limited cases (in which case we will analyse whether the conditions for the exercise of such rights are fulfilled, in line with the GDPR), you may exercise the following rights in relation to your personal data:

- *right to erasure*: which enables you, in specific cases provided for by art. 17 GDPR, to obtain from us the erasure of your personal data;
- *right to restriction of processing*: which enables you, in the specific cases provided for by art. 18 of the GDPR, to restrict the processing of your personal data by us;
- *right to object*: which enables you to object to the processing of your personal data when certain conditions are met.

To exercise any of these rights, you may contact us by email [privacy@apollo.com](mailto:privacy@apollo.com) or by postal mail:

AMI (Luxembourg) S.à r.l. and Apollo Investment Management Europe (Luxembourg) S.à r.l.  
Le Dôme  
2-8, Avenue Charles de Gaulle  
3rd Floor  
Luxembourg L-1653  
Luxembourg

You have the right to lodge a formal complaint with the *Commission nationale pour la protection des données* ([CNPD](#)).

## **9. CHANGES TO THIS DATA PROTECTION NOTICE FOR VIDEO SURVEILLANCE**

Changes may occur in the way we process personal data. In case these changes oblige us to update this Data Protection Notice for Video Surveillance, we will clearly communicate it to you via appropriate means.

You may request a copy of this privacy notice from us. Should you wish to do so, please contact [privacy@apollo.com](mailto:privacy@apollo.com).