

PANTHEON INFRASTRUCTURE PLC (THE “COMPANY”) – DATA PROTECTION POLICY

The Company will process personal data provided by investors in the Company at all times in compliance with the material requirements of applicable data protection legislation in the United Kingdom and/or the EEA, as appropriate (the “DP Legislation”), and shall only process such information for the purposes set out in the Company’s privacy policy (the “Purposes”) which is available for consultation on the Company’s website at www.pantheoninfrastructure.com (the “Privacy Policy”).

Where necessary to fulfil the Purposes, the Company may disclose personal data to:

- (a) third parties located either within, or outside of, the United Kingdom and/or the EEA, for the Company’s Registrar, Administrator and Company Secretary to perform their respective functions and in particular in connection with the holding of shares in the Company; or
- (b) the Company’s Registrar, Administrator, Investment Manager and their respective associates, some of which are located outside the United Kingdom and/or the EEA.

Any sharing by the Company of personal data with third parties will be carried out in compliance with the DP Legislation and as set out in the Company’s Privacy Policy.

The Company’s Investment Manager, Pantheon Ventures (UK) LLP, has a data protection policy in place which applies to all of its partners, employees and other members of staff. This policy is intended to ensure that personal data is used and protected in a lawful manner as part of its business activities (including its role as Investment Manager to the Company).

*Approved by the Board of Directors of Pantheon Infrastructure PLC
April 2022*

Pantheon Infrastructure Plc

Registered office: Beaufort House, 51 New North Road, Exeter, Devon, EX4 4EP, United Kingdom

T: +44 (0) 20 3356 1800 | F: +44 (0) 20 3356 1801 | E: pint@pantheon.com | www.pantheoninfrastructure.com

Incorporated in England number: 13611678. An investment company under section 833 of the Companies Act 2006. Managed by Pantheon Ventures (UK) LLP.