

INTRODUCTION

Welcome to the privacy policy (this “Privacy Policy”) for Innisfree M&A Incorporated and/or its affiliates.

Innisfree respects your privacy and is committed to protecting your Personal Data. This Privacy Policy will inform you as to how we look after your Personal Data when you visit our websites (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how Innisfree collects and processes your Personal Data (defined below) through your use of this website, including any data you may provide through this website. This Privacy Policy applies only to the collection and use of Personal Data and other information gathered on the websites innisfreema.com and lakeislema.com (each a “Site” and collectively the “Sites”) that are owned by Innisfree M&A Incorporated and/or its affiliates (collectively, “Innisfree”) and operated by, or by authorized third parties on behalf of, Innisfree. This Site is a commercial website and is intended for use by our customers, prospective customers, vendors and their respective employees and agents to obtain information about Innisfree’s products and services.

THIS POLICY CONTAINS CONTRACTUAL RESTRICTIONS ON YOUR RIGHTS TO USE THESE SITES, RESTRICTIONS ON RIGHTS YOU CAN ENFORCE AGAINST INNISFREE, AND LIMITATIONS OF INNISFREE’S LIABILITY.

By submitting your Personal Data through this Site, you will be considered to have given your permission and consent for the collection, use, retention and disclosure of your Personal Data as set forth in this Privacy Policy. Use of this Site and Innisfree’s services is strictly limited to persons who are of legal age in the jurisdictions in which they reside. You must be at least eighteen (18) years of age to use our Sites and Innisfree’s services.

Innisfree will not knowingly accept any information from an individual under the age of thirteen (13) years. In compliance with the Children’s Online Privacy Protection Act (“COPPA”), any information that Innisfree may receive from any individual who is reasonably believed to be under the age of 13 will be deleted. If you are under the age of 13, please do not provide any Personal Data through the Site. If you are under the age of 13 and have already provided Personal Data through the Site, please have your parent or guardian contact us immediately using the information below so that we can remove such Personal Data from our files.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

Lake Isle is a subsidiary of Innisfree M&A Incorporated. This Privacy Policy is issued on behalf of both companies so when we mention the “Company”, “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant company responsible for processing your Personal Data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the privacy manager using the details set out below.

CONTACT DETAILS

If you have any questions about this Privacy Policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Innisfree M&A Incorporated
E-mail address: info@innisfreema.com
Postal address: 501 Madison Avenue, 20th Floor, New York, NY 10022

If you reside in the UK, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. Otherwise, if you reside elsewhere, please contact us directly so that we may address your concerns.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep this Privacy Policy under regular review and reserve the right, in our sole and absolute discretion, to change, modify, add or remove any portion of the terms, in whole or in part, of this Privacy Policy at any time. Please review this Privacy Policy periodically, as we may update it from time to time. Each time you visit any of the Sites or provide us with information, including Personal Data, by doing so you are accepting the practices described in this Privacy Policy as in effect at that time.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

2. THE DATA WE COLLECT ABOUT YOU

"Personal Data", means; any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **"Identity Data"** includes first name, maiden name, last name, title and gender.
- **"Contact Data"** includes your address, e-mail address and telephone numbers.
- **"Technical Data"** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect Personal Data from and about you including through:

- **Direct interactions.** You may give us your Identity Data and Contact Data by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data you provide when you contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns.

We collect this Personal Data by using cookies, server logs and other similar technologies.

- **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties and public sources including search information providers based inside **or** outside the EU. These may include:
 - Contact Data, from providers of technical, delivery and other services based inside **or** outside the EU.
 - Identity Data and Contact Data from data brokers or aggregators based inside **or** outside the EU.
 - Identity Data and Contact Data from publicly available sources.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests or
- Where we need to comply with a legal obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set forth below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your Personal Data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include notifying you about changes to our terms or this Privacy Policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to evaluate your feedback)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
maintenance, support, reporting and hosting of data)	(c) Technical	fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

MARKETING

You will not receive marketing communications from us unless you have specifically requested information from us and you have not opted out of receiving that marketing information. We will not share your Personal Data with any third party for marketing purposes and you may opt out of receiving communications from us at any time.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access “cookies”. A cookie is a piece of data stored on the computer that runs an Internet browser and is commonly used to store information about a consumer’s online activities, including information such as the content or advertisements that a consumer views or the pages a consumer visits within a particular website. It can contain information about you, your computer, your browser, your session, the websites you visit and other information about you or others who use, or have used, the computer or browser you use to access the Internet. Cookies are used for record-keeping purposes: the stored information can be retrieved by our website server when you return to the website. This allows us to personalize or regulate the use of this Site, and it also permits us to tailor the appearance or presentation of this Site to your preferences or interests. The cookies we use, if any, are not linked to any Personal Data while using this Site unless you have given us permission to link Personal Data to one or more cookies. Please note that you give us that permission any time you register on this Site, use or conduct a transaction through this Site, or identify yourself or the computer you are using through this Site.

We use cookies as a convenience feature to save you time, to understand how our Site is used, and to improve the content and offerings on our Site. For example, we may use cookies to personalize your experience at our web pages or recall your specific information on subsequent visits (e.g., to recognize you by name when you return to our Site). We may also use cookies to offer you or inform you of products, programs or services and targeted advertising. You can opt to have your browser reject cookies.

Most or all browsers permit you to disable or reject cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. You can do this by adjusting your preferences in the browser. Innisfree does not track its Site users over time and across third-party websites to provide targeted advertising and therefore does not respond to “Do Not Track” signals or other mechanisms that provide consumers the opportunity to exercise choice regarding the collection of Personal Data about an individual consumer’s online activities over time and across third-party websites or online services. Accordingly, your selection of the “Do Not Track” option provided by your browser may not have any effect on our analytics or tracking tools. Use the “Help” feature of your browser to obtain more information about refusing cookies. If you set the browser you use to reject cookies, you may not be able to access the Site or use the full functionality of the Site, or it may take additional time to utilize such functionality. If you opt to reject cookies, you may need to re-register with us every time you visit our Site. If you choose to accept cookies, you also have the ability to later delete cookies that you have accepted. Your continued use of the Site reflects your consent to allow additional cookies to be placed on your computer to help you navigate the Site.

Flash Cookies

We may use local shared objects, sometimes known as Flash cookies, to store your preferences and to assist with online authentication by allowing us to recognize you and your device when you return to the Site. This permits us to display content based upon what you view on our Site to personalize your use of our services. Entities acting on our behalf also may use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount and type of data they collect, as well as how data is stored. Cookie management tools provided by your device or browser will not remove Flash cookies. If you disable Flash cookies, you will not have access to many features that make your user experience more efficient.

Pixel Tags, Web Beacons, Clear GIFs and Other Similar Technologies

Pixel tags, web beacons, clear gifs and other similar technologies are typically small pieces of data that are embedded in images on the Site, our applications or certain e-mail communications. They may involve the transmission of information directly to us, to another party on our behalf or to another party in accordance with its privacy policy. We may use these technologies to compile information we collect about you.

Clickstream Data

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can identify the type of computer and browsing software you use and the address of the website from which you linked to the Site. We may use clickstream data as a form of non-Personal Data to anonymously determine how much time visitors spend on each page of the Site, how visitors navigate throughout the Site and how we may tailor our web pages to better meet the needs of visitors.

Log Files

We or our hosting provider may collect traffic information from visitors for statistical analysis and Site improvement. When you access the Sites, we or our hosting provider may collect information about your visit in a log file on a server. Log file information may include, but is not limited to, Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp and number of clicks. We or our hosting provider use this information to analyze trends, administer sites, track users' movements in the aggregate and gather demographic information for aggregate use. We and/or our hosting provider may review this information to better understand overall trends and to determine what kinds of content are popular with and useful to users.

CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your Personal Data with the parties set out below for the purposes set out in the table [Purposes for which we will use your Personal Data](#) above with Internal Third Parties as set out in the [Glossary](#).

6. INTERNATIONAL TRANSFERS FROM WITHIN THE EUROPEAN ECONOMIC AREA (EEA)

If you access the Site from within the EEA we may share your Personal Data with Innisfree M&A Incorporated and this will involve transferring your data outside the EEA.

Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring we use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of Personal Data to third countries*.

This Privacy Policy and our legal obligations are subject to the laws of the State of New York and the United States or the laws of England and Wales, as appropriate based on the location of a particular user. Any claims or complaints must be filed exclusively in the courts of the United States in the State of New York unless such is prohibited by the laws in effect in a user's particular location.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

While we strive to undertake reasonable and necessary efforts to secure Personal Data provided to us through the Site, even such security measures do not guarantee the security of all Personal Data, and we cannot guarantee that the Personal Data it collects, uses and retains will be protected in all circumstances, including those beyond our reasonable control.

You can usually tell whether encryption is being used by noting the "locked" or other status indicator on the browser you are using. If the browser you are using does not indicate that the session is secure (e.g., by displaying a lock, a key or a similar icon), you should assume that the connection is not secure and that third parties will receive the information shared by you and us during that part of the session. Your information may be transferred to and maintained on computer networks that may be located outside of the state, province, country or other governmental jurisdiction in which you reside, and the country or jurisdiction in which these computer networks are located may not have privacy laws as protective as the laws in your country or jurisdiction.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. The specific means of notification used is up to us, and we will use our best judgment based on the circumstances. Where any notice is to be sent to a specific address or number (such as an e-mail address, physical address, telephone number, etc.), we will use the latest available address in our records. YOU AGREE TO THIS MEANS OF NOTIFICATION.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your Personal Data: see “*Your Legal Rights*” below for further information.

In some circumstances we will anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. These include the right to:

- Request access to your Personal Data.
- Request correction of your Personal Data.
- Request erasure of your Personal Data.
- Object to processing of your Personal Data.
- Request restriction of processing your Personal Data.
- Request transfer of your Personal Data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

“Legitimate Interest” means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

“Performance of Contract” means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

“Comply with a legal obligation” means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

“Internal Third Parties” means other companies within the Innisfree corporate group as identified above and who are based around the world and provide IT and system administration services and undertake leadership reporting.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some

cases, we may demonstrate that we have compelling legitimate grounds to process your Personal Data which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the Personal Data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

END OF DOCUMENT