Privacy Statements Collas Crill Corporate Services Limited

1 What is the purpose of this document?

1.1 This privacy notice describes how Collas Crill Corporate Services Limited ("**CCCS**") collects and uses personal information about you in accordance with the applicable data protection legislation.

1.2 CCCS recognises the importance of this data and the risks related to its possession of such data. CCCS is committed to protecting the privacy and security of your personal information.

1.3 CCCS is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. To comply with data protection legislation and best practice we are required to notify you of the information contained in this privacy notice.

1.4 This notice sets out your rights under applicable data protection laws as well as our commitment to you regarding how we treat your data. We may update this notice at any time.

1.5 It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2 About CCCS

CCCS is licenced to provide company management services in the Cayman Islands by the Cayman Islands Monetary Authority (CIMA). CCCS is part of the Collas Crill Group, a major offshore legal and fiduciary services provider made up of a number of different entities. For more detail on CCCS and our group, please go to www.collascrill.com.

We have appointed an Information Officer to oversee compliance with this privacy notice for CCCS.

If you have any questions about this privacy notice or how we handle your personal information, please contact your CCCS Information Officer, contact details of whom are set out below. You have the right to make a complaint at any time to your local regulator for data protection and privacy issues. Details of the local regulators are also set out below:

2.2 **Information Officer:**

- Damon Selman-Carrington
- +1 345 914 9674
- information.officerky@collascrill.com

Regulator: Information Commissioner

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3 Data protection principles

We will comply with applicable data protection acts. Whilst these obligations differ due to the many jurisdictions that CCCS' clients operate in, CCCS has committed to applying the highest standards. This means that the personal information we hold about you must be:

3.2 Used lawfully, fairly and in a transparent manner.

3.3 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

3.4 Relevant to the purposes we have explained to you and limited only to those purposes.

3.5 Accurate and kept up to date.

3.6 Kept only for so long as is necessary for the purposes explained to you.

3.7 Kept securely.

4 The kind of information we hold about you

4.1 Personal data, or personal information, 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).

4.2 There are "special categories" of more sensitive personal data which require a higher level of protection (as detailed in paragraph 10).

4.3 We may collect, store and use the following categories of personal information about you:

4.3.1 Personal contact details such as name (including previous names and known aliases) title, addresses, telephone numbers and personal email addresses.

4.3.2 Date of birth.

4.3.3 Gender.

4.3.4 Marital status and dependants.

4.3.5 Bank account and transactional details, records and tax ID or status information.

4.3.6 Information about your employer and employment status.

4.3.7 Information about your academic history and professional qualifications.

4.3.8 Information about your service requirements and sector of interest.

4.3.9 Information about your personal and business assets and information relevant to specific structures, transactions or issues you seek assistance with.

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4.3.10 Information relating to your place of residence, domicile and nationality.

4.3.11 Information related to identification, such as passport/ID card numbers and dates of issue/expiry, proof of residential address copies of identification documentation.

4.4 We may also collect, store and use the following "special categories" of more sensitive personal information:

4.4.1 Information about criminal convictions, offences, adverse media or sanctions.

4.4.2 Information about your direct involvement with politics or affiliation with politically exposed persons (PEPs).

4.4.3 Information about your family and personal life relevant to your personal service requirements.

5 How is your personal information collected?

5.1 We collect personal information about you through your on boarding as a CCCS client, and as a result of and through our ongoing work for you. We may sometimes collect additional information from third parties including, credit reference agencies or other background check agencies or databases.

5.2 We will collect additional personal information in the course of our work for you.

6 How we will use information about you

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

6.1.1 Where we need to perform the contract we have entered into with you.

6.1.2 Where we need to comply with a legal obligation or regulatory requirement.

6.1.3 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.

6.2 We may also use your personal information in the following situations, which are likely to be rare:

6.2.1 Where we need to protect your interests (or someone else's interests).

6.2.2 Where it is needed in the public interest.

7 Situations in which we will use your personal information

7.1 We need all the categories of information in the list above (see paragraph 4) primarily to allow us to perform our contract with you and to enable us to comply with legal or regulatory obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

7.2 Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

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7.3 The situations in which we will process your personal information are listed in Schedule 1, together with the purpose or purposes for which we are processing or will process your personal information.

8 If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as processing a transaction on your behalf), or we may be prevented from complying with our legal obligations (such as to ensure you are property identified and verified for compliance with anti-money laundering legislation).

9 Change of purpose

9.1 We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

10 How we use sensitive personal information

10.1 "Special categories" sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

10.1.1 In limited circumstances, with your explicit written consent.

10.1.2 Where we need to carry out our legal or regulatory obligations.

10.2 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about you in the course of legitimate business activities with the appropriate safeguards.

11 Do we need your consent?

We do not need your consent if we use your personal information in accordance to carry out our legal and regulatory obligations or exercise specific rights under the act. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

12 Information about criminal convictions, offences, adverse media or sanctions

12.1 We envisage that we will hold information about criminal convictions, offences, adverse media or sanctions where such information is available in the public domain.

12.2 Where appropriate, we will collect information about criminal convictions, offences, adverse media or sanctions as part of the client take-on process or we may be notified of such information directly by you in the course of our relationship.

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12.3 We may only use information relating to criminal convictions, offences, adverse media or sanctions where the law allows us to do so. This will usually be where such processing is necessary to carry out our legal or regulatory obligations.

12.4 Less commonly, we may use information relating to criminal convictions, offences, adverse media or sanctions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

12.5 We may also process such information about you in the course of legitimate business activities with the appropriate safeguards.

13 Automated decision-making

13.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

13.1.1 Where we have notified you of the decision and given you 21 days to request a reconsideration.

13.1.2 Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.

13.1.3 In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

13.2 If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

13.3 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

13.4 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

14 Data sharing

14.1 We may have to share your data with third parties, including third-party service providers or other entities in the Collas Crill group which provide support services to CCCS.

14.2 We require third parties to respect the security of your data and to treat it in accordance with the act.

14.3 We may transfer your personal information outside of the Cayman Islands.

14.4 If we do, you can expect an equivalent degree of protection in respect of your personal information.

14.5 **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. This may involve us sharing your

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information with:

14.5.1 Third party service providers who help us work with you and operate our business; (if any);

14.5.2 Revenue and customs agencies, regulators and other authorities;

14.5.3 Financial services compensation schemes;

14.5.4 Fraud prevention agencies;

14.5.5 Entities working with you or your business' product or service;

14.5.6 Organisations that introduce you to us;

14.5.7 Companies that we introduce you to; and

14.5.8 Companies you ask us to share your data with.

If the make-up of CCCS changes or such changes are proposed we may share your data with third parties to allow us to sell, merge or transfer aspects of our business or acquire or merge into other businesses. We will only do this if they agree to keep your data to the same standards we have set for holding your data. Following such a change other parties may use your data in line with these standards.

14.6 **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. Information technology, finance and compliance related services are provided to CCCS by other entities in the Collas Crill group.

14.7 **How secure is my information with third-party service providers and other entities in the Collas Crill group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

14.8 **When might you share my personal information with other entities in the group?**

To the extent permitted by law, we may in our absolute discretion share your personal information with other entities in our group. They will safeguard that information in line with this notice and all applicable laws

By accepting these terms, you agree to this sharing of information across entities within the group.

14.9 **Transferring information outside the EU**

By providing your personal information to CCCS you understand it will generally be processed within the Cayman Islands, and that we may from time to time as part of our normal business processes, transfer the personal information about you to the following countries which are outside of the EU.

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14.9.1 British Virgin Islands;

14.9.2 Guernsey;

14.9.3 Jersey;

14.9.4 London;

in order to perform our contract with you. There is not an adequacy decision by the European Commission in respect of all of those countries. This means that some countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place binding contract clauses in line with international standards to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the applicable laws on data protection. If you require further information about these protective measures, you can request it from your Local Information Officer.

15 Data security

15.1 We have put in place measures to protect the security of your information.

15.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

15.4 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

16 Data retention

16.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. Retention periods for your personal information are decided by considering the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised 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 requirements. This will vary depending upon the relationship we have with you but in general terms for legal advice relationships we will retain your information for 7 years after the end of our relationship unless we are required to keep it longer for legal reasons.

16.2 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

16.3 If you have any questions regarding data retention please speak to your Local Information Officer.

17 Marketing

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17.1 We may use your personal information to let you know about those of our products and services we think may be of interest to you. Before doing so we may use your personal information to better understand what services or products you are likely to need or have use for.

17.2 If you ask us to stop using your personal information to market to you, we will do so and you can change this choice at any time.

18 Cookies

We use "cookies" on our website, these are small pieces of data that allow us to track which computers visit our website and how. To find out how, please review our cookie policy.

19 Rights of access, correction, erasure, and restriction

19.1 Your duty to inform us of changes

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

19.3 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

19.3.1 **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

19.3.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

19.3.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

19.3.4 **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

19.3.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

19.3.6 **Request the transfer** of your personal information to another party.

19.4 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your Local Information Officer in writing.

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19.5 No fee usually required

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

19.6 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

20 Right to withdraw consent

In the limited 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. To withdraw your consent, please contact your Local Information Officer. 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 we have another legitimate basis for doing so in law.

21 Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Schedule

How Collas Crill uses your data

How CCCS uses client data	Our basis for doing so	CCCS 's legitimate interests (where appropriate)
To operate and maintain our relationship with clients	Your consent Contract fulfilment CCCS's legitimate interest CCCS's legal or regulatory obligations	Developing and growing our business Obtaining your consent where needed for contact Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations
Marketing our products and capabilities to clients	Your consent CCCS's legitimate interest	Developing and growing our business Obtaining your consent where needed for contact

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Developing new service lines and products to better service clients	Contract fulfilment CCCS's legitimate interest	Developing and growing our business Maintaining proper practice and efficiencies in meeting our legal and commercial obligations
To learn how our clients work with us and how we can improve this	CCCS's legitimate interest	Developing and growing our business Obtaining your consent where needed for contact Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations
To advise our clients about our services	Your consent CCCS's legitimate interest	Developing and growing our business Obtaining your consent where needed for contact
Working with service providers who help CCCS operate its business	Contract fulfilment CCCS's legitimate interest CCCS's legal or regulatory obligations	Developing and growing our business Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations
Designing and testing new products and services for our clients	CCCS's legitimate interest CCCS's legal or regulatory obligations	Developing and growing our business Identifying the client base for our service lines Maintaining proper practice and efficiencies in meeting our legal and commercial obligations
Delivering CCCS's services to our clients	Contract fulfilment CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations

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Providing corporate and regulatory services	CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations
Making and delivering client payments, disbursements and fees on client accounts	Contract fulfilment CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations
Risk management	CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal, regulatory and commercial obligations
Responding to complaints	CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal and commercial obligations
Obeying applicable acts and regulations including the prevention of financial crime	CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal or regulatory obligations
To properly, efficiently and lawfully operate the business of CCCS with proper regard to legal advice and monitoring, internal communications and corporate governance, audit and oversight	CCCS's legitimate interest CCCS's legal or regulatory obligations	Maintaining proper practice and efficiencies in meeting our legal or regulatory and commercial obligations
To exercise CCCS's contractual rights including the collections of monies owed to CCCS	Fulfilling contracts CCCS's legitimate interest	

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