



Citco Group of Companies Data Protection Notice

October 2021

CITCO

Data Protection Notice

The **Citco Group Limited and its subsidiaries and affiliates** (together **Citco, we, us** or **our**) recognize the importance of protecting your privacy.

This notice describes how we collect, hold, use and disclose personal information that you provide, is provided on your behalf or is collected by us. If you would like more detail on any of the information in this notice, please see our website's Q&A resources at www.citco.com/footer/privacy and for a list of the Citco affiliates and their contact details, please visit: <https://www.citco.com/global-reach>.

1. What personal information do we collect

We collect personal information that is required to enable us to provide a broad range of services including, fund administration and ancillary services, corporate governance services, banking, custody and depositary services, middle office services, financial products, reporting and tax services (our **Services**) to our clients and related parties (**Clients**). In the provision of our Services, Citco, acting as controller, may therefore process personal information relating to you in your capacity as a director, officer, authorized signatory, employee, investor and/or beneficial owner (a **related person**) of our Client.

The kinds of personal information that we may collect include:

Demographic Data	Name, gender, date of birth, age, nationality
Contact Details	Home/work landline phone number, personal/work mobile, home/work postal address, personal/work email address
Financial Data	Bank account number
Government Identifiers	Passport copies, personal public service number, driver's licence, income tax number
Criminal records and political associations	Criminal records and political associations, where they are revealed by client screening procedures

2. How we collect personal information?

We collect personal information in various ways, including:

- client due diligence enquiries and on-boarding documentation;
- subscription, redemption and transfer documentation, questionnaires and other forms and agreements; and
- correspondence, which may include written, telephone or electronic communications.

In some circumstances, we may collect personal information about you from a third party or from publicly available sources. The parties from whom we may acquire personal information may include Citco affiliates, Clients in which you are or were a related person, other Client service providers including fund managers, your adviser or anyone you have authorized to deal with us on your behalf.

In addition, our websites use 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit any of our websites. They help us make the sites work better for you.

More information on our cookie policy can be found at <https://www.citco.com/footer/use-of-cookies/>.

3. How we use personal information?

We use information about you to:

- provide relevant services and identify ways we can improve our services;
- providing you with information or assistance that you request from us;
- meet our legal and regulatory obligations, including to carry out anti-money laundering checks and related actions, to comply with production and court orders and to report tax related information to tax authorities;
- monitor electronic communications for investigation and fraud prevention purposes, crime detection, prevention and investigation;
- monitor and record calls for quality, business analysis, training and related purposes; and
- market and promote complementary services;
- as well as any other uses identified at the time of collecting your personal information.

If we do not collect this personal information, we may not be able to provide our Clients with the services or assistance requested.

In addition, all Citco employees have committed themselves to confidentiality by signing an acknowledgement (yearly) that they have received, understood, and will abide by the Citco Handling Confidential, Sensitive and Inside Information policy.

4. Legal Basis for Using Your Personal Information

There are different legal bases that we rely on to use your personal information, namely:

- **Compliance with legal obligations** – The use of your personal information may be necessary to comply with legal and regulatory obligations such as those set out under anti-money laundering and counter terrorist financing laws (in some circumstances, public interest shall also constitute a relevant legal basis for the use of your personal information when complying with anti-money laundering and counter terrorist financing laws);
- **Performance of a Contract** – The use of your personal information may be necessary to perform the contract that you have with us so that we can provide the services and products that you have engaged us to provide to you.
- **Legitimate interests** – We may use your personal information for our legitimate interests to improve our services, quality assurance, training and for administrative purposes including sharing of data with our Citco affiliates for AML/CFT purposes.
- **Consent** – We may periodically send promotional communications about Citco news and industry updates, events and service information to the contact information you have provided – we will only do so with your consent. We have an interest in making sure our marketing is relevant for you, so we may process your information to send you marketing communications tailored to your interests. You may at any time withdraw your consent and choose not to receive marketing communications from us by following the unsubscribe instructions included at the end of each email communication or by contacting us at the address at the end of this notice.

5. How long will we keep your personal information?

To meet our legal and regulatory obligations, we will hold your personal information while our Services are ongoing and for a period of time after that. This would usually be for a minimum period of 7 years from the date on which our Services are terminated or 10 years from the date on which a Citco bank account with which you are associated has been closed. We may retain it for longer if required in connection with ongoing complaints, litigation or investigations or to comply with applicable legal/regulatory obligations. However, we will not hold your personal information for longer than necessary and at all times one or more legal basis exist that enable us to lawfully retain your personal information for the determined duration(s).

In circumstances where your personal is obtained and processed by reason of your consent, we will retain your personal data only for as long as you continue to consent to us retaining that personal data for the purposes that you had consented to.

6. Security and Storage

Security

We implement and maintain physical, electronic and procedural safeguards and security measures designed to protect personal information from misuse, interference and loss, and from unauthorized access, modification or disclosure.

<p>(a) encryption of personal data</p>	<p>Citco has implemented encryption: “data in transit” and “data at rest” (Citco holds the keys). The extent and nature of encryption which Citco implements is kept under review taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing.</p>
<p>(b) the ability to ensure the ongoing confidentiality, integrity, availability, and resilience of processing systems and services</p>	<p>Please refer to controls below. Citco has also obtained an ISO 27001:2013 certification of our Information Security Management System (“ISMS” aka Security Program) in December 2016. The 27001:2013 is an industry standard framework for securing an ISMS. It is comprised of a suite of activities (14 domains) relating to the identification and management of information risks. An ISMS is a systematic approach to managing sensitive information so that it remains secure. It includes people, processes and IT systems by applying a risk management process.</p> <p>The certification applies Citco group-wide and covers all Citco computer systems/IT operations - used by all entities within Citco. Citco’s offices with significant IT presence/operations are in scope of the certification as certain aspects of the certification are specific to where these operations take place. We can supply you with a copy of our certificate upon request.</p> <p>We perform security awareness and data privacy essentials training when staff is on-boarded and yearly thereafter.</p> <p>We deployed a Privacy and Security portal containing policies, standards, procedures, definitions, and other various resources an employee can reference for privacy and security related matters.</p>
<p>(c) ensuring processes exist to ensure access controls are ‘least privilege’</p>	<p>Changes to access must go through our Change Management System requiring management sign off. Managers review attestations every quarter.</p>
<p>(d) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident</p>	<p>Our systems are clustered (high availability). We also maintain a separate facility in the event the facility goes off-line. Complete failover tested yearly.</p>

<p>(e) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing</p>	<p>We regularly test a number of controls for effectiveness and security of processing:</p> <ol style="list-style-type: none"> 1) Tests are conducted by the Business – (1st line of defence) 2) Results are overseen by Risk Management – (2nd line of defence) 3) Risk framework is audited by (Internal Group Audit – (3rd line of defence) <p>In addition, we have dedicated security staff who test all systems for vulnerabilities. All systems tested after each patch cycle; after any significant changes; and prior to new systems going into production. Citco also has an independent 3rd party conducting tests on an annual basis of our DMZ environment.</p>
<p>(f) technical controls</p>	<p>Citco has implemented and maintains physical, electronic and procedural safeguards and security measures designed to protect personal information. For example:</p> <ul style="list-style-type: none"> • Encryption – both at rest and in transit; • Citco operates under the principles of Least-privilege and Segregation of Duties; • Multi-factor authentication to access external-facing web applications; • Advanced Persistent Threat Infrastructure - IPs sensors at every point of ingress and egress as well as EPP and EDP deployed to all Windows endpoints; • Next-gen firewalls and Intrusion Detection Systems (IDS) in all offices and Data Centers; • Privileged Access Control; • Threat Intelligence Services; • System Protection including centralized next-gen anti-virus/anti-spam systems, heuristic detection, etc.; • E-mail Gateways with additional anti-spam control and data egress/ingress detection; • Data loss prevention measures to control USB ports and CD / DVD drives; • Integrated phishing reporting mechanisms; • URL filtering to control internet access; • Security part of Lifecycle development process; • Code reviews and penetration tests conducted during development and prior to production release; • Baseline security established for systems and periodically measured for compliance; • Information Rights Management with persistent, on/off network protection for sensitive, proprietary unstructured data files; • 3rd party Data Centers professionally managed and maintained; • Badge reader or biometric authentication required to access offices or computer rooms.

Storage

We store business and client data within our secure corporate datacenters or authorized secure cloud providers.

- Cloud providers do not have access to our encryption keys and cannot access Citco Data;

- Passwords are securely stored in our authentication repository and not accessible to any Citco personnel; and
- Access to customer information is strictly controlled via role-based access controls and multi-factor authentication.

7. Your personal information and third parties

We may disclose your personal information to Citco affiliates for legitimate business purposes (including providing services to you) in accordance with applicable law. Sometimes we may also share your personal information with:

- third party service providers or suppliers engaged by us to perform functions or activities on our behalf;
- Clients of which you are a related person;
- service providers to Clients of which you are a related person, including fund managers and their affiliates, banks and brokers;
- regulators, law enforcement, tax authorities or other or government authorities as required to comply with our legal and regulatory requirements; and
- other entities identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

This list of possible disclosures is not intended to be exhaustive and there may be other legitimate purposes for holding, disclosing or otherwise processing your personal information. Where the law so requires, you will be notified of any additional purposes and where required your consent will be sought.

Note: Citco does not sell personal data that it processes on behalf of our clients.

8. International transfer of data

The sharing of personal information with the third parties set out above may involve the transfer of data to jurisdictions outside the European Economic Area (**EEA**). Such countries may not have the same data protection laws as your jurisdiction. However, Citco shall ensure that the transfer (export) of data by Citco outside the EEA is subject to a contract incorporating standard contractual clauses in the form adopted by the European Commission under Decision 2010/87/EU, Decision 2004/915/EC or an equivalent or replacement decision (including, where applicable, suitable supplementary measures as may be required in accordance with European Data Protection Board or other relevant supervisory authority guidelines) or permitted pursuant to an adequacy decision.

A list of countries and territories in which Citco companies are located can be accessed at <https://www.citco.com/global-reach>.

9. Your personal information rights

You have various rights in relation to your personal information, including the right to request access to your personal information, correct any mistakes on our records, erase or restrict records where they are no longer required, object to use of personal information based on legitimate business interests.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than within one month after of receipt of your request. In exceptional cases, we may extend this period by two

months and we will tell you why. We may request proof of identification to verify your request. To exercise these rights please contact us using the details below.

The rights that you have in respect of your personal information are not absolute and are subject to a range of legal conditions and exemptions. If and to the extent a relevant legal condition or exemption applies, we reserve the right not to comply with your request.

10. Notification of Appointments

EU General Data Protection Regulation 2016/679

As part of our EU General Data Protection Regulation 2016/679 compliance measures, we have appointed Eoghan Nihill as the Data Protection Officer for Citco entities in the jurisdictions of the Netherlands, Ireland, Luxembourg, Lithuania, Malta, Cyprus and the United Kingdom. Details of the entities that have had a **Data Protection Officer** appointed are available upon request.

Bermuda Personal Information Protection Act 2016

In accordance with Section 5 of the Bermuda Personal Information Protection Act 2016, we have appointed Eoghan Nihill as the **Privacy Officer** for Citco (Bermuda) Limited and Citco Fund Services (Bermuda) Limited.

Canada Personal Information Protection and Electronic Documents Act 2000

In accordance with Part 4.1.1 of Schedule 1 of the Canada Personal Information Protection and Electronic Documents Act 2000, we have appointed Julianne Bryant as the designated person (**Privacy Officer**) for Citco (Canada) Inc., Citco REIF Services (Canada) Limited, Citco Global Securities Services (Canada) Limited and Citco Technology Management Canada Limited. In accordance with part 4.1.1 of Schedule 1 of the Canada Personal Information Protection and Electronic Documents Act 2000, we have appointed Michelle Hall as the designated person (**Privacy Officer**) for Citco Bank Canada and Citco Securities Inc.

Mauritius Data Protection Act 2017

In accordance with Section 3 of the Mauritius Data Protection Act 2017, we have appointed Gianesha Rampall as the **Local Representative** for Citco (Mauritius) Limited.

Philippines Data Privacy Act 2012 & Implementing Rules and Regulations of the Data Privacy Act 2012

In accordance with Section 21(b) of Chapter VI of the Philippines Data Privacy Act 2012 and Section 25 of Rule VI of the Implementing Rules and Regulations of the Data Privacy Act 2012, we have appointed Marlon Ornea as the local office **Data Protection Officer** for Citco International Support Services Limited.

Singapore Personal Data Protection Act 2012

In accordance with Section 11 of the Singapore Personal Data Protection Act 2012, we have appointed Jocelyn Li Ern Loke as the local office **Data Protection Officer** for Singapore Pte. Ltd. In accordance with Section 11 of the Singapore Personal Data Protection Act 2012, we have appointed James Robertson as the local office **Data Protection Officer** for Citco Fund Services (Singapore) Pte. Ltd.

New Zealand Privacy Act 2020

In accordance with Section 201 of the New Zealand Privacy Act 2020, we have appointed Eoghan Nihill as the **Privacy Officer** for Citco Trustees (New Zealand) Limited.

11. Questions or Complaints

Our Chief Privacy Officer oversees how we collect, hold, use and disclose personal information and protect your personal information to ensure your rights are fulfilled. For questions about this notice, to exercise your rights regarding your personal information held by us, or to make an enquiry, please contact our Data Protection Officer or privacy team:

c/o Citco Technology Management (Ireland) Limited
Custom House Plaza, Block 5, IFSC Dublin 1, Ireland

Privacy Team Email: Privacy@citco.com

Data Protection Officer Email: dpo@citco.com

Phone #: Toll Free: +1 800 457 2251 / Americas: +1 201 793 5858 / Europe: +41 22 591 1212

You may make a complaint about an alleged breach by us of applicable privacy laws in relation to our handling of your personal information. Your complaint should be in writing and addressed to our Data Protection Officer. Alternatively, you have a right to lodge a complaint with the competent supervisory authority.

12. Notice of Changes

We keep this notice under regular review and may modify or amend it from time to time at our discretion. If we make changes, we will record the date of amendment or modification at the top of the notice. The revised notice will apply to you and your information from that date. We would encourage you to review this notice periodically.

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