



Citco Group of Companies Data Protection Notice

November 2018

CITCO

Data Protection Notice

(Effective: May 25th 2018)

The **Citco Group Limited and its subsidiaries and affiliates** from time to time (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.

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.

4 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.

5 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;
- **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 rely on your consent to use your personal information, for example, for marketing purposes. You may withdraw your consent at any time by contacting us at the address at the end of this notice.

6 Security

We implement and maintain physical, electronic and procedural safeguards and security measures that are reasonably designed to protect your personal information. For example, we implement:

- security measures for access to our business premises;
- security procedures within our offices; and
- IT security measures, including password protection, firewalls, intrusion detection and site monitoring.

These measures are in place to protect your personal data that we hold to prevent misuse, interference and loss, and from unauthorized access, modification or disclosure.

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.

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 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 (the **Model Clauses**) 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.

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.

Mauritius Data Protection Act 2017

In accordance with Section 3 of the Mauritius Data Protection Act 2017, we have appointed Giancesha Rampall as the **Local Representative** for Citco (Mauritius) 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 #: +1 800-457-2251

Americas: +1 201 793 5858

Europe: +41 22 951 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.