



Cayman Islands Data Protection

The Cayman Islands Government enacted the Data Protection Act (as revised) of the Cayman Islands (the “DPA”) on 18 May 2017. The DPA came into force on 30 September 2019. The DPA introduces legal requirements for the Cayman Company based on internationally accepted principles of data privacy.

Prospective investors should note that, by virtue of making investments in a Cayman Company and the associated interactions with the managers and its affiliates and/or third party service providers, or by virtue of providing the Cayman Company with personal data on individuals connected with the investor (including but not limited to directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents) such individuals will be providing the Cayman Company and its affiliates and/or third party service providers (including, without limitation, the Administrator) with certain personal data within the meaning of the DPA.

The Cayman Company shall act as a data controller in respect of this personal data and its affiliates and/or third-party service providers, such as the Administrator, will normally act as data processors. Where those affiliates or third-party service providers make their own decisions regarding the processing of personal data they hold, in certain circumstances they may also be data controllers in their own right under the DPA.

By investing in the Cayman Company, the investors shall be deemed to have read in detail and understood the Privacy Notice set out below. This Notice provides an outline of the Investor’s data protection rights and obligations as they relate to their investment.

Oversight and enforcement of the DPA is the responsibility of the Cayman Islands’ Ombudsman. Breach of the DPA by the Cayman Company could lead to enforcement action by the Ombudsman, including the imposition of remediation orders, financial penalties or referral for criminal prosecution. The Ombudsman’s address is set out at the end of the Notice.

Privacy Notice

Introduction

The purpose of this Notice is to provide investors with information on the Cayman Company’s use of their personal data in accordance with the Data Protection Act (as revised) of the Cayman Islands (the “DPA”).

The Cayman Company refers to the Administrator and its or their affiliates and/or delegates, except where the context requires otherwise.

If an Investor is a natural person, this Notice will apply to such Investor directly. If an Investor is a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited



partnerships) that provides the Cayman Company with personal data on individuals connected to such Investor for any reason in relation to such Investor's investment with the Cayman Company, this Notice will be relevant for those individuals and such Investor should transmit the content of this Notice to such individuals or otherwise advise them of its content.

What Personal Data May be Collected

To make an investment in the Cayman Company and in connection with an investor's associated interactions with the Cayman Company (including any subscription (whether past, present or future), including the recording of electronic communications or phone calls where applicable) the investor will provide the Cayman Company with certain personal data within the meaning of the DPA ("Investor Data").

Investor Data includes, without limitation, the following information relating to an investor:

- Name;
- residential address;
- email address;
- contact details;
- corporate contact information;
- signature, nationality;
- place of birth;
- date of birth;
- tax identification;
- credit history;
- correspondence records;
- passport number;
- bank account details; and
- source of funds details and details relating to the investor's investment activity.

The investor may also provide the Cayman Company with personal data relating to individuals connected with the investor as a co-investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents).

The Cayman Company may also obtain Investor Data from other public sources.

Investor Data the Cayman Company May Generate

- information to identify and authenticate the investor;
- investigations data, sanctions and anti-money laundering checks, content and metadata related to relevant exchanges of information between the Cayman Company and the investor;
- records of correspondence and other communications between the Cayman Company and Investor; and
- records of any interactions between the Cayman Company and Investor including the recording of electronic communications or phone calls where applicable.



How the Cayman Company May Use Investor Data

The Cayman Company, as the data controller, may collect, store and use Investor Data for lawful purposes, including, in particular:

- where this is necessary for the performance of the Cayman Company's rights and obligations under any subscription agreements or purchase agreements;
- where this is necessary for compliance with a legal and regulatory obligation to which the Cayman Company is subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- where this is necessary for the purposes of the Cayman Company's legitimate business interests and such interests are not overridden by the Investor's interests, fundamental rights or freedoms.

Additionally, the Administrator may use Investor Data, for example to provide its services to the Cayman Company or to discharge the legal or regulatory requirements that apply directly to it or in respect of which the Cayman Company relies upon the Administrator, but such use of Investor Data by the Administrator will always be compatible with at least one of the aforementioned purposes.

Should the Cayman Company wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires an investor's consent), the Cayman Company will contact the applicable investors.

Why the Cayman Company May Transfer Investor Data

In certain circumstances the Cayman Company and/or its authorised affiliates or third party service providers may be legally obliged to share Investor Data and other information with respect to an investor's interest in the Cayman Company with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

The Cayman Company anticipates disclosing Investor Data to the Administrator and others who provide services to the Cayman Company and their respective affiliates (which may include certain entities located outside the Cayman Islands or the European Economic Area), who will process an investor's personal data on the Cayman Company's behalf. Therefore, Investor Data may be transferred to countries outside Cayman which may have data protection laws and regulations that differ from the DPA.



Protection and Storage of Investor Data

Any transfer of Investor Data by the Cayman Company or its duly authorised affiliates and/or third party service providers outside of the Cayman Islands shall be in accordance with the requirements of the DPA.

The Cayman Company and its duly authorised affiliates and/or delegates shall apply appropriate technical and organisational information security measures designed to protect against unauthorised or unlawful processing of Investor Data, and against accidental loss or destruction of, or damage to, Investor Data.

The Cayman Company shall notify an Investor of any Investor Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of an Investor or those data subjects to whom the relevant Investor Data relates.

Data Subject Rights

Subject to local law, data subjects may have certain rights regarding Investor Data that the Cayman Company has collected.

The data subject's ability to exercise these rights will depend on a number of factors and in some instances, the Cayman Company will not be able to comply with the request, for example because it has legitimate grounds for not doing so or where the right doesn't apply to the particular Investor Data held.

How to contact us

If a data subject would like to contact the Cayman Company regarding this Notice it should send an email to cayman.spvinfo@cscglobal.com. In each case, the data subject should include as the subject or heading line "Privacy Notice".

Complaints

Data subjects may have the right to complain to the data protection authority/regulator, as applicable, in the Investor's jurisdiction.

The Office of the Ombudsman in the Cayman Islands can be contacted at:
Address: 3rd Floor, Anderson Square, 64 Shedden Road, George Town, Grand Cayman
By mail to: PO Box 2252, Grand Cayman KY1-1107, Cayman Islands
Email: info@ombudsman.ky
Telephone: +1 345 946 6283

The Investor may also have the right to make a complaint to a regulator based in another jurisdiction.