

EnTrust Global

Privacy Notice

March 2024

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1. Important Information

This Privacy Notice applies to the processing of personal data by EnTrust Global and applies to all entities within the EnTrust Global group of companies (the “EnTrust Global Group” or “EnTrust Global”). All of our offices are located in countries with laws governing the processing of your personal information.

References to “you” or “your” relate to individuals whose personal data is processed by EnTrust Global, including direct and indirect relationships with prospects or clients, vendors, suppliers, professional advisers and other counterparties, including visitors to our website and offices.

We respect your privacy and appreciate the confidence you have placed in us. We are committed to protecting your privacy and preserving your trust. Please carefully review this Privacy Notice to learn about how we collect, use, and protect any personal information you provide us, or we obtain about you, and your choices for managing your personal information. This Privacy Notice is subject to the Terms of Use posted on the Website.

2. Personal Information We Collect About You, Purpose and Lawful Basis For Processing

Personal data, or personal information, means any information about an individual which can be used either alone, or with other sources of information to identify that individual. Personal data or personal information does not include information where the identity of the individual or the specific detail of the information has been removed and is therefore anonymous.

We collect, use, store and transfer different kinds of personal data about you. We have grouped together the following categories of personal data to explain how this type of information is used by us. These terms are used throughout this Notice:

- **“Identity Data”**: including your first name, middle names, maiden name, last name, marital status, family members, title, date of birth, passport number or other official identity number, photographs, image and gender.
- **“Contact Data”**: including your home and/or work address, email address and telephone number(s).

- **“Professional Information and History Data”**: including your position, job title, professional affiliations, the name of your employer as well as your previous positions and professional experience.
- **“Financial Data”**: including your bank account details, holdings, transaction data, historical arrangements in association with services we provided to you and payment details.
- **“Marketing and Communications Data”**: including marketing and communication preferences and event participation details.
- **“Technical Data”**: including technical information collected when you access our Website or our electronic portals and platforms including your internet protocol (IP) address, username, your login data and browser type and version.
- **“Security Data”**: including CCTV footage and other information relating to access of our facilities obtained through electronic means, such as swipe card records, or visitor logbook.
- **“Services data”**: including details of services you have provided to us or we have provided to you including potential counterparties involved.

We provide below, in a table format, a description of the purpose for which we use your personal data and the legal bases we rely on to do so. We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data.

2.a. In Relation To Visitors To The EnTrust Global Website And Client Portal

Purpose and/or Activity	Type of Data	Legal Basis for processing:
To manage and protect our business, our Website and Client Portal, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting and reporting	- Technical Data	- Legitimate interests: to ensure the secure and efficient running of our Website and Client Portal, including the maintenance of IT services, network and data security.

To deliver relevant content via our Website or Client portal	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data 	<ul style="list-style-type: none"> - Legitimate interests: to provide relevant content - Performance of a contract
To enable you to contact the firm, send a complaint or complete event participation forms	<ul style="list-style-type: none"> - Contact Data - Identity Data - Professional Information and History Data 	<ul style="list-style-type: none"> - Legitimate interests: providing you with access to requested services and ensuring that you are provided with the best client services - Legal or regulatory obligation
To invite you to take part in our events and client seminars (including online events), host these events and manage your registration and participation in them	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data - Marketing and Communication Data 	<ul style="list-style-type: none"> - Legitimate interests: promoting our client services, receiving direct feedback and improving our services

2.b. In Relation To Visitors To The EnTrust Global Offices

Purpose and/or Activity	Type of Data	Legal Basis for processing:
To manage and protect our business and employees and to detect and prevent crime and safety incidents	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data 	<ul style="list-style-type: none"> - Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security

2.c. In Relation To Persons With Whom EnTrust Global Has Contact For Business Purposes

Purpose and/or Activity	Type of Data	Legal Basis for processing:
To maintain our directory of contacts and share information about our services	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data - Marketing and Communication Data - Financial Data - Service Data 	<ul style="list-style-type: none"> - Legitimate interests: To ensure our records are up-to-date, identify ways to grow our business by targeting our business development initiatives and marketing activities more effectively
To organise meetings between you and EnTrust Global representatives	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data - Service Data 	<ul style="list-style-type: none"> - Performance of a contract - Legitimate interests: ensuring the effectiveness of our business development initiatives, running of our business and review of counterparties
To manage our relationship with you and perform our contractual obligations which may include amongst others notifying you about changes to our terms of business or other terms that may affect you	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data - Service Data - Financial Data 	<ul style="list-style-type: none"> - Performance of a contract - Legal or regulatory obligation - Legitimate interests: To ensure we can notify you about changes to our terms of business
For general business marketing, including providing product, business and economic insights and periodic updates	<ul style="list-style-type: none"> - Identity Data - Contact Data - Professional Information and History Data - Marketing and Communication Data - Service Data 	<ul style="list-style-type: none"> - Legitimate interests: to promote and identify new ways to grow our business and to maintain and build relationships with counterparties

	- Technical Data	
To interact with governmental or regulatory bodies or other competent national authorities	- Identity Data - Contact Data - Professional Information and History Data - Service Data	- Legal or regulatory obligation - Performance of a contract - Public interest
To conduct ongoing administrative, reporting and other processes and communication required to operate the business in accordance with the agreements and other applicable documentation between you and EnTrust Global	- Identity Data - Contact Data - Professional Information and History Data - Service Data	- Performance of a contract - Legal or regulatory obligation - Legitimate interests: ensuring our company continues to run effectively

2.d. Persons Associated With EnTrust Global Suppliers, Vendors Or Professional Advisers

Purpose and/or Activity	Type of Data	Legal Basis for processing:
To engage you or the organization or entity you work for as a new supplier, vendor or professional adviser, including performing anti-money laundering, anti-terrorism, sanctions, fraud and other background checks	- Identity Data - Contact Data - Professional Information and History Data - Financial Data - Service Data	- Performance of a contract - Legal or regulatory obligation - Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism.
To review whether we would have a conflict of interest in appointing you as a supplier, vendor or professional adviser	- Identity Data - Contact Data - Professional Information and History Data	- Legal or regulatory obligation - Legitimate interests: ensuring we (and all other parties concerned) understand any conflict of interest which may arise for us in a matter

<p>To manage payments, fees and charges and to collect and recover money owed to us</p>	<ul style="list-style-type: none"> - Identity Data - Contact Data - Financial Data - Service Data 	<ul style="list-style-type: none"> - Performance of a contract - Legitimate interests: ensuring we can manage payments, fees and charges; to collect and recover money owed to us
<p>To provide you access to our systems and provide you the resources and access required to perform the services under a supplier, vendor or professional services agreement and to ensure we protect our business</p>	<ul style="list-style-type: none"> - Identity Data - Contract Data - Technical Data - Service Data - Professional Information and History Data 	<ul style="list-style-type: none"> - Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security

If the legal basis is compliance with the law (i.e. legal or regulatory obligation), you can obtain further information about the law applicable to the particular activity by contacting Bruce Kahne at (212) 224-5548 or toll free at (888) 812-5100 or by email at bkahne@entrustglobal.com. For more details about your rights and how to contact us please refer to Section 13 (How To Contact Us And How To Exercise Your Data Subject Rights).

A failure to provide personal information requested to fulfil the purposes described in this Privacy Notice may result in EnTrust Global being unable to provide the services in connection with the terms of any subscription agreement, operating agreement or other agreement or arrangement.

3. How Do We Collect This Information?

We typically collect personal information about you when you provide it to us through your registration on our website, fill an event participation form or when you contact us through our website's contact form.

We may also collect personal information from you and about you through direct interactions such as for example when you enquire about our services, you market or provide your services to us, give us personal data necessary for a specific service we

are performing for you, give us your business card at an event or a meeting, or otherwise personally give us your personal data.

We may also collect personal information through the use of cookies or other automated technologies or interactions such as your IP address, network location, browser characteristics, device characteristics and operating system. The personal data collected this way is limited. For more information please refer to our Cookies Policy.

In addition, we may receive personal information about you from third parties, such as:

- Public sources or information vendors;
- Introducers or other intermediaries who market or provide services to you;
- If we have a business relationship with the organisation that you represent, your colleagues or other business contacts who may give us information about you such as your contact details or details of your role;
- When you provide your personal data to a third party for the purpose of sharing it with us. For instance, recruitment agencies and consultants may provide your personal data to us for recruitment activities.

4. With Whom Will We Share Your Information?

We may have to share your personal data with the entities and persons set out below for the purposes for which we collected the personal data, as detailed in Section 2 of this Notice (Personal Information We Collect About You, Purpose and Lawful Basis For Processing) and Section 5 (Lawful Basis).

We have policies that limit access to your personal information to only those people who need it to perform their jobs and provide services to you, and we have physical, electronic and procedural safeguards that comply with applicable laws to protect your information from unauthorized access.

We will not sell, share, or rent your personal information to third parties, and we will not otherwise disclose personal information to third parties, without your permission, except as disclosed in this Privacy Notice.

We may disclose the information we collect to third parties that assist us in providing financial services to you, which include, as applicable, the relevant fund's

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administrator, distributors, brokers and custodians. From time to time, we disclose your information to persons or entities whom we have asked to assist us to operate our business or provide services to you ("Service Providers").

We provide our Service Providers with the information needed for them to perform these services. Each Service Provider must agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to protect your personal information from unauthorized access, use, destruction, modification, or disclosure and in accordance with applicable laws.

We may also disclose information with other non-affiliated third parties who perform services on our behalf or who assist us in providing services to you, such as attorneys and accountants, and as otherwise permitted by law. These third parties may be based in countries outside the European Economic Area ("EEA") which may not offer the same level of protection of the information transmitted.

We also may share personal information with entities controlling, controlled by, or under common control with EnTrust Global. In the event that EnTrust Global is merged, or in the event of a proposed or actual transfer of the business or assets associated with it, we may disclose or transfer your personal information and non-personal information in connection for such transaction to the acquirer of the assets, including for due diligence purposes and to complete the transaction. We also reserve the right to transfer personal data we have about you or otherwise process in the event that we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution or liquidation). Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the part of our business that is (as the case may be) sold, acquired or is the merged entity may use your personal data in the same way as set out in this Notice.

In certain instances, we may disclose your personal information when we have reason to believe it is necessary to identify, contact or bring legal action against persons or entities who may be causing injury to you, to EnTrust Global, its affiliates, or to others. We may also disclose your personal information when we believe the law or legal process requires such disclosure, to cooperate with regulators or law enforcement authorities, or to protect our rights.

We will only share the minimal amount of personal data necessary for the purposes described in this Privacy Notice and, where possible, we will share the personal data in an anonymised form.

5. Lawful Basis

We will only process (meaning the collection, storage, use, disclosure or otherwise making available) your personal data when the law allows us to, that is, when we have a legal basis for processing. Section 2 (Personal Information We Collect About You, Purpose and Lawful Basis for Processing) sets out further information about the legal bases that we rely on to process your personal data.

There is a need to process personal information for the purposes set out in this Privacy Notice as a matter of contractual necessity under or in connection with the applicable agreement, and in the legitimate interests of EnTrust Global and its affiliates to operate their respective businesses. From time to time, EnTrust Global may need to process personal information on other legal bases, including: to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest.

6. Our Website and Use Of Cookies

We use various technologies to collect other types of information, including personal information, automatically. The use of your personal information submitted through the Website is necessary for our legitimate business interest in the proper administration of our Website and business as well as to monitor and improve our services. For example, in order to measure the usefulness and efficiency of our Website pages, we automatically track certain information from all visitors to our Website. The types of information we might track may include the Internet address that you just came from, which Internet address you go to, what browser you are using, your IP address, your internet service provider, date and timestamp information. We will retain your personal data for as long as you use our Website and for a minimum period of seven years thereafter.

Additionally, like most interactive websites, EnTrust Global uses “cookies” on certain pages of our Website. “Cookies” are small data files located in your hard drive that store certain information, including certain personal information, such as your password and any information or content preferences you may voluntarily set. For more details, please refer to our Cookie Policy. We currently only use cookies that are strictly necessary for you to browse and use our website. Strictly necessary are cookies that are essential for the website to function properly, without which the site would not work. These cookies are primarily session cookies and are deleted when you leave the site.

The website may contain links to websites operated and maintained by third parties, over which we have no control. Privacy Notices on such linked websites may be different from our Privacy Notice. You access such linked websites at your own risk. You

should always read the Privacy Notice of a linked website before disclosing any personal information on such site.

7. Data Storage and Retention

Your personal information will be retained only for as long as the information is needed to fulfil the purposes for which it was collected and processed. EnTrust Global reserves the right to retain and use your personal information for as long as necessary to comply with its own and its affiliates' legal obligations and business requirements and/or to resolve ongoing disputes and enforce its own and its affiliates' agreements.

To determine the appropriate retention period for personal data, we take into account various factors, including 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.

8. Transfers Of Personal Information

Your personal information may be transferred, processed and/or stored in a country other than the one in which your personal information is collected. When transferring your personal information to the United States or other countries, EnTrust Global has implemented procedures to ensure that appropriate safeguards are in place to protect the personal information regardless of where it is being transferred.

EnTrust Global may transfer personal information to a non-equivalent country (a country or territory other than (i) a member state of the EEA; or (ii) a country or territory which has at the relevant time been decided by the European Commission in accordance with EU law to ensure an adequate level of protection for personal information), in order to fulfil the purposes described in this Privacy Notice and in accordance with applicable laws and safeguards, including where the transfer is necessary for the performance of a contract, for the establishment, exercise or defence of legal claims, for the protection of the vital interests of the data subject or another person and lastly where the transfer is necessary for reasons of public interests.

Where we transfer personal data outside of the UK, the EEA, or other territories subject to data transfer restrictions to other members of EnTrust Global or to our service providers, we will ensure that our arrangements with them are governed by data transfer agreements, terms approved for the particular purpose of data protection by the European Commission (EC Standard Contractual Clauses) or other safeguards

designed to ensure that your Personal Data is protected as required under applicable law.

9. Security

We use encryption and authentication tools to protect the security of personal information that you share with us. However, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect personal information, we cannot and do not guarantee or warrant the security of any information you transmit and you do so at your own risk.

Moreover, we have a legal duty to make sure we hold your personal information (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them.

10. General Data Protection Regulation (GDPR)

GDPR (implemented across all European Union member states from 25 May 2018) applies to the collection, processing and storage of personal data undertaken by organisations within the European Economic Area (EEA), as well as to firms outside the EEA that handle personal data relating to individuals in the EEA. Following the UK withdrawal from the European Union, the GDPR has been retained in UK domestic law.

The GDPR and UK GDPR have two key purposes: (a) to set guidelines for the collection, processing and protection of personal data and (b) to give individuals certain rights in relation to their personal data (such as to access and correct it and object to further processing).

11. Your Rights and Choices

You may exercise the following rights by contacting your usual EnTrust Global representative or Bruce Kahne at (212) 224-5548 or toll free at (888) 812-5100 or by email at bkahne@entrustglobal.com:

- Right to be informed about how your personal data is used: you have a right to be informed about how we will use and share your personal data. This explanation will be provided to you in a concise, transparent, intelligible and easily accessible format and will be written in clear and plain language;
- Right to access personal data: you have a right to obtain confirmation of whether we are processing your personal data, access to your personal data and information regarding how your personal data is being used by us;

- Right to have inaccurate personal data corrected: you have a right to have any inaccurate or incomplete personal data rectified. If we have disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible;
- Right to have personal data erased in certain circumstances: you have a right to request that certain personal data held by us is erased. This is also known as the right to be forgotten. This is not a blanket right to require all personal data to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your personal data;
- Right to restrict processing of personal data in certain circumstances: you have a right to block the processing of your personal data in certain circumstances. This right arises if you are disputing the accuracy of personal data, if you have raised an objection to processing, if processing of personal data is unlawful and you oppose erasure and request restriction instead or if the personal data is no longer required by us but you require the personal data to be retained.
- Right to data portability: in certain circumstances you can request to receive a copy of your personal data in a commonly used electronic format. This right only applies to personal data that you have provided to us (for example by completing a form or providing information through a website). Information about you which has been gathered by monitoring your behaviour will also be subject to the right to data portability. The right to data portability only applies if the processing is based on your consent or if the personal data must be processed for the performance of a contract and the processing is carried out by automated means (i.e. electronically);
- Right to object to processing of personal data in certain circumstances, including where personal data is used for marketing purposes: you have a right to object to processing being carried out by us if (a) we are processing personal data based on legitimate interests or for the performance of a task in the public interest (including profiling), (b) if we are using personal data for direct marketing purposes, or (c) if information is being processed for research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly brought to your attention and be presented clearly and separately from any other information; and
- Right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect: you have a right not to be subject to a decision which is based on automated processing where the decision will produce a legal effect or a similarly significant effect on you.

Where data is being processed on the basis of consent your right to withdraw consent will not affect the lawfulness of processing based on consent before the withdrawal.

You can also lodge a complaint about our processing of your Personal Data with the body regulating data protection in your country.

We may update this Privacy Notice at any time by making the updated copy available on our Website.

12. Personal Information Rights for California Residents

The California Consumer Privacy Act (as amended, restated, modified and/or supplemented from time to time, including pursuant to the California Privacy Rights Act, the, "CCPA") requires us to make certain additional disclosures and provides California residents with the ability to request additional information about their personal information. If you are a California resident and it is determined that the CCPA applies to you, this section details those rights, how you may exercise them, and what EnTrust Global will do in response.

Please note that the rights under the CCPA do not apply to personal information collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022). If you are an individual who resides in California and whose personal information is collected and processed by EnTrust Global, you may have the right to:

- Request that we disclose, free of charge, the categories and specifics of the personal information we collect about California residents, the sources from which the personal information was collected (and/or, if applicable, sell or otherwise disclose to a third party), and the business purpose for collecting personal information.
- Choose to opt-out of the sale of personal information. Currently, however, EnTrust Global does not sell personal information.
- Request that EnTrust Global delete the personal information it has collected. Following EnTrust Global's verification of the request, it will comply with the request and delete any or all of the personal information in its possession that it collected from the California resident and/or any or all such personal information in the possession of its Service Providers, unless otherwise restricted by law or regulation.

Non-Discrimination for Exercising Your Personal Information Rights: EnTrust Global follows the requirements of California Civil Code § 1798.125, and will not discriminate against any consumer who exercises the rights set forth in this Privacy Policy.

13. How To Contact Us And How To Exercise Your Data Subject Rights

If you have any questions or concerns regarding the information in this Privacy Notice, or would like to exercise any of your rights set forth in this Privacy Notice, please contact Bruce Kahne at (212) 224-5548 or toll free at (888) 812-5100 or by email at bkahne@entrustglobal.com. If you would like to exercise any of your rights, please include a description of what right you want to exercise and the information to which your request relates.

If you choose to contact us with a request, you will need to provide us with identifying information that matches the personal information EnTrust Global currently has about you. For example, EnTrust Global may require identifying documents such as an ID or passport, utility bill or driver's license.

EnTrust Global
375 Park Avenue, 24th Floor
NY, NY 10152

Please also contact us via any of the above methods if you have a disability and require an alternative format of this online Privacy Notice. You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact Bruce Kahne at the email address or phone number provided above.

14. Accessibility Information

For consumers with disabilities who need to access this Privacy Notice in an alternative format, please contact Bruce Kahne at the email address or phone number provided above.

Users with a visual impairment can change the text size by adjusting the settings in their browser. Internet Explorer users can access this facility through the View > Text Size menu. Other browsers enable this feature by pressing Ctrl and the + or – keys.

15. Changes to this Privacy Notice

From time to time, we may update this Privacy Notice. If revisions are made to this Privacy Notice, we will update the below statement with a new revision date.

This Privacy Notice was last revised and posted in March 2024.