

## External Privacy Notice

(applicable to shareholders of the Company and their advisors, officers and employees (if any), and to any other relevant external stakeholders or service providers of the Company)

### 1 Introduction

- 1.1 This Privacy Notice is applicable to each entity (hereinafter the "**Company**") to which Standard Bank Offshore Trust Company Jersey Limited, Lumbro Corporate Services Limited and/or Cotillion Trust Company Limited (each, an "**Administrator**") render services, and all of which are carrying on trust company business under the Financial Services (Jersey) Law 1998 (as amended) respectively as Affiliation Leader and Participating Members.
- 1.2 This Privacy Notice sets out how personal data is collected, processed and disclosed in connection with the Company.
- 1.3 In this document, "we", "us" and "our" refer to the Company.

### 2 Who this affects

- 2.1 Your personal data may be held and processed by the Company as a data controller in connection with your legal or beneficial interest in the Company (where you are a natural person holding shares in the Company) or in connection with a shareholding held by a corporate entity in which you have an interest (either as an ultimate beneficial owner or otherwise).
- 2.2 Your personal data may also be held and processed by the Company where:
  - 2.2.1 you are an adviser to a shareholder or another stakeholder;
  - 2.2.2 you or someone you work for is a counterparty in a transaction involving the Company;
  - 2.2.3 you or someone you work for provides services to the Company;
  - 2.2.4 you correspond with the Company in relation to any matter concerning the Company;
  - 2.2.5 you are named in documentation submitted to or maintained by the Company, such as statutory registers, filings or transaction documents; and
  - 2.2.6 your personal data is obtained by the Company in the ordinary course of its business.
- 2.3 These examples are not exhaustive. The Company may process your data in other contexts where it has a lawful basis and it is necessary for its operations, governance, or compliance.
- 2.4 If you are a director, officer, employee or consultant of an entity that provides us with personal data on individuals connected to you for any reason in relation to your involvement with us, you shall make this Privacy Notice available to such individuals and draw their attention to it. This Privacy Notice is readily available at <https://international.standardbank.com/international/personal/about-us/legal>. For example, if you are an estate agent and you secure tenants for a property owned by the Company, you must draw the attention of the tenants to this Privacy Notice. Similarly, if you are a tax advisor and you provide us with personal information about your clients or their beneficiaries in the course of your services, you must ensure that they are made aware of this Privacy Notice.

2.5 We take the privacy and security of your information seriously and will only use such personal information as set out in this Privacy Notice.

2.6 The Company may also publish other privacy notices in specific circumstances.

## **2 Where we obtain your personal data:**

2.1 We primarily collect your personal data from the following sources:

2.1.1 from information which you or your authorised representative gives to us, including but not limited to:

- (a) information set out in any subscription agreement which you complete;
- (b) such other forms and documents as we may request that are completed in respect of your shareholding;
- (c) client due diligence documentation as part of our regulatory requirements; and
- (d) any personal data provided by you by way of correspondence with us by phone, e-mail or otherwise;

2.1.2 from you or any third party sources which may include:

- (a) entities in which you or someone connected to you has an interest;
- (b) your legal and/or financial advisors;
- (c) other financial institutions who hold and process your personal data to satisfy their own regulatory requirements;
- (d) our administrators in certain circumstances;
- (e) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; and
- (f) information collected via websites (including cookies and IP addresses) and emails.

2.1.3 where you have a contractual or business relationship with the Company, including but not limited to situations where:

- (a) you or the organisation you represent provide or receive goods or services to or from the Company;
- (b) you are involved in a funding or lending arrangement with the Company, whether as lender, borrower, guarantor or otherwise;
- (c) you are party to a lease or licence agreement involving immovable property with the Company, whether as landlord, tenant or occupier;

- (d) you are engaged in a joint venture, outsourcing, consultancy or other professional relationship with the Company;
- (e) your personal data is shared in the course of negotiation, performance or enforcement of such arrangements; or
- (f) you communicate with the Company in connection with any such matters.

2.2 We may also collect and process your personal data in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

### **3 Why we collect your personal data:**

#### *Lawful grounds for processing:*

3.1 We are entitled to hold and process your personal data on the following lawful grounds:

- 3.1.1 the processing is necessary for our legitimate interests provided your interests and fundamental rights do not override our legitimate interests;
- 3.1.2 to comply with our legal and regulatory obligations (and those of our service providers) including in the relation to anti-money laundering and fraud checks and maintaining the statutory books of the Company;
- 3.1.3 (on exceptional occasions) where we have obtained your consent;
- 3.1.4 on rare occasions, where we need to protect your interests (or someone else's interests); and
- 3.1.5 on rare occasions, where it is needed in the public interest (e.g. where processing is necessary for public health or regulatory disclosures).

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

#### *Inaccurate or Amended Information*

3.2 Please let us know if any of your personal data (including correspondence details) changes as soon as possible. Failure to provide accurate information or to update changed information may have a detrimental impact upon our ability to safeguard shareholder rights. Failure to provide information where the same is required for anti-money laundering or other legal requirements means that we may not be able to (i) accept you as an investor or shareholder and/or (ii) accept capital call monies from you or pay distribution monies to you.

#### *Purposes of processing*

3.3 Pursuant to paragraph 3.1, we may process your personal data, for the purposes set out below ("**Purposes**"). Those based wholly or partly on our legitimate interests are set out in paragraphs 3.3.1 to 3.3.7 inclusive:

- 3.3.1 conducting credit reference checks;
- 3.3.2 communicating with you as necessary in connection with your affairs and generally in

- connection with your interest in the Company;
  - 3.3.3 operating IT systems, software and business applications;
  - 3.3.4 monitoring and recording telephone and electronic communications and transactions:
    - (a) for quality, business analysis, training and related purposes in order to improve service delivery;
    - (b) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act);
  - 3.3.5 disclosing your personal data (including your identity and interest in the Company) to any bank, financial institution, portfolio company (where relevant) or other third party lender providing any form of facility, loan, finance or other form of credit or guarantee to the Company or its affiliates;
  - 3.3.6 to enforce or defend our legal rights, or those of third parties to whom we each may delegate responsibilities or rights in order to comply with legal or regulatory obligations imposed on each of us;
  - 3.3.7 collecting, processing, transferring and storing “customer due diligence”, source of funds information and verification data under applicable anti-money laundering and terrorist financing laws and regulations; and
  - 3.3.8 liaising with or reporting to any regulatory authority (including tax authorities) with whom we either are required to cooperate with, report to or with whom it decides or deems appropriate to cooperate in relation to an investment, and which has jurisdiction over the Company or its investments.
- 3.4 You have the right to object to processing where we rely on the legitimate interests basis to use and share your personal data.
- 3.5 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. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where these are required or permitted by applicable laws.
- 3.6 To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data then the processing of such data shall solely be for the purpose of complying with any duty imposed on the Company (or on any service provider) by an enactment including, but not limited to, legislation and regulatory obligations relating to anti-money laundering and combatting the financing of terrorism and all other related legislation.
- 4 Sharing personal data**
- 4.1 We may share your personal data with other group companies and third parties (including bank, financial institution or other third party lenders, IT service providers, auditors, our administrators and legal professionals) under the terms of any appropriate delegation or contractual arrangement. Those authorised third parties may, in turn, process your personal data abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. Where such entities act as data processors, we will ensure that there is an appropriate agreement

in place. Where such entities act as data controllers, they will be under an obligation to process your personal data in accordance with applicable laws.

- 4.2 Where we transfer your personal information outside of both Jersey and the European Economic Area ("EEA"), we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

- 4.2.1 the country to which we send the personal information may be approved by the European Commission as providing adequate protection for personal data;
- 4.2.2 by utilising a contract based on "standard contractual clauses" approved by the European Commission and adopted by the Jersey Office of the Information Commissioner ("JOIC"), together with the Jersey Addendum to the standard contractual clauses; or
- 4.2.3 where the recipient is located in the US, it may be a participant of the EU-US Data Privacy Framework.

- 4.3 In other circumstances, the law may permit us to otherwise transfer your personal information outside of both Jersey and the EEA.

- 4.4 If you would like further information about the safeguards we have in place to protect your personal information, please contact the Administrator via email at [DPO@standardbank.com](mailto:DPO@standardbank.com).

## 5 **Retention of personal data**

- 5.1 Your personal data will be retained as long as required:

- 5.1.1 for the Purposes for which the data was collected;
- 5.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
- 5.1.3 as required by the Data Protection (Jersey) Law 2018 (as amended) and any other applicable laws or regulatory requirements.

- 5.2 We endeavour to store your personal data securely in accordance with accepted market standards.

- 5.3 Whilst we have taken every reasonable care to ensure the implementation of appropriate technical and security measures, we cannot guarantee the security of your personal data over the internet, via email or via our websites nor do we accept, to the fullest extent permitted by law, any liability for any errors in data transmission, machine, software or operating error or any other cause.

## 6 **Access to and control of personal data**

- 6.1 You have the right, under certain circumstances, to the following rights in respect of personal data:

- 6.1.1 right to access and port personal data;
- 6.1.2 right to rectify personal data;
- 6.1.3 right to restrict the use of personal data;
- 6.1.4 right to request that personal data is erased; and
- 6.1.5 right to object to processing of personal data.

- 6.2 You also have the right to lodge a complaint with the JOIC or a supervisory authority in the EU member state of your usual residence or place of work or of the place of any alleged breach of data protection legislation.
- 6.3 Where we have relied on consent to process the personal data, you have the right to withdraw consent at any time by contacting us via the contact details below.
- 6.4 If you wish to exercise any of the rights set out in this paragraph, please contact the Administrator via email at [DPO@standardbank.com](mailto:DPO@standardbank.com).

## **7 How to contact us:**

- 7.1 If you have any questions about our use of your personal data, our retention procedures or our security processes, please contact the Administrator via email at [DPO@standardbank.com](mailto:DPO@standardbank.com).

## **8 Changes to this Privacy Notice**

- 8.1 This Privacy Notice is effective from 24 July 2025 and supersedes and replaces any previous External Privacy Notice applicable to a Company to which the Administrator renders services.
- 8.2 We reserve the right to amend this Privacy Notice at any time without notice.