



**PRIVACY NOTICE
SELWOOD ASSET MANAGEMENT (FRANCE) SAS**

1 INTRODUCTION

Your privacy is very important to us. This notice (this “Privacy Notice”) is provided by Selwood Asset Management (France) SAS (“Selwood”) and sets forth the policies of Selwood for the collection, use, storage, sharing, disclosure (collectively, “processing”) and protection of personal data relating to personal data provided by the relevant fund or sub-fund (the “Company”) or the relevant management company (the “Management Company”) in respect of its employees, Directors and existing and prospective investors of the Company who, in each case is an individual, or any individual connected with an investor who is a legal person, as applicable (“you” or “investor”).

2 WHO TO CONTACT ABOUT THIS PRIVACY NOTICE

This Privacy Notice is being provided in accordance with the applicable requirements under the privacy and data protection laws that apply in the jurisdictions where Selwood operates (collectively, the “Data Protection Laws”). Selwood is considered to be data controller in respect of any personal information we hold about you for the purposes of certain Data Protection Laws. This means that Selwood determines the purposes and the means of the processing of your personal information.

Please contact Selwood’s RCCI on compliance.fr@selwoodam.com or by writing to the following address – 106 Boulevard Haussmann, 75008 Paris, France for any questions about this Privacy Notice or requests with regards to the personal data we hold.

3 THE TYPES OF PERSONAL DATA WE MAY HOLD

The categories of personal data we may collect regarding existing and prospective investors include names, residential or business addresses, or other contact details, signature, nationality, tax identification or passport number, date of birth, place of birth, photographs, copies of identification documents, bank account details, information about assets or net worth, credit history (if available), information on investment activities, or other personal information, as specified under the applicable Data Protection Laws, that may be contained in the relevant materials, documents, or obtained through background searches.

The categories of personal data we may collect regarding employees and Directors of the Company or the Management Company include names, business addresses, email address, professional phone number, other contact details and position within the Company. In case of Directors, other personal data may be gathered in order to ensure compliance with know your client rules.

4 HOW WE COLLECT PERSONAL DATA

We may collect personal data about you through: (i) information provided directly to us by you, or another person on your behalf; (ii) information that we obtain in relation to any

transactions between you and us; and (iii) recording and monitoring of telephone conversations with you.

We also may receive your personal information from third parties or other sources, such as the Investment Manager, the Administrator, publicly accessible databases or registers, tax authorities, governmental agencies and supervisory authorities, fraud prevention and detection agencies, or other publicly accessible sources, such as the Internet.

5 HOW WE MAY USE PERSONAL INFORMATION

As regards existing and prospective investors, we may process your personal data for the purposes of administering the relationship between you and us (including onboarding you as a client, communications and reporting), marketing of our products and services, monitoring and analysing our activities, and complying with applicable legal or regulatory requirements (including anti-money laundering, fraud prevention, tax reporting, sanctions compliance, or responding to requests for information from supervisory authorities, or law enforcement agencies).

As regards employees and Directors of the Company and the Management Company, we may process your personal data for the purposes of administering the relationship between us and the entity which you represent or which you manage and, more generally, following our exchange regarding any agreement entered into with that entity.

We will use one of the following permitted grounds under the applicable Data Protection Laws to process your personal information described above:

- (a) processing is necessary to perform our obligations under any agreement or deemed to be entered with you;
- (b) we are required to comply with a legal or regulatory obligation applicable to us; or
- (c) we, or a third party on our behalf, have determined that, in the pursue of our legitimate interest consisting in the management of clients' relationship, network and information security, direct marketing activities as well as intra-group administrative transfers it is necessary to collect and use your personal information, such as if we believe that you have a reasonable expectation for us or a third party to collect or use your personal information for such purpose.

If other permitted grounds of processing are used to process your data, we will inform you accordingly through an amendment of this Privacy Notice.

6 WHAT ARE THE CONSEQUENCES OF FAILING TO PROVIDE PERSONAL INFORMATION

Where personal data is required to satisfy a statutory obligation (including compliance with applicable anti-money laundering or sanctions requirements) or a contractual requirement, failure to provide such information may result in Selwood not being able to continue to provide services under this Agreement. Where there is suspicion of unlawful activity, failure

to provide personal data may result in the submission of a report to the relevant law enforcement agency or supervisory authority.

7 HOW WE MAY SHARE PERSONAL DATA

We may disclose information about you in accordance with the provisions of this Agreement, to our affiliates, service providers, or other third parties to manage the Company, or otherwise perform our contractual obligations.

As regards existing and prospective investors, we may also need to share your personal information with regulatory, tax or law enforcement authorities to comply with applicable legal or regulatory requirements, respond to court orders, or in the context of regulatory requests for information, administrative proceedings, or investigations. We will also release information about you if you direct us to do so.

It may also be necessary, under anti-money laundering and similar laws, to disclose information about you to facilitate the establishment of trading relationships for the Company with counterparties.

We may also disclose information about you, or your transactions and experiences with us, to our affiliates or service providers for our everyday business purposes, such as administration of our business, record-keeping, maintaining security of our information technology systems, reporting and monitoring of our activities, investor relations activities, and compliance with applicable legal and regulatory requirements.

8 RETENTION PERIODS AND SECURITY MEASURES

We will not retain personal data for longer than is necessary in relation to the purpose for which it is collected, subject to the applicable Data Protection Laws. Personal data will be retained for the duration of this Agreement and for a minimum of five years after the termination of the Agreement. We may retain personal data for a longer period for compliance with applicable law. We may also retain personal data for a maximum duration of three (3) years for the purpose of marketing our products and services. From time to time, we will review the purpose for which personal data has been collected and decide whether to retain it or to delete if it no longer serves any purpose to us.

To protect your personal information from unauthorised access and use, we apply organisational and technical security measures in accordance with applicable Data Protection Laws. These measures include computer safeguards and secured files and buildings.

We will notify you of any material personal data breaches affecting you in accordance with the requirements of applicable Data Protection Laws.

9 MONITORING OF COMMUNICATIONS

We will record and monitor telephone conversations and electronic communications with you for the purposes of: (i) ascertaining the details of instructions given, the terms on which any transaction was executed or any other relevant circumstances; (ii) ensuring compliance

with our regulatory obligations; and/or (iii) detecting and preventing the commission of financial crime.

These recordings will be conducted to comply with legal and regulatory obligations applicable to us or in accordance with our internal procedures in the pursuits of our legitimate interest and legal obligation to prevent possible fraud.

These recordings will only be accessible by Selwood's Compliance or duly authorised personnel, or by authorised agents of the French Authority of Financial Markets in accordance with applicable legal and regulatory provisions.

The recordings will be kept for a maximum duration of 5 years.

You will be able to exercise your rights relating to these recordings as described in the section below "Your rights".

10 ADDITIONAL INFORMATION UNDER THE EU GENERAL DATA PROTECTION REGULATION

You may have certain rights under EU General Data Protection Regulation ("GDPR") in relation to our processing of your personal data and any processing carried out on your behalf. These rights include: (i) the right to request access to your personal data; (ii) the right to request rectification of your personal data; (iii) the right to request erasure of your personal data (the "right to be forgotten"); (iv) the right to restrict our processing or use of your personal data; (v) the right to object to our processing or use where we have considered this to be necessary for our legitimate interests (such as in the case of our marketing activities); (vi) where relevant, the right to request the portability of the data; (vii) if your consent to processing has been obtained, the right to withdraw your consent at any time; and (viii) the right to lodge a complaint with a supervisory authority. Please note that the right to be forgotten that applies in certain circumstances under GDPR is not likely to be available in respect of the personal data we hold, given the purpose for which we collect such data, as described above.

In France, you also have the right to give instructions to us regarding the processing of your personal data after your death.

Due to the international nature of our business, your personal data may be transferred to our group companies located in the UK, on the basis of a controller to controller data transfer agreement, a copy of which may be provided upon request.

Your personal data may also be transferred to other jurisdictions that do not offer equivalent protection to personal data as under the GDPR ("Third Countries"). In such cases, we will process personal data (or procure that it be processed) in the Third Countries in accordance with the requirements of GDPR, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on our behalf in such Third Countries. We may also be required to transfer your personal information to our regulators or government agencies in Third Countries in cases where such transfers are necessary in the context of administrative proceedings, such as requests for information, examinations or investigations, or to other relevant parties in Third Countries

where it is necessary for the purposes of establishing, bringing, or defending legal claims, or for another legitimate business purpose, such as compliance with our legal or regulatory obligations under foreign law.

A complaint in respect of Selwood may be made to the CNIL - Service des Plaintes - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.