

Data Privacy Notice

The purpose of this Data Privacy Notice (hereinafter referred to as the "**Notice**") is to inform data subjects about how we collect, store and process data (hereinafter referred to as the "**Subjects**") according to the requirements of the GDPR and the British Virgin Islands Data Protection Act, 2021 and other applicable laws and regulations.

1. Entity Responsible for Processing and Principles

The responsible entity for processing, CISA Group (CISA Trust Company (Switzerland) SA, CISA Trust Company (BVI) Ltd, CISA Trust Company (South Dakota) LLC, CISA LatAm LLC, CISA New York LLC) (hereinafter referred to as the "**Company**"), recognizes the importance of keeping the personal data of its customers confidential and protecting their privacy rights. Regarding its activities and the data collected by it, the Company intends to apply the most restrictive principles and standards that are identifiable with respect to the protection of personal data.

Consequently, all personal data and information (hereinafter referred to as "**Data**") provided in connection with our services will be processed lawfully, fairly, transparently and confidentially by the Company.

2. Consent

By contracting the services offered by the Company (hereinafter referred to as the "**Services**"), and in accordance with the legal provisions in force, you acknowledge and agree that, in connection with our Services, Data is or will be collected by the Company. The Data will be collected and used solely for the purposes of the Services offered by the Company or any subsequent contractual relationship with the Company. Therefore, entering into an engagement with the Company means that you agree to the collection, processing of Data and agree to this Notice.

3. Legal Basis and Purposes of Data Collection and Processing

3.1. Legal Basis

The Subject concerned acknowledges that the collection and processing of Data by the Company is necessary for the fulfilment of the mandate entrusted to the Company to which the Subject concerned is a party in connection with the Services, but also for the preservation of the legitimate interests of the Company and for the fulfilment of legal obligations incumbent upon the Company.

3.2. Purposes

The Data is collected and processed by the Company for the following purposes (hereinafter referred to as "**Purposes**"):

- The opening and maintaining of the contractual relationship with the Subject or the beginning of a business relationship with the Company (hereinafter referred to as a "**Business Relationship**"), including all formalities relating to the identification of the Subject and of any person or entity over whom the Subject or a third party provides information and / or of which the Company has knowledge in any other way in connection with the Business Relationship (hereinafter referred to as a "**Related person**").
- Any other related services provided by the Company's service providers and subcontractors in a Business Relationship.
- The management, administration, placement and distribution of estate planning products, including all services related to these activities.
- Compliance with legal and regulatory obligations to which the Company is subject under regulations applicable to financial intermediaries (Money Laundering and Enforcement Act, International Financial Regulations (eg FATCA, Automatic exchange of information)).
- The regulations relating to sanctions and embargos.
- The reply to an official request from administrative or judicial authority.
- Prevention and elucidation of criminal offenses, risk management, exercise of rights and defense in litigation, consultation and exchange of information with information desks, computer security, safety of buildings and facilities.
- The Company Customer Management: the Company's customer administration, invoicing services, marketing (newsletters, event invitations, etc.) and others.

4. What Data is Collected?

4.1. Types of Data

As part of the Services, the Company collects the following data (contemplative, non-exhaustive list) from its counterparties (customers, administrators of private equity vehicles, lawyers, banks, other financial intermediaries):

- Identification data: personal identification data (name, surname, title, tax identification number) and structural identification data (information relating to trust companies and legal entities).
- Identification data issued by public authorities and other registers: identity cards, passports, certificate of incorporation, articles of association, share registers.
- Location data: personal and business addresses of investment entities.

- Communication and electronic identification data (personal and business): telephone number, e-mail address.
- Financial data: identification number and bank account numbers, financial means / assets, financial transactions.

4.2. Information Collected Directly from Subjects

The Company collects and records all information provided to it in connection with the Services or by any other means in its Customer Relationship Management (CRM) system. The Subject may choose not to provide the Company with certain information, however this decision may have the effect of depriving the Subject of certain Services or features offered in connection with the Services.

You as Data subjects are responsible for ensuring that all the Data you submit is accurate, complete and up to date. From time to time, we may request updated Data and respective documentation and it is important that you cooperate and provide such required information and documentation. We take reasonable steps to make sure that the Data we collect, generate, use or disclose is accurate, complete, and up to date.

4.3. Information Collected from Third Parties – Subcontractors

As part of its Services, the Company may also collect data from third parties (administrators of private equity vehicles, lawyers, banks, other financial intermediaries, list of international sanctions, information available to the public (e.g. Bloomberg, World-Check, FACTIVA or LexisNexis)). Data collected from third parties is treated in the same way as Data collected directly from the Subjects (see paragraph 4.2 above).

The Company may be considered as a processor of personal data in the context of information collected from third parties, according to the applicable regulations. Should this be the case, the Company will enter into a subcontracting agreement with the third parties concerned to ensure compliance with the present Notice.

5. Methods of Data Processing

The Data is processed by the Company - or by third parties selected on the basis of their reliability and competence, as well as by duly appointed data processors - solely for the purpose of carrying out the purposes specified in paragraph 2.2 above, mainly by means of computer tools, but also on paper.

The Company retains the Data for as long as necessary for the fulfilment of the Purposes for which it was collected and in accordance with the regulations applicable to the Services (for example, ten years in connection with banking services or seven years in accordance with FATCA regulations).

Similarly, the Company deletes or anonymizes Personal data (or takes equivalent measures) as soon as they are no longer necessary to achieve the Purposes, subject however (i) to legal or regulatory requirements applicable to the data retention for a longer period of time, or (ii) to ascertain, exercise and / or defend actual or potential rights in legal proceedings, investigations or similar proceedings, including legal holds that the Company might impose to preserve relevant information.

Specific measures are applied to prevent the risk of loss of data, unlawful or improper use and unauthorized access (see paragraph 7 (How we protect Personal data) below).

6. Access to Data and Data Transfers

The Data transmitted to the Company will be known and used by the Company employees and/or its subsidiaries (national or foreign) for the sole purpose of performing the Services that constitute the purpose for which the Data was collected.

As part of the performance of the Services, the Company may transmit the Data to third parties, in particular to custodian banks or national and international tax authorities, in accordance with fiscal reporting obligations.

The transmission of data to third parties abroad is alternatively based on (i) an adequacy decision, (ii) appropriate safeguards or (iii) a waiver for specific situations (execution of a mandate related to the Services offered by the Company, in particular).

It is already stated that:

- In dealings with custodian banks, Data transfers may take place towards national and international banks, as well as towards any other financial intermediary.
- As part of the implementation of FATCA regulations, data transfers may be made to the internal Revenue Service (IRS) or any other competent tax authority recognized by the IRS
- In the context of the implementation of the Automatic Exchange of Information (AEOI), data transfers may take place with any competent tax authority, it being specified that the condition of confidentiality of data is a sine qua non stipulated by the OECD to adhere to the AEOI Mechanism.
- The Company might share confidential customer identification information and Documents (Know Your Customer: passport, proof of address, statement regarding the source of funds, self certification, etc.) within CISA Group for marketing purposes. The data transfer is performed according to applicable data protection standard and respecting all adequate security measures.
- As part of the implementation of any other regulations and Services, the Company carries out an assessment of Data recipients in accordance with applicable data standards.

the Company does not sell or rent the Data to any third party.

Finally, the Company may have to share the Personal data:

- To put the needed Service at the Subjects disposal.
- Where permitted or required by law to comply with a valid legal process.
- To protect and defend the Company's rights or property, including the security of its products and services.
- To protect the personal safety, property or other rights of the public, the Company or its customers or employees or in connection with the sale of all or part of the Company's operations.

If the Company is required by law to disclose the Data to third parties, the Company will take all commercially reasonable steps to notify you in advance, unless otherwise required by law. If the Company engages in a process of merging, acquiring or selling assets, the Company will comply with this Notice.

7. Privacy, Security and Data Protection

The Company undertakes to ensure that there are adequate levels of protection of Data, in particular those relating to banking secrecy and data protection.

Subjects' Data will be transmitted to and stored on the Company's servers, access to which is strictly limited. The Company has taken the appropriate technical and organizational precautions to ensure that its servers are accessible exclusively to duly authorized persons, as well as special precautions with regard to the protection of its technical environment (e. g. use of anti-viruses and Firewalls).

In relation to Personal data of clients within the British Virgin Islands processed by CISA Trust Company (BVI) Ltd (the "**BVI Clients**"), we may disclose your Personal data for any purpose other than the purpose for which the Personal data was to be disclosed at the time of its collection or any other purpose directly related to that purpose, only under the following circumstances:

- You have given your expressed consent to the disclosure.
- The disclosure is necessary for the purpose of preventing or detecting a crime, or for the purpose of investigations; or was required or authorized by or under any law or by the order of a court.
- We have acted in the reasonable belief that we had in law the right to disclose the Personal data to the other person.
- We have acted in the reasonable belief that we had your consent of if you had known of the disclosing of the Personal data and the circumstances of such disclosure; or
- The disclosure was justified as being in the public interest in circumstances as determined by the applicable laws and authorities of the British Virgin Islands.

You are entitled at any time, by notice in writing to us, require us within a period which is reasonable in the circumstances, to stop processing, or not to begin processing, for the purposes of direct marketing any of your Personal data. For the purposes of this section, "direct marketing" means the communication, by whatever means, of any advertising or marketing material which is directed to particular individuals.

We shall store your Personal data only while it is necessary to store it in order for us to be able to provide you with the services, unless we are obligated to store the Data for a longer period by other applicable laws.

8. Rights of the Subjects

In accordance with the applicable regulations, Subjects may exercise the following rights with respect to their data in connection with the processing of Data:

- right to request access to stored data.
- right to request the rectification of stored data.
- right to request the deletion of stored data, subject to the applicable legal provisions on data retention.
- right to request a limitation of the processing of stored data, subject to the applicable legal provisions regarding the processing of data.
- right to request a prohibition on the processing of stored data, subject to the applicable legal provisions regarding the processing of data.

Even if a Subject contests the processing of its Data, the Company is entitled to continue such processing if it is (i) legally binding, (ii) necessary for the performance of the Contract to which the Subject is party, (iii) necessary for the performance of a public interest mission or (iv) necessary for the legitimate interests that the Company pursues, including the finding, exercise or defense of a right in justice.

For BVI Clients, you also have the right to receive information on:

- Your Personal data being processed.
- The purposes for which the Personal data is being processed.
- The recipients or classes of recipients to whom Personal data is or may be disclosed.
- Any information available to us as to the source of the data.

Your applications should as far as practicable specify:

- The Document containing the record of Personal data that you require to amend.
- The Personal data that is claimed to be incomplete, incorrect, misleading or irrelevant.
- The reasons for the claim; and
- What amendment should be made.

Generally speaking, the Subject has the right to require the Company to protect their data. The Company works tirelessly to protect itself and its users from unauthorized access, alteration, disclosure or destruction of information that is held. More specifically:

- the Company respects the content of this Notice in all circumstances with respect to all Data that the Company collects about the Subject concerned.;
- the Company limits the use and disclosure of Data and ensures that anyone with whom the Company shares this information will treat it with the confidentiality and security it deserves.; and
- the Company has implemented physical, technical and administrative procedures to protect the information collected.

The exercise of any right set forth in the paragraph shall be carried out in accordance with the communication provisions of paragraph 9 (Communication and Remarks) below.

9. Communication and Remarks

If you have any questions about the Company's data protection, a detailed message can be sent to (info@cisatrust.ch/Karine Burnet) and the Company will address them as soon as possible.

You may exercise any of your rights related to Personal Data (paragraph 8) by sending your request to the aforementioned address.

The Company's business is constantly evolving and this Notice may change. Unless otherwise stated, our Notice applies to the use of all information collected about any Subject. Any such changes shall be communicated to you via posting in the Company website or via email and by continuing to use our services you will have provided your agreement and consent for any such changes.

For BVI Clients

The institution overseeing Personal data matters within the BVI is the Office of the Information Commissioner.

You may submit your complaints in relation to processing of your Personal data to the BVI Office of the Information Commissioner.

December 13, 2021