

PRIVACY INFORMATION NOTICE

Highvern Cayman Limited, and its subsidiaries (together "HIGHVERN/we/our"), is committed to protecting your privacy. In this policy, we set out how HIGHVERN collects personal data, how it uses and shares it, and the rights and choices you have in relation to the personal data held and processed by HIGHVERN. It should be noted that we do not transfer personal information you provide to any third-parties for their own direct marketing use.

Where applicable, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. We also comply with the Data Protection Law, 2017 in the Cayman Islands (which came into force on 30 September 2019).

This Privacy Policy is separate and in addition to client confidentiality obligations we owe you. Please refer to our terms and conditions, applicable to your engagement, for further details.

We may collect information from you when you correspond with us or engage our services. We may also collect information on you as a result of your relationship with one or more of our team, or otherwise in the general course of our business. In each case your data will be controlled by HIGHVERN.

THE TYPES OF PERSONAL INFORMATION WE COLLECT

We collect different personal information for different reasons – it is not our intention to collect excessive amounts of personal information, but the types of information collected may include:

- your personal identification information and contact information, including your: name, passport information, convictions, political exposure, personal data available in the public domain, physical address, postal address, telephone numbers, email address and such other information necessary for HIGHVERN to carry out its CDD and AML/CFT obligations;
- information on relevant family members and your business relationships;
- education, professional qualifications and employment information; and
- financial information, sources of wealth and your assets and bank details.

If you apply for a position with HIGHVERN, we may collect personal information relating to you and your past employment, professional qualifications, education, nationality, health, criminal records and immigration/residential status, and we may also collect similar information with respect to your family members for immigration purposes. We may also gather information from third-parties in the form of references, in addition to other information that may be obtained during the recruitment process.

HOW WE COLLECT YOUR PERSONAL DATA?

Personal data is collected at different times and from different sources, including but not limited to:

- when you or your organisation contact us to consider engaging our services;
- information gathered through our client due diligence procedures as part of our compliance requirements with regulatory authorities;
- through email, fax or telephone communication;
- from third-parties; and
- when you or your organisation provides services to us or offers to do so.

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HOW WILL WE USE YOUR PERSONAL DATA?

HIGHVERN understands that personal data is sensitive and is committed to protecting and respecting your privacy. We provide fiduciary, corporate and other professional services to our clients and we use your personal data for these purposes. Normally the purposes for which we use your personal data will be evident when we collect that data. HIGHVERN will only use your personal information to:

- perform under a contract we have with you;
- conduct administrative or operational processes within our business;
- comply with any legal obligation;
- share with third-party service providers. This may include, but is not limited to, counterparties to transactions or litigation (including law firms acting for other parties), tribunals or courts;
- process and respond to requests, enquiries or complaints received from you or someone connected to you;
- establish, exercise or defend the legal rights of HIGHVERN or for the purposes of legal proceedings;
- manage and administer your or your organisation's business relationship with us, including processing payments, billing and collection;
- for other legitimate business purposes; and/or
- should you apply for a position with us, to review and process your application.

HOW WE MAY SHARE THE INFORMATION WE COLLECT?

- We do not share personal information with unaffiliated third-parties, except as necessary for our legitimate professional and business needs, to carry out your request and/or as required or permitted by applicable laws or professional standards. This would include:
- responding to requests from regulatory bodies or law enforcement agencies where it is necessary or prudent to comply with applicable laws or government regulations;
- sharing with HIGHVERN's service providers, advisors or other third-parties;
- sharing with affiliates or potential affiliates, should we merge, sell, liquidate or transfer in whole or in part; and/or
- should you apply for a position with us, disclosing your personal information for the purposes of seeking references and confirmation of the details that you have provided.

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RETENTION OF PERSONAL INFORMATION AND SECURITY

Your personal information will be retained for as long as required:

- for the purpose for which the personal information was collected;
- in order to satisfy any reporting or accounting obligations; and/or
- as required by data protection laws and any other applicable laws or regulatory requirements.

HIGHVERN has reasonable security policies and procedures in place to protect personal information from unauthorised loss, misuse, alteration or destruction. Despite our best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may keep your personal data in our electronic systems and in paper files.

ACCESS TO YOUR PERSONAL DATA

- If you have submitted information to HIGHVERN, you have the following rights.
- to access that data and port (transfer) such personal information;
- to rectify personal information where the information we hold about you is incorrect;
- to restrict the use of personal information;
- to request that personal information is erased;
- to object to processing of personal information; and
- submit a complaint if you have concerns about the way in which we are handling your data to samanthahennings@highvern.com or to the Information Commissioner's Office in the UK (see ico.org.uk for further information), the data protection authority in the EU member state of your usual place of residence, or to the Ombudsman in the Cayman Islands (see ombudsman.ky for further information).

We cannot be responsible for any loss that may arise due to us having any inaccurate, incomplete, inauthentic or otherwise deficient personal data that you or a third-party have provided to us.

INACCURATE OR AMENDED INFORMATION

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to provide services to you.

CHANGES TO OUR PRIVACY POLICY

This Privacy Policy was last updated on 17 January 2023. We have the right to update the contents of this Privacy Policy from time to time to reflect any changes in the way in which we process your personal data or to reflect legal requirements as these may change.