

Privacy policy

Freeland and its subsidiaries and affiliates from time to time (together “**Freeland**”, “**we**”, “**us**” or “**our**”) recognize the importance of protecting your privacy.

This Privacy Policy describes how we collect, hold, use and disclose personal information that you provide, is provided on your behalf or is collected by us. Freeland is subject privacy and data protection laws applicable in the Netherlands (“**Local Privacy Laws**”). This Privacy Policy should not be viewed as a supplement to such Local Privacy Laws and shall not vary or diminish Freeland’s obligations under the applicable Local Privacy Laws. To the extent this Privacy Policy conflicts with any provisions of Local Privacy Laws, such Local Privacy Laws shall take precedence over this Privacy Policy.

For the purposes of this Privacy Policy, Freeland is the data controller.

We reserve the right, at our discretion, to modify or remove any part of this Privacy Policy at any time.

1. Scope

1.1 What personal information does Freeland collect?

We collect personal information that is required to enable us to provide a broad range of services for administration, corporate and trust, banking, financial products, reporting and tax services to our clients and related parties (“**Clients**”). The kinds of personal information and special information that we may collect includes:

- contact details, such as name, address, email address and telephone numbers;
- date of birth;
- gender;
- professional resume including current occupation;
- identity information (government ID, driver's license);
- bank account information;
- taxation details (including tax file number);
- investment information;
- details of directorships;
- source of wealth or funds;
- other financial details such as credit history records; and
- client and investor political associations and criminal records, where they are revealed by client screening procedures.

We may also collect other information that is relevant to our functions or activities. We collect information in various ways, including from:

- client due diligence enquiries and on-boarding documentation;
- subscription, redemption and transfer documentation, questionnaires and other forms and agreements; and
- correspondence, which may include written, telephone or electronic communications.

We may also collect other information that is relevant to our functions or activities.

1.2 How does Freeland collect information?

We collect information in various ways, including:

- client due diligence enquiries and on-boarding documentation;
- subscription, redemption and transfer documentation, questionnaires and other forms and agreements; and
- correspondence, which may include written, telephone or electronic communications.

In some circumstances, we may collect personal information about you from a third party or from publicly available sources. The parties from whom we may acquire personal information may include Freeland affiliates, Clients in which you are or were an investor, other Client service providers including fund managers, your adviser’s or anyone you have authorized to deal with us on your behalf.

1.3 Why does Freeland collect information?

We only collect, hold, use and disclose personal information for purposes related to our functions or activities, including for the purposes of:

- Processing subscription/capital contribution, transfer, redemption/withdrawal and conversion documentation on behalf of our Clients;
- processing payments in respect of subscriptions/capital contributions and redemptions of shares/withdrawals of capital and any dividends or distributions declared by or on behalf of our Clients;
- maintenance of registers of the holders of the securities for our Clients;
- providing you with information or assistance that you request from us;
- conducting verifications, monitoring and reporting in accordance with anti-money laundering and counter terrorist financing laws;
- communicating with you or our Clients regarding the status of your holdings, value and distributions;
- providing Clients with the services requested, including administration, corporate and trust, banking, custody, middle office services, financial products, reporting and tax services amongst others;
- notifying you or Clients about changes to our services;
- monitoring and improving the quality of our services;
- quality assurance and training purposes;
- complying with our legal and regulatory requirements, and
- marketing and promotional activities.

Furthermore any other uses identified at the time of collecting your personal information.

If we do not collect this personal information, we may not be able to provide Clients with the services or assistance requested.

2. How does Freeland use cookies?

We may periodically collect information from you through the use of “cookies” and similar online tracking tools across our websites. This is in order for us to provide better service, enhance the user experience, store online preferences, track usage of our websites and services, or generally improve/update data security.

3. How does Freeland disclose personal information?

We may disclose your personal information to the following parties:

- Freeland affiliates;
- Freeland staff, for the purposes of their work responsibilities;
- third party service providers/suppliers engaged by us to perform functions or activities on our behalf;
- Clients in which you are an investor;
- service providers to Clients in which you are an investor, including fund managers and their affiliates, banks and brokers;
- regulators or government authorities as required to comply with our legal and regulatory requirements; and
- other entities identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

This list of possible disclosures is not intended to be exhaustive and there may be other legitimate purposes for holding, disclosing or otherwise processing your personal information. Where the law so requires, you will be notified of any additional purposes and where required your consent will be sought.

To provide services to Clients, your personal information may be transferred and/or stored in other jurisdictions, including to jurisdictions that may not offer a level of personal data protection equivalent to your country of residence. We ensure that all data transfers comply with applicable legal requirements. Should you wish to know more about how your personal information is protected please contact the person stated below.

4. Legal bases for using your personal information

There are different legal bases that we rely on to use your personal information, namely:

- **Performance of a contract:** The use of your personal information may be necessary to perform the contract that you have with us so that we can provide the services and products that you have engaged us to provide to you.

- **Consent:** We will rely on your consent to use:
 - cookie data and geolocation data (if applicable); and
 - your personal information for marketing purposes.
 You may withdraw your consent at any time by contacting us at the address at the end of this Privacy Policy.
- **Compliance with legal obligations:** The use of your personal information may be necessary to comply with legal and regulatory obligations such as those set out under anti-money laundering and counter terrorist financing laws;
- **Legitimate interests:** We may use your Personal Information for our legitimate interests to improve our products and services, quality assurance, training and for administrative purposes.

5. Security

We implement and maintain physical, electronic and procedural safeguards and security measures which are reasonably designed to protect your personal information. For example, we implement:

- Security measures for access to our offices;
- security procedures within our offices; and
- IT security measures, including password protection, firewalls, intrusion detection and site monitoring.

These measures are in place in the attempt to protect your personal information that we hold from misuse, interference and loss, and from unauthorized access, modification or disclosure. However, such measures are never completely secure.

6. Accessing and correcting personal information held by Freeland

You may access the personal information we hold about you, and you may make or seek changes to that information, by contacting us using the contact details set out below. You may also ask us to erase, restrict or port your personal information and you may tell us if you object to our use of your personal information. To exercise these rights please contact us using the details below.

We will promptly investigate your privacy enquiry and provide you with answers or update our records, as appropriate.

7. Retention of your personal information

We will retain your personal information in accordance with our Data Retention Policy.

8. Questions or complaints

You may make a complaint about an alleged breach by us of applicable Privacy laws in relation to our handling of your personal information. Your complaint should be in writing and addressed to the undersigned. Alternatively, you have a right to complain to your local data protection authority (if one exists in your country).

For questions about our Privacy Policy, to exercise your rights regarding your personal information held by us or to make an enquiry, please contact K.Vrijling

T: +31 10 201 3626

E: Kees.vrijling@freelandgroep.nl

Office Address: Weena 210-212 (3012 NJ) Rotterdam, The Netherlands