

BVI PRIVACY NOTICE

This privacy notice (the "**BVI Privacy Notice**") explains the manner in which the Fund collects, processes and maintains personal data about you pursuant to the Data Protection Act, 2021 of the British Virgin Islands and any regulations, codes of practice or orders promulgated pursuant thereto (the "**Data Protection Act**").

The Fund is committed to processing personal data in accordance with the Data Protection Act. In its use of personal data, the Fund will be characterised under the Data Protection Act as a 'data controller', whilst certain of the Fund's service providers, affiliates and delegates may act as 'data processors' under the Data Protection Act.

Interpretation: For the purpose of this BVI Privacy Notice "**you**" or "**your**" shall mean, you, the Subscriber or potential subscriber for the Shares and shall also include any individual connected to you which could include: any person owning or controlling the Subscriber, having a beneficial interest in the Subscriber, any person for whom the Subscriber is acting as agent or nominee, any trustee, settlor or protector of a trust, and the directors, managers, members, officers and employees of all such persons. "**We**", "**us**" or "**our**" means the Fund in its capacity as data controller of the personal data.

Personal data: By virtue of making an investment in the Fund, the Fund, the Advisor and the Administrator and other service providers and their respective affiliates and delegates ("**Authorised Entities**") may collect, record, store, transfer and otherwise process personal data¹ by which individuals may be directly or indirectly identified.

Much of the personal data will be provided through completion of subscription forms, investor questionnaires and other information provided by you in writing (including any anti-money laundering, identification, and verification documentation), in person, by telephone (which may be recorded), fax, electronically or by any other means.

We may combine personal data that you provide to us with personal data that we collect from, or about you. This may include personal data collected in an online or offline context including from credit reference agencies and other available public databases or data sources, such as news outlets, websites and other media sources and international sanctions lists.

If you are a nominee investor or a corporate entity, this BVI Privacy Notice will be relevant for those individuals connected to you and you should transmit this document to such individuals for their awareness and consideration.

Why is your personal data processed: Your personal data will be processed fairly and for lawful purposes, including:

- where the processing is necessary for the Fund to perform a contract to which you are a party or for taking pre-contractual steps at your request, which may include the following circumstances:
 - to operate the Fund, including managing and administering the Fund on an on-going basis which enables the Fund and its investors to satisfy their contractual duties and obligations to each other;

¹ Examples of personal data include: name, title, date of birth, age, gender, nationality, picture, national identification number, usernames, email address, residential address, postal address, telephone / mobile / fax number, family structure, siblings, offspring, source of wealth, personal assets, bank account numbers and income details, tax identification number, financial and investment qualification, shareholder reference number, payment details and other details of products and services purchased by the client, power of attorney information, job titles, employment history, employer details, personal data contained in emails, data regard the client's preferences in connection with marketing communications, personal data obtained pursuant to standard criminal record checks, data obtained further to the Fund's standard anti-money laundering and client due diligence checks. It may also include data which, when aggregated with other data, enables an individual to be identified, such as an IP address and geolocation data.

- to process your subscription, investment or redemption in the Fund or any payment or distribution to you, such as recording your information in the registers and accounts of the Fund;
- to send you statements in relation to your investment in the Fund;
- to facilitate the continuation or termination of the contractual relationship between you, other investors and the Fund; and/or
- to administer and facilitate the transfer of funds and other transactions between you, other investors and the Fund;
- where the processing is necessary for compliance with any legal, tax or regulatory obligation to which the Fund is subject, which may include the following circumstances:
 - to undertake investor due diligence and on-boarding checks;
 - to carry out know-your-client, client due diligence, anti-money laundering, counter-terrorist financing and proliferation financing checks of investors (and where applicable, their controllers and beneficial owners);
 - to comply with requests from regulatory, governmental, tax and law enforcement authorities;
 - to prevent and detect fraud;
 - surveillance and investigation activities;
 - to carry out audit checks and to instruct auditors;
 - to comply with FATCA, CRS and other comparable legislation;
 - to comply with applicable sanctions and embargo legislation; and/or
 - to maintain statutory registers;
- where the processing is for the purposes of legitimate interests pursued by the Fund or by an Authorised Entity to whom the data are disclosed, which may include the following circumstances:
 - to comply with a legal, tax, accounting or regulatory obligation to which the Fund or such Authorised Entity is subject;
 - to assess and process requests you make;
 - to send updates, information and notices or otherwise corresponding with you in connection with your investment in the Fund;
 - to verify the identity of the Fund to third parties in connection with any actual or proposed investments and/or for any purpose which the Fund considers is necessary or desirable;
 - to investigate any complaints, or pursue or defend any claims proceedings or disputes (where domestic or foreign);
 - for risk management and risk controlling purposes relating to the Fund;
 - to comply with audit requirements;
 - to ensure internal compliance with our policies and procedures;
 - to seek professional advice, including legal advice;
 - to facilitate business asset transactions involving the Fund or related entities;
 - to monitor communications to/ from us (where permitted by law);
 - to protect the securities and integrity of our IT systems;
 - to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and share this data with legal, compliance, risk and managerial staff to assess suspicious activities, and against fraud, breach of confidence or theft of proprietary materials; and/or
- where you otherwise consent to the processing of personal data for any other specific purpose.

As a data controller, we will only use your personal data for the purposes for which we collected it. If we need to use your personal data for an unrelated purpose, we will contact you.

Disclosure of personal data: We anticipate that we will share your personal data with the Authorised Entities for the purposes set out in this BVI Privacy Notice as well as advisers (e.g. auditors, legal counsel and tax advisers) to the Fund relating to or in connection with subscriptions to the Fund. We may also share relevant personal data where it is lawful to do so and necessary or desirable to comply with our contractual obligations or your instructions or where it is necessary or desirable to do so in connection with any regulatory reporting obligations. In exceptional circumstances, we will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened), in any country or territory including to any other person where we have a public or legal duty to do so (e.g. to assist with detecting and preventing fraud, tax evasion and financial crime or compliance with a court order). At times, it may also be necessary to share relevant personal data with (i) a prospective service provider of the Fund including one which is replacing an existing service provider or (ii) to people or companies where required in connection with a potential or actual corporate restructuring, merger, acquisition or takeover of the Fund.

We will not sell your personal data. Any transfer of personal data outside of the British Virgin Islands shall be in accordance with the requirements of the Data Protection Act. Where necessary, we will ensure that separate and appropriate legal agreements are put in place with the recipient of that data. For example, where data is to be transferred to a person in a country which does not provide an adequate level of data protection, the Fund will ensure it puts in place appropriate safeguards, such as contracts which seek to ensure that any data processor is contractually bound to provide an adequate level of protection in respect of the personal data transferred to it and that any such transfer complies with the requirements of the Data Protection Act.

Your rights: You have certain rights under the Data Protection Act, including:

- (a) The right to be informed upon request of:
 - (i) whether your personal data is being processed by us on our behalf and the purposes for which your personal data is being or is to be collected and further processed;
 - (ii) the personal data relating to you which is being or will be processed;
 - (iii) any information available to the us as to the source of that personal data;
 - (iv) your right to request access to and to request correction of the personal data and how to contact the data controller with any inquiries or complaints in respect of the personal data;
 - (v) the class of third parties to whom the we discloses or may disclose the personal data;
 - (vi) whether it is obligatory or voluntary for the you to supply the personal data; and
 - (vii) where it is obligatory for you to supply the personal data, the consequences for you if you fail to supply the personal data.
- (b) the right to withdraw your consent and require us to stop processing or restrict the processing, or not begin the processing of your personal data;
- (c) the right to have inaccurate or incomplete personal data corrected;
- (d) the right to require us to stop direct marketing;

(e) the right to complain to the Information Commissioner of the Virgin Islands.

Please note that if you do not wish to provide us with requested personal data or subsequently withdraw your consent, you may not be able to invest in the Fund or remain invested in the Fund as it will affect our ability to provide our services to you and manage your investment.

Retention of Personal Data: The personal data shall be held pursuant to the Advisor's data retention policy.

Changes to BVI Privacy Notice: We encourage you to regularly review this and any updated BVI Privacy Notice to ensure that you are always aware of how personal data is collected, used, stored and disclosed.

Contact us: Please contact the Fund if you have any questions about this BVI Privacy Notice, the personal data we hold about you or to discuss your data protection rights.