



WEB POLICY

Protecting the confidentiality and security of personal information is integral to the way in which Patronus Wealth Privé (DIFC) Limited conducts its business worldwide. We at Patronus Wealth Privé (DIFC) Limited are committed to safeguarding the privacy of our clients and use it in accordance with our privacy principles set out below while providing our services to them. The following are major points from our updated Privacy Policy statement that will help to explain the data processing practices of our businesses.

Introduction

In accordance with the GDPR, applicable EU data protection legislation and the DIFC Data Protection Law, Patronus Wealth Privé (DIFC) Limited, being the data controller for the purposes of this application for its services, must provide you with information on how your personal data will be processed.

1. Purposes of processing and lawful basis of processing:

The personal data collected from you, provided by you or obtained from other sources on your behalf will be held, disclosed and processed by Patronus Wealth Privé (DIFC) Limited for the purposes of offering you our services and maintaining the relationship with you.

We process personal data only when we have a lawful purpose. Presently, we use your personal data for the following lawful purposes:

2. Performance of Contract:

- On receiving your application with the subscription money and signed Investment Management/Subscription Agreement (IMA) along with you providing the required documentation as specified in the IMA, Patronus Wealth Privé (DIFC) Limited shall carry out the account opening process.
- Managing and administering your portfolio and any related account on an ongoing basis which involves your personal data for redemption, distribution of payments and for future subscriptions.
- Disclosures to third parties identified in the IMA/Offering Memorandum such as auditors, regulatory, tax authorities and technology providers;
- Recording, maintaining, storing and using recordings of telephone calls that you make to and receive from Patronus Wealth Privé (DIFC) Limited, the Administrator, or the Manager and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for processing and verification of instructions, management and administration of your account(s) and any other matters related to your investment with Patronus Wealth Privé (DIFC) Limited, dispute resolution, record keeping, security and/or training purposes.
- Circulating periodic reports.
- Responding to queries or providing you support.
- For any other purpose as provided for in the Agreement between us.

3. Compliance with legal obligations:

Complying with any applicable legal, Tax or regulatory obligations imposed on the Portfolio Manager including legal obligations under the Companies Act, Tax Laws and the AML regulations including but not limited to:

AML

Disclaimer: Patronus Wealth Privé (DIFC) Limited is a firm regulated by the Dubai Financial Services Authority (DFSA) and is only authorized to provide financial services to Professional Clients or Market Counterparties (all terms are defined in the DFSA COB Rules).

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In line with anti-money laundering requirements under the PMLA, the DFSA AML regulations and other related regulations set by globally recognized AML agencies, all investors are required to be identified. For this purpose, certain documentation will be required at the time of application as set in the IMA.

CRS/FATCA

Patronus Wealth Privé (DIFC) Limited is obliged to collect certain information about each investor's tax arrangements. For CRS/FATCA reporting purposes, please note that in certain circumstances Patronus Wealth Privé (DIFC) Limited may legally be obliged to share this information and other financial information with respect to investor's interest with the relevant tax authorities under relevant jurisdictions.

Screening

Patronus Wealth Privé (DIFC) Limited shall engage in screening for the purpose of AML regulations and counter terrorist facing legislations including PEP screening and with UN, EU and other applicable sanctions regimes.

4. Legitimate interest:

Recording, maintaining, storing and using recordings of telephone calls that you make to and receive from Patronus Wealth Privé (DIFC) Limited, the Administrator,

Please note that where personal data is processed for purposes of legitimate interests, Patronus Wealth Privé (DIFC) Limited will no longer process the personal data unless Patronus Wealth Privé (DIFC) Limited can demonstrate compelling legitimate grounds.

5. Consent:

From time to time, Patronus Wealth Privé (DIFC) Limited may send you information about financial markets etc., by telephone, by email or by other reasonable means of communication. You have the right not to receive such information.

Your consent is not required to process your personal data for the lawful purposes and legitimate interests referenced above.

6. Disclosures to data processors and / or third parties:

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by Patronus Wealth Privé (DIFC) Limited or their duly appointed agents and any of their respective related, associated or affiliated companies for the purposes specified above.

These data processors will handle your information in accordance with applicable Data Protection Legislation.

Patronus Wealth Privé (DIFC) Limited may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors and the regulatory bodies, taxation authorities and technology providers.

7. Transfers Abroad

Since we are an international company, your data will be processed outside of the EU region or the DIFC. Personal data collected from you or provided by you or on your behalf may be transferred outside of transactions originating jurisdiction including to companies situated in countries which may not have the same data protection laws. Such data



transfers will only involve companies which are part of the same corporate group or acting as service providers to the Patronus Wealth Privé (DIFC) Limited.

8. Retention period

Patronus Wealth Privé (DIFC) Limited will retain your personal information for as long as is needed to fulfil the purposes outlined in our Privacy Policy, unless a longer retention period is required or permitted by law.

9. Security Measures to Protect your Data

We maintain reasonable and appropriate security measures to protect Customer Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Our information security controls ensure that personal and financial data is well protected and accessible only to authorised personnel.

10. Your data protection rights:

- You have a right of access to and the right to amend and rectify your personal data.
 - You have the right to have any incomplete personal data completed.
 - You have a right to be forgotten (right of erasure of personal data)
 - You have a right to restrict processing.
 - You have a right to data portability.
 - You also have the right to object to processing where Patronus Wealth Privé (DIFC) Limited is processing personal data for legitimate interests.
 - You have the right to withdraw your consent used for Direct Marketing
- Additionally, you have a right to lodge a complaint with a supervisory authority, in particular, in the State of your habitual residence; place of work or place of the alleged infringement if you consider that the processing of personal data relating to you carried out by Patronus Wealth Privé (DIFC) Limited is not as per the regulation in force.



You may request for your rights as outlined above by submitting your written request to us via:

Data Privacy Officer:

Clarinda Rosaria Campos
Patronus Wealth Privé (DIFC) Limited
Address: Office 18-33, Central Park Towers
PO Box 507327
DIFC, Dubai, UAE

Tel: 971 4 309 2105
Fax: 971 4 343 9919
Email: clarinda.campos@patronuswealth.com

We do not track your online activities across the Internet. We do not use your personal information for automated decision making, including profiling. We do not sell or rent your personal information to third parties.

11. Refusal to provide personal data:

The provision by you of personal data, as outlined in the section titled “Purposes of processing and lawful basis for processing” is required for us to accept your application and manage and administer your portfolio and so that we can comply with the contractual, tax, legal and regulatory requirements referenced above. Where you fail or refuse to provide such personal data, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.