PARVUS PRIVACY & COOKIES NOTICE – INVESTORS

This Privacy Notice ("**Notice**") is provided by Parvus Asset Management Jersey Limited, the investment manager of certain investment funds and vehicles, as well as the fund or funds that you are considering investing in, currently invest in or have previously invested in (the "**Fund(s)**"), Parvus Asset Management (Services) LLP and its affiliates. In this Notice, all references to "**Parvus**", "**we**", "**us**" and "**our**" refers to Parvus Asset Management Jersey Limited, Parvus Asset Management (Services) LLP, their affiliates and the Fund(s).

In this Notice:

- "**Personal Information**" means information relating to a living individual and from which that individual can be identified.

- "**Data Protection Legislation**" means any law applicable to Parvus from time to time relating to the processing of Personal Information and/or privacy, including the Data Protection (Jersey) Law 2018, the Data Protection Authority (Jersey) Law 2018, the UK Data Protection Act 2018, the UK General Data Protection Regulation, the EU General Data Protection Regulation and Privacy and the Electronic Communications (EC Directive) Regulations 2003.

We are committed to safeguarding the Personal Information of the Fund(s)' potential, current and past investors ("**you**"), including when you visit and use the website at www.parvusfunds.com (the "**Website**"). We will ensure that your Personal Information is handled in accordance with the Data Protection Legislation. This Notice sets out how we will use and protect your Personal Information. Please note that we also have a separate privacy notice that applies to the Personal Information that we collect from individuals that are not potential, current or past investors.

By negotiating and/or signing an investor non-disclosure agreement (an "**NDA**") or an investor subscription agreement (a "**Subscription Agreement**") and/or otherwise engaging with us in relation to an investment, you acknowledge that Parvus and the Fund(s) may process your Personal Information as set out in this Notice.

We will ordinarily process your Personal Information as a "**data controller**" (as defined in the Data Protection Legislation). The data controller in respect of your Personal Information will be Parvus Asset Management Jersey Limited (registered in Jersey with registered office Second Floor, No. 4 The Forum, Grenville Street, St. Helier, JE2 4UF, Jersey with registered number 155937), Parvus Asset Management (Services) LLP (registered in the United Kingdom with registered office 7 Clifford Street, London, W1S 2FT, UK with registered number OC391494), and the Fund(s) that you are considering investing, currently invest in, or have previously invested in.

Please note that Citco Fund Services (Ireland) Limited (the "**Administrator**") may handle your data in the course of providing administration and similar services to the Fund(s) and, where it do so, it may act as data controller of your Personal Information. Please see the Administrator's privacy notice at https://citco.com/footer/privacy-policy/ for further information on the Administrator's processing of Personal Information as a data controller.

This Notice covers the following topics:

1. PERSONAL INFORMATION THAT WE COLLECT FROM YOU

We may collect your Personal Information directly from you. Most commonly, we would collect Personal Information directly from you in the following circumstances:

(a) Where you negotiate and/or have signed an NDA in relation to a potential investment in the Fund(s), you may provide us with Personal Information including your name and contact details (e.g. your work and/or home address, email address and telephone number).

(b) Where you negotiate and/or sign a Subscription Agreement in relation to an investment in the Fund(s), you may provide us with additional Personal Information including identity documentation, investment history, risk profile and bank details.

(c) Where you otherwise engage with us in relation to potential, current or past investments (e.g. sending us emails, contacting us via telephone, using the Website or making transactions with the Fund(s)).

(d) Where you make use of the Website, we may collect information about your use of those websites (e.g. your IP address and choice of web browser). See section 10 of this Notice for more information on our use of cookies.

(e) Some of our offices have CCTV cameras, which are generally used for the purpose of crime prevention. We will clearly display appropriate notices where CCTV cameras are used, but please note that when you visit our offices, our CCTV cameras may capture footage of you. Some of the communal areas in our premises have CCTV cameras that are under the control of a third party, and therefore you should consult any notices they display and their privacy statements for more information on their processing of your Personal Information as data controllers.

(f) In order to comply with our legal obligations, we record all calls made on certain partners, officers and employees' telephone lines. If your call is recorded, the recording may contain Personal Information that you provide during the call.

2. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHERS

We may collect your Personal Information from third parties. For example:

(a) where we or any of our service providers conduct due diligence on prospective investors (e.g. verification or anti-money laundering checks);

(b) where we receive your contact details and other Personal Information from intermediaries; and

(c) where another individual makes an investment on your behalf and they provide us with your Personal Information to effect the investment.

Where this is the case, the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Notice as to how we will process your Personal Information and obtaining any relevant consents from you. However, once we are holding it, we will only handle Personal Information in accordance with this Notice.

Where you provide Personal Information on behalf of another individual, you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Notice for information on how we process their Personal Information.

3. SENSITIVE PERSONAL INFORMATION

"**Sensitive Personal Information**" is Personal Information concerning an individual's (i) racial or ethnic origin, (ii) political opinions, (iii) religious beliefs or other beliefs of a similar nature, (iv) membership of a trade union, (v) physical or mental health or condition, (vi) sexual life or orientation, (vii) commission or alleged commission of any offence or any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

We may process your Sensitive Personal Information from time to time in connection with your application to invest with us, our provision of investment services to you or otherwise. Your provision of Sensitive Personal Information to us is entirely voluntary. However, we may be unable to carry out some activities necessary to process your application, instructions or other requests without the provision of such information.

4. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We may process your Personal Information because the processing is necessary for us to perform our contract with you or take steps at your request prior to entering into a contract, because it is necessary for us to comply with our legal obligations, and/or because the processing is necessary for our legitimate interests or the legitimate interests of a third party (and these interests are not outweighed by the rights and freedoms of the individual). Our legitimate interests include the carrying out and improving our business, analysing the use of the Website and servicing and supporting our clients.

We will only process your Sensitive Personal Information if, in addition to the grounds set out in the previous paragraph, you have given your express consent to the processing, the processing is necessary for the purpose of carrying out or obligations and exercising our or your rights in the field of employment, the processing is necessary for reasons of substantial public interest on the basis of domestic law, you have made the Sensitive Personal Information public and/or the processing is necessary for the establishment, exercise or defence of legal claims. If we rely on your express consent to the processing, we will let you know (and give you the chance to withdraw consent).

We will generally use your Personal Information for one or more of the following purposes:

(a) to initiate and perform our pre-investment processes, where you have displayed an interest in receiving investment services;

(b) to supply the investment services you have requested, to manage and administer your holdings in the Fund(s) and to correspond with you in relation to the same;

(c) to provide support to you in respect of our services;

(d) to improve our services, our systems and our Website;

(e) to comply any applicable legal, tax or regulatory obligations which are imposed on us or our third party service providers, including those which derive from anti-money laundering and counter-terrorism legislation;

(f) to enforce or defend our rights, whether directly or through third parties to whom we delegate such responsibilities;

(g) the prevention and detection of crime;

(h) to perform or improve our internal business processes, such as to update and maintain records and provide NAV and other calculations;

(i) to perform general, financial and regulatory account and reporting; and

(j) in respect of recorded telephone calls, for compliance, quality, business analysis, training and related purposes.

Where you have explicitly consented or where we otherwise have a right to do so, we may also use your Personal Information for marketing purposes (including letting you know about events and training). You have the right to ask us not to process your Personal Information for marketing purposes, by following the instructions outlined in any marketing communications you receive, or by using the contact details in section 14 of this Notice.

5. HOW WE SHARE YOUR PERSONAL INFORMATION

Where you are negotiating and/or have signed an NDA, your Personal Information may be shared with the Fund(s) that you are considering investing in, our affiliates, Citco Fund Services (Ireland) Limited, our professional advisors and third party service providers to Parvus, in each case for one or more of the purposes referred to above.

Where you are negotiating and/or have signed a Subscription Agreement, in addition to the entities listed in the above paragraph, your Personal Information may be shared with the Fund(s) that you invest in and/or the Administrator and its affiliates, again in each case for one or more of the purposes referred to above.

Personal Information may also be shared with government authorities, law enforcement agencies, courts and/or similar bodies (i) if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering obligations or anti-terrorist financing obligations), (ii) to assist a regulator or any competent authorities (including tax authorities), courts and/or similar bodies, (iii) to enforce our rights under any agreement we may have with you, (iv) to carry out an internal investigation, or (v) otherwise to protect the rights, property, or safety of Parvus, our group companies and our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us, so that they can continue to provide the services you have requested/maintain any existing relationship (as applicable).

6. INTERNATIONAL TRANSFERS

It may be necessary for us to transfer your Personal Information outside Jersey, the UK or the European Economic Area ("**EEA**"), for example where we are required to transfer Personal Information to regulators and similar bodies outside Jersey, the UK or the EEA. Your Personal Information may also be accessed by staff operating outside Jersey, the UK or the EEA who work for us, the Fund(s), or for one of our suppliers or group companies. This includes staff engaged in, among other things, the provision of support services.

We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Notice and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside Jersey, the UK or the EEA. This means that we will only transfer Personal Information to our non-Jersey, non-UK or European offices and Fund(s) and other third parties outside Jersey, the UK or the EEA if (i) that third party is situated in a country that has been confirmed by the European Commission or the Jersey or UK Government (as relevant) to provide adequate protection to Personal Information and we have undertaken a transfer risk assessment in respect of the transfer (as required), (ii) that third party has agreed (by way of written contract or by some other form of data transfer mechanism approved by the European Commission or the Jersey or UK Government) to provide all protections to Personal Information as required by the Data Protection Legislation, or (iii) we have your explicit consent to do so (such as where you have requested us to make the transfer). Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by contacting us using the details in section 14 of this Notice.

7. DATA RETENTION AND SECURITY

We will only retain your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of such information, the purposes for which we process such information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We implement technical and organisational measures to safeguard your Personal Information. Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk. Further, where you have chosen a password which allows you to access certain parts of the Website, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

8. CONSEQUENCES OF NOT PROVIDING REQUIRED DATA

Where we require your Personal Information in order to comply with anti-money laundering or other legal requirements, failure to provide this information means that we may not be able to accept you as an investor in the Fund(s) and/or may be unable to process, or release your investment in the Fund(s). This may result in the termination of our relationship with you. We will tell you when we ask for your information whether it is a statutory or contractual requirement to give us the information and the consequences of not providing the information.

9. THIRD PARTY LINKS

The Website may contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

10. OUR USE OF COOKIES

A cookie is a small file that is sent to your browser from a web server and is stored on your computer. We use cookies in order to make the Website work, to make the Website work more efficiently (e.g. by remembering information about your preferences), and to gather information on use and performance of the Website (for example, to analyse web traffic and identify which pages of the Website are being used).

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website, and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings).

In particular, we may use the following cookies on the Website:

(a) **Strictly necessary cookies.** These cookies are essential in order to enable you to move around the Website and use its features, such as accessing secure areas.

(b) **For functionality.** These cookies and similar technologies remember choices a user makes. We use these cookies to provide the site user with an experience more appropriate with their selections and to make their use of the platform more tailored.

(c) **Performance cookies.** These cookies collect information about how visitors use our Website, for instance which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Website works.

You can manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. Note, however, that if you block all cookies (including strictly necessary cookies) via your browser settings you may not be able to access or use all or parts of our Website.

You can also find more information about cookies generally here: https://www.allaboutcookies.org/verify.

11. YOUR RIGHTS

Subject to some exceptions, you have the right to ask us for a copy of the Personal Information we hold about you, and to ask us to (i) make any changes to ensure that any Personal Information we hold about you is accurate and up to date, (ii) erase or stop processing any Personal Information we hold about you where there is otherwise no longer a legal ground for us to hold it, (iii) in some circumstances, transfer any information we hold about you to a specified third party, and (iv) in some circumstances, restrict the processing of your Personal Information.

You also have the right to ask us not to process your Personal Information for marketing or research purposes and to object to processing in some circumstances, such as where Parvus relies on its legitimate interests to process your Personal Information.

In addition, where we have asked for your consent to process your Personal Information, you have the right to withdraw that consent at any time. If you ask to withdraw your consent to Parvus processing your Personal Information, this will not affect any processing which has already taken place but this may affect our ability to process your Personal Information in accordance with this Notice.

Please note that these rights may be limited (e.g. if fulfilling your request to access your Personal Information would reveal Personal Information about another person, or if you ask us to delete Personal Information which we are required by law to keep or have compelling legitimate interests in keeping). Where applicable, we will inform you of relevant exemptions we rely upon when responding to any request you make.

If you want to exercise any of your rights or withdraw your consent to processing, please contact us by using the contact details in section 14 of this Notice. Please note that we may need to request proof of identification to verify your identity.

12. ADDITIONAL INFORMATION UNDER THE CAYMAN ISLANDS DATA PROTECTION ACT 2021 ("DPA")

Where the Fund(s) or other data controllers are registered in the Cayman Islands, this section 12 applies.

The data controller may share your Personal Information with its service providers, including Parvus Asset Management Jersey Limited, Parvus Asset Management (Services) LLP and the Administrator, and others who are located outside the Cayman Islands. It may also be necessary to share your information with the Cayman Islands Monetary Authority or the Tax Information Authority, which may, in turn, exchange this information with foreign tax authorities, regulatory or law enforcement agencies. Any transfer of your Personal Information by us, our affiliates or service providers outside the Cayman Islands will be carried out in accordance with the DPA.

You have certain rights under the DPA, including (i) the right to be informed, (ii) the right of access, (iii) the right to rectification, (iv) the right to stop or restrict processing, (v) the right to stop direct marketing, (vi) rights in relation to automated decision making, (vii) the right to seek compensation, and (viii) the right to complain to the supervisory authority. If you wish to exercise these rights, please contact us using the contact details set out at section 14 of this Notice.

13. CHANGES TO THIS NOTICE

Parvus may amend this Notice at any time. Any changes to this Notice will be posted to the Website. You should check the Website to make sure you are happy with any changes. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services.

14. CONTACT DETAILS AND COMPLAINTS

If you have any questions or concerns about how Parvus processes your Personal Information, or you want to exercise any of the rights described above, please contact data@parvusfunds.com.

Alternatively, you have the right to make a complaint to the Information Commissioner's Office (in Jersey or the UK) or, if you are an EU data subject, one of the competent European supervisory authorities. Where the Fund(s) or other data controllers are registered in the Cayman Islands, you may also lodge a complaint with the Office of the Ombudsman in the Cayman Islands.

Rev. March 2025