

COLUMBUS POINT LLP

Privacy Policy

25 May 2018

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Columbus Point LLP ("Columbus Point") takes your privacy seriously. This privacy statement contains information on what personal data Columbus Point collects, what it does with that information, and what rights you have. If you have any questions or comments, please contact sbishop@columbuspoint.com.

1. Collection of personal data

Columbus Point collects and processes personal data about you including but not limited to:

- personal details such as your name, date of birth, KYC documents, physical and electronic address;
- professional information about you, such as your job title and work experience, and your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use;
- identifiers we assign to you, such as your client or account number;
- information held in public registers, such as in beneficial ownership registers;
- in some cases, special categories of personal data, such as information relating to criminal convictions or offences.

In some cases, we collect this information from public registers or other third party sources, such as credit reference agencies and fraud prevention agencies.

2. How we process personal data

We process personal data for the following purposes:

- a) on-boarding processes, including to verify your identity and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud);
- b) managing our relationship with you, including communicating with you in relation to the products and services you provide to us or obtain from us and from our business partners, handling customer service-related queries and complaints;
- c) helping us to learn more about you as a customer or supplier, the products and services you receive or provide, and other products and services you may be interested in receiving or providing;
- d) taking steps to improve our products and services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve our existing products and services or learn about other products and services we can provide;
- e) meeting our on-going regulatory and compliance obligations, including in relation to disclosures to tax authorities, financial service regulators and other regulatory and governmental bodies, and investigating or preventing crime;
- f) ensuring the safety of our customers, suppliers and other stakeholders; and
- g) for Columbus Point's prudent operational management (including credit and risk management, insurance, audit, systems and products training and similar administrative purposes).

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The processing of your personal data may be:

- i) necessary for our legitimate interests, including our interests in pursuing the purposes in (a) to (g) above and, when we make the disclosures referred to in paragraph 3 below, necessary for providing products and services of a consistently high standard, keeping our customers, suppliers and other stakeholders satisfied, and meeting our accountability and regulatory requirements around the world, in each case provided such interests are not overridden by your privacy interests;
- ii) necessary for taking steps to enter into or executing a contract with you for the services or products you receive or provide, or for carrying out our obligations under such a contract, such as when we use your data for the purposes in (a), (b) and (c) above;
- iii) required to meet our legal or regulatory responsibilities, including when we conduct the checks referred to in (a) above and make the disclosures to authorities, regulators and government bodies referred to in (e) above and paragraph 3 below;
- iv) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- v) in limited circumstances, processed with your consent which we obtain from you from time to time such as when you consent to marketing or in the case of special categories of personal data obtained pursuant to our onboarding process.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this personal data we may be unable to on-board you as a client or supplier.

3. Recipients of personal data

Third Parties

- When engaging with you, we may share personal data with persons acting on your behalf or otherwise involved in the relationship, including:
 - payment recipients, beneficiaries, account nominees, intermediary, and correspondent and agent banks;
 - clearing houses, and clearing or settlement systems;
 - specialised companies or payment institutions such as SWIFT;
 - market counterparties;
 - upstream withholding agents;
 - swap or trade repositories; stock exchanges;
 - other financial institutions, credit reference agencies or credit bureaus (for the purposes of obtaining or providing credit references).

Service providers

- We may also share personal data with our suppliers, and other business partners who provide services to us, including those that assist us in responding to inquiries, processing transactions, preparing and mailing account statements and other forms of shareholder services, as well as IT

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and hosting providers, communication services and printing providers, debt collection, tracing, debt recovery, fraud prevention, and credit reference agencies, and others. When we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure.

Public or regulatory authorities

- From time to time we disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

Others

- We may need to disclose personal data to exercise or protect legal rights, including ours and those of our employees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

4. International transfers of personal data

The recipients referred to above may be located outside the European Economic Area (for example in the US). In those cases, except where the relevant country has been determined by the relevant public authority to provide an adequate level of protection, Columbus Point requires such recipients to comply with appropriate measures designed to ensure such transfers are permitted under applicable data protection laws.

5. Retention of personal data

We will retain your personal data for the longer of the period required in order to comply with applicable laws, regulations or regulatory guidance, and the period envisaged within the Columbus Point records management retention documentation. Columbus Point determines the retention period for documentation with regard to our operational and legal requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests.

6. Your rights

You have a right to ask Columbus Point to rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. You have a right to ask us to stop processing your personal data, or to request deletion of your personal data – these rights are not absolute, but we will consider your request and respond to you with the outcome. When personal data are processed for direct marketing purposes, your right to object extends to direct marketing, including profiling to the extent it is related to such marketing. You may object to direct marketing by clicking the "unsubscribe" link in any of our marketing emails to you, or by contacting us using the contact details below.

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Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your personal data be transferred to you or to another controller (known as the 'data portability' right). You may also have the right to ask us for a copy of some or all of the personal data we collect and process about you.

You can exercise the rights set out above by contacting the address at the end of this notice.

7. Complaints

If you are not satisfied with any aspect of the processing of your personal data by Columbus Point, we would like to discuss it with you to understand how we can rectify the issue. However you also have the right to complain to your local data protection supervisory authority.

8. Personal data processing for indirect client relationships and prospective clients

From time to time, Columbus Point collects and processes personal data on prospective clients in order to assess the suitability of such prospective clients and, where appropriate, contact such prospective clients. This processing is justified on the grounds that it is necessary for the purposes of client prospecting, which is in the legitimate interests of Columbus Point. Where this occurs, we take steps to minimise the amount of personal data collected, the duration of retention and will, at the earliest practicable occasion, communicate the nature and content of processing to such individuals.

9. Cookies

By using our website, you agree that we can place cookies on your device. Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device, preferences and generally help to improve your online experience. If you want to restrict or block any of the above cookies, you should do this through the web browser settings for each browser you use and on each device you use to access the internet. Please use the contact details below if you require more information about our use of cookies.

10. Status of this privacy notice

This privacy statement is a notice explaining what Columbus Point does, rather than a document that binds Columbus Point or any other party contractually. We reserve the right to amend it from time to time.

If you have any questions about this policy or the use of your personal data, or if you would like to exercise your rights set out in 7 above, please contact: sbishop@columbuspoint.com.