

**STONE COAST FUND SERVICES LTD.
CAYMAN ISLANDS DATA PROTECTION ACT (2021 REVISION)
DATA PROTECTION NOTICE TO CAYMAN ISLANDS FUND CLIENTS UNDER
ADMINISTRATION**

This Data Protection Notice (“Notice”) is provided by your administrator, Stone Coast Fund Services Ltd. (“Stone Coast”), in our capacity as data controller for the personal data we collect from controlling and authorized persons of our Cayman Islands fund clients for purposes of regulatory compliance. Under Cayman Islands law, you have rights, and we have obligations, with respect to your Personal Data. The purpose of this Notice is to explain how and why we, and persons we engage, will use, store, share and otherwise process your Personal Data. This Notice also sets out your rights under the Cayman Islands data protection legislation, and how you may exercise them. Please read this Notice carefully and direct any questions you may have to the address noted below.

In this Notice, we use the following defined terms:

"Personal Data" has the meaning given in the Cayman Islands data protection legislation, as amended from time to time, (the "Data Protection Act (2021 Revision)"). Examples of Personal Data include an individual's name, address, email address, date of birth, passport details or other national identifier, driver's license number, and employment information. It can also include data which, when aggregated with other data, enables an individual to be identified, such as an IP address and geolocation data;

"Processing" has the meaning given in the Data Protection Act (2021 Revision). It is widely construed and includes obtaining, recording and holding data, as well as carrying out any operation on Personal Data, such as sharing, destroying and using the Personal Data. It also includes aggregating Personal Data from different sources;

"we", "us" and "our" refers to Stone Coast Fund Services Ltd.; and

“you” and “your” refers to the controlling and authorized persons of Stone Coast’s Cayman Islands Fund Clients; “you” and “your” does not refer to investors in our Cayman Islands Fund Clients.

Who Is Providing This Notice?

This Notice is provided by Stone Coast Fund Services Ltd. in our capacity as data controller for the Personal Data we collect from controlling and authorized persons of our Cayman Islands Fund Clients under administration.

What Role Do We Perform in Relation to Your Personal Data?

We act as a "data controller" in respect of your Personal Data. This means that we are the decision maker as to the purposes, conditions and manner in which your Personal Data is processed, including:

- how we use, store, and process your Personal Data;
- with whom we share your Personal Data;
- when to modify or erase your Personal Data;
- when to engage one or more third parties to process your Personal Data; and
- which such third parties to engage.

Why Is Your Personal Data Processed?

This section details the principal reasons why your Personal Data is processed. To facilitate our regulatory compliance and mitigate risk, it is our policy to perform anti-money laundering, anti-terrorist financing and anti-proliferation financing procedures on fund clients with whom we enter into a services agreement, our fund clients’ investment managers, and relevant controlling and authorized persons for both.

The processing is necessary for compliance with applicable legal or regulatory obligations or in pursuance of our legitimate interests, or those of a third party to whom your Personal Data is disclosed, including but not limited to:

- complying with a legal or regulatory obligation to which we or the third party are subject;
- investigating any complaints, or pursuing or defending any claims, proceedings or disputes (whether domestic or foreign);
- ensuring compliance with applicable internal policies and procedures;

- protecting our business against fraud, breach of confidence or theft of proprietary materials;
- seeking professional advice, including legal advice;
- protecting the security and integrity of our IT systems;
- helping detect, prevent, investigate and prosecute fraud and/or criminal activity, and sharing this data with legal, compliance, risk and managerial staff to assess suspicious activities;

but in all cases only where we have considered that the processing is necessary and, on balance, our legitimate interests are not overridden by your legitimate interests, rights or freedoms.

Where Do We Obtain Your Personal Data From?

We collect your Personal Data from a number of sources, including from you directly. These include, but are not limited to:

- from the identification documentation that you supply;
- when you provide it to us or our service providers in correspondence and conversations (including by email);
- publicly available and accessible directories and sources, including websites; and
- a regulatory, criminal and sanctions screening platform.

We may combine Personal Data that you provide to us with Personal Data about you that we collect from others. This may include Personal Data collected in an online or offline context.

What Personal Data Do We Collect?

The Personal Data we may collect includes, but is not limited to:

- contact information: name, professional e-mail and telephone details, and business, home and mailing addresses; and
- personal information: passport, national identity card or driver's license details, photograph, driver's license, and/or passport.

Who Will We Share Your Personal Data With?

As a general matter, with the exception of our parent company, Stone Coast Fund Services LLC, we do not share your Personal Data with other parties.

We will share your Personal Data with:

- the Cayman Islands government for the purposes of:
 - reporting data and documentation to them required by law, and
- our lawyers for purposes of:
 - seeking advice on, and complying with, legal and regulatory requirements or legal rights and 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.

Sending Your Personal Data Internationally

Not all countries have data protection and privacy laws that provide you with the same or a comparable degree of protection as Cayman Islands law. Where we transfer your Personal Data to third parties, we may be required to put in place data transfer agreements so as to provide your Personal Data with the same protections as exist under Cayman Islands law.

Retention and Deletion of Your Personal Data

We will keep your Personal Data for as long as it is required by us. For example, we may require it for our legitimate business purposes or where law or regulation obliges us to. We expect to delete your Personal Data (at the latest) once there is no longer any legal or regulatory requirement, legitimate business purpose for retaining your Personal Data, or, if not required by regulation to be retained for an additional period of time, in the event of cessation of our services you instruct us to do so.

Your Rights

You have certain data protection rights, including:

- the right to be informed about the purposes for which your Personal Data is processed;
- the right to access your Personal Data;
- the right to have incomplete or inaccurate Personal Data corrected;
- the right to ask us to stop processing your Personal Data (though we are not obliged to comply in every circumstance);
- the right to be informed of a Personal Data breach (unless the breach is unlikely to be prejudicial to you);
- the right to complain to the Data Protection Ombudsman; and
- the right to require us to delete your Personal Data in some limited circumstances.

Contact Us

We are committed to respecting your data protection rights. Please contact us if you have any questions about this Notice at the following email: legal@stone-coast.com.

Validity and Effective Date

This Notice was originally effective as of 30 September 2019. This notice is reviewed annually, and, should there be any material changes to the above, we will issue a replacement notice via publication on our website.