

Data Privacy Statement for Clients and Prospects

Aventicum Capital Management (Qatar) LLC

This Data Privacy Statement is provided in accordance with the QFC Data Protection Regulations 2021 and the QFC Data Protection Rules 2021.

Aventicum Capital Management (Qatar) LLC has issued this Privacy Statement in accordance with the applicable QFC Data Protection Legislation. Data privacy is important – please read the statement below.

If you are an individual, this will affect you directly. If you are an institutional investor that provides us with personal data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content. This Statement provides an overview of how we collect and Process Personal Data and of your rights under the applicable Data Protection Legislation. The Personal Data we Process and how we Process it will depend on the nature of our relationship and the services requested or provided. In this document, "**we**", "**us**" and "**our**" refer only to **Aventicum Capital Management (Qatar) LLC**.

"**Data Protection Legislation**" means the QFC Data Protection Regulations 2021, the QFC Data Protection Rules 2021 and applicable guidance, decisions and requirements issued by the QFC Data Protection Office, in each case as amended from time to time.

1. Who Is Responsible For Data Processing & How Can I Contact Them?

The Data Controller responsible for the Processing described in this Statement is Aventicum Capital Management (Qatar) LLC, QFC No. 00173, an Authorised Firm regulated by the Qatar Financial Centre Regulatory Authority (QFCRA).

Registered office: 41st Floor, Palm Tower B, Al Funduq Street, West Bay, Doha, Qatar

Should you have any questions about this statement or wish to exercise your Data Subject rights, please contact:

Omar AlShari, VP – Risk and Compliance

Email Address: omar.alshari@aventicum.com

Phone Number: +974 4459 4415

2. What Sources & Data Do We Use?

We process Personal Data that we obtain from clients and prospective clients in the context of our business relationships. We also process, insofar as necessary to provide our services or meet legal and regulatory requirements, Personal Data obtained from publicly accessible sources (for example, corporate registries, press and internet sources) or lawfully received from other third parties, such as screening providers, professional advisers or other service providers.

In order to facilitate, establish or maintain our business relationship, we may collect and otherwise Process Personal Data relating to clients, investors and prospective clients and to individuals connected with them, such as authorised representatives, shareholders, beneficial owners, signatories, agents or advisers (each an "Affected Person")

Personal Data may include identification and contact information, corporate role and authority information, financial and investment-related information, KYC/AML and other due diligence information, signatures and correspondence, together with other information necessary to provide our services or comply with applicable legal and regulatory requirements.

Where we Process Sensitive Personal Data, we will do so only where an applicable condition under Article 12 of the QFC Data Protection Regulations 2021 is satisfied.

3. What Do We Process Your Data For (Purpose of Processing) & On What Legal Basis?

We Process Personal Data in accordance with the Data Protection Legislation and only where a lawful basis under Article 10 of the QFC Data Protection Regulations 2021 applies.

a. For fulfillment of contractual obligations

Where applicable, Personal Data is Processed where necessary to enter into or perform a contract with you, or to take steps at your request before entering into a contract (Article 10(1)(B)), including in connection with the services for which we are engaged.

b. In the context of balancing interests

We may Process Personal Data where necessary for the legitimate interests pursued by us or another Person, provided those interests are not overridden by your rights and legitimate interests (Article 10(1)(F)). Examples may include:

- managing and developing client and prospective-client relationships and improving our services;
- business development and direct marketing where permitted, subject to your right to object at any time;
- establishing, exercising or defending legal claims;
- maintaining the security, availability and integrity of our systems and operations;
- fraud, financial crime and security risk prevention and investigation;
- business management, governance and the development of our services;
- risk management and internal control;
- premises and access security, where such Processing is carried out by or on behalf of Aventicum.

c. As a result of your consent

Where you have given us consent to Process your Personal Data for a specific purpose, we may rely on that consent (Article 10(1)(A)). You may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of Processing carried out before the withdrawal.

d. Due to statutory provisions or in the public interest

Furthermore, as a QFCRA Authorised Firm, we are subject to legal and regulatory obligations. We may therefore Process Personal Data where necessary to comply with an obligation imposed on us by law (Article 10(1)(C)). The purposes may include identity verification, customer due diligence, AML/CFT and sanctions compliance, beneficial ownership checks, tax and regulatory reporting, responding to lawful requests from regulators or other competent authorities, record keeping and risk management.

Certain Personal Data is required in order for us to comply with legal and regulatory obligations or to establish and perform our relationship with you. If required information is not provided, we may be unable to establish or continue the relationship or provide some or all the relevant services.

4. Who Receives My Data & Confidentiality Requirements?

We are under a duty of confidentiality to our clients and to prospective clients and are obliged to maintain confidentiality regarding all client-related matters and assessments of which we acquire knowledge.

The following paragraphs describe the categories of Recipients to whom Personal Data may be disclosed and the purposes for which such disclosure may occur.

a. External recipients of data

We may disclose Personal Data in the course of conducting our business where necessary to provide our services, comply with legal or regulatory requirements, pursue legitimate interests, or where another applicable lawful basis exists. Recipients may include:

- To public bodies and competent authorities, including the QFCRA, relevant QFC authorities or offices, the Qatar Financial Information Unit, tax authorities, courts and law-enforcement authorities, where disclosure is required or permitted by law.
- To financial institutions, funds and fund service providers, custodians, brokers, counterparties, administrators and other transaction or service providers, where relevant to the services provided or necessary to meet applicable legal, contractual or regulatory requirements.

b. To service providers and agents

We may disclose Personal Data to service providers and agents appointed by us, including providers of KYC/AML, IT, professional and other operational services. Where they Process Personal Data on our behalf, appropriate confidentiality, data protection and security requirements will apply.

We maintain appropriate technical and organisational measures designed to protect Personal Data against unauthorised or unlawful Processing and against accidental loss, destruction or damage.

5. Will Data Be Transferred Outside The QFC ?

Personal Data may be transferred to Recipients located outside the QFC where necessary for a relevant Processing activity. Transfers outside the QFC are made in accordance with Articles 23 and 24 of the QFC Data Protection Regulations 2021.

- Where the Recipient is located in a jurisdiction determined by the QFC Data Protection Office to provide an adequate level of protection, the transfer may take place under Article 23.
- Where the Recipient is located in a jurisdiction that has not been determined adequate, we will rely on an applicable safeguard, derogation or other transfer mechanism permitted under Article 24.

The level of protection may differ between jurisdictions; however, transfers will be assessed and handled in accordance with the QFC Data Protection Regulations 2021.

You may contact us using the details in Section 1 to request information about the safeguards applicable to a transfer and, where applicable, how and where to obtain a copy of those safeguards.

6. For How Long Will My Data Be Stored?

We will process and store your personal data for as long as it is necessary in order to fulfill our contractual, regulatory and statutory obligations.

Requests for erasure will be assessed in accordance with Article 18 of the QFC Data Protection Regulations 2021. Personal Data will not be erased where continued retention is necessary, for example to comply with a legal or regulatory obligation or to establish, exercise or defend a legal claim.

We retain Personal Data for as long as necessary to meet our contractual, legal and regulatory obligations. Certain records, including AML/CFT records, may be retained for at least 10 years where required by applicable law or regulation, and may be retained for longer where legally required.

7. What Data Privacy Rights Do I Have?

Each data subject has in relation to their personal data:

- a. The right of access.
- b. The right to rectification.
- c. The right to erasure.
- d. The right to restriction of processing.
- e. The right to object to processing.
- f. The right to data portability.
- g. The right to object at any time to Processing for direct marketing purposes. If you object, your Personal Data will no longer be Processed for those direct marketing purposes.

Where your right to object applies on grounds relating to your particular situation, we will stop the relevant Processing unless we can demonstrate compelling legitimate grounds that override your rights and legitimate interests, or the Processing is necessary for the establishment, exercise or defense of legal claims. Depending on the Processing concerned, exercising a right may affect our ability to provide a particular service or continue a relationship.

Where Processing is based on consent, you may withdraw that consent at any time without affecting the lawfulness of Processing carried out before withdrawal.

We will inform you of the action taken on a request to exercise your rights without undue delay and, at the latest, within 30 days of receiving the request. Where permitted because of the complexity and number of requests, this period may be extended by a further 60 days and we will inform you of the extension and the reasons for it.

Requests to exercise Data Subject rights do not need to follow a particular form. Please send requests or privacy queries to Aventicum using the contact details set out in Section 1.

You have the right under Article 34 of the QFC Data Protection Regulations 2021 to lodge a complaint with the QFC Data Protection Office if you consider that the Processing of Personal Data relating to you infringes the Regulations. The QFC Data Protection Office can be contacted at dataprotection@qfc.qa

8. To What Extent Is There Automated Decision Making?

We generally do not make decisions based solely on automated Processing, including Profiling, that produce legal or similarly significant effects on Data Subjects. We may use automated tools to support compliance, screening, monitoring and risk assessment; however, material decisions are subject to human review.

Where Profiling is used, it may support our legal and regulatory obligations, including AML/CFT, sanctions, fraud prevention and risk assessment. If we use solely automated decision-making in circumstances covered by Article 22, we will provide the information and safeguards required under the Data Protection Legislation.

Data Privacy Notice for Current Employees, Former Employees and Job Applicants

Aventicum Capital Management (Qatar) LLC

This Data Privacy Notice is provided in accordance with the QFC Data Protection Regulations 2021 and the QFC Data Protection Rules 2021 (together, the "**Data Protection Legislation**"). Aventicum Capital Management (Qatar) LLC ("**the Firm**", "**we**", "**us**" or "**our**"), as a Data Controller regulated by the Qatar Financial Centre Regulatory Authority (QFCRA), has an obligation under the Data Protection Legislation to inform individual Data Subjects of their rights in relation to the Personal Data we hold about them. We are committed to safeguarding Personal Data and Processing it in line with the Data Protection Legislation. As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you of:

- why and how the Firm collects, uses and stores your Personal Data;
- the legal basis on which your Personal Data is Processed; and
- what your rights are, and what our obligations are, in relation to such Processing.

1. What Does This Notice Cover?

This Notice applies to all forms of use ("Processing") of Personal Data by the Firm relating to its current, former and prospective employees, in the Qatar Financial Centre (QFC). It supplements, and should be read alongside, any employment contract, staff handbook or policy issued to you separately.

2. How Do We Get Your Information?

We collect information about you in different ways, specifically:

- Data you give to us:
 - when you apply for employment with the Firm;
 - when you complete an application form or provide information through supporting documents;
 - when you speak to us by telephone;
 - in emails, letters and other correspondence;
 - in interviews;
 - in employee surveys;
 - in appraisal, investigation or disciplinary meetings;
 - in the course of managing your employment with us (for example, payroll);
 - to be included in the Firm's internal staff directory;
- Data we collect from CVs submitted directly or by recruitment agencies;
- Data we collect from job forums, professional social media and recruitment agencies;
- Data we collect when you are referred to us by a third party, including an existing employee;
- Data we receive from third parties we work with, including:
 - credit reference agencies;
 - fraud prevention agencies;
 - publicly accessible sources;
 - government and law enforcement agencies;

- background screening providers.

3. Information We Hold About You

- **Identification data:** such as your name, date of birth, address, contact details (email, telephone number), gender, photograph and staff member ID;
- **National identifiers:** such as your Qatari ID (QID) number, passport number, national identification/tax identification number, right-to-work and residency permit documents, and driving licence number;
- **Employment details:** such as job title/position, office location, employment contract, performance and disciplinary records, grievance procedures, and sickness/holiday records;
- **Background information:** such as academic/professional qualifications, education history, CV/resume and, where permissible and in accordance with applicable law, criminal record data for vetting purposes;
- **Financial information:** such as bank details, tax information, withholdings, salary, benefits, expenses and company allowances;
- **IT information:** information required to provide access to the Firm's IT systems and networks (and information collected by or through those systems), such as IP addresses, log files and login information;
- **Family member information:** next of kin and/or family member names and contact details;
- **Legal information:** criminal convictions, offences, court judgments and information relevant to fraud prevention, anti-money laundering and other legal obligations.

We may also Process Sensitive Personal Data relating to you (and, where relevant, your spouse/partner and/or dependents). Under the Data Protection Legislation, Sensitive Personal Data means Personal Data revealing or relating to race or ethnicity, political affiliation or opinions, religious or philosophical beliefs, trade-union or organisational membership, criminal records, health or sex life, and genetic and biometric data used to identify an individual. As a general rule, we try not to collect or Process Sensitive Personal Data about you unless it is necessary and an applicable condition under Article 12 of the QFC Data Protection Regulations 2021 is satisfied – for example, information about a disability to provide reasonable workplace accommodations, or health information to administer insurance and benefits.

4. What Do We Use Your Information For, and What Is Our Legal Basis?

Legal basis for Processing

The Firm Processes Personal Data in accordance with the Data Protection Legislation. We are not permitted to Process Personal Data unless we have a valid legal basis under Article 10 of the QFC Data Protection Regulations 2021. Accordingly, we will only Process your Personal Data where:

- it is necessary to perform our contractual obligations to you, or to take steps at your request before entering into a contract (Article 10(1)(B));
- it is necessary to comply with a legal or regulatory obligation to which we are subject, for example verifying your identity or right to work (Article 10(1)(C));
- it is necessary to protect the vital interests of you or another individual (Article 10(1)(D));
- it is necessary for the legitimate interests pursued by the Firm, provided those interests are not overridden by your rights and legitimate interests (Article 10(1)(F)); or
- you have given your consent (Article 10(1)(A)).

Recruitment

If you are applying for a role with the Firm, we collect and use your Personal Data primarily for

recruitment purposes – in particular, to assess your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a role, verifying your information, carrying out reference or background checks (where applicable), and generally managing the hiring process and communicating with you about it.

If you are successful, the information collected during recruitment will form part of your ongoing staff record. If you are not successful, we may retain your application for up to 6 months so that we may consider you for other suitable openings within the Firm during that period.

Employment and Work-Related Purposes

Once you become a staff member, we collect and use your Personal Data to manage our employment relationship with you – for example, your employment records and contract information, your bank account and salary details (so that we can pay you), and details of your spouse and dependents (for emergency contact and benefits purposes).

Staff Directory

We maintain an internal directory of staff members containing your professional contact details (such as your name, location, photograph, job title and contact details). This information is available within the Firm to facilitate cooperation, communication and teamwork.

Other Legitimate Business Purposes

We may also collect and use your Personal Data where necessary for other legitimate purposes, such as to:

- help us conduct our business more effectively and efficiently – for example, for HR resourcing, IT security and management, accounting, or financial planning; and
- investigate suspected violations of law or breaches of our internal policies, whether by you or another staff member – for instance, we may monitor use of our devices, systems and communications where we suspect involvement in fraud, phishing or activity that competes with or is inconsistent with your role at the Firm, in each case proportionately and in accordance with applicable law.

Legal and Regulatory Purposes

We may also use your Personal Data where we consider it necessary to comply with applicable laws and regulations, including disclosing staff Personal Data as required by law (for example, for tax, immigration, health and safety, and other employment-related laws), pursuant to a lawful request from a court or regulator, to protect your vital interests (or those of another person), or to establish, exercise or defend a legal claim.

5. Your Obligations

You must provide the Personal Data that is required for us to enter into and carry out your employment relationship and the accompanying contractual obligations, or that we are legally obliged to collect.

In particular, anti-money laundering and related regulatory requirements may require us to verify your identity on the basis of your identification documents, and to record information which may include your name, place and date of birth, nationality, address and identification details. If you do not provide us with the necessary information and documents, or fail to disclose changes to that information over the course of our relationship, we may be unable to establish or continue your employment or engagement with us (in which case we will inform you accordingly).

6. Your Consent

Where you have given us consent in accordance with the QFC Data Protection Regulations 2021 to Process your Personal Data for a specific purpose, that Processing is lawful on the basis of your consent (Article 10(1)(A)). You may withdraw your consent at any time by contacting us using the details set out under “Exercising Your Rights” below. Withdrawal of consent does not affect the lawfulness of Processing carried out before the withdrawal.

7. How Your Data Is Processed

Personal Data is Processed both manually and electronically for the purposes described in this Notice, and in each case in a manner designed to ensure the security and confidentiality of that data. Access is limited to our employees and third-party Processors who need it for the purposes described, and who are appropriately designated and trained to Process Personal Data only in accordance with our instructions. Personal Data is Processed for the duration of your relationship with the Firm and, thereafter, for as long as necessary to fulfil our legal and regulatory obligations (see “Data Retention” below).

8. Who Has Access to Your Personal Data, and Who Is It Shared With?

Outside the Firm

To the extent permitted by applicable law, we may transfer Personal Data to third parties outside the Firm, including:

- public bodies and competent authorities, including the QFCRA, relevant QFC authorities or offices, the Qatar Financial Information Unit, tax authorities, courts and law-enforcement authorities, where disclosure is required or permitted by law;
- other financial institutions or comparable institutions, where necessary to carry out services required in connection with your employment (for example, payroll or benefits providers);
- third parties where necessary to meet the requirements of applicable law, contractual provisions or regulatory/compliance standards;
- a natural or legal person, public authority, agency or body to whom you have given consent for us to transfer your Personal Data; and
- service providers and agents, such as providers of IT, payroll, HR, background screening, professional advisory and other operational services.

We maintain appropriate technical and organisational measures designed to protect Personal Data against unauthorised or unlawful Processing and against accidental loss, destruction or damage, including where such data is disclosed to third parties.

Data Transfers Outside the QFC

Your Personal Data may in some cases be transferred to Recipients located outside the QFC. Any such transfer will be made in accordance with Articles 23 and 24 of the QFC Data Protection Regulations 2021, namely where:

- the Recipient is located in a jurisdiction that the QFC Data Protection Office has determined provides an adequate level of protection (Article 23); or
- in the absence of such a determination, an appropriate safeguard, derogation or other transfer mechanism permitted under Article 24 applies (for example, standard data protection clauses, your explicit consent, or where the transfer is necessary to perform your employment contract).

You may contact us using the details set out under “Exercising Your Rights” below to request

information about the safeguards applicable to a particular transfer.

9. Data Retention

We will Process and store your Personal Data for as long as necessary to fulfil the purpose for which it was collected, including to comply with our legal, regulatory or internal policy requirements. In particular, we retain information to:

- maintain business and employment records for analysis and/or audit purposes;
- comply with record-retention requirements under applicable law (for example, AML/CFT record-keeping obligations under the applicable QFCRA rules, which generally require retention of certain records for at least 10 years);
- establish, exercise or defend a legal claim;
- deal with any future complaints; and
- assist with fraud monitoring and other legal hold requirements.

Requests for erasure will be assessed in accordance with Article 18 of the QFC Data Protection Regulations 2021. Personal Data will not be erased where continued retention is necessary, for example to comply with a legal or regulatory obligation, or to establish, exercise or defend a legal claim.

10. Your Rights

We always aim to use your Personal Data in a way that is fair to you. Subject to the conditions and exemptions set out in the QFC Data Protection Regulations 2021, you have the right to:

- obtain confirmation of, and access to, the Personal Data we hold about you (Article 16);
- have inaccurate or incomplete Personal Data corrected (Article 17);
- have your Personal Data erased in certain circumstances (Article 18);
- object to Processing carried out on the basis of our legitimate interests, on grounds relating to your particular situation, and to object at any time to Processing for direct marketing purposes (Article 19);
- request that we restrict the Processing of your Personal Data in certain circumstances (Article 20);
- receive certain Personal Data you have provided to us in a structured, commonly used and machine-readable format (Article 21); and
- not be subject to a decision based solely on automated Processing, including Profiling, that produces legal or similarly significant effects on you, subject to the exceptions in Article 22.

Where Processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of Processing carried out before withdrawal.

These rights are not absolute and, depending on the circumstances, exemptions under the Data Protection Legislation may apply. When you make a request, we may ask you to verify your identity and/or provide further information to help us understand and respond to your request. If we are unable to comply with a request, we will explain why. We will inform you of the action taken on your request without undue delay and, at the latest, within 30 days of receiving it; this period may be extended by a further 60 days where permitted because of the complexity or number of requests, and we will tell you if this applies and why.

11. Exercising Your Rights

If you have any questions or concerns about how we use your Personal Data, or wish to exercise any

of your rights under this Notice, please contact the Head of Human Resources in the first instance. If they are unable to resolve your query, please contact: [Insert designated Data Protection contact point – e.g. name/role, email address and telephone number].

If you consider that our Processing of your Personal Data infringes the QFC Data Protection Regulations 2021, you also have the right under Article 34 to lodge a complaint with the QFC Data Protection Office. The QFC Data Protection Office can be contacted at **dataprotection@qfc.qa**.

12. Changes to This Notice

This Notice explains how the Firm handles your Personal Data and describes your rights under the Data Protection Legislation; it does not form part of, and is not intended to create, any contractual obligation on the Firm or any other party. A copy of this Notice may be requested from us using the contact details set out above. We may update this Notice from time to time and, where a change has a fundamental impact on the nature of our Processing or otherwise a substantial impact on you, we will give you reasonable advance notice.