

Banking Data Protection Notice

This Data Protection Notice ("Notice") contains important information about how We collect, use, disclose, store and otherwise process Your Personal Data. It is also referred to as a Privacy Notice.

In the Notice:

'We' 'Us' 'Our' means MUFG Alternative Fund Services (Cayman) Limited, a limited company incorporated in the Cayman Islands which is the Data Controller of the Personal Data and the Bank that provides services to the Client.

'AML Law' means anti-money laundering and prevention of terrorist financing legislation, regulations and guidance that are applicable as a result of relevant business activity in the jurisdictions in which We operate.

'Applicable Law' means all applicable statutes, rules, regulations and orders that are applicable as a result of relevant business activity in the jurisdictions in which We operate.

'Data Protection Law' means all applicable data protection and privacy laws or regulations that must be complied with as a result of relevant business activity in the jurisdictions in which We operate, including the EU General Data Protection Regulation (Regulation 2016/679), the Data Protection Act 2018 (Ireland), the Data Protection Act (2021 Revision) (Cayman Islands), Law 125(I) of 2018, providing for the Protection of Natural Persons with Regard to the Processing of Personal Data and for the Free Movement of Such Data (Cyprus), the UK GDPR and Data Protection Act 2018 (United Kingdom), the Personal Information Protection and Electronic Documents Act, SC 2000 c5 and the Personal Information Protection Act (British Columbia) S.B.C 2003 (Canada), the Personal Data (Privacy) Ordinance (Cap. 486) (Ordinance) 1996 and the Personal Data (Privacy)(Amendment) Ordinance (Amendment Ordinance) 2021 (Hong Kong), the Personal Data Protection Act 2012 (Singapore), the Privacy Act 1988 (Cth) (Australia) and the Personal Data Protection Act 2010 (Malaysia).

'Client' means the legal person, entity, or relationship to which We provide Accounts and Services.

'Data Controller' means the entity which decides what Personal Data to collect and process and for what purposes, how that Personal Data will be processed, who it will be shared with, how it will be kept safe and how You can exercise Your rights in relation to Your Personal Data

'Personal Data' means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, personal identification number, addresses, contact numbers, license numbers, records, personal assets, bank and credit card numbers, photos and videos of an individual, and any other data of personal nature, for example digital identifiers like cookies and IP addresses. Put simply, Personal Data is information that identifies, relates to, describes, or can reasonably be used to identify an individual.

'Processing' means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'You' are the Data Subject, the person who can be identified from the Personal Data, and one of the following categories: (i) Investors in the Client; (ii) Legal guardians of investors, in the case of minors; (iii) Commercial contacts of the Client; (iv) Client's directors and employees; (vi) Persons who have a commercial relationship with the Client.

Who We Are

We are the Data Controller of Your Personal Data, and we are responsible for providing You with this Notice. This Notice sets out important information about how We process your Personal Data in our capacity as a Data Controller when providing banking and related services to Clients.

We are part of MUFG Investor Services which is an industry-leading asset services and fund financing arm within Mitsubishi UFJ Financial Group (MUFG). We partner with leading investment firms to provide them with holistic, customised solutions that meet their operations, financing, and regulatory needs across the investment lifecycle.

MUFG Investor Services is a service brand name and includes the following entities only within the MUFG global financial group: MUFG Investor Services Holdings Limited, MUFG Fund Services (Cayman) Limited, AFS Controlled Subsidiary 1 Ltd, AFS Controlled Subsidiary 2 Ltd, AFS Controlled Subsidiary 3 Ltd, MUFG Alternative Fund Services (Cayman) Limited, MUFG Controlled Subsidiary 1 (Cayman) Limited, MUFG Fund Services (Cyprus) Limited, MUFG Alternative Fund Services (Ireland) Limited, MUFG Trustee (Ireland) Limited, MUFG Fund Services (Singapore) Pte. Ltd., MUFG Fund Services (Canada) Limited, MUFG Fund Services (UK) Limited, MUFG Fund Services (Hong Kong) Limited, MUFG Fund Services (Australia) Pty Ltd and MUFG Investor Services (Malaysia) SDN BHD.

Personal Data We Process About You

The Personal Data we process about You is generally collected either from You directly or from the Client. Personal Data may also be obtained from other MUFG Investor Services entities and from Our service providers who perform activities such as legally required due diligence, sanction screening and identity verification. The Personal Data We process about You falls into the below categories:

Identity and contact information	Name, gender, date of birth, place of birth, postal address, email address, telephone number, FAX number, country of residence, nationality, legal domicile, citizenship, signature, passport number, government-approved ID, user credentials, IP address
Financial details and circumstances	Bank account number, tax details and tax ID, Source of funds and Source of Wealth, investment data, FATCA/CRS status, FATCA Global Intermediary Identification Number ("GIIN"), risk rating
Marital status and/or financial associations	Marital status, family member's name (spouse, minors, etc.)
Image/video and/or voice recordings	Images/photos, video and/or voice recordings of meetings, webinars or calls, transcripts
Special categories ("sensitive categories")	Criminal Offence data (where permitted by applicable law), including information arising from sanctions screening, adverse media checks and politically exposed person ("PEP") assessments

Why We Process Your Personal Data and our Lawful Basis for Processing

We will only process Personal Data provided to us for the purposes for which it was intended and any reasonably related purpose as required by Data Protection Law. We will also ensure that Processing is supported by a lawful

basis. A lawful basis means a legal justification or reason for Processing Your Personal Data which is set out in Data Protection Law.

Why We Process Your Personal Data	Our Lawful Basis
To carry out anti-money laundering checks and related actions for the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis. To carry out these and any other activities required to comply with AML Law and to report on these activities.	To comply with legal and regulatory obligations to which we are subject.
To monitor and record calls and electronic communications, which may contain Personal Data, for quality, business analysis, training, investigation and fraud prevention purposes, for crime and/or regulatory detection, prevention, investigation and prosecution. Individuals will be advised calls are recorded prior to recording.	To comply with legal and regulatory obligations to which we are subject. To pursue our legitimate interests. We will only rely on legitimate interest as our lawful basis after taking Your interests, rights and freedoms into consideration to make sure You are protected and that we do not cause You any harm.
To manage and respond to inquiries by regulators or public authorities and to report tax or regulatory related information to competent bodies or authorities	To comply with legal and regulatory obligations to which we are subject.
To protect and ensure the security of Our business and Your Personal Data, to ensure the health and safety of visitors to Our offices and that of Our employees and to manage Our internal operations, including corporate governance, secretarial administration, software development, hosting, business development, business continuity, disaster recovery, fraud prevention, risk and incident management, procurement and third-party management, in-house legal advice and litigation, screening and due diligence activities, event planning and management, as well as audit and compliance activities.	To pursue our legitimate interests. We will only rely on legitimate interest as our lawful basis after taking Your interests, rights and freedoms into consideration to make sure You are protected and that we do not cause You any harm.
To engage in preparatory steps for or to conclude a corporate transaction or business sale where We may sell one or more of Our businesses, assets or services and Your Personal Data may be transferred as part of that purchase or sale.	To pursue our legitimate interests. We will only rely on legitimate interest as our lawful basis after taking Your interests, rights and freedoms into consideration to make sure You are protected and that we do not cause You any harm.

How We share Your Personal Data

We may share Your Personal Data with the types of third parties listed below but will only do so as permitted by Applicable Law and subject to implementing any required data protection agreements, so your Personal Data is protected if it is shared.

Parent company, other entities, and affiliates	We may share your Personal Data with Our parent company, other entities, and/or other affiliates as required from time to time to manage Our business operations.
Service Providers and Data Controllers	Our Service Providers include financial intermediaries and third-party account providers, information technologies and telecommunication service providers, software support and development contractors, cloud hosting and support providers, computer maintenance contractors, printing companies, document storage and destruction companies, archiving services providers, auditors, consultants, legal advisors, sanctions and politically exposed persons screening application support services. In certain circumstances, recipients may act as Independent Controllers. This means that they will process this Personal Data for their own purposes and will provide You with their own Data Protection Notice which can be accessed by clicking on the link(s) below: StoneX Financial Ltd – https://www.filesandimages.com/Brand/StoneX/PDF/Europe-External-Privacy-Notice-April-2025.pdf JPMorgan Chase Bank N.A. – EMEA Privacy Policy.pdf
Regulatory and Statutory Bodies, Competent Authorities	Your Personal Data may be disclosed to third parties such as statutory or regulatory bodies and competent authorities only where we are legally obliged to do so.
Parties involved in negotiations for sale of a business, asset or service	In the event of a disclosure to a party with whom MUFG Investor Services is in negotiation for the sale or transfer of a business, assets, or services we will only share what is strictly necessary and proportionate in the circumstances and will take steps to ensure Personal Data is protected if disclosed.

Countries Your Personal Data may be transferred to

We may transfer Personal Data to a country outside of the European Economic Area (“EEA”), including Australia, Canada, Cayman Islands, Hong Kong, India, Japan, Malaysia, Singapore, UK, USA, and any other countries as may be required depending on a Client’s or Investor’s domicile in accordance with the Model Contracts or other available data transfer solutions under Data Protection Law. To the extent that Personal Data processed is subject to the General Data Protection Regulation (“GDPR”), We will ensure that Model Contracts are entered into. These are safeguards that ensure that the Personal Data is protected to at least the same standard as the GDPR regardless of where the data is transferred to.

How Long We Keep (Retain) Your Personal Data

We will keep Your Personal Data for no longer than is necessary. We determine how long we need to keep Your Personal Data by taking into account legal obligations under Applicable Law to retain data for a certain period of

time, statute of limitations under Applicable Law and guidelines issued by relevant data protection authorities and other relevant regulatory authorities.

How We protect Your Personal Data

We have implemented technical and organizational measures to ensure an appropriate level of security, taking into account the nature, scope, context and purpose of the Processing, and the risks for the rights and freedoms of natural persons. Our global Information Security Management System (“ISMS”) is aligned to the ISO/IEC 27001 standard and supports the ongoing protection of your information and resilience of our information security environment.

Your Rights

You have a number of rights in relation to Your Personal Data called Data Subject Rights. These rights are not absolute and are subject to certain exceptions or qualifications depending on the circumstances.

Right of Access to Your Personal Data

You have a right to access the Personal Data we process on You. We will endeavor to give You as much information as possible but we can't provide You with information about another person. If there is any specific information You are looking for, please outline this in Your request.

Right to Correct Your Personal Data

If any of the Personal Data we hold about You is incorrect, incomplete or out of date You have a right to have Your Personal Data corrected.

Right to Object to Processing of Your Personal Data

You have the right to object to certain types of Processing of Your Personal Data. If You object to the Processing of Your Personal Data we will review Your objection in the context of the Personal Data we process about You. If we consider that we can demonstrate compelling legitimate grounds for the Processing which may override Your individual objection, we may continue to process Your Personal Data despite Your objection. If we feel we cannot demonstrate compelling legitimate grounds for the Processing, we will stop Processing Your Personal Data.

Right to Erase Your Personal Data

You can ask us to erase Your Personal Data if You think that Your Personal Data is processed without a legitimate reason or where You believe we no longer have grounds to process Your Personal Data. Please note that we cannot erase Your Personal Data if doing so would prevent us from meeting our legal and regulatory obligations.

Complain to Us

You can complain to Us by using the contact information provided below. We will acknowledge your complaint, keep You advised of progress and let You know the outcome of your complaint.

Complain to the Supervisory Authority

You have a right to complain to the relevant Supervisory Authority. This is the authority responsible for supervising data protection law and compliance in the jurisdiction You reside in. Contact information for the Office of the Ombudsman Cayman Islands is: PO Box 2252, Grand Cayman KY1-1107, Cayman Islands, info@ombudsman.ky and +1 345 946 6283.

How to Contact Us

You can find out more about Your Personal Data, how to exercise Your rights, how to complain to Us or the relevant Supervisory Authority by e-mailing our Data Protection Team at dataprotectionoffice@mfsadmin.com. Contact details for our office locations can be found [here](#).

Changes to This Data Protection Notice

We review and update (as required) this Notice to reflect changes in Data Protection Law and how We process Personal Data.

Last Updated: August 19, 2026

AI Transparency and Responsible Use Policy

Click [here](#) to find out more about how we use Artificial Intelligence responsibly when Processing Personal Data.