

## **Banking Data Protection Notice**

In this Data Protection Notice (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.

**'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 any information that will identify or single out 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 this important information and relating to how We process your Personal Data as Data Controller when providing services as a Bank 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). The firm partners 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 Fund Services (Bermuda) Limited, MUFG Fund Services Limited, MUFG Fund Services (Cayman) Limited, MUFG Alternative Fund Services (Cayman) Limited, MUFG Fund Services (Cyprus) Limited, MUFG Alternative Fund Services (Ireland) Limited, MUFG Jersey Limited, MUFG Jersey Management Company Limited, MUFG Fund Services (Singapore) Pte. Ltd., Fund Services (Canada) Limited, MUFG Fund Services (UK) Limited, MUFG Fund Services (Hong Kong) Limited, MUFG Fund Services (Cayman) 2 Limited, MUFG Fund Services (Halifax) 2 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 collected either from You directly or from the Client and includes the following categories:

<b>Identity and contact information</b>	Name, gender, date of birth, place of birth, postal address, email address, telephone number, country of residence, nationality, legal domicile, citizenship, signature, passport number
<b>Financial details and circumstances</b>	Bank account number, tax details and tax ID, Source of funds and Source of Wealth, investment data
<b>Marital status and/or financial associations</b>	Marital status, family member's name (spouse, minors, etc.)
<b>Image/video and/or voice recordings</b>	Images/photos, video and/or voice recordings of meetings, webinars or calls, transcripts
<b>Special categories ("sensitive categories")</b>	Sanction screening and adverse media searches, criminal records,

### 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 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.

<b>Why We Process Your Personal Data</b>	<b>Our Lawful Basis</b>
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 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.	To comply with legal and regulatory obligations to which we are subject.
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 and to manage our internal operations including corporate governance, secretarial, software development, hosting, business development and 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.

### Who we share Your Personal Data with

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

<b>Group entities and affiliates</b>	We may share your Personal Data with our parent company or other group affiliates as required from time to time to manage our business operations.
<b>Service Providers and Data Controllers</b>	<p>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.</p> <p>Some Service Providers that we share Personal Data with are Data Controllers in their own right. 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:</p> <p><a href="https://www.filesandimages.com/Brand/StoneX/PDF/Europe-External-Privacy-Notice-April-2024.pdf">https://www.filesandimages.com/Brand/StoneX/PDF/Europe-External-Privacy-Notice-April-2024.pdf</a></p>
<b>Regulatory and Statutory Bodies and Competent Authorities</b>	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.
<b>Parties involved in negotiations for sale of a business, asset or service</b>	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 the Personal Data to a country outside of the European Economic Area (“EEA”) to Australia, Bermuda, Brazil, Canada, Hong Kong, India, Japan, Jersey, Malaysia, Philippines, 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 subject to the General Data Protection Regulation we will ensure that Model Contracts are entered into. These are safeguards which ensure that the Personal Data is protected to at least the same standard as the General Data Protection Regulation regardless of where the data is transferred to.

### **Retention period or criteria used to determine the retention period**

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.

### **Security Measures we have in place**

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. We have aligned to ISO 27001:2013 for the implementation and management of a global Information Security Management System (ISMS).

## **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 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.

## **How to contact us**

You can find out more about Your Personal Data, how to exercise Your rights, how to complain to the relevant Supervisory Authority by e-mailing our Data Protection Team at [dataprotectionoffice@mfsadmin.com](mailto:dataprotectionoffice@mfsadmin.com)

### **By Post**

Contact details for our office locations can be found [here](#).

This Notice will be reviewed regularly and will be updated as required to take into account changes in the law, changes to how We Process Personal Data and user experience.