

## **Columna Capital Privacy Notice**

The General Data Protection Regulation (“**GDPR**”) applies to the collection, processing and storage of personal data undertaken by organisations within the European Economic Area (EEA), as well as to firms outside the EEA that handle personal data relating to the offering of services to individuals in the EEA.

The GDPR has two key purposes: (a) to set guidelines for the collection, processing and protection of personal data and (b) to give individuals certain rights in relation to their personal data (such as to access and correct it and object to further processing).

This Privacy Notice is intended to ensure that the investor or, where the investor is not an individual, the investor’s individual directors, officers, employees and/or owners (including beneficial owners) (“**you**”, or “**your**”) are aware of the categories of your personal data the investment funds and investment vehicles (and, where such fund is a limited partnership, its general partner) managed or advised by Columna Capital LLP or any of its affiliates (together, “**Columna**”, “**we**”, “**us**” or “**our**”) may collect, how we collect it, what we use it for and with whom we share it in accordance with the GDPR. Where the investor is not an individual, please provide a copy of this Privacy Notice to those individual directors, officers, employees and/or owners (including beneficial owners) whose personal data we may process.

“Personal data” means any information relating to you, but does not include data where you can no longer be identified from it such as anonymised aggregated data.

We will be a data controller in respect of your relationship with us as an investor or similar contact. A data controller is responsible for deciding how to hold and use personal data about you. We may process your personal data ourselves or through others acting as data processors on our behalf.

We may provide supplemental privacy notices on specific occasions when collecting or processing personal data about you so that you are fully aware of how and why your personal data is being used. These supplemental notices should be read together with this Privacy Notice.

If you have any questions about this Privacy Notice you can contact us at [GDPR@columnacapital.com](mailto:GDPR@columnacapital.com).

### **What information do we collect about you and what do we use it for?**

Personal data held by us or on our behalf may include, but is not necessarily limited to, your name, residential address, place of business, email address, other contact details, corporate contact information, signature, nationality, country of residence, place of birth, date of birth, tax identification, tax jurisdiction, employment and job history, education details, regulatory status, credit history, correspondence records, passport number, bank account details and certain financial information contained within KYC documents.

The purposes for which we may collect, store and use personal data about you and our ‘lawful basis’ for processing such data are set out in the table below. The law specifies certain ‘lawful bases’ for which we are allowed to use your personal data.

Purpose	Lawful basis for processing
<p>To undertake pre-investment steps, including, but not limited to:</p> <ul style="list-style-type: none"> <li>— determining your eligibility to invest with us;</li> <li>— required due diligence; and</li> </ul>	<p>In order to take steps prior to the contract between you and us/the fund or vehicle in which you may invest and compliance with applicable legal obligations.</p>
<p>To facilitate the opening of accounts with us, the management and administration of your investment in an investment fund or investment vehicle managed by us and any related account on an on-going basis as considered necessary or appropriate for the performance of a contract, including without limitation the processing of subscription, redemption, conversion and transfer requests and the payment of distributions.</p>	<p>The performance of your contract with Columna as an investor.</p>
<p>To carry out anti-money laundering checks and related actions considered appropriate to meet any legal obligations relating to 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, in accordance with applicable anti-money laundering procedures.</p>	<p>Compliance with applicable legal obligations and Columna’s legitimate interests in complying with law and regulation.</p>
<p>To report tax related information to tax authorities.</p>	<p>Compliance with applicable legal obligations.</p>
<p>To disclose information to parties such the administrator, auditor, legal counsel and other service providers of Columna such as technology providers and regulatory authorities to comply with any legal obligation imposed on Columna and/or the administrator or in order to pursue the legitimate business interests of Columna and/or the administrator.</p>	<p>Compliance with applicable legal obligations.</p> <p>The legitimate interests of the Columna in conducting its business in a proper manner.</p>
<p>To maintain Columna’s records and carry out fee calculations.</p>	<p>The performance of your contract with Columna as an investor.</p> <p>The legitimate interests of Columna in complying with its contractual obligations and conducting its business in a proper manner.</p>
<p>To provide investor relations including the provision of periodic reporting, seeking consents for changes to investment terms and for other corporate governance purposes.</p>	<p>The performance of your contract with Columna as an investor.</p> <p>Compliance with applicable legal obligations.</p>
<p>To exercise or defend one or more of our rights in court proceedings or out of court.</p>	<p>To pursue our legitimate interests in protecting our rights in court proceedings or out of court.</p>

In addition to the uses above, please note that Columna may also process your information where required by law to do so or if it reasonably believes that it is necessary to protect its rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

#### Special categories of personal data

There are more limited bases for processing special category personal data. This is personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation.

We do not intend to actively collect special category data about you. Whilst we will use reasonable efforts to limit our holding of such data, please be aware that we may hold such data incidentally, for example, where:

- you volunteer special category data to us or one of our Processors, such as if you send an email containing special category data;
- documents gathered for legal / regulatory purposes containing special category data, such as a passport copy which references ethnic origin or a due diligence search from public sources which includes special category data.

#### What if you do not provide the personal data requested?

In some circumstances, if you do not provide us with certain information when requested, we may be limited or restricted in our ability to deal with you and may in some cases be prevented from complying with our legal obligations. Where we require your personal information to comply with anti-money laundering or other legal requirements, failure to provide this information means we may not be able to accept you or retain you as an investor.

#### Change of purpose

We will only use your personal data for the purposes for which we collected it (as identified above in the 'Purpose' column), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### **How is this information collected?**

We typically collect personal data about you when you provide information to us or others acting on our behalf when communicating or transacting with us in writing, electronically, or by telephone. For instance, applications, requests for fund documentation or other forms of literature, your transactions and account positions.

In addition, we may receive personal information about you from third parties, such as:

- public sources or information vendors;
- your bank;
- your legal, financial, tax or other professional advisers

### **With whom will your information be shared?**

We may share your personal data with a third party where this is required by law, where it is necessary to perform our contract with you, or where we have another legitimate interest in doing so.

We may need to share your personal data with:

- Columna and other members of its group;
- the administrator and its affiliates
- professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services;
- regulators;
- tax authorities;
- cloud service providers;
- parties undertaking anti-money laundering checks; and
- any other service provider where such information is relevant to their performance of such services.

We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We may transfer the personal data we collect about you to non-EEA countries, including in particular Switzerland. Those countries may not have the same standard of data protection laws as the EEA. Where this is the case, we will (or will require a processor to) put in place appropriate safeguards such as the EEA-approved standard contractual clauses to ensure that your personal data is treated in a manner that is consistent with and respects the EEA laws on data protection. If you require further information about this you can request it from [GDPR@columnacapital.com](mailto:GDPR@columnacapital.com).

### **How long will your information be retained?**

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. This will normally include any period during which we are dealing or expect to deal with you and what we consider to be a suitable period thereafter for our internal record-keeping purposes. In doing this we will have regard to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we will keep information relevant to its dealings with you for seven years following full redemption or longer as required by applicable law or regulation.

In some circumstances your personal data may be anonymised so that it can no longer be associated with you, in which case it is no longer personal data.

Once we no longer require your personal data for the purposes for which it was collected, we will securely destroy your personal data in accordance with applicable laws and regulations.

## Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data which we hold changes during your relationship with us.

## Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information held about you under certain circumstances. These rights are to:

- request **access** to your personal data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- request **rectification** of your personal data;
- request the **erasure** of your personal data;
- request the **restriction** of processing of your personal data;
- **object** to the processing of your personal data; and
- request the **transfer** of your personal data to another party.

In exercising your rights above, you may be required to withdraw your investment.

If you want to exercise one of these rights please contact us at [GDPR@columnacapital.com](mailto:GDPR@columnacapital.com).

You also have the right to make a complaint at any time to a supervisory authority for data protection issues.

## Fees

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

## Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [GDPR@columnacapital.com](mailto:GDPR@columnacapital.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we now have an alternative legal basis for doing so.

## Changes to this privacy notice

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

**Further information**

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact [GDPR@columnacapital.com](mailto:GDPR@columnacapital.com).