



PERSONAL DATA PROCESSING NOTICE – CONTRACTORS

Service Providers, Suppliers and Other Contractors of TPAM and TPAM Affiliates (“Contractors”)

Notes

Any capitalized terms have been defined in **Appendix I**.

1. Background

The *General Data Protection Regulation (EU) 2016/679 (“GDPR”)* came into force on the 25th May 2018. Terra Partners Asset Management Limited (“TPAM”) has reviewed and updated its Privacy Policy to safeguard and secure Personal Data.

2. Scope

The scope of this Notice is to inform you about the Processing of your Personal Data that TPAM Processes during the normal course of its business.

3. Processing of Personal Data

Purposes & Legal Basis

Your Personal Data shall be Processed primarily for the purposes of your legal relationship with TPAM.

Due to the nature of the investment management business, Processing of your Personal Data may also take place by TPAM’s affiliates and Contractors of TPAM or its affiliates (the Processors).

Recipients

TPAM will share your Personal Data with the Processors on a need-to-know basis. Your Personal Data will also be shared with third parties on a need-to-know basis, such as with auditors or regulators for oversight. Please note that your Personal Data will necessarily flow through electronic means on third party systems, and will therefore be Processed on email servers or in databases.

Transfer to Third Countries

Your Personal Data will at times be transferred to Third Countries. TPAM's Chief Compliance Officer for the US is currently based in New York, USA. Several entities carrying out due diligence which may require your Personal Data are based outside the EU.

In the absence of an adequacy decision by the EU Commission on such Third Countries, TPAM shall implement appropriate or suitable safeguards, generally through the requirement that equivalent standards are applied, a copy of which may be obtained from the Principal Contact identified in this Form. TPAM may nevertheless transfer your Personal Data to Third Countries when you have given your explicit Consent, where the transfer is necessary for the performance of a contract between you and TPAM, or in other cases allowed by GDPR.

Retention Period

Generally, your Personal Data is kept for a period of not less than five (5) years from the end of your legal relationship with TPAM. This period may be longer in the case that legal retention requirements subsist, or where legal rights may still arise therefrom.

All emails Processed through the *terrapartners* domain are retained indefinitely and are subject to regulatory scrutiny.

Rights

For information about your rights with respect to your Personal Data (such as the right of access, rectification, erasure, restriction or objection of Processing, and data portability), refer to the Privacy Policy, principally Section 3.5.

If you have any query in relation to your rights, you can address your questions to the Principal Contact identified in this Form. Should you remain unsatisfied with the resolution of your query, you may refer the matter to the Office of the Information and Data Protection Commissioner (<https://idpc.org.mt/en/>).

4. Ancillary Documents

In addition to this Notice and any other applicable arrangements (such as your contract with TPAM and/or its affiliates), your Personal Data shall be Processed in terms of TPAM's Privacy Policy, as may be amended from time to time. A copy of the latest version of the Privacy Policy has been made available to you.

5. Important Information

TPAM

Terra Partners Asset Management Limited

Address: Portomaso Tower, 8/5A, Portomaso Avenue, St. Julian's, STJ 4011, MALTA

General Contacts

Tel: +356 2371 7000

Email: info@terrapartners.com

Fax: +356 2371 7200

Principal Contact

Aaron Zammit Apap, Chief Legal & Compliance Officer

Tel: +356 2371 7004

Email: aaron@terrapartners.com

DEFINITIONS

Consent. ‘Consent’ of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her.

Data Subject. Natural Persons, including but not limited to, its UBOs, employees, supervised Persons, suppliers, service providers, advisers, contractors and clients.

GDPR. General Data Protection Regulation (REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)

Identifiable Person. An Identifiable Person is one who can be identified, directly or indirectly, in particular by reference to an identification number, location data, an online identifier or to one (1) or more factors specific to one’s physical, physiological, genetic, mental, economic, cultural or social identity.

Notice. This *Personal Data Processing Notice – Contractors*, envisaged for service providers, suppliers and other contractors of TPAM and TPAM affiliates.

Personal Data. For the purposes of this Notice, Personal Data shall be taken to mean any information relating to an identified or Identifiable Person.

Processing. ‘Processing’ means any operation or set of operations which is performed on 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 information available, alignment or combination, restriction, erasure or destruction (and ‘Process’, ‘Processed’, etc shall be construed accordingly).

Privacy Policy. TPAM’s current version of its privacy policy, Version 4 published on: 18th June 2018.

Processor. Any person acting under TPAM’s authority to Process Personal Data.

Third Country. For the purposes of this Notice, a "Third Country" shall be any country that at the relevant time is not a Member State of the European Union, or an international organisation.

TPAM. Terra Partners Asset Management Limited