PERSONAL DATA PROCESSING NOTICE – CLIENTS

*Funds managed by TPAM and General Partners & Investors of said Funds ("**Clients**")*

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**") maintains 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 i.e. due to your investment/subscription (if you are an investor/subscriber), being a fund or general partner of a fund managed by TPAM, and/or your ownership (if you are a UBO of any of the aforementioned).

Due to the nature of the investment management business, Processing of your Personal Data will also take place in relation to ancillary matters, such as due diligence procedures carried out by TPAM, as well as affiliates, administrators, service providers of TPAM or funds managed by TPAM, including but not limited to custodians, bankers and other officers (the Processors).

Other Processing of your Personal Data that may take place includes, but is not limited to, the carrying out of CRS and FATCA reporting obligations as necessary, as well as the purposes stipulated in the subscription documents of each fund managed by TPAM.

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 (such as the tax reporting software).

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/).

4. Ancillary Documents

In addition to this Notice and any other applicable arrangements (such as your contract with TPAM and/or the subscription documents), 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 is available to you upon request.

5. Important Information

TPAM
Terra Partners Asset Management Limited
Address: 10, Corporate House, The Penthouse, Level 3, Oratory Street, Naxxar, NXR 2505 MALTA

General Contacts
Tel: +356 2371 7000 Email: info@terrapartners.com Fax: +356 2141 6877

Principal Contact
Aaron Zammit Apap, Director | Chief Legal & Compliance Officer
Tel: +356 2371 7000 Email: aaron@terrapartners.com

Appendix I

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.

Clients. Funds managed by TPAM and general partners & investors of said funds.

CRS. Common Reporting System.

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).

FATCA. Foreign Account Tax Compliance Act.

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 – Clients*, envisaged for funds managed by TPAM and general partners & investors of said funds (including their UBOs).

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.

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.

UBO. Ultimate beneficial owner.