

## PRIVACY STATEMENT

**Coprolin is committed to protecting your personal data. This privacy statement describes how Coprolin SCC p.l.c. and Coprolin Fund Services RICC Ltd. as well as its affiliated companies in Malta (hereafter "Coprolin", "we", "us", or "our") process your personal data, and provides information about your rights in this regard. It applies to all personal data provided to us. Please take the time to read through carefully.**

**Personal data is any information relating to an identified or identifiable living individual, either on its own or together with other information.**

### **1. Who we are and how you get to us**

As a professional services company, Coprolin provides support in all matters relating to private label funds, securitisation and security trustee. We also advise on all matters pertaining to corporate strategy, finance, real estate and international trade. Coprolin is a member of the Mandaris Group.

Should you have any questions or comments about this privacy statement, including any request to exercise your individual rights, please contact our Group Compliance Officer by post at Coprolin, St. Alban-Anlage 46, CH-4052 Basel or by e-mail at [compliance@coprolin.com](mailto:compliance@coprolin.com).

### **2. Which personal data we collect**

Coprolin may collect from you and use the following personal information:

- Basic contact information, such as name, address, e-mail address, telephone numbers
- Background information as part of our client onboarding and due diligence/Know Your Customer (KYC) process, such as date of birth, social security number, tax identification number, marital status, nationality as well as copies of official identification documents like passport or identity card
- Occupational and financial details such as information on employment, income & benefits, expenses, and bank accounts and your financial standing in general
- Interactions with our staff and partners as well as details of visits
- Technical information, such as IP address, and other information relating to visits to our website, applications or to materials and communications sent electronically
- Other information provided to us or generated by us in connection with our services or employment, which may include special categories of data, and any personal information you provide to us for the purpose of our business relationship

Usually, you will have provided us with your personal data. In some cases, we may collect data from other sources, such as the government, information providers (e.g. Worldcheck), or from public records (e.g. register of companies).

### **3. How we use your personal data**

We only use your personal information to perform our professional services, including the fulfilment of our legal or regulatory obligations.

This may include:

- Performing our professional services as instructed
- Managing our business relationship with you, and responding to your queries
- Keeping records of your interactions with us
- Complying with our obligations under anti-money laundering legislation or other legal and regulatory requirements
- Processing, which is necessary for the purposes of legitimate interest of our company or third parties, unless your interests or your fundamental rights and freedoms override such interests
- Securing access to our offices, systems and platforms
- Administrating employment within our company, monitoring and training our staff

We may send marketing information about events, updates and services to you, in particular, if you hand over your business card to us, but you have the right to object to such processing, which means that you are free to deregister from our marketing service at any time you choose.

We may process your data for additional purposes, if you have given your explicit consent. We do not use your data for any automated decision making nor profiling.

Should we need your data to perform our services, or in case we are legally obliged to obtain such data, and you fail to provide us with the requested data, we may not be able to provide our services to you.

### **4. How we share your personal data**

We may share your personal data with all our offices, which ensure data protection at a level at least as high as required by the laws of Switzerland or the EU. Data may be stored on encrypted devices and transported with individuals as appropriate to perform our services.

In order to perform our services to you it is necessary for us to use suppliers, sub-processors or other third parties. In many cases, they will be granted access to the data we process to provide us with assistance. For example, we use an external service provider to facilitate our IT support, and we make use of private cloud based solutions. Coprolin contracts all suppliers, sub-processors or third parties to provide at least the same level of data protection as we do, and takes appropriate safeguards to ensure data integrity and protection.

When required by law (and only then), we may share your personal information with government bodies, supervisory or other authorities, such as the Swiss Financial Market Supervisory Authority (FINMA), the Maltese Financial Services Authority (MFSA), or tax authorities.

We may transfer your personal information outside the European Union, e.g. the U.S. Since these countries do not always provide for an equivalent level of data

protection, we ensure data protection as best as we can to protect your personal information, in particular we may rely on contractual protection approved by the European Commission or the applicable safeguards under data protection law.

#### **5. How long we process your personal data**

In general, at the end of our services, it is for you to decide what happens to the personal information you provided to us. We will process your personal information for the time you instruct us or until you withdraw your explicit consent, unless we are required to retain your data to comply with legal or regulatory obligations or we are permitted to do so. In particular, we may retain your personal information as long as it requires us to overwrite our automated disaster recovery backup systems, or as long as it seems necessary to us to assert or defend any legal claims.

#### **6. How we secure your personal data**

Coprolin takes appropriate technological and organisational measures, including policies and procedures, against unauthorized or unlawful processing of your personal information, to protect your personal data from accidental loss, misuse, alteration or unintentional destruction. We contract all suppliers, sub-processors or third parties to provide at least the same level of data protection, and takes appropriate safeguards to ensure data integrity and protection.

We may store your personal data on our systems, those of suppliers, sub-processors or third parties, or in paper files, as appropriate.

Please bear in mind that we cannot guarantee secure communication over the internet, even though we take appropriate steps to protect your data using encryption. It is your responsibility to ensure security, when data reaches your network.

#### **7. What rights you have**

We will provide you with a copy of your personal information we process, if you request us to do so, and we will rectify any mistakes, errors or inaccuracies you identify.

In addition, you have the right to restrict our processing of your personal information, to request erasure of personal information we hold about you, and to object to our use of personal information for our legitimate interests. Last, but not least, you can receive your personal information in a structured and commonly used machine readable format, and you can have your data transmitted to another data controller.

In some cases, these rights are limited by data protection legislation. If you wish to exercise any of these rights please contact us. We will respond to you within a month.

We hope that we can resolve any queries you may have about the use of your data. However, you have the right to lodge a complaint to the Swiss Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>) by using e-mail:

info@edoeb.admin.ch, or call the advice service from Monday to Friday from 10am to 12pm on Tel. +41 (0)58 462 43 95, or the Office of the Information and Data Protection Commissioner, Floor 2, Airways House, Triq il-Kbira, Sliema SLM 1549 in Malta – idpc.info@gov.mt

#### **8. Changes & updates to this statement**

We updated our privacy statement in May 2018 and may amend it from time to time to include changing legal and regulatory requirements as well as our processing standards. Any amendment will be published on our website and will be effective upon posting. We recommend to check this statement on a regular basis.

#### **Our office locations**

Coprolin Fund Services  
RICC Ltd./ Coprolin SCC  
p.l.c.  
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