

DATA PROTECTION AND PRIVACY NOTICE

General

Credo Partners is a Norwegian investment firm which is licenced by the Norwegian Financial Supervisory Authority to act as a Fund Manager for Alternative Investment Funds.

The information contained in this privacy notice is aimed at individuals who are investors in any of Credo Partners' investment vehicles, potential investors, for those who seek work with Credo Partners or otherwise individuals contacting Credo Partners and thus share personal information with Credo Partners. Any capitalised letters shall be understood as defined in this privacy notice.

Personal data

Credo Partners may collect personal data from many sources, both public and private. The information may be used by Credo Partners to enhance our service offerings, and otherwise to communicate with our clients and network and to transmit newsletters. Over time, Credo Partners also create personal data by documenting our interactions with you, from updating your accounts etc. The term personal data typically includes:

- Contact details, name, address, email addresses, telephone numbers etc.;
- Information required to meet legal and regulatory requirements in respect of anti-money laundering legislation, including details such as gender, date of birth, passport number(s), other government issued number(s), nationality, images of passports and driving licences, signatures, occupation, source of funds and source of wealth;
- Information required to meet legal and regulatory requirements relating to the automatic exchange of tax information (e.g. FATCA and CRS), including details of tax residency, tax classification and tax identification numbers;
- Financial details, including billing address; bank account numbers; instruction records; transaction details and counterparty details;
- Details of meetings and telephone calls with our office and employees; and
- Any other information you may provide to us or might be provided to us by our clients, third parties etc.

Credo Partners will normally not hold information which is considered sensitive personal data. This includes information racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

Credo Partners will only disclose personal data to third parties if it is i) specifically agreed between Credo Partners and the relevant individual, ii) necessary within the scope of a specific engagement agreement to safeguard individuals' rights, iii) necessary based on an outsourcing agreement with a service provider after a satisfactory due diligence, iv) necessary for Credo Partners to comply with a legal obligation or decision from a public body/authority or court decision or v) following signed non-disclosure agreements, to third parties conducting a due diligence process on Credo Partners. Credo Partners is obliged to report suspicions of money-laundering to public authorities (No. Økokrim).

Credo Partners AS

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Credo Partners will only store personal data for as long as it is necessary to fulfil a legitimate purpose for which Credo Partners collected it, or as necessary for fulfilling any statutory retention period according to for example anti-money laundering-, bookkeeping- or accountancy legislation. After any statutory retention period, Credo Partners will either delete or destroy the relevant personal data permanently or irreversibly anonymise this information.

Handling personal data – data processing

Credo Partners will primarily Process your personal data within the EU/EEA. If Credo Partners engages third-party service providers domiciled outside the EU/EEA, Credo Partners will act with due diligence to ensure that your personal data is processed in a manner that ensures security and confidentiality. Should in our opinion this not be possible, Credo Partners will not share your personal data without your consent.

If Credo Partners holds any of your personal data, you:

- i) may request information from Credo Partners on how we Process your personal data
- ii) may request that Credo Partners amends, completes and rectifies your personal data should you believe information is wrong or misleading
- iii) may request that Credo Partners does not use your personal data for direct marketing
- iv) may request that Credo Partners disclose designated parts of your personal data to a third party that you instruct.
- v) may request that Credo Partners deletes personal data. Note however, that Credo Partners may be obligated by law to keep certain information for a certain period of time.
- vi) have the right to be notified by Credo Partners of a personal data breach which is likely to result in your personal data being available for unwanted third parties.

If you are dissatisfied with Credo Partners's Processing of your personal data you may file a complaint with the Data Supervisory Authority of the country where you live or work, or with those regulating any of Credo Partners's entities.

Legitimate purpose

Credo Partners is required by law to control the identity of its clients and their ultimate beneficial owners, and from time to time their source of wealth and other related information. This is an example of a legitimate purpose of which there are several.

There are a number of legitimate purposes in the operation of Credo Partners's business:

- Financial crime prevention
- FATCA/CRS reporting
- Client / investor onboarding
- Issuing contractually agreed reports etc. to you
- Legal compliance
- Legal proceedings
- Risk management
- Relationship management
- Security, work related to securing data, electronic systems etc.

Please note that Credo Partners does not require your consent to process your personal data when there is a legitimate purpose.

Job applications

If you apply for a job position in Credo Partners, the information you submit will not be shared with any third parties. Access to the information will be restricted to Credo Partners employees involved in the recruitment process. If you are not hired, Credo Partners will delete all personal data unless you specifically have requested that Credo Partners keep your information in case a future job opportunity may arise.

Other issues

For the purposes of this privacy notice Credo Partners AS (org.nr. 997228405) is a Norwegian legal entity.

When communicating with Credo Partners, you are responsible for ensuring that the personal data you send is sent securely.

Any questions relating to this privacy notice or requests in respect of information which may identify you as an individual (personal data) processed by Credo Partners should be directed to info@credopartners.no. Credo Partners reserves the right to modify or amend this document at any time and an updated version of it will be placed on our website www.credopartners.no.