



Privacy Policy

Introduction

1. Treis Partners Advisory Limited, Treis (Luxembourg) S.à.r.l. and Treis Asia Private Limited (collectively referred to as “Treis”, “we”, “us” and “our”) respects your privacy and is committed to protecting your personal data. This privacy policy informs you about how we look after your personal data, provides information about your privacy rights and explains how the law protects you.
2. We are the data controller responsible for your personal data. If you have any questions about this privacy policy, Treis can be contacted at privacy@treis-group.com.

About this Privacy Policy

3. This privacy policy aims to give you information on how Treis collects and processes your personal data through your use of this website and any personal data you may provide to us at any time.
4. This website is not intended for children under 16 years of age and we do not knowingly collect data relating to children.
5. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Changes to this Privacy Policy and your duty to inform us of changes

6. We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

7. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

8. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
9. We may collect, use, store and transfer different categories of personal data about you, which we have grouped together as follows:

- a. **identity data** includes first name, maiden name, last name, marital status, title, date of birth and gender;
 - b. **contact data** includes billing address, email address and telephone numbers;
 - c. **financial data** includes bank account and payment card details, financial and bank statements, tax identification number and tax returns; and
 - d. **marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
10. We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

11. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may, for example, have to cancel the contract you have with us but we will notify you if this is the case at the time.

How we collect your personal data

12. We use different methods to collect personal data from and about you including through:
 - a. **Direct interactions.** You may provide us with personal data corresponding with us via our email address posted on our website or otherwise.
 - b. **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, such as Google or LinkedIn.

How we use your personal data

13. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
 - a. where we need to perform the contract we are about to enter into or have entered into with you;
 - b. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests); or
 - c. where we need to comply with legal or regulatory obligations.
14. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us as described below.

Purposes for which we will use your personal data

15. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- a. to register you as a new investor;
- b. to process and deliver your investment including
 - i. manage payments, fees and charges; and
 - ii. collect and recover money owed to us.
- c. to facilitate the management and administration of your relationship with Treis on an on-going basis which are necessary to fulfil all related contractual and regulatory obligations;
- d. in order to carry out anti-money laundering checks and related actions which Treis considers appropriate or necessary to fulfil any of its legal obligations on an on-going basis;
- e. to comply with our legal and regulatory obligations;
- f. to disclose information to other third parties such as service providers (including, for example, legal advisors, accountants, auditors, or other professionals), regulatory authorities and technology providers in order to comply with any legal obligation imposed on Treis or in order to pursue the legitimate interests of Treis;
- g. to otherwise pursue the legitimate interests of Treis relating to your investment and/or where the processing of your personal data would be in the public interest, including where Treis or another third party must fulfil their regulatory obligations; and
- h. to form a view on what we think you may want or need, or what may be of interest to you.

Change of purpose

16. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
17. 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.
18. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of your personal data

19. We may share your personal data with other companies in the Treis group.
20. To best serve you, we may share your personal data with service providers that provide support services to us. Service providers are third parties who perform services on our behalf. They are contractually restricted from using your data in any manner other than in helping us to provide you with the services available from Treis.
21. We may also disclose your personal data to a third party:
 - a. when you ask us to do so;
 - b. where it is required by law or any regulatory obligation; or
 - c. in the event that we sell or buy any business assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

22. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specific purposes and in accordance with our instructions.

Countries Having Access to Your personal Data

23. The servers we use to store and keep your personal data secure are located in Asia, with the principal data centres in Singapore, Japan and Hong Kong. Personal data may also be processed by staff members and third party service providers who are located in countries outside of the European Economic Area (the "EEA").
24. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it, by ensuring at least one of the following safeguards is implemented:
 - a. where we transfer your personal data to Treis group companies located in the United States, we do so under an internal intra-group data transfer agreement which incorporates the standard contract clauses and ensures a level of protection acceptable to the European Commission (the "EC");
 - b. the transfer of your personal data is to a country that has been deemed to provide an adequate level of protection for personal data by the EC;
 - c. where we use certain service providers, we may use specific contracts approved by the EC which give personal data the same protection it has in Europe; or
 - d. where we use providers based in the United States, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
25. Please contact us at privacy@treis-group.com if you would like further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

26. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
27. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention of Your personal Data

28. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
29. To determine the appropriate retention period for personal data, we consider 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, regulatory, tax, accounting or other requirements.

30. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at privacy@treis-group.com.

Your Rights

31. You have the right to:
 - a. **request access** to your personal data (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
 - b. **request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
 - c. **request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
 - d. **object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
 - e. **request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - i. if you want us to establish the data’s accuracy;
 - ii. where our use of the data is unlawful but you do not want us to erase it;
 - iii. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - iv. you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it;
 - f. **request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and

- g. **withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- 32. To exercise any of the rights as listed above, please contact us at privacy@treis-group.com.
- 33. You will not 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 is clearly unfounded, repetitive or excessive or if additional copies of your personal data are requested. Alternatively, we may refuse to comply with your request in these circumstances.
- 34. We may need to request specific data from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 35. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to this privacy Policy

- 36. This privacy policy replaces all previous disclosures we may have provided you about our data practices. We reserve the right to change this policy at any time, and to apply any changes to data previously collected, as permitted by law. Any changes we may make to this policy in the future will be posted on our website and will be effective upon posting.

Contact details

- 37. If you have any questions about this privacy policy or our privacy practices, or to update us with your data-sharing preferences or to update your personal details, you may contact us in the following ways:
 - a. Full name of legal entity: Treis Partners Advisory Limited
 - b. Email address: privacy@treis-group.com
 - c. Postal address: 50 Jermyn Street, London, SW1Y 6LX

Making a Complaint

- 38. We pride ourselves on excellent service, but if you would like to make a complaint about the way we have collected or used your personal data, please contact us at privacy@treis-group.com.
- 39. If your habitual residence or place of work is within the EEA, and you are unhappy with our processing of your personal data, you have the right to lodge a complaint with a supervisory authority in the European Union Member State of your habitual residence or place of work or in the place of the alleged infringement. In the United Kingdom, you can do so by contacting the Information Commissioner's Office ("ICO") by following this link: <https://ico.org.uk/concerns/> or telephoning the ICO helpline, which is 0303 123 1113.



40. We would, however, appreciate the chance to deal with any concerns before you approach the supervisory authority, so please contact us by email in the first instance.