



BTIG Limited Privacy Policy

About this privacy notice

BTIG Limited ('BTIG') are a data controller in respect of your personal data for the purposes of data protection law, including the European Union's General Data Protection Regulation (GDPR). We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies to you if you are a client or prospective client of BTIG; a service provider to us; or you otherwise enter into communications with us by email or other means.

This privacy notice sets out the basis on which personal data about you that you provide to us, that we create about you or that we obtain about you from other sources, will be processed by us.

Personal data that we might use

We might process the following personal data about you:

- a. Information provided to BTIG by you: This might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, copies of identity documents, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- b. Information that BTIG collects or generates: This might include information relating to your emails (and related data), call recordings and website usage data.
- c. Information that BTIG obtains from other sources: This might include information obtained for the purpose of our know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from the applicant's advisers or from intermediaries.

Uses of your personal data

We collect your personal information to fulfil our contractual obligations, our statutory and regulatory obligations and/or the legitimate business interests of BTIG and for other purposes for which BTIG has a lawful basis under the privacy laws, including:

- a. Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.
- b. General business administration, including communicating with investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of Information Technology systems and monitoring and improving products.



- c. Business activities, such as investor relations, discussions with our service providers and counterparties, business strategy, development and marketing.

We are entitled to process your personal data in these ways for the following reasons:

- a. Processing may be necessary to discharge a relevant legal or regulatory obligation.
- b. The processing is necessary for the legitimate business interests of BTIG or its administrator or another person, such as:
 - i. carrying out the ordinary or reasonable business activities of BTIG or its administrator or other persons, or other activities previously disclosed to you or referred to in this privacy notice;
 - ii. ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
 - iii. establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and
 - iv. ensuring the security of information systems.
- c. In respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

Disclosure of your personal data to third parties

We may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) our affiliates: BTIG LLC BTIG Hong Kong Limited, BTIG Australia Limited, BTIG Singapore PTE Ltd; (b) professional advisers such as law firms and accountancy firms; (c) other service providers of BTIG or its administrator, including technology service providers; (d) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

Transfers of your personal data outside the European Economic Area

Your personal data may be transferred to and stored by persons outside the European Economic Area (the “EEA”) such as BTIG LLC, BTIG Hong Kong Limited, BTIG Australia Limited, BTIG Singapore PTE Ltd or their administrators outside the EEA.

Where personal data is transferred outside the EEA, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

Necessity of personal data for us to provide services to you

The provision of certain personal data is necessary for us to provide services to you for compliance by BTIG and our respective service providers with certain legal and regulatory



obligations. Accordingly, if certain personal data is not provided when requested, we may not be able to provide services to you and/or an application for interests might not be accepted or interests might be compulsorily redeemed.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include the following:

- a. The right to obtain information regarding the processing of your personal data and to access to the personal data that we hold about you.
- b. In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.
- c. The right to request that we rectify your personal data if it is inaccurate or incomplete.
- d. The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.
- e. The right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, its processing of your personal data but we are legally entitled to continue processing your personal data or to refuse that request.
- f. The right to lodge a complaint, should you believe that any of your rights have been infringed by us. You can find out more information about your rights by contacting an EU data regulator such as the UK's Information Commissioner's Office, or by searching its website at ico.org.uk.

Contacting us

If you have any questions about this privacy policy or our privacy practices, please contact our compliance officer in the following ways:

Full name of legal entity: BTIG Limited

Email address: privacy@btig.com

Postal address: 2nd Floor Princes Court, 7 Princes Street, London, EC2R 8AQ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We



would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.