

Privacy Notice – (as at 01 September 2024)

This Privacy Notice sets out how we obtain and use personal data about you before and after your relationship with us, in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017 (“the Guernsey DP Law”) and in accordance with the European Union General Data Protection Regulation (2016/679) (“**GDPR**”).

Paramount Fund Services Limited (“**Paramount**”) may act as a “data controller” within the meaning of the GDPR and the Guernsey DP Law.

As a data controller, we are responsible for deciding how we hold and use your personal data and we are required under the data protection legislation detailed above to notify you of the information contained in this privacy notice.

Paramount will not be the controller of all personal data it receives and instead may be a data processor (within the meaning of the GDPR and the Guernsey DP Law) of personal data it receives, so where your personal data is being collected by or on behalf of other parties, we recommend that you take note of who the controller of that data will be and read their privacy notice.

This Privacy Notice applies to clients, investors, shareholders, limited partners, beneficiaries and other trust or foundation parties, service providers, business referrers, intermediaries, and other contacts of Paramount (whether current, prospective, declined, exited, or former) and users of our website. We may update this Notice at any time.

Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed to julian.timms@pfsi.gg in the first instance.

The data we obtain, store, and use

Paramount processes data to provide fund administration and fiduciary services. The type of data we may collect and process includes:

- Contact details (including names, postal and email addresses, telephone numbers, and website URL)
- Information required for Paramount to meet legal and all regulatory requirements in particular in respect of anti-money laundering legislation, including identification data (date and place of birth, nationality, identity number, copies of your passport or other identification documents) and information regarding the source of funds and source of wealth
- Information required for Paramount to meet its reporting obligations for example, tax reporting, including tax status, tax number, tax residency, and financial information
- Information required for us to provide the services, including financial information to process payments, background information including employment details and details of dependents
- Any other information you may provide to us.

We may also collect and process Special Category Data , including:

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions
- Information about your health, including any medical condition, health and sickness records
- Data relating to a person’s criminal record or alleged criminal activity

Special Category Data requires a higher level of protection and will only be collected and processed where we have received explicit consent or the collection and processing is necessary for compliance with a legal obligation.

Data Retention

Paramount only keeps data for as long as is necessary to fulfil the purposes (as set out above) for which we collected it. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential for harm from unauthorised use or disclosure of the data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once our business relationship ends, we will retain your personal data for a period of 6 years, and then securely destroy your personal data, in accordance with our record retention and destruction policy unless there is an applicable legislation and/or regulatory requirement to keep the data for longer.

Data subject's rights

As a data subject you have certain rights in respect of your personal data. You have the following rights:

- Right of access — you have the right to request a copy of the personal data that we hold about you and to check that we are lawfully processing that data. You will not have to pay a fee to access your personal data (or exercise any of the other rights) unless your request is clearly unfounded or excessive in which case, we may charge a reasonable fee or refuse to comply with the request.
- Right of rectification — you have the right to correct data that we hold about you which is inaccurate or incomplete.
- Right of 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 to continue to process it.
- Right to restrict processing — this enables you to ask us to suspend the processing of your personal data for example: if you want us to establish its accuracy or the reasons for processing it.
- Right of portability — you have the right to have the data we hold about you transferred to another organisation.
- Right to object — you have the right to object to certain types of processing including direct marketing. You also have the right to ask us to delete or remove personal data where you have exercised your right to object.
- Right to object to automated processing including profiling — you have the right not to be subject to decisions based on automated processing or profiling. Paramount does not currently undertake any automated processing or profiling.

If you wish to exercise these rights you should send the request in the first instance to the Data Protection Representative who can be contacted as set out below.

Data Sharing

We may share your data with third parties, including third-party service providers, when we are required by law to do so, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We require third parties to respect the security of your data and to treat it in accordance with the law.

The current "third-party service providers" that could have access to your personal information are as follows:

- Providers assisting with our compliance obligations, including undertaking background checks (including criminal checks) on people who work for Paramount. Currently these providers are

Focus HR Limited, Advisory Services Guernsey Limited, APT Limited (Capital Studio) and Refinitiv;

- Banks, Investment Houses and other professional organisations whom we engage, with transfers across borders, to undertake work for the entities we administer on your behalf.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to use your personal data for specified purposes.

We may share your personal information with other third parties, for example, in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are available from the data protection representative. Such measures include prevention of your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information 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 instruction and are themselves, subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach and would notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Status

This Privacy Notice sets out our current policy as regards the maintenance and processing of personal data. It does not form, and should in no way be construed as, a contract and no contractual rights or causes of action shall arise in relation to or consequence of the content of this Privacy Notice.

Changes to this Privacy Notice

We keep this Privacy Notice under review and any updates will appear on our website at www.pfsl.gg

Changes to Personal Data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data (including your email address) changes during your relationship with us or if you wish to cancel any request you have made to us, by sending an email to gill.newton@pfsl.gg or julian.timms@pfsl.gg. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Contact details

Paramount has a Data Protection Representative and all enquiries in respect of this Privacy Notice, any complaints about the way in which your personal data is being processed, or any request to exercise any of the rights set out above should be directed to the Data Protection Representative via email: julian.timms@pfsl.gg, or by post at:

Unit 1, Houmet House, Rue Des Houmets, Castel, Guernsey GY5 7XZ.

Complaints

In the event you wish to make a complaint about how your personal data is being processed or how your complaint has been handled you have the right to lodge a complaint directly with the Guernsey Data Protection Commissioner either via email info@odpa.gg or by post at:

The Office of the Data Protection Authority, Block A, Lefebvre Court, Lefebvre Street, St Peter Port,
Guernsey GY1 2JP

www.odpa.gg