

## Privacy Policy

### Data Protection Notice

Crossbridge Capital (UK) Ltd, Crossbridge Capital LLP, Crossbridge Capital SAM CC and Crossbridge Capital Limited (Malta) (“abbreviated name”, “us”, “we” or “the Firm”), as a Data Controller, have an obligation under the GDPR to inform individual Data Subjects of their rights in relation to data held about them.

In this policy, “we”, “us”, “our” or “CC” means Crossbridge Capital, and “you”, “your” or “yours” means the persons to whom this policy applies.

This data protection notice (the “Notice”) outlines how we collect, use, store and disclose your personal data in accordance with the General Data Protection Regulation (GDPR). The GDPR strives to protect personal data of individuals. Please take a moment to read about how we collect, use and/or disclose your personal data so that you know and understand the purposes for which we may collect, use and/or disclose your personal data.

This Notice supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your personal data. We may from time to time update this Notice to ensure that this Notice is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, the prevailing terms of this Notice shall apply. For the avoidance of doubt, this Notice forms part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions.

### What is Personal Data?

Personal data refers to any data or information about you from which you can be identified either (a) from that data or (b) from that data and other information to which we have or are likely to have access.

Depending on your relationship with us (e.g. prospective or current client, employee or business partner), the personal data about you that we may collect, use, store and disclose include:

1. personal particulars (e.g. name, contact details, residential address, date of birth, identity card/passport details, and/or education details);
2. specimen signature(s);
3. financial details (e.g. income, expenses, and/or credit history);
4. images and voice recordings of our conversations with you;

5. employment details (e.g. occupation, directorships and other positions held, employment history, salary, and/or benefits);
6. tax and insurance information;
7. information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets; and/or
8. banking information (e.g. account numbers and banking transactions);

## We Keep Your Personal Data Confidential and Secure

At each stage of data collection, use and disclosure, we implement physical, electronic, administrative and procedural safeguards to protect your personal data against loss, misuse, damage and unauthorized access, modifications or disclosures.

## Purposes for Collection, Use and Disclosure of Your Personal Data

We collect, use and/or disclose your personal data to provide enhanced asset management services, including operations for these purposes. This may include the following (non-exhaustive) as applicable to the relationship we have with you:

- (a) evaluating your standing, resources and capabilities to enter or maintain a relationship with you as a client, employee, business partner or other;
- (b) evaluating your performance as our employee or business partner;
- (c) conducting credit checks, screenings or due diligence checks as may be required under applicable law, regulation or directive;
- (d) addressing or investigating any complaints, claims or disputes;
- (e) verifying your identity for the purposes of providing services to you as our client;
- (f) analysing your financial situation and determining financial strategies and products suitable for you as our client;
- (g) assessing and processing any applications, requests and instructions for financial products and services offered by other financial institutions for you as our client;
- (h) managing our infrastructure and business operations and complying with internal policies and procedures;
- (i) responding to queries or feedback;
- (j) complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;
- (k) financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes;
- (l) enforcing obligations owed to us; and/or
- (m) seeking professional advice, including legal advice.

We may also use personal data for purposes set out in the terms and conditions that govern our relationship with you or our customer.

If we wish to collect, use, retain and/or disclose your personal data for any other purposes not included above, we will adequately seek your consent.

## How We May Collect Your Personal Data

Generally, we may collect your personal data ourselves or through third parties in ways including the following:

- (a) during our preliminary discussions with you to enter into employment or for any other business relationship;
- (b) when you interact with our employees, in particular with your Relationship Manager;
- (c) when you communicate with us by email or telephone, your emails will be retained and we may monitor and/or record your voice calls to us;
- (d) when you access our website;
- (e) when you respond to our requests for additional personal data; or
- (f) when you submit your personal data to us for any other reason.

You are responsible for ensuring that the personal data you provide to us is accurate, complete, and not misleading and that such personal data is kept up to date. You acknowledge that failure on your part to do so may result in our inability to provide you with the products and services you have requested. To update your personal data, please reach out to your Relationship Manager or our Compliance Officer.

Where you provide us personal data concerning individuals other than yourself, you are responsible for obtaining all legally required consents from the concerned individuals and you shall retain proof of such consent(s), such proof to be provided to us upon our request.

## How data is stored and processed

Data is recorded on paper and IT systems. Basic personal data will be stored on our CRM system which is accessible to authorised members for the above-mentioned purposes. Data may reside on shared IT systems with one of our group companies, who will be able to access the data for the above-mentioned purposes.

Personal data is processed both manually and electronically in accordance with the above-mentioned purposes and, in any case, to guarantee data security and data confidentiality in compliance with current regulations. Our authorised Employees and Third Party processors can access your data. Our Employees and Third Party processors are appropriately designated and trained to process data only according to the instructions we provide them. All the data will be processed for the duration of this contract and subsequently for the fulfilment of legal obligations.

All the data you provide to us will be processed subject to the restrictions and for the purposes pointed out in this notice, namely:

- a. For the performance of the contract and the complete fulfilment of any contractual obligation we have with you and/or your Company (legal basis for processing as per lawfulness condition is a contract as stated at art. 6 (b) of the General Data Protection Regulation 2016/679)
- b. For complying with obligations provided by laws, current regulations and European legislation (e.g. tax regulations) (is a legal obligation for processing data, as per Art. 6 (c) of the General Data Protection Regulation 2016/679)
- c. We may communicate to you through [e-mail, phone call, post], in the framework of ordinary commercial relationship, about other products or services similar to the subject matter of what we think will be of interest to you. (Legal basis for processing as per lawfulness condition is our legitimate interests as stated at art. 6 (F) of the General Data Protection Regulation 2016/679).

Whenever we process your Personal Data we will ensure always to take account of your rights and to balance our interests with them. You have the right to object to this processing if you wish. Please bear in mind that if you object this will affect our ability to provide the above-mentioned advice and services for your benefit.

The provision of data is discretionary however a lack of data can be an impediment to the exchange of information necessary for the execution of the contract. You (natural persons to which the data refers) have the right to determine how we use your data and to oppose to the purposes of processing at any time.

## Cookies

When you access our website you generally do so anonymously. Your activity may however be monitored by Cookies or other navigational data. "Cookies" are small data files sent to your browser to store and track information about you when you enter our websites. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

## Who We May Disclose Your Personal Data to

Generally, we shall protect and keep confidential your personal data. We will disclose your personal data only with your consent and for purposes that you have been informed about.

However, subject to applicable laws, we may disclose your personal data for the purposes set out above to parties such as those described below:

- (a) all Crossbridge Capital group entities;
- (b) banks, financial institutions, and their respective service providers;
- (c) companies providing services relating to insurance to us, and associations of insurance companies;
- (d) agents, contractors or third party service providers who provide services to us such as telecommunications, information technology, payment, data processing, storage and archival;
- (e) our professional advisers such as our compliance advisors, auditors and lawyers; and
- (f) regulators and authorities.

When we disclose your personal data to third parties which are authorised service providers. If this is the case we will ensure that they are contractually bound to protect your personal data in accordance with applicable laws and regulations, save in cases where your personal data is shared with governmental agencies and regulators, or where your personal data is publicly available, or where use/disclosure of your personal data is otherwise legally mandated and exempted.

If your personal data has to be transferred overseas, we will, where legally required, inform you of the extent to which your personal data will be protected, in the foreign jurisdiction(s) to which it will be transferred.

## How Long We Keep Your Personal Data For

We shall store your personal data for as long as necessary to fulfil the purposes for which such data was collected, our business purposes, our internal and legal needs or as is otherwise legally required.

## Queries, Access/Correction Requests and Withdrawal of Consent

If you:

- (a) have queries about our data protection processes and practices;
- (b) wish to request access to and/or make corrections to your personal data in our possession or under our control; or
- (c) wish to withdraw your consent to our collection, use or disclosure of your personal data;

please submit a written request (with supporting documents, if any) to our Compliance Officer at the following address:

Crossbridge Capital, 9 South Street, London, W1K 2XA

Our Compliance Officer shall strive to respond to you within 30 days of your submission.

Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such event.

### If You Have A Complaint

We are committed to protecting your personal data. If, however, you should be dissatisfied with our handling of your personal data, please submit a written complaint containing details of your dissatisfaction to our Compliance Officer.

Our Compliance Officer shall acknowledge in writing the receipt of your complaint within 2 business days. Within 10 business days, our Compliance Officer shall contact you to provide you with an estimated timeframe for our investigations and resolution of your complaint. If your complaint requires more time beyond such estimation to resolve due to its complexity, our Compliance Officer shall inform you accordingly on or before the expiry of the original estimated timeframe.

In the event that the Compliance Officer's investigations conclude with a solution that is dissatisfactory to you, you may wish to contact our Chief Executive Officer as follows:

CEO | Email: [info@crossbridgecapital.com](mailto:info@crossbridgecapital.com)

Our Chief Executive Officer will acknowledge your complaint within 2 business days and strive to provide a satisfactory solution to you within 10 business days. In the unlikely event that we cannot reach an agreement with you, you may wish to refer your complaint to the Personal Data Protection Commission or consider dispute resolution by way of mediation.