

PYNE GOULD CORPORATION LIMITED

PRIVACY NOTICE

This Privacy Notice sets out how personal data is collected, processed and disclosed in connection with the Pyne Gould Corporation Limited (the "Company", "we" and/or "us").

Structure of this notice

This privacy notice is provided in a layered format so you can click through to the section which relates to the Company's Privacy Policy and the information that we collect about you. Alternatively you can download a pdf version of the policy here [LINK].

1. [IMPORTANT INFORMATION AND WHO WE ARE](#)
2. CATEGORIES OF DATA SUBJECTS AND WHAT DATA WE COLLECT ABOUT YOU
 - (A) [INVESTORS](#)
 - (B) [VISITORS TO OUR WEBSITE](#)
3. [DISCLOSURES OF YOUR PERSONAL DATA](#)
4. [INTERNATIONAL TRANSFERS](#)
5. [DATA SECURITY](#)
6. [YOUR LEGAL RIGHTS](#)
7. FURTHER INFORMATION

1. IMPORTANT INFORMATION AND WHO WE ARE

Pyne Gould Corporation Limited (the "**Company**", "**we**", "**us**" or "**our**") is committed to protecting the privacy of individuals whose data it processes ("**you**" or "**your**") as a controller of data relating to shareholders and/or potential investors in the Company.

We take privacy and security of your information seriously and will only use such personal information as set out in this Privacy Notice.

This privacy notice aims to give you information on how the Company collects and processes your personal data as a controller of data supplied by shareholders and potential investors in connection with holdings and/or investing in the Company including through your use of the website or by sending us correspondence, subscription forms or other materials submitted to us during the course of your relationship with us.

In addition, it outlines your data protection rights under the Data Protection (Bailiwick of Guernsey) Law, 2017 (the "**New DPL**") and the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) (the "**GDPR**") (the New DPL and the GDPR together constituting the "**Data Protection Laws**").

The website is not intended for children and we do not knowingly collect data relating to children.

Please contact Pyne Gould Corporation Limited (incorporated in the Island of Guernsey as a non-cellular company limited by shares with registered number 60552), Sarnia House, Le Truchot, St Peter Port, Guernsey GY1 1GR if you have any queries in relation to the processing of your personal data under this policy.

The Company may from time to time update this policy. Please refer back to this page regularly to see any changes or updates to this policy.

2. CATEGORIES OF DATA SUBJECTS AND WHAT DATA WE COLLECT ABOUT YOU

(A) INVESTORS

The following section of this policy sets out how the Company, as controller of personal data supplied by, and collected in relation to, shareholders and potential investors in the Company, will process such personal data.

We may hold personal data about investors in the Company which is provided to us by you directly as a result of your holding and/or investment in the Company. Information may be obtained by completing and submitting application forms, through our website or by email, recorded and monitored telephone calls, collation of due diligence identification documents and/or corresponding with us. It also may be collated or provided to us from third parties for credit and money laundering checks and compliance purposes, such as screening or through your legal or financial advisers or from entities in which you or someone connected to you has an interest. We may also process personal data about individuals that are connected with you as an investor (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents).

In connection with your holding and/or investment in the Company, we may collect, store, and use the following categories of personal information about you: contact details (including name, title, address, telephone number, personal email address), employment history, income and personal wealth, your date of birth, marital status, occupation, copies of passport, driving licences and utility bills, bank account details and details relating to your investment activity and personal identifiers such as your social security number, national insurance number, tax file number and IP address.

In limited cases, we also collect what is known as “special categories” (or “sensitive”) of information. Our money laundering, sanctions, financial crime and fraud prevention checks sometimes result in us obtaining information about political opinion, actual or alleged criminal convictions and offences.

You are not obliged to provide us with your information where it is requested but we may be unable to provide certain products and services or proceed with our business relationship with you if you do not do so. Where this is the case, we will make you aware.

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- (a) to provide you with information on the Company (including performance updates), which is being carried out to pursue the Company's legitimate interests;

- (b) to allow us to administer and manage your holding in the Company (including fee calculations and the payment of dividends and other corporate actions) which are necessary for the Company to comply with applicable laws and/or in its legitimate interest;
- (c) to update and maintain records for the Company, including maintaining statutory registers, which is necessary to comply with the Company's legal obligations;
- (d) to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime and verify your identity, which the Company considers necessary for compliance with the Company's legal obligations, for the performance of a task being carried out in the public interest and/ or to pursue the Company's legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);
- (e) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which the Company is subject; and
- (f) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (g) such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Company, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes and enforcing or defending the rights and/or interests of the Company, in order to comply with the Company's legal obligations and/or to pursue the Company's' legitimate interests.

The lawful grounds for processing your personal data, or the Company's legitimate interests, comprise its use in connection with the Company's internal management and reporting, to comply with contractual duties to administer, operate, facilitate and manage your account(s) with us, your use of our services and products, to facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements and to pursue the legitimate interests of the Company in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions. To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data then the processing of such data shall solely be for the purpose of complying with any duty imposed on us and/or the Administrator by an enactment including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation.

Some of the above grounds of processing will overlap and these may be several grounds which justify how we use your personal data.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests are not overridden by your interests, fundamental rights or freedoms.

The Company does not anticipate being required to obtain your consent for the processing of your personal data as listed above. If the Company wishes to use your personal data for other purposes which do require your consent, the Company will contact you to request this.

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where these are required or permitted by law.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any regulatory, legal, accounting, or reporting requirements:

- A minimum of six years or as long as required under regulation or law;
- as long as is necessary for the relevant activity or as long as is set out in any relevant agreement you enter into with us;
- the length of time it is reasonable to keep records to demonstrate compliance with professional or legal obligations;
- any
- the end of the period in which litigation or investigations might arise in respect of the services that we provide to you.

(B) VISITORS TO OUR WEBSITE

The following section of this policy sets out how the Company may process personal data (as a controller) about visitors to its website.

We may collect, use, store and transfer different kinds of personal data about you which you provide to us through our website: name, date of birth, address, email address, telephone numbers, technical data (including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, usage data (including information about how you use our website, products and services, and marketing and communications preferences (including your preferences in receiving marketing from us and your communication preferences).

We do not collect any sensitive personal data or special categories of personal data about you through our website (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.

We use different methods to collect data from and about you including through:

- direct interactions with you, including by filling in forms. This includes personal data you provide when you subscribe to our publications and/or request marketing to be sent to you.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies.

[We may also receive technical data about you if you visit other websites employing our cookies.]

- [Technical data from the following parties:
 - (a) analytics providers [such as Google based outside the EU];

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden by those interests, or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to send you updates on the performance of the Company, newsletters, invitations to events and other electronic marketing communications which we will do [(a) on the basis of our legitimate interests if you are an investor in the Company or if we are sending electronic marketing communications to corporate subscriber email addresses (eg name@company.com) or (b)] with your consent;
- to use data analytics to improve our website, marketing, customer experiences on the basis of our legitimate interests;
- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions, [monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes] and enforcing or defending the rights and/or interests of the Company, in order to comply with their legal obligations and/or to pursue their legitimate interests.

If we consider it necessary to obtain your consent in relation to the use of your personal data (such as for sending emails to individuals that have not invested in the Company), we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us at DPM.PFS.Guernsey@praxisifm.com or following the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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 requirements. [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 DPM.PFS.Guernsey@praxisifm.com

Where the website provides links to other websites, the Company is not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting a linked website and such websites are not governed by this policy. You should always exercise caution and review the privacy policy applicable to the website in question.

Cookies: A cookie is a small file which asks permission to be placed on your computer. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our Website by tailoring it to the needs of users. We only use this information for statistical analysis purposes.

Overall, cookies help us provide a better website by enabling us to monitor which pages users find useful and which they don't. A cookie does not give us access to a user's computer or any information about them, other than the data they choose to share with us.

The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences.

However, please remember that cookies are often used to enable and improve certain functions on our website. [If you choose to switch certain cookies off, it will affect how our website works and you may not be able to access all or parts of our website.]

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For further details on cookies (including how to turn them off) can be found at www.allaboutcookies.org.]

3. DISCLOSURES OF YOUR PERSONAL DATA

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to other members of our group, to third parties who are or may provide services to us, including IT service providers, event management, PR and marketing service providers, background and/or credit reference services, processors of the Company (including any investment manager, registrar, administrator or sub-administrator, auditor, legal counsel or print firm) telephone service providers, document storage providers, backup and disaster recovery service providers and to any person who provides professional, legal, tax or accounting advice or other services to the Company.

We may also disclose personal data we hold to third parties:

- (a) in the event that we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or
- (b) if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party; and
- (c) all such parties are required to maintain the confidentiality of such information to the extent they receive it.

4. INTERNATIONAL TRANSFERS

The Company is a controller incorporated in Guernsey and as such will be bound to comply with the New DPL. As the Company will be processing personal data of shareholders and potential investors who are in the European Union, the Company will also be required to comply with the GDPR. The New DPL substantially mirrors the requirements of the GDPR in relation to the processing of personal data and it is hoped that Guernsey's existing adequacy ruling by the European Commission for data protection purposes will be unaffected or reconfirmed.

Some of the external service providers used by the Company are based outside the European Economic Area (EEA), such as Guernsey or other non-EEA country deemed to have an adequate level of data protection, so their processing of the personal data of shareholders or potential investors situated in the EEA will involve a transfer of data outside the EEA.

Whenever your personal data is transferred out of the EEA by us, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For

further details, see European Commission: Model contracts for the transfer of personal data to third countries.

- Where we use providers based in the US, 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. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

5. DATA SECURITY

The Company has 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 and as data processors are subject to

Whilst we have taken every reasonable care to ensure the implementation of appropriate technical and security measures, we cannot guarantee the security of your personal data over the internet, via email or via our websites nor do we accept, to the fullest extent permitted by law, any liability for any errors in data transmission, machine, software or operating error or any other cause.

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.

6. YOUR LEGAL RIGHTS

In certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications please notify the Company in writing or contact us at DPM.PFS.Guernsey@praxisifm.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise any of the rights set out above, please contact the Directors in writing at Sarnia House, Le Truchot, St Peter Port, Guernsey, GY1 1GR.

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. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information 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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

You have the right to make a complaint at any time. In the UK to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk), in Guernsey to the Office of the Data Protection Commissioner at enquiries@dataci.org or to any supervisory authority in the EU member state of your usual residence or place of work or of the place of the alleged breach if you consider that the processing of your personal data carried out by the us, the administrator of any other service provider to us, has breached data protection laws. We would, however, appreciate the chance to deal with your concerns before you approach any of the supervisory authorities so please contact us in the first instance by emailing DPM.PFS.Guernsey@praxisifm.com

7. FURTHER INFORMATION

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Directors, Sarnia House, Le Truchot, St Peter Port, Guernsey GY1 1GR or by email to DPM.PFS.Guernsey@praxisifm.com

Pyne Gould Corporation Limited is incorporated in the Island of Guernsey under the Companies (Guernsey) Law, 2008, as amended, as a non-cellular company limited by shares with registered number 57987.

Inaccurate or Amended Information

Please let us know if any of your personal data (including correspondence details) changes as soon as possible. Failure to provide information where the same is required for anti-money laundering, pursuant to automatic exchange of information agreements, or other legal requirements means that the Company may not, or may no longer, be able to accept you as an investor.

Data Protection and Privacy Policy

We may update this notice (and any supplemental privacy notice), from time to time. We will notify you of the changes where required by law to do so.

Last updated June 2018