

**GRATICULE ASSET MANAGEMENT ASIA**

**PERSONAL DATA PRIVACY NOTICE (“NOTICE”)**

This Notice sets out how Graticule Asset Management Asia L.P. whose operating entities include Graticule Asia Macro Advisors LLC, Graticule Asset Management Asia Pte. Ltd., and Graticule Asset Management Asia (UK) Limited and the Cayman Islands investment funds they manage (collectively, “**GAMA**” or the “**Firm**”) collects, uses, and discloses personal data online and offline in connection with services we provide to our clients and investors in funds managed by GAMA (“**Services**”), actual or prospective contractual relationships that you may have with GAMA, or personal data that you disclose to GAMA voluntarily. (hereinafter, “**you**”). If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Personal Data on individuals connected to you for any reason in relation to your investment with GAMA, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

**PERSONAL DATA**

“**Personal Data**” is information that identifies an individual or relates to an identifiable individual, including:

- Name
- Account details and related contact information
- Postal address
- Telephone or fax number
- Email address and other identifying addresses for electronic communications
- Date of birth
- Details from passports and other government or state issued forms of personal identification (including social security, driver's license, national insurance and other identifying numbers)
- Photographic or video images
- Telephonic or electronic recordings

In the course of providing certain Services, we may also receive from you, or third parties, information including:

- (a) Employment related information (salary information, stock options, shareholdings, pension, and CVs);
- (b) Information about regulatory and other investigations or litigation to which you are or have been subject to, your sources of wealth, or the beneficial ownership of various assets or entities.

GAMA collects and processes Personal Data where GAMA is legally required to do so, or where it is necessary for the purposes of providing the Services or for the purposes of its direct dealings with individuals.

## Collection of Personal Data

Personal Data is collected by GAMA, its agents, affiliates, and service providers in a number of ways, including:

- (a) Collection of Personal Data in the course of any provision of Services or in the case of any contractual arrangement that we have with you.
- (b) In addition to the foregoing, GAMA may collect Personal Data ahead of and in connection with, meetings, transactions, pitches, proposals, and contractual arrangements, GAMA's service providers, public sources (e.g., databases), and other third parties (e.g., consumer reporting agency, credit rating agencies).

The security of Personal Data that we collect, process, and maintain is important to us. GAMA maintains physical, technical, electronic, procedural, and organizational safeguards and measures in place to protect personal data against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access, whether such data is processed within the European Union ("EU"), the Cayman Islands or elsewhere. GAMA employees may only access Personal Data for legitimate purposes that are permitted by law. GAMA employees are bound by a code of conduct, internal policies governing the treatment of any Personal Data, and are subject to disciplinary action (and where necessary, referred to the relevant government or investigative agencies) for breaches of GAMA's internal policies or breaches of legal obligations relating to Personal Data.

GAMA and its service providers may use Personal Data for legitimate business interests, where such interests are not overridden by your interests, fundamental rights or freedoms, including (but not limited to) the following:

- (a) to verify and authenticate authorized persons and their signatories when entering into any agreement or transaction;
- (b) to contact identified individuals in connection with any transaction or contractual agreement;
- (c) to respond to enquiries and fulfill requests from our clients and/or relevant third parties who require information as a necessary part of the provision of the Services, and to administer account(s) and manage our relationships;
- (d) to inform our clients or fund investors about products or services which we believe may be of interest;
- (e) to verify an individual's identity and/or location (or the identity or location of a client or investor of funds we manage and their representative or agent) in order to conduct online transactions or to allow access to any electronic facility, account online, or client accounts;
- (f) for relationship management purposes and business purposes, including data analysis, audits, developing and improving products and services, and identifying usage trends;
- (g) for risk management;
- (h) for compliance with our legal and regulatory obligations and for fraud detection, prevention, and investigation, including "know your customer", anti-money laundering, conflict and other necessary onboarding documentation, ongoing client checks, due diligence and verification requirements, credit checks, credit risk analysis, compliance with sanctions procedures or rules, and tax reporting;
- (i) to comply with laws and regulations (including any legal or regulatory guidance, codes or opinions), and to comply with other legal processes and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions);
- (j) to provide, and perform GAMA's obligations with respect to, the Services or otherwise in

- connection with fulfilling instructions;
- (k) to send administrative information to clients and investors in the funds that we manage, such as changes to our terms, conditions, and policies; and
- (l) for the purposes of making a payment or otherwise discharging any legal obligations (whether in contract or in tort) to you (in the case where you are personally a party to any actual or potential contractual or other relationship or arrangement with GAMA).

#### Disclosure of Personal Data

Personal Data may be disclosed to third parties in connection with the performance of any contract. The recipients of any such information will depend on the specific service or obligation that we are performing or discharging. Subject to any confidentiality restrictions, and any other restrictions that we may have agreed to with you or any other relevant party, and always subject to conditions of confidentiality and security that GAMA has determined to be appropriate for every individual circumstance of disclosure, such disclosures may include disclosures to:

- (a) affiliates of GAMA;
- (b) third party service providers e.g., web-site hosting, data analysis, payment processing, information technology, infrastructure, e-mail services, audit and other services;
- (c) third party experts and advisers (including external legal counsel, notaries, auditors and tax advisers);
- (d) payment, banking, and communication infrastructure providers e.g., SWIFT, financial institutions or intermediaries including banks, insurers, insurance brokers, brokers, central counterparties, clearing houses, clearing and settlement systems, exchanges, trading platforms, regulated markets, portfolio reconciliation, and margin services providers;
- (e) third party storage providers e.g., providers of archival services, document repositories, and trade data repositories;
- (f) third party distribution platforms and to operators of private or common carrier communication or transmission facilities, time sharing suppliers, and mail or courier services;
- (g) counterparties, vendors and beneficiaries, and other entities connected with the provision of the Services or any proposed or actual contractual agreement (including guarantors, affiliates, underlying clients, obligors, investors, funds, accounts, and/or other any principals connected) where we have obtained Personal Data relating to you as a result of our provision of the Services or such proposed or actual contractual arrangement; and
- (h) other persons as agreed with you, our client or as required or expressly permitted by applicable law.

#### Other Uses and Disclosures

GAMA may use and disclose Personal Data that it believes is necessary or appropriate:

- (a) to comply with applicable law, including any treaty or international agreement between governments which may include laws and other obligations outside the jurisdiction that you are located in (e.g., tax reporting obligations) for the purposes of responding to any request or instruction to cooperate with any governmental, regulatory or investigative agency which has jurisdiction over GAMA;
- (b) to the courts, an arbitral tribunal, or any party to litigation where such use and disclosure is

- pursuant to any subpoena, court order, process or to courts, litigation counterparties and others, pursuant to a subpoena or other court order or process; and
- (c) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

GAMA may, in addition to the foregoing, use, disclose, or transfer Personal Data (i) to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of GAMA's business, assets or stock (including in connection with any bankruptcy or similar proceedings) and/or (ii) to third parties, at the request of any party who has demonstrable rights to make such request.

### **THIRD PARTY SERVICES**

This Notice does not address, nor is GAMA responsible for, the practices of any third party that collects Personal Data (including any web-site, web-link, physical form, or any other form of communication referring you to provide information to a third party not acting on behalf of, or at the direction of GAMA). The inclusion by GAMA of any web-site, web-link, physical form, in any form of communication does not imply endorsement of such web-link, web-site, or physical form.

### **SECURITY**

GAMA will use reasonable organizational, technological, and administrative measures to protect Personal Data that it is in possession of. However, it is not possible to guarantee that any transmission or storage data is completely secure. If you have any reason to believe that any communication or interaction you have with us is compromised, please notify us in the manner set out in the Contact Information section below.

### **YOUR CHOICES AND ACCESS**

#### Your Choices Regarding Use and Disclosure of Personal Data

E-mails from GAMA: If you no longer wish to receive any investor relations e-mails from us, you may opt out by contacting your usual point of contact at GAMA or by e-mailing [ir@gama.com](mailto:ir@gama.com).

GAMA will endeavor to comply with your request(s) as soon as practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative and other transaction related e-mails, which GAMA will not be able to permit you to opt out of.

#### How to Access, Change or Suppress Your Personal Data

If you would like to request to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us at [legal@gama.com](mailto:legal@gama.com). We will respond to your request consistent with applicable law as soon as practicable.

Please include in your request details about the Personal Data that you would like changed, whether you would like to have the Personal Data suppressed from GAMA's databases or the limitations that you

would like us to impose on our use of your Personal Data. To protect your interests, we will only act on requests from e-mails or other forms of communications that we can verify. GAMA is required by law in the jurisdictions it operates in to retain information for recordkeeping purposes, and/or to act on any outstanding obligations or actions prior to your request. We would also like to inform you that there may be residual information within our records that may not be removed.

If you are a national of an European Union Member State, and are not satisfied with the manner in which GAMA has managed or processed your Personal Data, GAMA has determined that Graticule Asset Management Asia (UK) Limited as the only operating subsidiary of Graticule Asset Management Asia L.P. within the EU, is GAMA's representative in the EU, and accordingly, you have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/concerns>). If you are an investor in a Cayman Islands investment fund, you have a right to lodge a complaint with the Office of the Ombudsman in the Cayman Islands.

## **RETENTION PERIOD**

GAMA will retain Personal Data for such duration that it is necessary for the purposes under which it was obtained, and the necessity of GAMA's continued retention of such Personal Data. GAMA would like to highlight that even where Personal Data is no longer necessary for the purposes under which it was obtained, GAMA may be required for legal, regulatory, and document retention reasons in the jurisdictions that it operates in to continue retaining such Personal Data.

## **MINORS**

Given the nature of GAMA's business activity, GAMA does not expect to receive any Personal Data relating to individuals under the age of eighteen. GAMA does not knowingly collect Personal Data from such individuals.

## **JURISDICTION AND CROSS-BORDER TRANSFER**

Personal Data may be stored and processed in any jurisdiction where GAMA has facilities or has engaged service providers, including the United States and Singapore. In certain circumstances, the courts, law enforcement agencies, regulators or other government agencies of the jurisdictions where Personal Data is stored and processed may be entitled to access Personal Data.

### European Economic Area (EEA)

Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. The full list of these countries is available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures such as standard contractual clauses adopted by the European Commission to protect Personal Data. You may obtain a copy of these measures by following this link: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en). Transfers may also be made pursuant to contracts in your interest or at your request.

## Cayman Islands

Any transfer of Personal Data by GAMA or its duly authorized affiliates and/or delegates shall be in accordance with the requirements of the Data Protection Law, 2017 of the Cayman Islands (the "**DPL**"), this may include the foregoing measures.

## **SENSITIVE INFORMATION**

We do not typically collect sensitive Personal Data in connection with the Services. Please do not send us through the Services or otherwise any Personal Data that would be categorized as special data under GDPR or the DPL, where applicable, (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) ("**Special Data**") unless we specifically request this information from you or make a due diligence enquiry of you where the response necessitates you disclosing Special Data to us. In such a case, please ensure you notify us that you are providing Special Data.

We may receive Special Data from third party service providers and others in support of due diligence activities we undertake to satisfy various legal and regulatory requirements to which we are subject to.

## **RECORDING OF COMMUNICATIONS**

Communications with GAMA (including telephone conversations, e-mail, text messages, and electronic messages, may, where permitted or otherwise required by applicable law, be recorded and/or monitored for regulatory, monitoring, and governance purposes.

## **CONTACT INFORMATION**

Please contact us at [legal@gama.com](mailto:legal@gama.com) should you wish to communicate with GAMA regarding your Personal Data or this Notice.

## **UPDATES TO THIS NOTICE**

We may amend this Notice from time to time. The "LAST UPDATED" annotation at the top of this Notice indicates when this document was last revised.

Any changes will become effective when a new Notice is posted on GAMA's web-site at [www.gama.com](http://www.gama.com).