

SWC

Privacy Notice

This Privacy Notice is issued by SWC B.V. and applies to SWC B.V. (hereinafter “**SWC**”).

At SWC we respect and protect your right to privacy and will process your personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and other applicable privacy laws.

The GDPR and any other applicable privacy laws apply to this Privacy Notice and anything not specifically mentioned in this Privacy Notice shall be governed by the GDPR and any other applicable privacy laws.

This Privacy Notice explains how we may use, process and store your personal data.

WHAT KIND OF PERSONAL DATA DO WE COLLECT?

Personal data means any information relating to an identified or identifiable natural person. SWC processes the following types of personal data:

- name, address, email address, telephone number and other contact information;
- date and place of birth;
- nationality;
- gender;
- copies of identity documents (passport, national ID card, driver’s license, employee identification numbers);
- source of wealth;
- utility bill, bank statement;
- tax residency.

Please note that the list is not exhaustive and that SWC may also collect and process personal data to the extent this is useful or necessary for the provision of our services.

Disclaimer

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HOW DOES SWC COLLECT PERSONAL DATA?

We collect, control and process personal data in different ways:

- Personal data provided to SWC directly;
- We collect personal data directly from (prospective) clients, investors, business partners and intermediaries for the purposes of executing an agreement, entering into a contract or a service agreement and/or to meet certain legal requirements.
- Personal data obtained from third parties;
- We also collect and process personal data from publicly accessible sources such as internet, social networks or commercial registers.

Furthermore we may receive personal data from third parties as part of the service we provide to you or in connection with legal requirements that are applicable to us.

HOW DOES SWC USE PERSONAL DATA?

The majority of the personal data processed by SWC is necessary for the performance of a contract to which the data subject is a party or to comply with the request of the data subject prior to entering into a contract. SWC also processes personal data in order to comply with our legal and regulatory obligations.

We may furthermore process personal data for the purposes of legitimate business interests. Such legitimate interests include general research and development (including statistical research or as a basis to analyze our current security measures) or to develop and improve our services or to strengthen our relationship with you. We may provide you with communications or information regarding our service offering which we think will be interesting for you.

When we process your personal data for our legitimate business interests, we will consider and balance any potential impact on you and your rights under the relevant data protection and any other relevant law. Whenever we process personal data for these purposes you have the right to object to this way of processing. Where an evident legitimate business interest is absent we will always ask your consent for the processing of your data.

TO WHOM DOES SWC PROVIDE PERSONAL DATA?

SWC may disclose or transfer personal data to subcontractors for the purpose of the proper performance of the services we provide to our clients. It may, for example, disclose or transfer such personal data to third party service providers who provide fund administration, prime broking, banking, audit, and other services required to

manage our fund. We enter into data processing agreements with such subcontractors to ensure that they process your data, on our behalf, with the same level of security and confidentiality as applied by SWC. SWC may furthermore disclose or transfer personal data when we received your consent to do so.

In addition SWC may disclose or transfer personal data to protect our rights or those of our clients and/or to prevent fraud. SWC can also be obliged to disclose or transfer personal data to competent authorities in order to comply with our legal and/or regulatory obligations.

Except as described in this paragraph, SWC will not disclose, transfer or sell your personal data to any third party unless you have consented to this.

INTERNATIONAL TRANSFERS AND DATA STORAGE

SWC may disclose or transfer personal data to other affiliated companies or individuals that are located in countries that are outside the European Economic Area in connection with the above purposes. The personal data SWC processes is stored by SWC on our servers, and/or on the servers of the cloud-based database management services SWC engages. If disclosure or transfer of personal data is being done in a country that does not ensure an adequate level of protection of your personal data, SWC will make sure additional safeguards will be put in place.

RETENTION

SWC will process and store the relevant personal data for the duration of our services or for the duration of the business relationship. SWC may also store the data for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations and for the establishment, exercise or defense of legal claims, and in general where it has a legitimate interest in doing so.

YOUR RIGHTS

You have the following rights:

- **Access to your information.** You have the right to access the personal information that SWC holds about you at any time.
- **Data portability.** You may ask SWC to provide you with a copy of the personal information that SWC holds about you.
- **Correction of your personal information.** You have the right to ask SWC to update and correct any out-of-date or incorrect personal information that we would hold about you.

- **Deletion of your personal information (the right to be forgotten).** You have the right to ask SWC to delete your personal information, to the extent that SWC has no legal and/or regulatory obligations to keep such personal information.
- **Restriction of processing of your personal information.** You have the right to ask SWC to restrict the processing of your personal information in case:
 - You contested the accuracy of the personal information held by SWC;
 - The processing is unlawful but you objected to the deletion of the personal data and request the restriction of the use instead;
 - SWC no longer needs the personal data for the purposes of the processing, but you require them for legal reasons;
 - You objected to processing and SWC is investigating whether there are legitimate grounds to override your objection.
- **Object.** You have the right to object at any time to the processing of your personal data for any direct marketing (and related profiling) by SWC. In addition you have the right to make a complaint with the local supervisory authority with respect to the way SWC is processing your personal data or the way SWC is handling your rights.

AUTOMATIC DECISION MAKING

SWC generally does not make decisions by purely automatic means, but if we do, you have the right to object.

NAVIGATION AND COOKIES

Please note that SWC is the controller of personal data collected through the SWC website (“**Website**”). SWC will, however, only use this personal data in accordance with the purpose set forth in this Privacy Notice.

SWC collects personally-identifiable information on certain areas of the Website when users register, request publications or other information, sign up for conferences and events, apply for jobs, and participate in user posting areas, such as bulletin boards, discussion forums, and surveys. The personally identifiable information collected may consist of information that you provide, such as names, mailing addresses, e-mail addresses, telephone and fax numbers, and, for recruiting purposes, any other personally identifiable information on your resume.

The Website also may use cookies to identify you and your interests and to track usage of the website. Cookies are small pieces of text stored on your computer that help us know which browser you are using and where you have been on the Website and on websites to which you may link in order to use some of our features. By

accepting our cookie, you will be permitted access to certain pages of the Website without having to log in each time you visit. A user who does not accept the cookie from the Website may not be able to access certain areas of the Website. SWC may also log IP addresses, or the location of computers on the Internet, to help diagnose problems with our server and to administer the Website. If you prefer not to accept a cookie, you can set your web browser to warn you before accepting cookies, or you can refuse all cookies by turning them off in your web browser.

HOW WE PROTECT PERSONAL DATA?

SWC is committed to ensuring the security of your personal data. SWC takes appropriate commercially reasonable technical, physical and organizational measures to prevent unauthorized or unlawful processing of your personal data or accidental loss or destruction of your personal data. SWC will ensure a level of security suitable to the identified risks and pursuant to applicable Data Protection Laws, where the Processing concerns personal data of EU residents, shall take measures required pursuant to article 32 GDPR.

Employees of SWC are trained to handle personal data securely and with utmost respect and they will treat your personal data strictly confidential. Staff members shall be authorized to access personal data only to the extent necessary to serve the applicable legitimate purposes for which the data are processed by SWC and to perform their job.

SWC will not divulge client information to a third party unless we have received explicit client authorization or we are required to do so by law.

CHANGES TO THIS NOTICE

SWC may update this Privacy Notice from time to time. We advise you to periodically review this Privacy Notice to be informed of how SWC is protecting your privacy.

CONTACT

If you have any questions, concerns or complaints with respect to this Privacy Notice, the way SWC is handling your privacy or you wish to exercise any of your rights please contact:

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