

## FUND DATA PRIVACY NOTICE

In accordance with the European Union's General Data Protection Regulation ("GDPR"), the Cayman Islands Data Protection Law, 2017 ("DPL") and the Personal Data Protection Act (No. 26 of 2012) of Singapore (the "PDPA"), this data privacy notice ("Notice") sets out how and why SEA Crest Feeder Fund Limited (the "Fund") and Fuchs Capital Partners Pte. Ltd. (the "Manager") (together with the Fund, the "Fund Parties" or "we" or "us" or "our") collect, use, disclose, store, transfer or otherwise process your personal data when either you (in your individual capacity) or an entity of which you are an officer, employee or beneficial owner (if an individual or, if beneficial owner is a legal entity, an officer or employee of the beneficial owner) (the "Investing Entity") (together, "you" or "your") invest(s) into the Fund.

This Notice also contains information about your rights in relation to your personal data.

### 1. WHY ARE WE PROVIDING THIS DATA PRIVACY NOTICE TO YOU?

- 1.1 In connection with your investment into the Fund, you may need to, from time to time, provide personal data to us.
- 1.2 If you do not supply this data, it may not be possible for you to become a shareholder in the Fund as there will not be sufficient information for us to process your subscription into the Fund and/or communicate to you matters relating to your investment into the Fund.
- 1.3 Please read this Notice carefully to understand what we do with your personal data.

### 2. IN WHAT CAPACITY ARE WE ACTING IN RESPECT OF YOUR PERSONAL DATA?

- 2.1 When you provide us with your personal data, the Fund acts as a "data controller". In simple terms, this means that:
  - 2.1.1 we "control" the personal data that you provide, including making sure that it is kept secure; and
  - 2.1.2 we make certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or are otherwise required and/or permitted to do so by law.

### 3. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

- 3.1 The types of personal data we collect and share depends on the product or service you have with us and the nature of your investment. This information can include or be related to:
  - 3.1.1 name;
  - 3.1.2 email address;
  - 3.1.3 telephone number;
  - 3.1.4 work address;
  - 3.1.5 position in Investing Entity;
  - 3.1.6 passport number;
  - 3.1.7 personal address\*;

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\* To be included in the case where an individual investor is investing into the Fund.

- 3.1.8 assets and income\* ;
  - 3.1.9 investment experience\* ;
  - 3.1.10 risk tolerance and transaction history\* ; and
  - 3.1.11 investment activity\* .
- 3.2 The personal data collected about you is necessary for us to provide the service you have required and to facilitate our business relationship.
- 3.3 We may combine personal data that you provide to us with information that we collect from, or about, you in some circumstances.
- 3.4 This will include information collected in an online or offline context.
- 4. WHERE DO WE OBTAIN YOUR PERSONAL DATA?**
- 4.1 We collect information about you from a number of sources. Generally speaking, we may obtain your personal data in two main ways – information that you provide to us; and information we obtain from others.
- 4.2 How do you provide your personal data to us?**
- 4.2.1 from the subscription documents, forms and any associated documentation that you complete when you subscribe for shares in the Fund;
  - 4.2.2 when you provide it to us in correspondence and conversations;
  - 4.2.3 when you make transactions with respect to the Fund;
  - 4.2.4 when you tell us where to send money.
- 4.3 How do we obtain your personal data from others?**
- 4.3.1 from publicly available and accessible directories and sources;
  - 4.3.2 from bankruptcy registers;
  - 4.3.3 from tax authorities, including those that are based outside the UK and the European Economic Area ("EEA") and the Cayman Islands if you are subject to tax in another jurisdiction;
  - 4.3.4 from governmental and competent regulatory authorities to whom we have regulatory obligations;
  - 4.3.5 from credit agencies; and
  - 4.3.6 from fraud prevention and detection agencies and organisations.

## 5. WHY DO WE PROCESS YOUR PERSONAL DATA?

5.1 We set out below the reasons/purposes of why and how we process your personal data:

Why?		How?
1.	Contract	<p>It is <b><u>necessary to perform our contract</u></b> with you to:</p> <ul style="list-style-type: none"> <li>(a) allow you to purchase your holding of shares in the Fund;</li> <li>(b) meet the resulting contractual obligations we have to you;</li> <li>(c) facilitate the continuation or termination of the contractual relationship between you and the Fund; and</li> <li>(d) facilitate the transfer of funds, and administering and facilitating any other transaction, between you and the Fund.</li> </ul>
2.	Compliance with law	<p>It is <b><u>necessary for compliance with an applicable legal or regulatory obligation</u></b> to which we are subject to:</p> <ul style="list-style-type: none"> <li>(a) undertake our client and investor due diligence, and on-boarding checks;</li> <li>(b) carry out verification, know-your-client (KYC), terrorist financing and anti-money laundering checks;</li> <li>(c) verify the identity and addresses of our investors (and, if applicable their beneficial owners);</li> <li>(d) comply with requests from regulatory, governmental, tax and law enforcement authorities;</li> <li>(e) surveillance and investigation;</li> <li>(f) carry out audit checks;</li> <li>(g) maintain statutory registers;</li> <li>(h) prevent and detect fraud; and</li> <li>(i) sanctions.</li> </ul>
3.	Our legitimate interests	<p>For our <b><u>legitimate interests</u></b> or those of a third party to:</p> <ul style="list-style-type: none"> <li>(a) manage and administer your holding in the Fund in which you are invested on an ongoing basis;</li> <li>(b) assess and process any applications or requests made by you;</li> <li>(c) send updates, information and notices or otherwise correspond with you in connection with your investment in the Fund;</li> <li>(d) address or investigate any complaints, claims, proceedings or disputes;</li> <li>(e) provide you with, and inform you about, our investment products and services;</li> <li>(f) monitor and improve our relationships with investors;</li> <li>(g) send direct marketing communications to you;</li> <li>(h) comply with applicable regulatory obligations;</li> <li>(i) manage our risk and operations;</li> <li>(j) comply with our accounting and tax reporting requirements;</li> <li>(k) comply with our audit requirements;</li> <li>(l) assist with internal compliance with our policies and process;</li> <li>(m) ensure appropriate group management and governance;</li> </ul>

		<p>(n) keep our internal records;</p> <p>(o) protect our business against fraud, breach of confidence, theft of proprietary materials, and other financial or business crimes (to the extent that this is not required of us by law);</p> <p>(p) seek professional advice, including legal advice;</p> <p>(q) monitor communications to/from us using our systems; and</p> <p>(r) protect the security and integrity of our IT systems.</p> <p>We only rely on these interests where we have considered that, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms.</p>
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## 5.2 Direct marketing (as described in item 3(g) above)

5.2.1 We process your personal data for direct marketing purposes:

- (a) to provide you with information, products and services that may be of interest to you in the context of our investment-related activities;
- (b) when raising investments into our funds;
- (c) in connection with future fundraising activities.

5.2.2 You agree that we may contact you for marketing purposes. You have a right at any time to stop us from contacting you for marketing purposes.

5.2.3 If you object to the processing of your personal data for direct marketing purposes, we will stop using your personal data for these purposes. If you no longer wish to be contacted for marketing purposes, please contact us – please see section 13 below for our contact information.

## 5.3 Monitoring (as described in item 3(q) above)

5.3.1 We monitor communications where the law requires us to do so. We will also monitor where we are required to do so to comply with our regulatory rules and practices and, where we are permitted to do so, to protect our business and the security of our systems.

## 6. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

6.1 Your personal data will be shared with the following persons for the following reasons:

Who?		Why?
1.	Affiliates and related parties	<ul style="list-style-type: none"> <li>• to manage our relationship with you</li> <li>• to fulfil the purposes set out in this Notice</li> </ul>
2.	Prime brokers, administrators, custodians	<ul style="list-style-type: none"> <li>• to deliver the services you require</li> <li>• to manage your investment</li> <li>• to support and administer investment-related activities</li> <li>• to comply with applicable laws and regulations</li> </ul>
3.	Tax authorities	<ul style="list-style-type: none"> <li>• to comply with applicable laws and regulations</li> <li>• where required by EEA or the Cayman Islands tax authorities (who, in turn, may share your personal data with foreign tax authorities)</li> </ul>

		<ul style="list-style-type: none"> <li>• where required by foreign tax authorities, including outside of the EEA or the Cayman Islands</li> </ul>
4.	Service providers	<ul style="list-style-type: none"> <li>• to deliver and facilitate the services needed to support our business relationship with you</li> <li>• to support and administer investment-related activities</li> </ul>
5.	Our lawyers, auditors and other professional advisers	<ul style="list-style-type: none"> <li>• to provide advice in connection with your investment in the Fund and the Fund Parties' investment-related activities</li> <li>• to comply with applicable legal and regulatory requirements</li> </ul>

6.2 In exceptional circumstances, we will share your personal data with:

6.2.1 competent regulatory, prosecuting and other governmental agencies or litigation counterparties, in any country or territory; and

6.2.2 other organisations and agencies, where we are required to do so by law.

## 7. ARE YOU REQUIRED TO PROVIDE US WITH YOUR PERSONAL DATA?

7.1 Where we collect personal data from you, we will indicate if:

7.1.1 the provision of the personal data is necessary for our compliance with a legal and/or regulatory obligation; or

7.1.2 it is purely voluntary and there are no implications for you if you do not wish to provide us with it.

7.2 Unless otherwise indicated, you should assume that we require the personal data for business and/or compliance purposes.

7.3 Some of the personal data we request is necessary for us to perform our contract with you and if you do not wish to provide us with this personal data, it will affect our ability to provide our offering of products and/services to you and manage your investment.

## 8. TRANSFER OF PERSONAL DATA INTERNATIONALLY

8.1 We may transfer your personal data to our related parties, counterparties and third party service providers outside of the EEA or the Cayman Islands, which do not have similarly strict data protection and privacy laws.

8.2 Where we transfer personal data to our service providers, we will put in place appropriate measures as may be required by data protection laws that are applicable to us.

8.3 Please contact us if you would like to know more about these agreements.

## 9. RIGHT TO WITHDRAW CONSENT

9.1 Unless required under applicable law, we do not generally rely on obtaining your consent to process your personal data.

9.2 If we do, you have the right to withdraw this consent at any time.

9.3 Please contact us or send us an email at [ir@fuchscapitalpartners.com](mailto:ir@fuchscapitalpartners.com) at any time if you wish to do so.

## 10. RETENTION AND DELETION OF PERSONAL DATA

- 10.1 We keep your personal data for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, or where longer, such longer period as is required by law or regulatory obligations which apply to us.
- 10.2 We will generally retain information about you throughout the life cycle of any investment you are involved in.
- 10.3 Some personal information will be retained after your relationship with us ends.
- 10.4 As a general principle, we do not retain your personal data for longer than we need it.
- 10.5 We will usually delete your personal information (at the latest) after a minimum period of 5 years.

## 11. YOUR DATA PROTECTION RIGHTS

- 11.1 You have certain data protection rights, including:
  - 11.1.1 the right to access your personal data;
  - 11.1.2 the right to restrict the use of your personal data;
  - 11.1.3 the right to have incomplete or inaccurate data corrected;
  - 11.1.4 the right to ask us to stop processing your personal data;
  - 11.1.5 the right to require us to delete your personal data in some limited circumstances.
- 11.2 You also have the right in some circumstances to request for us to "port" your personal data in a portable, re-usable format to other organisations (where this is possible).

## 12. CONCERNS OR QUERIES

- 12.1 We take your concerns very seriously. We encourage you to bring it to our attention if you have any concerns about our processing your personal data.
- 12.2 This Notice was drafted with simplicity and clarity in mind. We are, of course, happy to provide any further information or explanation needed. Our contact details are below.
- 12.3 If you want to make a complaint, you can contact a body regulating data protection. For the purposes of the DPL, this is the Cayman Islands Ombudsman ([www.ombudsman.ky](http://www.ombudsman.ky)). For the purposes of the PDPA, this is the Personal Data Protection Commission of Singapore (<https://www.pdpc.gov.sg/>). Where the GDPR applies this may be the relevant body in the country which you live or work, or the location where the data protection issue arose. A list of the EU data protection authorities is available by clicking this link: [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

### 13. **CONTACT US**

13.1 Please contact us if you have any questions about this Notice or the information we hold about you.

13.2 You can contact us by email at [ir@fuchscapitalpartners.com](mailto:ir@fuchscapitalpartners.com).

13.3 You can also contact us or our Data Protection Officer in Singapore in writing using the following address:

The Data Protection Officer  
SEA Crest Feeder Fund Limited  
c/o Fuchs Capital Partners Pte. Ltd.  
112 Robinson Road, #14-04  
Singapore 068902

Telephone number: +65 6576 5555

Email: [dataprotectionofficer@fuchscapitalpartners.com](mailto:dataprotectionofficer@fuchscapitalpartners.com)

### 14. **CHANGES TO THIS NOTICE**

14.1 We keep this Notice under regular review.

14.2 This Data Privacy Notice was last updated on 13 May 2021.