



NOTICE AND POLICY ON PRIVACY

BIZ Holdings Investors and Partners

2020



Introduction

BIZ Holdings considers your privacy and the protection of personal data to be an utmost concern and has implemented the privacy notice and policy for Investors. We do not disclose personal data about our clients or former clients to third parties other than as described below.

We collect personal data about you from various sources, including our discussions with you, from documents that you may deliver to us and while providing advisory services for you. We may use this personal data to provide advisory services to you, to open an account for you, to process a transaction for your account or otherwise in furtherance of our business. Please read the remainder of this policy for more information.

Where disclosed to our employees and staff, we restrict access to your personal data to where such disclosure is strictly necessary to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal and local standards, and regulation to guard your personal data and which we believe are adequate to prevent unauthorized disclosure of such information.

The remainder of this policy provides further detail about our privacy practices, how and why we process or share your personal data, and how we comply with data protection and privacy laws that may apply to how we use your personal data.

This policy is being provided for your information only and no response is required. However, should you have questions please contact us using our contact details further provided herein.

Reasons you are seeing this policy

- As an investor in one or more funds or accounts managed or advised by **BIZ Holdings**, you provide us with certain personal data. This may relate to you, if you are an individual, or to your individual representative, contact person or persons, employee or employees, trustee or trustees, nominee or nominees, agent or agents and - or ultimate beneficial owner or owners if you are a corporate entity. For the purposes of this policy, personal data only means information relating to an identified or identifiable natural person.
- We want you to understand how and why we use, store and otherwise process your personal data when you deal with us or our relevant affiliates.

Reasons for providing this policy

This policy is being made and provided to you on behalf of the general partners of each fund to which **BIZ Holdings** acts as investment manager, **BIZ Holdings**, and any affiliates of those entities who process and - or control personal data now or in the future.

Where we use the terms; **we, us** and **our** in this policy, we are referring to the **BIZ Holdings**.

When you provide us with your personal data, the funds, in most cases acting through their general partner or investment manager will, in relation to some or all of your personal data, be acting as a **data controller**. In simple terms, this means that:

- we **control** the personal data that you provide – including making sure that it is kept secure.
- 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 permitted by law to use the data We are committed to protecting and respecting your privacy.

Certain entities within **BIZ Holdings** may act as a **data processor**.

The personal data we collect about you

The types of personal data we collect, and share depends on the type of investor and investment being made. Examples of the type of personal data collection includes:

- Information to allow **Know Your Customer - KYC** and **Anti Money Laundering - AML** requirements to be fulfilled with bank account details, social security number and income.
- Assets and investment experience alongside risk tolerance and transaction history.
- Investment activity and history and possible accounts at other institutions.
- Contact details, including home address, telephone numbers, email and possibly, tax information.

As part of our compliance with legal obligations such as AML - KYC, we may be required to process special categories of personal data as defined by **GDPR**, as well as criminal convictions and offences. The personal data collected about you will help us provide you with a better service and facilitate our business relationship. We may combine the personal data that you provide to us with personal data that we collect from, or about you, in some circumstances. This will include personal data collected in an online or offline context. This personal data may be shared with third parties as discussed below.

If you are a corporate entity, you undertake and guarantee to process personal data and to supply such personal data to the data controller in compliance with the **GDPR framework**, including, where appropriate, informing the relevant individuals of the contents of the present section, still in accordance GDPR framework.

Where we obtain these data from

We collect personal data about you from a number of sources, including from you directly

What we collect	How we collect it
Personal data that you provide us	<ul style="list-style-type: none">• from subscription documents, tax forms and other associated documentation that you complete when subscribing for an investment in a fund. This will include personal data such as your or your representative's or ultimate beneficial owner's name, address, date of birth, passport details or other national identifier, driving licence, your national insurance or social security number and income, employment information and other details about your investments.• when you provide it to us in correspondence and conversations.• when you provide us with bank account details to which distributions or other payments from the funds should be paid.
Personal data we obtain from others	<ul style="list-style-type: none">• publicly available and accessible directories and sources, background check providers, bankruptcy registers.• tax authorities, including those that are based outside the UK and the European Economic Area – EEA if you are subject to tax in another jurisdiction.

- governmental and competent regulatory authorities to whom we have regulatory obligations and credit agencies.
- Fraud prevention and control agencies.

Why we collect and process these data

We process your personal data for the following reasons

Why we collect them	How we collect them
Contract	<p>It is necessary to perform our contract with you to:</p> <ul style="list-style-type: none"> • establish, administer and manage fund investments and provide necessary advisory services to you. • process a transaction on your behalf and meet the resulting contractual obligations we have to fund investors. • facilitate the continuation, transfer, or termination of the contractual relationship between investors and the fund.
Compliance with laws and regulations	<p>It is necessary for compliance with an applicable legal or regulatory obligation to which we are subject to:</p> <ul style="list-style-type: none"> • undertake investor due diligence and on-boarding checks and carry out verification, KYC terrorist financing and AML checks and comply with any other legal obligations, such as CRS obligations. • verify the identity and addresses of our investors and, if applicable, their beneficial owners. • comply with requests from regulatory, governmental, tax and law enforcement authorities and for surveillance and investigation. • carry out audit checks and maintain statutory registers, including among others the Luxembourg register of beneficial owners. • prevent and detect fraud and check compliance with sanctions laws.

For marketing purposes, you have a right at any time to stop us from contacting you. 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.

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

Who we share the collected data with

Your personal data collected by us may be shared with third parties for our ordinary business purposes and as required by applicable law or regulation with the following:

- Investment managers, investment advisers and **BIZ Holdings** partners.
- Administrators, custodians, and depositories.
- Tax authorities and service providers.
- Finance and hedging providers, counterparties and their professional advisers.
- Our lawyers - attorneys, auditors, accountants, other professional advisors and most importantly, again, **BIZ Holdings** partners.

In exceptional circumstances, in accordance with applicable laws and regulations, we will share your personal data with:

- competent regulatory, prosecuting and other governmental agencies or litigation counterparties, in any country or territory; and
- organisations and agencies – where we are required to do so by law.

Providing us with your personal data

Where we collect your personal data from you, we will indicate:

- provision of the personal data is necessary for our compliance with a legal obligation; or
- it is purely voluntary and there are no implications for you if you do not wish to provide us with it.

Unless otherwise indicated, you should assume that we require the personal data for business and - or compliance purposes. 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 services to you and manage your investment.

Sending your personal data internationally

We will transfer your personal data to certain entities included within **BIZ Holdings** and partners and to third party service providers, some of which may be located outside of Jersey, Luxembourg, and the EEA, and which do not have similarly strict data protection and privacy laws. In these situations, we will seek to put in place appropriate safeguards. In each such case, we will obtain a contractual commitment from the **BIZ Holdings** and partners entity or the service provider to protect the confidentiality of your non-public personal information and to use the information only for purposes for which it is disclosed to them.

Consent – and your right to withdraw it

We generally do not rely on obtaining your consent to process your personal data but rather rely on other lawful bases for processing. In the event that consent is obtained, you have the right to withdraw such consent at any time.

Retention and deletion of your personal data

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 period as is required by law or regulation which apply to us.

Your rights

In accordance with the conditions laid down by the GDPR framework, you have certain data protection rights, which include:

- the right to access your personal data.
- the right to restrict the use of your personal data.
- the right to have incomplete or inaccurate personal data corrected.
- the right to ask us to stop processing your personal data.
- the right to require us to delete your personal data in some limited circumstance.

Concerns or queries

We take your concerns very seriously. We encourage you to bring it to our attention if you have any concerns regarding the processing of your personal data. This policy was drafted with simplicity and clarity in mind. We are, of course, happy to provide further information or explanation as needed.

Our contact details are below. If you want to make a complaint, you can also contact the body regulating data protection in your country, where you live or work, or the location where the data protection issue arose.

Contact us

Please contact us if you have any questions about this policy or the personal data we hold about you, by emailing us.

Changes to this policy

We keep this policy under regular review. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, investors will be notified directly.

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