

**PII and Privacy Policy**

**East72 Capital Management and Advisors LLP**

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## PII and Privacy Policy

### Purpose

East72 Capital Management and Advisors LLP. supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that describes them, their personal choices, or life experiences. East72 Capital Management and Advisors LLP. supports domestic and international laws and regulations that seek to protect the privacy rights of such individuals.

### Scope

This policy applies to all East72 Capital Management and Advisors LLP. employees, contractors, temporaries, and consultants, and other workers. All of these people are expected to be familiar with and fully comply with these policies.

This policy also applies to outsourcing organizations that perform information-processing services on behalf of East72 Capital Management and Advisors LLP. Use of outsourcing organizations to process personal data must always include a contractual commitment to consistently observing these policies and related East72 Capital Management and Advisors LLP. procedures and standards. All outsourcing organizations handling personal data provided by East72 Capital Management and Advisors LLP. must periodically issue certificates of compliance with this policy, and permit East72 Capital Management and Advisors LLP. to initiate independent audits to determine compliance with this policy.

### Definitions

1. **Personal data** - any information relating to an individual. Such data includes name, address, telephone number, address, social security number, driver's license number, and personal business transaction details. For example, such a person could be a purchaser of East72 Capital Management and Advisors LLP. products. The following policies do not apply to statistical reports or other collections of information in which specific natural persons are not identifiable.
2. **Processing of personal data or "processing"** - Any operation or set of operations performed on personal data, whether by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, combination, blocking, erasure or destruction.
3. **Owner** - The East72 Capital Management and Advisors LLP. manager or executive, who determines the purposes for processing personal data, and who makes decisions about the security mechanisms to be used to protect such personal data.
4. **Custodian** - The East72 Capital Management and Advisors LLP. manager, or third-party organization manager if processing is outsourced, who processes personal data according to the instructions provided by the Owner.
5. **Third party** - Any person, partnership, corporation, public authority, government agency, or any other entity other than the individual, Owner, Custodian, and the persons who, under the direct authority of the Owner or the Custodian, are authorized to process the data.
6. **Recipient** - The person, public authority, government agency, or any other entity to whom personal data is disclosed, even if the recipient is a third party.
7. **Consent** - Any freely-given informed indication of his or her wishes by which the individual signifies his or her agreement to have his or her personal data processed, which may include disclosure.

### Requirements

1. All personal data must be processed fairly and lawfully, according to the laws and regulations of all jurisdictions where East72 Capital Management and Advisors LLP. does business.
2. Personal data must be collected for purposes communicated to the individual and not further processed in a way incompatible with those purposes. Further processing of such data for historical, statistical or other business purposes is not incompatible with the original purpose provided the further processing includes adequate additional controls protecting the rights of the individual.
3. The amount of personal data collected must be adequate, relevant, and not excessive in relation to the purposes for which they are collected or for which they are further processed.
4. Personal data must be accurate and complete, and where necessary, kept up to date. Every reasonable step must be taken

to ensure that personal data that is inaccurate or incomplete, keeping in mind the purposes for which it was collected or for which it is further processed, are definitively erased or corrected.

5. Individuals must be given an opportunity to examine, and issue complaints about, inaccuracies and incompleteness in records containing their personal data. Investigations of complaints must be performed promptly, and must be answered with a letter informing the involved individuals about the courses of action that East72 Capital Management and Advisors LLP. will take. Any resulting erasures or corrections must be performed promptly and at no cost to the individuals. Reasonable steps to prevent reoccurrence of the same inaccuracies or incompleteness must also be taken, for instance by adding an explanatory paragraph in the subject's file. An exception to the requirements stated in this paragraph is permitted for personal data in management succession planning records, criminal activity investigation records, and other legitimate business activities where disclosure to the individual would be highly likely to jeopardize.
6. Personal data must not be kept in a form that permits identification of individuals for any longer than is necessary for the purposes for which the data was collected or for which it is further processed. For example, this can be implemented with linked separate files respectively containing identification information and related sensitive information. Owners of personal data are responsible for ensuring that items in the preceding points are complied with.
7. Personal data may be processed only if:
  - a. The individual has given his or her consent unambiguously.
  - b. Processing is necessary for the performance of a contract to which the individual is a party, such as completing an order for goods.
  - c. Processing is required to respond to a request made by the individual.
  - d. Processing is necessary for compliance with a legal obligation to which the Owner is subject.
  - e. Processing is necessary in order to protect the vital interests of the individual.
  - f. Processing is necessary to explore or provide new business products or services that may be of use to the owner, as long as these new products or services do not override the fundamental rights or freedoms of the individual.
8. Processing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, criminal offenses, health, or sex life is prohibited unless:
  - a. The individual has provided explicit consent to such processing.
  - b. Processing is necessary for the purposes of carrying out the obligations and specific rights of the Owner in the field of employment law.

### Information to be given to the Individual

The Owner or his or her representative must provide individuals with the following information:

- The identity of the custodian and of his or her representative, if any.
- The purposes of the processing for which the data is intended.
- The policies related to handling personal data, including material changes to these policies that have gone into effect since the personal data was collected.
- Any further information such as:
  - The recipients or categories of recipients of the data.
  - Whether replies to the questions are obligatory or voluntary, and the possible consequences of the failure to reply.
  - The existence of the right of access to and the right to correct the data concerning the individual.

Where personal data has not been obtained directly from the individual, the owner or his or her representative must notify the individual at the time when personal data will be processed. If a disclosure to a third party is anticipated, the individual must be notified no later than the time when the data is disclosed. The owner must provide the individual with at least the following information, except where the individual already knows it:

- The identity of the custodian and the custodian's representative, if any.
- The purposes of the processing.
- Any further information such as:
  - The categories of data concerned.
  - The recipients or categories of recipients.
  - The existence of the right of access to and the right to correct information concerning the individual.

Upon request, the owner or his or her representative must provide all individuals with a brief written summary of the subject's rights to learn about, get copies of, lodge objections to, and correct personal data. Trained personnel who can explain an individual's rights must be available to subjects by telephone.

East72 Capital Management and Advisors LLP. changes its privacy policy, an attempt to notify all individuals must be promptly initiated. As a part of this notification, East72 Capital Management and Advisors LLP. must provide individuals with a summary of the words that have changed and what these changes mean. Individuals also must be given an opportunity to be removed from East72 Capital Management and Advisors LLP. records.

### **Individual's Right of Access to Data**

Every individual has the right to obtain the following from the Custodian:

1. Without undue constraint at reasonable intervals and without excessive delay or expense:
  - Confirmation as to whether data relating to him or her is processed and information at least as to the purposes of the processing, the categories of data concerned, and the recipients or categories of recipients to whom the data is disclosed.
  - Details as to the source of information about the individual, if such information is recorded.
  - Communication of the personal data to the subject in an intelligible form.
  - Knowledge of the logic involved in any automatic processing of data concerning him or her at least in the case of the automated decisions affecting the individual.
2. When appropriate, an indication that his or her personal data has been corrected, erased, or blocked because it was incomplete or inaccurate.
3. Notification to third parties to whom the data has been disclosed of any correction, erasure, or blocking carried out in compliance with the prior paragraph, unless this proves impossible or involves an unreasonable effort or expense.

### **Individual's Right to Object**

Individuals may object, free of charge, to the processing of personal data that the Owner anticipates will be processed for the purposes of direct marketing. Owners must provide prompt processing mechanisms that permit individuals who objected to be removed from direct marketing lists.

Individuals must be informed before personal data is disclosed for the first time to third parties or used on their behalf for the purposes of direct marketing. Individuals must be expressly offered the right to object free of charge to such disclosures or uses. Owners must provide processing mechanisms that permit individuals who objected to block such a disclosure.

### **Disclosure of Personal Data to Third Parties**

East72 Capital Management and Advisors LLP. may provide third parties with personal data processed on its systems for generally accepted business purposes such as court orders, subpoenas, employment verification, governmental licensing, underwriting, and other reasons. All recipients of such information must definitively identify themselves, certify in writing the legal and customary purposes for which the information is sought and certify that the personal data will be used for no other purposes.

Sufficient time must be provided between the receipt of such notice to the individual and the actual disclosure to the third party to permit the individual to object, should he or she so elect.

## Processing Confidentiality and Security

The Owner must implement appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, accidental loss, unauthorized alteration, and unauthorized disclosure or access. These measures must be consistent with the standards and procedures issued by the Information Security department.

Transfers of private information to another country, no matter what technology is employed, must not take place unless prior approval of the Information Security manager has been obtained. An exception is made in those cases where the individual is, was, or will be located in the destination country, or when the individual has specifically requested such a transfer.

East72 Capital Management and Advisors LLP. information systems or staff must not link anonymous information about individual behavior or activities with personally-identifiable information unless the involved individuals have given their consent. For example, such a linkage could tie Internet shopping purchase information with web browsing logs.

The Owner or his or her designated representative must prepare a documented risk assessment to determine the privacy implications of all significantly new or different uses of personal data. Such a risk assessment must be completed before these uses take place, and must include all steps in the proposed processing, including access, storage, transmission, and destruction. Such a risk assessment must include not only consideration of the risks, but also the security measures to be employed such as access controls, encryption, logs, data retention schedules, and data destruction procedures.

When not in use, personal data must be stored in encrypted form if held in a computer or network, or in locked or similarly secured containers if held in paper, microfiche, or other non-computerized form. When sent over public computer networks such as the Internet, personal data must be protected by encryption. Procedures and standards issued by Information Security provide additional details on these topics.

When they are no longer needed, all copies of personal data, including those on backup tapes, must be irreversibly destroyed according to standards and procedures defined by the Compliance department. A document describing the personal data destroyed and the reasons for such destruction must be prepared for each destruction process, and promptly submitted to the relevant owner. Permission to destroy personal data may be granted by only the Owner, and only if all legal retention requirements and related business purposes have been met.

The use of cookies, web bugs, images, and other techniques to covertly gather information about individuals who use the Internet is incompatible with this policy. Whenever East72 Capital Management and Advisors LLP. gathers information about individuals, these same subjects must have agreed upon the collection effort in advance. For this same reason, East72 Capital Management and Advisors LLP. does not deposit cookie files on individual hard drives or does not perform any other covert recording of the Internet activity in which individuals have engaged.

East72 Capital Management and Advisors LLP. streamlines and expedites all of its computerized business interactions with individuals, but at the same time to be forthright and clear about its privacy policies. To support these objectives and to encourage individuals to use Internet commerce sites and other computerized business systems, East72 Capital Management and Advisors LLP. adopts and supports all generally-accepted standards for web content rating, web site privacy protection, and Internet commerce security, including third-party seals of approval.

East72 Capital Management and Advisors LLP. does not use externally-meaningful identifiers as its own internal individual account numbers. For example, to prevent identity theft, East72 Capital Management and Advisors LLP. customer account numbers must never be equivalent to driver's license numbers, or any other identifier that might be used in an unauthorized.

## Responsibilities

Employees of East72 Capital Management and Advisors LLP.

1. It is every employee's responsibility to comply with central, state and local laws and regulations, and East72 Capital Management and Advisors LLP. Policies that apply to his or her job. It is also every employee's responsibility to report concerns to his or her supervisor or to the Compliance department if illegal or unethical behavior is suspected.
2. While handling data, the employee must comply with the privacy policy to ensure the confidentiality and integrity of the data.

**Compliance**

Failure to comply with this or any other security policy will result in disciplinary actions as per the Sanction Policy / Punitive Actions Procedure. Legal actions also may be taken for violations of applicable regulations & contractual terms.

**Contact**

Vatsal Gupta

Designated Officer

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**Non-disclosure**

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