

## **PRIVACY NOTICE**

Updated: September 2019

### **Purpose of this notice**

This privacy notice provides information regarding our processing of personal data.

If you are a natural person, this will affect you directly. If you are a corporate entity (including, for these purposes, a legal arrangement such as a limited partnership or trust) that provides personal data on natural persons connected to you for any reason in relation to your structure held with us, this will be relevant for those persons and you should transmit this privacy notice to them.

In this privacy notice, the terms “**we**”, “**us**” and “**our**” refers to ICG Management Limited, its affiliates and/or its delegates, unless the context otherwise requires.

### **Your Personal Data**

By virtue of using our services and your associated interactions with us, you will provide us with certain information (“**Personal Data**”) that constitutes “personal data” under the Data Protection Law, 2017 of the Cayman Islands (the “**DPL**”). We may also obtain Personal Data from public sources. Personal Data may include, without limitation, the following information relating to you and/or any natural persons connected with you: name, residential address, email address, corporate contact information, other contact information, date of birth, place of birth, passport or other national identifier details, national insurance or social security number, tax identification, bank account details and information regarding assets, income, employment, source of funds.

### **Why we process your Personal Data**

We process your Personal Data for the purposes of:

- performing our contractual rights and obligations;
- complying with our legal or regulatory obligations (including those relating to anti-money laundering and counter-terrorist financing, preventing and detecting fraud, sanctions, automatic exchange of tax information, requests from governmental, regulatory, tax and law enforcement authorities, beneficial ownership and maintaining statutory registers); and
- our legitimate interests or those of a third party, to send you updates, information and notices or otherwise correspond with you, to review, assess and process your requests or applications, to address or investigate any complaints, claims, proceedings or disputes, to seek professional advice, including legal advice, to meet our regulatory, accounting, tax reporting and audit obligations, to manage risk and operations, to maintain our internal records, to act in accordance with our policies and procedures, to protect our business against fraud, breach of confidence and theft of proprietary materials and to protect the security and integrity of our IT systems) where we consider that, on balance, our (or their) legitimate interests are not overridden by your interests, fundamental rights or freedoms.

(Should we wish to process your Personal Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.)

### **Whom we transfer your Personal Data to**

In certain circumstances, we may be required by law or regulation to transfer your Personal Data and other information to governmental, regulatory, tax and law enforcement authorities. They may, in turn, exchange this information with other governmental, regulatory, tax and law enforcement authorities (including in jurisdictions other than the Cayman Islands).

## **Transfer of your Personal Data outside the Cayman Islands**

Your Personal Data may be transferred to jurisdictions that do not have data protection laws equivalent to the DPL. This may be necessary under an agreement with a third party that is in your interests or in connection with international cooperation arrangements between governmental, regulatory, tax and law enforcement authorities.

## **How we safeguard your Personal Data**

We have implemented appropriate technical and organisational measures against unauthorised or unlawful processing of your Personal Data and against accidental loss or destruction of, or damage to your Personal Data, consistent with the DPL.

## **How long we retain your Personal Data**

We will retain your Personal Data for as long as we require it to perform our contractual rights and obligations or for our legitimate interests or for such longer period as required by our legal or regulatory obligations. We will also retain certain of your Personal Data after you cease to be a client. As a general principle, we do not retain your Personal Data for longer than we need it.

## **Your rights**

Under the DPL, you have certain data protection rights, including the right to request access to 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 certain circumstances and the right to complain to the Cayman Islands Ombudsman, who may be contacted by email ([info@ombudsman.ky](mailto:info@ombudsman.ky)), telephone (+1 345 946 6283) or post (PO Box 2252, Grand Cayman KY1-1107, Cayman Islands).

## **Automated decision-making**

We will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your Personal Data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the requirements of the DPL (and other applicable laws).

## **Questions or concerns**

If you have any questions or concerns about the contents of this privacy notice or our processing of your Personal Data, please contact Ralph Woodford by email at [ralph.woodford@icg.ky](mailto:ralph.woodford@icg.ky), or by post at PO Box 715, Grand Cayman, Cayman Islands, KY1-1107.