

Privacy Notice

FountainCap Research & Investment (Hong Kong) Co., Limited (the “Manager”), the funds or investment vehicles advised or managed by the Manager and its or their affiliates and/or delegates (together, for the purposes of this Privacy Notice, “FountainCap”, “we”, “us” or “our”) value our investors (“you”), and maintaining the trust and confidence of our investors is our highest priority.

FountainCap is dedicated to protecting the privacy and confidentiality of its investors’ personal information. This Privacy Notice sets forth the privacy practices of FountainCap with respect to its investors’ personal information provided to us as a consequence of and in connection with an investor’s investment with us.

Where your personal information is provided to FountainCap as a consequence of your investment with us and where you are an individual investor in the EEA, Switzerland or the United Kingdom, the Manager and its affiliates, acting as the data controllers may themselves (or through a third party acting in its capacity as the administrator of the funds advised or managed by us (the “Administrator”)) process your personal information. The Administrator acts as a data processor of your personal information in connection with the performance of its obligations as Administrator of your investment with us.

Personal Information FountainCap collects about its investors

The personal information FountainCap collects about you comes from:

- information you supply to FountainCap in making an investment with us and your associated interactions with us or the Administrator including any subscription (whether past, present or future) and account opening applications (whether written or electronic), or in other forms you may provide to FountainCap. This information may include your name, residential address, email address, telephone number, corporate contact information, signature, nationality, place of birth, social security number or tax identification number, birth date, correspondence records, passport number, and financial information about you, such as your bank account details, credit history, source of funds and source of wealth details, assets, income, and details relating to your investment experience and activity;
- transactions with FountainCap including account balances, investments and trading history at FountainCap, distributions, payments, withdrawals or your use of the various services and products that FountainCap provides;
- third-party sources, such as credit reporting agencies and public or commercial databases or data sources, such as news outlets, websites and other media sources and international sanctions lists;
- information that is collected as you use our website, including registration / login information and information captured via the use of cookies and
- information disclosed during any telephone calls and other electronic communications with FountainCap which may be monitored and/or recorded.

How FountainCap uses personal information about its investors

We will use your personal information for the following purposes:

Categories of Investor Data	Purpose	Legal Basis
Contact information, identification information, financial information, transaction and investment history	Managing and administering your investment with us, including assessing and processing applications and redemptions, servicing accounts, processing transactions, maintaining investor accounts and communicating with you about your investments and account related activities on an ongoing basis	This use of your personal information is necessary for the performance of your contract with us (Article 6(1)(b) of the GDPR)
Contact information	Managing and maintaining our relationships with you and for ongoing investor service	This use of your personal information is necessary for the performance of your contract with us (Article 6(1)(b) of the GDPR)
Contact information, identification information, financial information, transaction and investment history and as necessary to fulfil purpose	To enforce or defend our rights, ourselves or through third parties to whom we delegate such responsibilities	This use of your personal information is necessary for the performance of your contract with us (Article 6(1)(b) of the GDPR)
Contact information, identification information, financial information, transaction and investment history and as necessary to fulfil purpose	Investigating and resolving complaints and managing contentious regulatory matters, investigations and litigation	This use of your personal information is necessary in order for us to comply with our legal or regulatory obligations (Article 6(1)(c) of the GDPR)
Contact information, identification information, financial information, transaction and investment history and as necessary to fulfil purpose	Monitoring electronic communications for investigation and fraud prevention purposes, crime detection, prevention and investigation	This use of your personal information is necessary in order for us to comply with our legal or regulatory obligations (Article 6(1)(c) of the GDPR)
Contact information, identification information, financial information, transaction and investment history and as necessary to fulfil purpose	To share information with police, law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation, including screening transactions, reporting suspicious activity and complying with production and court orders	This use of your personal information is necessary in order for us to comply with our legal or regulatory obligations (Article 6(1)(c) of the GDPR)
Contact information, identification information, financial information, transaction and	To comply with any of our applicable legal, tax or regulatory obligations, which derive from AML and counter-terrorism legislation	This use of your personal information is necessary in order for us to comply with our legal or

investment history and as necessary to fulfil purpose		regulatory obligations (Article 6(1)(c) of the GDPR)
Contact information, identification information, financial information, transaction and investment history and as necessary to fulfil purpose	To report tax related information to tax authorities	This use of your personal information is necessary in order for us to comply with our legal or regulatory obligations (Article 6(1)(c) of the GDPR)
Contact information, identification information, financial information, transaction and investment history	<p>The day to day running and management of the FountainCap business, including to:</p> <ul style="list-style-type: none"> ▪ monitor, maintain and improve the processes, information and data, technology and communications solutions and services used by FountainCap; ▪ perform general, financial and regulatory accounting and reporting; ▪ monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of FountainCap, and to improve service delivery; ▪ protect our legal rights and interests including screening transactions for fraud prevention and anti-money laundering purposes; and ▪ share such personal information with third parties that acquire or are interested in acquiring all or part of our assets or shares, or that succeeds us in carrying on our business. 	This use of your personal information is necessary for our legitimate interests in managing our business including for legal, personnel, administrative and management purposes and for the prevention and detection of crime provided our interests are not overridden by your interests. (Article 6(1)(f) of the GDPR)
Contact information	To contact you to tell you about products and services offered by us which we believe may interest you unless you advise us that you do not wish to receive marketing or market research communications from us	If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent. If you wish to stop receiving marketing or market

		<p>research communications from us, you can unsubscribe via the link at the bottom of the relevant marketing email or contact us using the contact details below. (Article 6(1)(a) of the GDPR)</p>
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FountainCap will not sell personal information regarding its current or former investors.

Please note that where you are an individual investor in the EEA, Switzerland or the United Kingdom you have a right to object to the processing of your personal information where that processing is carried out for our legitimate interests or for direct marketing.

Consequences of not providing your personal information

Where we require your personal information to comply with AML or other legal or contractual requirements, failure to provide this information means we may not be able to accept your investment and/or may be unable to process, or release your investment with us. This may result in us terminating our relationship with you. We will tell you when we ask for your personal information whether it is a statutory or contractual requirement to give us the personal information and the consequences of not providing such personal information.

Sharing your personal information

FountainCap may share personal information about its current and former investors;

- with its affiliates to assist with the management, operation, administration, governance and regulatory compliance of your investments;
- with third party service providers, engaged in connection with the oversight, safekeeping, administration, distribution or operation of your investment account and our business, in order to process the data for the above mentioned purposes (e.g., transfer agents, cloud service providers, credit reporting agencies, custodians, depositories, distributors, and broker-dealers) external counsel, auditors, and other independent professionals as necessary to effect and administer your investment with us and enforce our rights and obligations. In such case, your personal information will remain subject to the confidentiality protections set forth herein;
- to courts, governmental and non-governmental agencies, regulators and ombudsmen as necessary and permissible under applicable laws;
- as necessary in order to investigate, prevent, or take action regarding inappropriate or illegal activities, fraud, or situations involving potential threats to the safety of any person or property; (in connection with) its effort to establish, protect or exercise its legal rights or otherwise in connection with legal proceedings or in compliance with applicable laws;
- any third party that acquires, or is interested in acquiring, all or part of our assets or shares, or that succeeds us in carrying on all or part of our business; and
- in order to cooperate with legal or regulatory authorities or pursuant to a court order, subpoena, or similar legal process or government request.

Transfer of personal information outside of the EEA, Switzerland and the United Kingdom

We are located in Hong Kong and the Cayman Islands and therefore your personal information will be transferred to Hong Kong and the Cayman Islands and may be transferred to the aforementioned recipients in other jurisdictions, including, *inter alia*, the United States, Singapore and other jurisdictions which the EEA, Switzerland and/or the United Kingdom may not deem to have “adequate” data privacy laws equivalent to those in the EEA, Switzerland and/or the United Kingdom. Where we conduct such transfers, they will be made in accordance with applicable data protection laws. If the country in question does not provide an adequate level of data protection, we ensure, unless otherwise specified, that your data is adequately protected by these companies by means of appropriate safeguards. These safeguards may be provided for by standard contractual clauses. Investors can request a copy of the appropriate safeguards for international data transfers.

Security

FountainCap is committed to the protection of your personal information and of your privacy.

We apply appropriate technical and organizational information security measures designed to protect against unauthorized or unlawful processing of investor personal information, and against accidental loss or destruction of, or damage to, investor personal information.

Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while FountainCap strives to protect your personal information, FountainCap cannot guarantee its security.

Your data subject rights

Where you are an individual investor in the EEA or the United Kingdom or Switzerland or an institutional investor to whom the Swiss Federal Act on Data Protection applies, you have a right to: (i) request access to the personal information we process about you at any time; (ii) ask for a copy of your personal information to be provided to a third party (in the context of the GDPR, in a machine-readable form) or receive from us the personal data you have provided to us in a readable format; (iii) erase or restrict records where they are no longer required. In individual cases, particularly in the case of statutory retention obligations, the right to erasure may be excluded. In this case, the erasure may be replaced by a blocking of the data if the requirements are met; (iv) request the correction of any error in relation to your personal information. In this case, we will also inform the recipients of the data concerned about the adaptations we have made, unless this is impossible or involves disproportionate effort; or (v) object or withdraw consent to the processing of your personal information. You also have a right to ask not to be subject to automated decision making if the decision produces legal or significant effects on you.

You may exercise any of the above rights or obtain further information about the use of your personal information by contacting FountainCap in accordance with the contact details provided below.

In addition, you also have the right to lodge a complaint about the processing of your personal information with your local data protection authority.

Changes to Privacy Notice

If this Privacy Notice changes, FountainCap will communicate material changes through the provision of a prominent notice on the FountainCap website or by other appropriate means.

Retention Period

We will retain your personal information for a minimum period of 7 years from the date on which you redeem all of your investment with us or for as long as required for us to perform the services, our contractual obligations or comply with applicable legal/regulatory obligations. The data will be deleted as soon as there is no longer any legal obligation to retain it and no legitimate interest in its retention exists.

Contact

If you have any questions about our use of your personal information, or if you would like to exercise your rights as described above, please contact our Chief Compliance Officer at the address below or email compliance@fountaincapri.com:

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