

## **Privacy Notice**

### **Introduction**

The purpose of this notice is to provide you with information on our use of your personal data in accordance with the Data Protection Act (As Revised) of the Cayman Islands (the "DPA").

In this document, "we", "us" and "our" refers to FountainCap Research & Investment (Hong Kong) Co., Limited (the "Manager") and the funds advised or managed by the Manager and its or their affiliates and/or delegates.

### **Personal Data**

By virtue of making an investment with us and your associated interactions with us (including any subscription (whether past, present or future), including the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the DPA ("**Personal Data**"). We may also obtain Personal Data from other public sources. Personal Data includes, without limitation, the following information relating to you and/or any individuals connected with you as an investor: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

In our use of Personal Data, we will be characterised as a "data controller" for the purposes of the DPA. Our affiliates and delegates may act as "data processors" for the purposes of the DPA.

### **Who this Affects**

If you are a natural person, this will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Personal Data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

### **How We May Use Your Personal Data**

We, as the data controller, may collect, store and use Personal Data for lawful purposes, including, in particular:

- (i) where this is necessary for the performance of our rights and obligations under the relevant investment management/advisory agreement, subscription agreement and/or the constitutional and operational documents;
- (ii) where this is necessary for compliance with a legal and regulatory obligation to which we are subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- (iii) where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

Additionally, the administrator of the funds advised or managed by us (the “Administrator”) may use Personal Data, for example to provide its services to such funds or to discharge the legal or regulatory requirements that apply directly to it or in respect of which we relies upon the Administrator, but such use of Personal Data by the Administrator will always be compatible with at least one of the aforementioned purposes for which we process Personal Data.

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

## **Why We May Transfer Your Personal Data**

In certain circumstances we and/or our authorised affiliates or delegates may be legally obliged to share Personal Data and other information with respect to your investment with us with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Personal Data to parties who provide services to us and their respective affiliates (which may include certain entities located outside the Cayman Islands or the European Economic Area). Such parties include the following, who may either process personal data on our behalf or for their own lawful purposes in connection with services provided to us.

- (i) the Administrator; and
- (ii) agents and/or delegates appointed by us and our affiliates to assist our management, operation, administration, governance and regulatory compliance.

We may also need to provide Personal Data to investment funds into which we invest for purposes of their compliance with legal and regulatory obligations (such as compliance with anti-money laundering and FATCA/CRS requirements).

## **The Data Protection Measures We Take**

Any transfer of Personal Data by us or our duly authorised affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPA.

We and our duly authorised affiliates and/or delegates shall apply appropriate technical and organisational information security measures designed to protect against unauthorised or unlawful processing of Personal Data, and against accidental loss or destruction of, or damage to, Personal Data.

We shall notify you of any Personal Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant Personal Data relates.

## **Getting In Touch**

Should you have any queries or wish to discuss your data protection rights with us, please contact us at [compliance@fountaincapri.com](mailto:compliance@fountaincapri.com).