

# Privacy Notice

Credit Suisse Insurance Linked Strategies Ltd (hereinafter, “CSILS”, “we” or “us”) has issued its own Privacy Notice (the “Notice”) pursuant to the applicable Data Protection Laws (as defined hereinafter).

## Duties of disclosure upon collection of personal data in accordance with the Data Protection Laws.

Data privacy is important – please read this document.

With the following information, we would like to give you an overview of how we will process your Personal Data (as defined below) and of your rights according to the Data Protection Laws.

- a. “**Personal Data**” shall mean any information relating to an identified or identifiable natural person or legal entity, as well as any beneficial owners, authorized representatives, authorized signatories or other contact persons designated by such legal entity.
- b. “**Data Subject**” or “**you**” shall mean any clients, investors, employees or third parties, whose Data are processed by CSILS for business purposes.
- c. “**Data Protection Laws**” means any law and / or regulation (including guidance and codes of practice issued by authorized data protection regulators) in the UK and / or EU which is applicable to the processing of your Personal Data by us, and which shall include, but is not limited to (i) the Swiss Act on Data Protection, (ii) the EU General Data Protection Regulation (2016 / 679) (“**GDPR**”), all relevant EU member states’ national legislation amending and / or supplementing the GDPR, (iii) the Data Protection Law 2017 of the Cayman Islands, and (iv) the Data Protection (Bailiwick of Guernsey) Law, 2017.
- d. “**ILS Funds**” means each of and all the funds for which CSILS is appointed as investment or portfolio manager, as the case may be.
- e. “**processing**” shall mean collection, recording, organization, structuring, storage, alteration, adaptation, retrieval, consultation, use, disclosure by transaction, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 1. Who is responsible for Personal Data processing?

In our role of investment manager / portfolio manager for the ILS Funds, we act as independent controller (as defined in the GDPR) and in our capacity, we are responsible for your Personal Data. Please note that what type of Personal Data and how Personal Data are processed may vary depending on the specific business purpose for which such Personal Data are processed by CSILS.

The following legal entity is responsible for Personal Data processing:

**Credit Suisse Insurance Linked Strategies Ltd**

Europaallee 1, 8004 Zurich, Switzerland

Our contact details are as follows:

Mail address: Credit Suisse Insurance Linked Strategies Ltd, Europaallee 1, 8070 Zurich

E-mail address: [list.csilsdataprotection@credit-suisse.com](mailto:list.csilsdataprotection@credit-suisse.com)

## 2. What sources and Personal Data do we use?

**a. Personal Data from you:**

We process Personal Data obtained directly from Data Subjects in the context of our business relationship with them.

**b. Personal Data from other sources:**

We may also process Personal Data – insofar as necessary to provide our services – that we obtain from publicly accessible sources (e.g. public databases or registers, governmental and competent regulatory authorities, press and internet), or that are legitimately transferred to us by other Credit Suisse Group companies or other third parties (e.g. ILS Funds and their service providers).

**c. Types of Personal Data:**

Depending on the circumstances, Personal Data processed by CSILS or by any recipient as defined in section 4 below may include:

- Basic personal data (such as your name, email address, phone number, place of domicile / residence, place and date of birth, nationality, gender, marital status);
- Identification data (such as identification documents and tax identification number);
- Certification data (such as specimen signature);
- Professional data (such as job title, former / current employer, resume); and
- Other data (such as bank account related information).

Please note that CSILS does not process any biometric data. However, CSILS may process other sensitive data provided by third parties in the performance of its contractual relationships.

## 3. What do we process your Personal Data for (purpose of processing) and on what legal basis?

CSILS may process Personal Data only for a legitimate business purpose and your Personal Data shall not be further processed in a manner incompatible with this purpose. CSILS may process Personal Data for the following purposes:

**a. For fulfillment of contractual obligations**

Personal Data is processed in order that we may provide the services for which we are engaged or to carry out pre-contractual measures necessary under the applicable regulations. Examples:

- Performing or facilitating any communication to the investors in relation to investments in the ILS Funds;
- Facilitating the administration of your holdings in the ILS Funds, including the processing of subscription, redemption, conversion, transfer requests, payment of distribution proceeds, redemption proceeds and alike; or
- Facilitating the performance of accounting services for the ILS Funds, including the calculation of distribution and redemption proceeds.

#### **b. In the context of balancing (legitimate) interests**

We may process your Personal Data beyond the scope of our strict engagement for the purposes of the legitimate interests pursued by us or a third party. Examples:

- Asserting legal claims and defense in legal disputes or any precedent stages thereof;
- Maintaining IT security and IT operations for CSILS or the ILS Funds;
- Preventing or investigating a crime;
- Assessment or implementation of measures for risk control purposes;
- Developing services or products and business management in general; or
- Pursuing our legitimate interests or those of a third-party to which we may transfer your Personal Data, provided that we consider that our legitimate interests are not overridden by your interests, fundamental rights or freedoms.

#### **c. As a result of your consent**

As long as you have granted us consent to process your Personal Data for certain purposes, then such processing is permissible under the law on the basis of your consent. Please note your consent can be withdrawn at any time.

Withdrawal of consent does not affect the legality of Personal Data processed prior to withdrawal.

#### **d. Due to statutory provisions or in the public interest**

Furthermore, as an asset manager, CSILS is subject to various legal obligations, meaning statutory requirements (e.g. money laundering regulations). The purpose of processing may include for example:

- Complying with any applicable tax requirements and reporting duties to the relevant tax authorities and to the ILS Funds or their representatives or delegates / agents;
- Complying with legal obligations under the applicable laws;
- Providing relevant information and reporting to the relevant supervisory authorities; or
- Performing or overseeing the performance of anti-money laundering checks and related actions which are considered appropriate in order to meet any legal obligations or to pursue our legitimate interests in preventing fraud, money laundering and other financial crimes in accordance with CSILS', the ILS Funds' and their service providers' anti-money laundering procedures.

## **4. Who receives my Personal Data?**

The following paragraphs set out details of the recipients or categories of recipients to which we transfer your Personal Data.

#### **a. The Credit Suisse group**

Within CSILS, access to your Personal Data may be given to employees that from time to time require your Personal Data to fulfill CSILS' contractual and legal obligations, subject to compliance with any Data Protection Laws and based on a "need-to-know" principle.

Besides, your Personal Data may be shared with other legal entities being part of Credit Suisse group, if required to fulfil contractual or legal obligations or in connection with any services offered by those legal entities or for risk control under any statutory or regulatory obligations.

#### **b. External recipients of Personal Data**

Finally, we may transfer your Personal Data to service providers and agents appointed by us or by the ILS Funds for the purposes given, subject at all times to such third parties being under a duty themselves to preserve the confidentiality and integrity of your Personal Data. These recipients may further disclose your Personal Data to their own affiliates and service providers in order to process the Personal Data for the above-mentioned purposes.

## 5. Will Personal Data be transferred to a third country or an international organization?

Due to the international nature of our business, your Personal Data may be processed in Switzerland, the Cayman Islands, Guernsey and other countries outside the EEA ("**Third Countries**").

You should be aware that the data protection legislation in such Third Countries may not provide exactly the same equivalent protection as GDPR. We will process Personal Data (or procure that it be processed) in Third Countries in accordance with the requirements of the relevant Data Protection Laws, which may include having appropriate contractual undertakings in legal agreements with service providers who process Personal Data in such Third Countries.

## 6. For how long will my Personal Data be stored?

In general, your Personal Data are retained by us for as long as necessary to carry out the purpose for which your Personal Data were initially processed and in order to meet regulatory requirements, whichever is longer.

Depending on the circumstances, your Personal Data will be subject to a retention period of 10 years from the termination of the relationship with the ILS Funds or us. Please however note that in certain case, such as pending / reasonably foreseeable investigations, litigations or alike circumstances, special retention rules may apply and as a result your Personal Data being retained for a longer period.

To find out more about the specific retention period applicable to your Personal Data, you can reach out to us (see contact details in section 1 above).

## 7. What Personal Data privacy rights do I have?

In relation to your Personal Data, and to the extent permitted under the Data Protection Laws you have the right:

- To request access to your Personal Data;
- To request the rectification of inaccurate or incomplete Personal Data;
- To request deletion of your Personal Data;
- To request the restriction of the processing of your Personal Data; and
- To Personal Data portability.

In addition to the above rights, you have the right to object at any time to:

- The processing of your Personal Data for direct marketing purposes, and profiling to the extent related to direct marketing; and
- The processing of your Personal Data for the reasons set out in section 2.a of this Notice (including profiling for these purposes), to the extent permitted under the Data Protection Laws.

To exercise any of the above rights, or request withdrawal of your previous consent you do not need to use a particular form but you should email, or write to our Data Protection Office. We will then assess and respond to your request to exercise your rights.

Please also contact us if you have any other questions or concerns such as relating to the way that CSILS collects and uses your personal information, you do not want us to contact you, or you wish to make a complaint in relation to the use of your Personal Data.

If applicable, you also have a right to make a complaint to the competent supervisory authority.

## 8. Am I obliged to provide Personal Data?

Within the scope of your business relationship with CSILS or the ILS Funds, you must provide Personal Data that are necessary for the preparation and maintenance of the relevant business relationship. Failure to do so shall result in the incapability for us to establish or to maintain the business relationship.

## 9. Automated decision process and profiling

In establishing and carrying out a business relationship, we generally do not use any automated decision-making and profiling.

We may process some of your Personal Data for the purposes of profiling in case of legal and regulatory requirements that imposes us certain duties (e.g. duty to combat money laundering, terrorism financing and fraud, duty to assess risk and offences that pose a danger to assets).

## 10. Notice revision

This Notice is dated 1 July 2020 and may be subject to revisions at any time without prior notice. As soon as released, the latest version shall be rendered available to you on the Credit Suisse website.