

Duties of Disclosure in Connection with the Collection of Personal Data from the Data Subject in Accordance with the EU General Data Protection Regulation (GDPR).

Data privacy is important – please read the statement below and sign at the end to confirm your consent.

Credit Suisse Trust Group (Credit Suisse Trust AG, Switzerland, Credit Suisse Trust Holdings Ltd., Guernsey, and their subsidiaries, hereinafter jointly referred to as “CSTG”) has issued the Privacy Statement below in light of the GDPR, the new data protection and privacy regulation of the European Union (EU). As the GDPR is an EU regulation, it may not be applicable to all business relationships with trustees of CSTG (hereinafter referred to as the “Relationship”).

CSTG therefore kindly asks you to familiarize yourself with the data protection information provided below.

Data Protection Information

The following data protection information gives an overview of the collection and processing of your data, as well as of your data privacy rights.

Through the following information, CSTG would like to give you an overview of how CSTG will process your data and of your rights under data privacy laws. The details on what data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

1. Who Is Responsible For Data Processing and How Can I Contact Them?

The legal entities responsible, as the case may be, are the following:

CREDIT SUISSE TRUST LIMITED, BAHAMAS
P.O. Box N3023
Bahamas Financial Centre
Shirley & Charlotte Streets,
Nassau
Bahamas

CREDIT SUISSE TRUST LIMITED, GUERNSEY
P.O. Box 122
Helvetia Court
South Esplanade
St. Peter Port
Guernsey GY1 4EE
Channel Islands

CREDIT SUISSE TRUST AKTIENGESELLSCHAFT, LIECHTENSTEIN
Pradafant 21
Postfach 1215
FL-9490 Vaduz
Principality of Liechtenstein

CREDIT SUISSE TRUST LIMITED, SINGAPORE
One Raffles Link, # 05-02, South Lobby
039393 Singapore
Singapore

CREDIT SUISSE TRUST AG, SWITZERLAND
Bleicherweg 33,
Postfach
8070 Zurich
Switzerland

2. What Sources and Data Does CSTG Use?

CSTG keeps a record of the following:

- (i) The details of the Structure-Relevant Parties, including, but not limited to the Prospect, (Economic) Settlor, Founder, Beneficiaries, Contracting Partner, Protector/Enforcer, Holder of a "Power of Attorney," Third Party Directors, External Asset Manager or Investment Managers, other non-CS introducers of intermediaries, (hereinafter referred to separately/jointly as the "Structure-Relevant Party/ies") and of the trust, foundation, company or other structure administered by CSTG (hereinafter referred to as the "Structure")
- (ii) Any other information provided in relation to the Structure, which may include, but is not limited to, personal data as such term is defined under applicable law, the information contained in this Form and financial information (collectively, the "Data")

3. Why Does CSTG Process Your Data (Purpose of Processing) and on What Legal Basis?

- I. CSTG processes personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) or any other applicable laws and regulations for the following purposes (collectively, the "Purposes"):
 - (i) To enable CSTG to provide the services required by the Structure-Relevant Parties and for administrative purposes
 - (ii) To comply with CSTG's know your client/anti-money laundering and risk management policies, including risk management of CSG (as defined below)
 - (iii) For CSTG's management and business development purposes, including the centralized collation of Data and the production of reports to be used as tools for decision making by CSTG's management and for CSTG's lawful marketing activities
 - (iv) To comply with all applicable legal and regulatory obligations (including, but not limited to FATCA) and CSTG internal policies, as these may be implemented from time to time in observance of legal and regulatory obligations
 - (v) For the purposes of investigations (including, but not limited to internal and external investigations, internal and external audits) and facilitating and providing centralized automatic exchange of information (AEI) and common reporting standard (CRS) to the tax authorities of the jurisdiction(s) listed above

As subsidiaries of Credit Suisse Group Ltd. (hereinafter referred to as "CSG"), CSTG is part of the risk management framework of CSG, which is based on transparency as well as management accountability and oversight. It is also part of CSG's framework of standards and policies consisting of, among other things, the Organizational Guidelines and Regulations and Global Code of Conduct. In this context, the Purposes include identity and age checks, fraud and money laundering prevention, fulfilling control and reporting obligations under financial regulation, and measuring and managing risks within CSG.

II. CSTG processes your personal data on the basis of:

- a. the necessity to perform obligations arising from the Relationship or upon request prior to the creation of the Relationship;

Data is processed in order to provide services in accordance with the terms of the Relationship between CSTG and the Structure-Relevant Parties or to carry out measures that occur as part of a request from an interested party. Such services include, without limitation, the setting up of a trust/foundation/company or any other Structure, and managing and administering such Structure. Please also refer to the Purposes defined in Section 3.1. above.

- b. the necessity to protect the vital interests of the data subject or another natural person;

Where required, we process your Data beyond the actual fulfillment of obligations arising from the Relationship for the purposes of the legitimate interests pursued by us or a third party. Examples:

- Consultation with external tax or legal advisers
- Reviewing and optimizing procedures for needs assessment for the purpose of discussion with SRPs
- Marketing or market and opinion research, unless you have objected to the use of your Data
- Obtaining personal data from publicly available sources for acquisition purposes
- Measures for business management and further development of services and products
- Risk control in CSTG
- Asserting legal claims and a defense in legal disputes
- Guaranteeing Credit Suisse Group's IT security and IT operations
- Prevention and investigation of crimes; and
- Video surveillance and measures to protect the rights of an owner of premises to keep out trespassers and to provide site security (e.g. access controls)

- c. the necessity to comply with a legal obligation of CSTG;

CSTG is obligated to comply with various statutory requirements (e.g. Anti-Money Laundering Regulations, the Financial Services and Markets Act 2000, MiFID and any tax laws).

- d. the necessity to perform a task in the public interest or in the exercise of official authority vested in CSTG;

- e. the necessity for the purposes of legitimate interests pursued by the data controller or by a third party;

- d. consent.

4. Who Receives My Data and Confidentiality Requirements

The Data may be generated, received, stored and processed (in electronic and/or hard copy format) centrally by CSTG or one or more dedicated members and affiliates of Credit Suisse Group AG, Switzerland (hereinafter referred to as "CSG"). Please refer to Section 5(iii) below regarding outsourcing to entities outside of CSG.

For the Purposes above:

- ① Data may be accessed by and transferred to CSTG or any member or affiliate of CSG which renders any service or facilitates communication with regard to the services provided by CSTG in relation to the Structure in connection with the Purposes;
- ② the Data may be generated, received, stored, transferred to and processed on servers which may be located outside the country in which the trust(s) or other Structure(s) is/are administered by CSTG, including in countries that do not have regulations, confidentiality and data protection laws comparable to the data protection laws of the country in which the trust(s) or other Structure(s) is/are administered and in particular countries that do not have laws protecting personal data as implemented in Switzerland or the member states of the European Economic Area (EEA).

For the avoidance of doubt, CSTG is entitled, but not obliged, to outsource any of its duties, functions, or business activities, in particular any outsourcing in connection with FATCA (Purpose 3(iv) above and AEI/CRS (Purpose (v) above), to CSTG or any members and affiliates of CSG.

5. Will Data Be Transferred to a Third Country or an International Organization?

In connection with any of the Purposes, CSTG is entitled, but not obliged, to disclose and to transfer the Data:

- ① to any banking or other institution with whom CSTG conducts business in connection with the Structure; or
- ② to accountants, auditors, legal and other advisors, directors or agents who render any service in connection with the services to be provided by CSTG in relation to the entities of the Structure; or
- ③ to entities to which CSTG has outsourced any part of its business activities and who may receive and process such Data on behalf of CSTG as a result; or
- ④ to CSG for Purpose 3(ii) above (i.e. group risk management).

In relation to the foregoing, CSTG may transfer the Data to recipients in countries that do not have regulations, confidentiality and data protection laws comparable to the data protection laws of the country in which the trust(s) or other Structure(s) is/are administered by CSTG and in particular countries that do not have laws protecting personal data as implemented in Switzerland or the member states of the European Economic Area (EEA).

Where required by mandatory law or regulations or by order of a court of competent jurisdiction, CSTG is also entitled to transfer the Data to any court, regulatory authority or police agency.

6. For How Long Will My Data Be Stored?

CSTG will process and store your personal data for as long as it is necessary in order to fulfill CSTG's legal obligations, contractual or otherwise. It is to be noted that, by nature of the services CSTG provides, CSTG's business relationships are long term, often spanning decades, during which it is necessary to store your Data.

CSTG will assess and respond to requests to delete Data. CSTG will delete Data provided that the Data is no longer required in order to fulfill legal obligations, contractual or otherwise, or for the fulfillment of any obligation to preserve records pursuant to commercial and tax law.

CSTG will retain your records for a minimum of ten years to comply with legal requirements, contractual, regulatory or otherwise. Longer retention periods may apply, e.g. in the case of legal hold requirements, which oblige CSTG to keep records for an undefined period of time.

7. What Data Privacy Rights Do I Have?

In the event that the GDPR applies, the data subject has, in relation to their personal data:

- the right of **access** in accordance with Article 15 of the GDPR;
- the right to **rectification** in accordance with Article 16 of the GDPR;
- the right to **erasure** in accordance with Article 17 of the GDPR;
- the right to **restrict processing** in accordance with Article 18 of the GDPR;
- the right to **object** in accordance with Article 21 of the GDPR; and
- the right to **data portability** in accordance with Article 20 of the GDPR.

If applicable to you, you also have the right to make a complaint to the Information Commissioner.

The GDPR does not apply to everybody. Other data privacy rights may apply to your business relationship with CSTG, as the case may be.

You can withdraw consent granted to CSTG for the processing of your personal data at any time. This also applies to withdrawing consent that was made to CSTG before May 25, 2018, when the GDPR came into force.

Please note that the withdrawal of consent only applies to the future processing of your personal data and does not have retrospective effect. Processing that was carried out before consent was withdrawn remains unaffected by it.

8. Am I Obligated to Provide Data?

In the context of the business relationship with CSTG, you must provide all personal data that CSTG requires to accept a relationship and carry out and fulfill the accompanying legal obligations, contractual or otherwise, and you must provide all personal data that CSTG is legally obliged to collect. Without this data, CSTG is, in principle, not in a position to enter into a business relationship.

In particular, anti-money laundering regulations require CSTG to identify you on the basis of your identification documents before establishing a business relationship and to collect and put on record your name, place and date of birth, nationality, address and identification details for this purpose. In order for CSTG to be able to comply with these statutory obligations, you must provide CSTG with the necessary information and documents in accordance with the applicable anti-money laundering regulations, and you must immediately notify CSTG of any changes over the course of the relationship. If you do not provide CSTG with the necessary information and documents, CSTG cannot enter into or continue the business relationship with you.

9. To What Extent Is There Automated Decision-Making?

In establishing and conducting a business relationship, CSTG generally does not use any fully automated decision-making pursuant to Article 22 of the GDPR. If CSTG uses this procedure in individual cases, CSTG will inform you of this separately, provided this is a legal requirement.

10. Will Profiling Take Place?

CSTG processes some of your Data automatically, with the goal of assessing certain personal aspects (profiling). For example CSTG uses profiling in the following ways:

- Due to legal and regulatory requirements, CSTG is required to combat money laundering, terrorism financing, and fraud, as well as to assess risk and offenses that pose a danger to assets. Data assessments (including of payment transactions) are also carried out for this purpose. At the same time, these measures also serve to protect you

11. CSTG May Collect Biometric Data from You

Biometric data is classified as sensitive personal data under the GDPR. Therefore your explicit consent will be required in a separate process to use your Touch ID or other biometric identification to access certain applications.

Information on Your Right to Object as a Data Subject in Accordance with Article 21 of the General Data Protection Regulation (GDPR)

I. Right to Object to Data Processing for Direct Marketing Purposes

In individual cases, CSTG processes your personal data in order to conduct direct marketing. You have the right to object to the processing of your personal data for the purpose of this type of marketing at any time. This also applies to profiling, insofar as it is in direct connection with such direct marketing.

If you object to processing for the purpose of direct marketing, CSTG will no longer process your personal data for this purpose.

II. Individual Right to Object

On grounds relating to your particular situation, you shall have the right to object to processing of your personal data at any time, in line with Article 6(1)(e) of the GDPR (data processing in the public interest) and Article 6(1)(f) of the GDPR (data processing based on balancing interests). This right to object also applies to profiling based on this provision in the sense of Article 4(4) of the GDPR.

If you submit an objection, CSTG will no longer process your personal data unless CSTG can provide evidence of mandatory, legitimate reasons for processing which outweigh your interests, rights, and freedoms, or processing serves the enforcement, exercise, or defense of interests. Please note that in such cases CSTG will not be able to provide services and maintain a business relationship.

The objection does not need to be made in a particular form. However it should be addressed to:

Credit Suisse Group Data Protection Officer
Credit Suisse AG, London Branch
Data Protection Officer
One Cabot Square London E14 4QJ Great Britain
E-mail: data.protection@credit-suisse.com