

PRIVACY NOTICE

INFORMATION ON PERSONAL DATA PROCESSING

Pursuant to the Regulation of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (general data protection regulation; “**GDPR**”), we would like to inform you that:

1. Data controller

The controller of your personal data in relation to brokerage/investment services provided to you and for the other purposes identified in point 3 below is Tourmaline Partners, LLC.

2. Categories of personal data

Tourmaline Partners, LLC may process your following categories of personal data:

identification data and contact information: forename(s), family name, surname, date and place of birth, nationality, personal identification number, personal ID card or passport number (name of document, number and series), place of residence (post code, town, street, building number, flat number, county, municipality), registered address, business telephone number, business e-mail address, business name, business address, gender, photographs, IP address, tax identification number and information on tax residence status;

financial and transactional data: e.g. bank account details, money transfers, assets, declared investor profile, credit history, origin of funds, debts and expenses;

data relating to your habits and preferences: data which relate to your interest in and use of our products and services in relation with financial and transactional data; and

data from your interactions with us: data collected through our internet website (Tourmaline does not use HTTP cookies), our social media pages, meetings, calls, chats, emails, interviews, phone conversations.

3. Purposes and legal grounds for Personal Data processing.

Your Personal Data may be processed by Tourmaline Partners, LLC for the following purposes:

to conclude a brokerage agreement or any other agreement relating to provision of brokerage services with you;

to take steps to perform the brokerage agreement or any other agreement relating to provision of brokerage services concluded with you;

to open accounts at Tourmaline Partners, LLC’s clearing broker Goldman Sachs & Co. for the sole purpose of settling trades on a DVP/RVP basis;

to record transactions arising from agreements on the provision of brokerage services and for statistical purposes;

to accept, review and respond to your complaints, if any, regarding Tourmaline Partners, LLC's, activities;

to perform the obligations imposed on the data controller by the provisions of the generally applicable law or regulation;

to perform IT management, including infrastructure management (e.g. shared platforms), business continuity and IT security;

to conduct necessary KYC as appropriate in the on-boarding process;

to establish aggregated statistics, tests and models for research and development, in order to improve the risk management of our group of companies or in order to improve existing products and services or create new ones;

to centralize your Personal Data in a database enabling representatives of Tourmaline Partners, LLC to have access to it on a strict need to know basis so as to allow us to involve the right level of expertise to deal with your requests and avoid unnecessary administrative duplications.

Your Personal Data may be processed on the basis of Article 6, items:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

We shall not process the Personal Data for other purposes which are inconsistent with the objectives described above unless the processing is required by law and/or regulation or unless Tourmaline Partners, LLC is authorized by you to process it.

4. Sharing Personal Data

Tourmaline Partners, LLC may provide Personal Data to the following third parties for the purposes specified in this document and below:

entities and authorities, to which we are obliged or authorized to provide the Personal Data in order to pursue the objectives specified above and for fulfilling the obligations imposed by law or regulation. This applies, in particular to the provision of Personal Data to the supervisory authorities, courts and authorities (e.g. tax authorities and law enforcement authorities and regulatory entities), independent external advisers (e.g. auditors) or entities providing services and other third parties. This also applies to entities and authorities which are authorized to receive the Personal Data from Tourmaline Partners,

LLC or which are authorized to demand access to the Personal Data on the basis of the generally applicable provisions of the law;

companies or persons with whom Tourmaline Partners, LLC has concluded cooperation agreement on

entrusting the performance of certain activities for Tourmaline Partners, LLC

(“**Data Processor**”), including entities with which Tourmaline Partners, LLC has contracted for the destruction of data. Such entities will be obliged by the agreements they have concluded with Tourmaline Partners, LLC to apply appropriate security, as well as technical and organizational measures to protect the Personal Data and to process it exclusively in accordance with the instructions provided by Tourmaline Partners, LLC;

Tourmaline Partners, LLC’s subsidiaries and affiliates.

5 Provision of Personal Data to third countries

With respect to transfers originating from the European Economic Area (“**EEA**”) to the United States and other non-EEA jurisdictions, where the level of protection has not been recognized as adequate by the European Commission, we may implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers, as required or permitted by Articles 46 and 49 of the GDPR.

6. Period of Personal Data storage

The Personal Data will be stored by Tourmaline Partners, LLC and/or the Processors for the period for which this is necessary for the purposes referred to in clause 3 of this information, for the purposes required in accordance with the provisions of the generally applicable law and regulations and for the purpose of defending Tourmaline Partners, LLC rights.

7. Rights of data subjects

Depending on the objective and the grounds on which we process your data, you may be entitled to the following rights regarding Personal Data protection:

right to access your Personal Data: the data subject is authorized to obtain confirmation from Tourmaline Partners, LLC as to whether that person’s personal data is being processed and, if so, he is authorized to obtain access to it. Tourmaline Partners, LLC shall provide you with a copy of the Personal Data that is being processed at your request.

Tourmaline Partners, LLC may collect a charge at a reasonable amount arising from the administrative costs for all further copies, which you request.

right to rectify your Personal Data: you are entitled to correct the Personal Data which applies to you and which is incorrect. Subject to the objectives of the processing, you are entitled to request that incomplete Personal Data is supplemented, including by presenting an additional declaration.

right to erasure your Personal Data (“right to be forgotten”): you are entitled to demand the deletion of your Personal Data if the circumstances provided for by law take place and Tourmaline Partners, LLC is required to delete such Personal Data in accordance with all local laws.

right to restrict processing of your Personal Data: in such a case, Tourmaline Partners, LLC shall, at your request, specify that Data and it may only be processed for specified purposes.

right to data portability: under certain circumstances, you are entitled to receive your Personal Data in a structured, commonly used machine-readable format, which has been provided to Tourmaline Partners, LLC and you are entitled to send this Personal Data to another entity without obstruction by Tourmaline Partners, LLC.

right to object further processing of your Personal Data: in certain circumstances, you are entitled to file an objection to the processing of your Personal Data for reasons related to your particular situation and Tourmaline Partners, LLC may be required to stop processing such Personal Data.

the right to file a complaint with the appropriate supervisory authority, if the data processing breaches the provisions of the GDPR.

8. Sources of the Personal Data

Your Personal Data may come from (i) you or your statutory representative or principal (in the case of a power of attorney that has been provided to us), (ii) an entrepreneur, with respect to which you are the representative or beneficial owner, (iii) a party to an agreement concluded with Tourmaline Partners, LLC and/or (iv) from generally accessible sources, in particular from various databases and registers.

9. Requirement to provide data

You need to provide your Personal Data for Tourmaline Partners, LLC to enable Tourmaline Partners, LLC to provide to you the services or to comply by Tourmaline Partners, LLC with obligations referred to in point 3 of this information.

10. Miscellaneous provisions

We would like to inform you of the ability to periodically update this Information in accordance with the applicable law (e.g. if we implement new systems or processes, which are related to the use of the Personal Data) and in such a case, we shall inform you accordingly of the changes that have been made.

Should you have any questions regarding Personal Data or exercising rights to privacy, please contact data protection Responsible Officer at the e-mail address jg@tourmalinellc.com.