



SUNTERA
GLOBAL

SMP Sterling Roll-Up Fund PLC

Data Privacy Notice

DATA PRIVACY NOTICE

SMP STERLING ROLL-UP FUND PLC (THE "FUND")

The Isle of Man Data Protection Act 2018 (DPA 2018) permitted the EU General Data Protection Regulation (GDPR) and EU Law Enforcement Directive (LED) to be applied to the Isle of Man by 'Order' and brought into effect through 'Implementing Regulations'. The Data Protection (Application of the GDPR) Order 2018 (SD2018/0143) and the Data Protection (Application of the LED) Order 2018 (SD2018/0144) (Data Protection Regulations) have been made under the DPA 2018 in respect of GDPR.

The Data Protection Regulations came into effect on 1 August 2018 with only a few transitional arrangements and savings.

This Data Privacy Notice (Notice) sets out how and why the Fund ("we" or "us") as the registered "Data Controller" uses, stores, transfers or otherwise processes your personal data when either you (in your individual capacity) or an entity of which you are an individual director, officer, employee or beneficial owner (if an individual or, if beneficial owner is a legal entity, an officer or employee of the beneficial owner) (the Investing Entity) (together, "you" or "your") invest(s) into the Fund, in accordance with the Data Protection Regulations.

Where the investor in the Fund is an Investing Entity, please provide a copy of this Notice to the Investing Entity's directors, officers, employees and/or owners whose personal data the Fund Parties may process.

This Notice also contains information about your rights in relation to your personal data.

WHY ARE WE PROVIDING THIS DATA PRIVACY NOTICE TO YOU?

In connection with your investment into the Fund, you may need to, from time to time, provide personal data to us.

If you do not supply this data, it may not be possible for you to become a shareholder in the Fund as there will not be sufficient information for us to process your subscription into the Fund and/or communicate to you matters relating to your investment into the Fund.

Please read this Notice carefully to understand what we do with your personal data.

IN WHAT CAPACITY ARE WE ACTING IN RESPECT OF YOUR PERSONAL DATA?

When you provide us with your personal data, the Fund acts as a "data controller". In simple terms, this means that:

- the Fund "controls" the personal data that you provide, including making sure that it is kept secure; and

- the Fund makes certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or are otherwise required and/or permitted to do so by law.

The Administrator processes personal data on behalf of the Fund.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The types of personal data we collect and share depends on the nature of your investment. This information can include or be related to:

- name;
- email address;
- telephone number;
- work address;
- position in Investing Entity;
- passport number;
- personal address;
- assets and income;
- investment experience;
- risk tolerance and transaction history;
- investment activity;
- personal tax information and certifications; and
- accounts at other institutions.

The personal data collected about you is necessary for us to provide the service you have required and to facilitate our business relationship.

We may combine personal data that you provide to us with information that we collect from, or about you, in some circumstances. This will include information collected in an online or offline context.

WHERE DO WE OBTAIN YOUR PERSONAL DATA?

We collect information about you from a number of sources. Generally speaking, we may obtain your personal data in two main ways:

- information that you provide to us; and
- information we obtain from others.

HOW DO YOU PROVIDE YOUR PERSONAL DATA TO US?

- From the subscription documents, forms and any associated documentation that you complete when you subscribe for shares in the Fund;
- when you provide it to us in correspondence and conversations;
- when you make transactions with respect to the Fund; and

- when you tell us where to send money.

HOW DO WE OBTAIN YOUR PERSONAL DATA FROM OTHERS?

- From publicly available and accessible directories and sources;
- from your advisors;
- where there is an Investing Entity, from the Investing Entity or persons acting on behalf of the Investing Entity;
- from bankruptcy registers;
- from tax authorities, including those that are based outside the Isle of Man if you are subject to tax in another jurisdiction;
- from governmental and competent regulatory authorities to whom we have regulatory obligations;
- from credit agencies; and
- from fraud prevention and detection agencies and organisations.

WHY DO WE PROCESS YOUR PERSONAL DATA?

We set out below the reasons/purposes of why and how we process your personal data:

| Why? | How? |
|------------------------|---|
| 1. Contract | <p>It is necessary to perform our contract with you to:</p> <ul style="list-style-type: none"> • allow you to purchase your holding of shares in the Fund; • meet the resulting contractual obligations we have to you; • facilitate the continuation or termination of the contractual relationship between you and the Fund; and • facilitate the transfer of funds, and administering and facilitating any other transaction, between you and the Fund. |
| 2. Compliance with law | <p>It is necessary for compliance with an applicable legal or regulatory obligation to which we are subject to:</p> <ul style="list-style-type: none"> • undertake our client and investor due diligence, and on-boarding checks; • carry out verification, know-your-client (KYC), terrorist financing and anti-money laundering checks; • verify the identity and addresses of our investors (and, if applicable their beneficial owners); • comply with requests from regulatory, governmental, tax and law enforcement authorities; • surveillance and investigation; • carry out audit checks; • maintain statutory registers; • prevent and detect fraud; • maintain our monitoring requirements under anti-money laundering legislation; and • comply with, and maintain our monitoring requirements under, sanctions. |

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| <p>3. Our legitimate interests</p> | <p>For our legitimate interests or those of a third party to:</p> <ul style="list-style-type: none"> • manage and administer your holding in the Fund on an ongoing basis; • assess and process any applications or requests made by you; • send updates, information and notices or otherwise correspond with you in connection with your investment in the Fund; • address or investigate any complaints, claims, proceedings or disputes; • monitor and improve our relationships with investors; • comply with applicable regulatory obligations; • manage our risk and operations; • comply with our accounting and tax reporting requirements; • comply with our audit requirements; • assist with internal compliance with our policies and process; • ensure appropriate management and governance; • keep our internal records; • protect our business against fraud, breach of confidence, theft of proprietary materials, and other financial or business crimes (to the extent that this is not required of us by law); • seek professional advice, including legal advice; • monitor communications to/from us using our systems; and • protect the security and integrity of our IT systems. <p>We only rely on these interests where we have considered that, on balance, our legitimate interests are not overridden by your interests, fundamental rights or freedoms.</p> |
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MONITORING

We monitor communications where the law requires us to do so. We will also monitor where we are required to do so to comply with our regulatory rules and practices and, where we are permitted to do so, to protect our business and the security of our systems.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Your personal data will be shared with the following persons for the following reasons:

| Who? | Why? |
|---|---|
| <p>Affiliates and related parties</p> | <ul style="list-style-type: none"> • to manage our relationship with you • to fulfil the purposes set out in this Notice |
| <p>Administrators, brokers/ custodians, investment managers</p> | <ul style="list-style-type: none"> • to deliver the services you require • to manage your investment • to support and administer investment-related activities • to comply with applicable laws and regulations |
| <p>Tax authorities</p> | <ul style="list-style-type: none"> • to comply with applicable laws and regulations • where required by tax authorities (who, in turn, may share your personal data with foreign tax authorities) |

| | |
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| | <ul style="list-style-type: none"> • where required by foreign tax authorities, including outside of the Isle of Man |
| Service providers | <ul style="list-style-type: none"> • to deliver and facilitate the services needed to support our business relationship with you • to support and administer investment-related activities |
| Our lawyers, auditors and other professional advisers | <ul style="list-style-type: none"> • to provide advice in connection with your investment in the Fund and the Fund' investment-related activities • to comply with applicable legal and regulatory requirements |

In exceptional circumstances, we will share your personal data with:

- competent regulatory, prosecuting and other governmental agencies or litigation counterparties, in any country or territory; and
- other organisations and agencies, where we are required to do so by law.

ARE YOU REQUIRED TO PROVIDE US WITH YOUR PERSONAL DATA?

Where we collect personal data from you, we will indicate if:

- the provision of the personal data is necessary for our compliance with a legal and/or regulatory obligation; or
- it is purely voluntary and there are no implications for you if you do not wish to provide us with it.

Unless otherwise indicated, you should assume that we require the personal data for business, tax and/or compliance purposes.

Some of the personal data we request is necessary for us to perform our contract with you and if you do not wish to provide us with this personal data, it will affect our ability to provide our offering of products and/services to you and manage your investment.

TRANSFER OF PERSONAL DATA INTERNATIONALLY

We may transfer your personal data to our affiliates, related parties, counterparties and third-party service providers outside of the Isle of Man, which do not have similarly strict data protection and privacy laws. Where necessary, we will ensure that separate and appropriate legal agreements are put in place, such as the European Union Model Clauses or equivalent agreements.

RIGHT TO WITHDRAW CONSENT

We do not generally rely on obtaining your consent to process your personal data.

If we do, you have the right to withdraw this consent at any time.

Please contact us or send us an email at fund.services@suntera.com any time if you wish to do so.

RETENTION AND DELETION OF PERSONAL DATA

We keep your personal data for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, or where longer, such longer period as is required by law or regulatory obligations which apply to us.

We will generally retain information about you throughout the life cycle of any investment you are involved in.

Some personal information will be retained after your relationship with us ends.

As a general principle, we do not retain your personal data for longer than we need it.

We will usually delete your personal information (at the latest) six years after the end of the life cycle of the Fund.

YOUR DATA PROTECTION RIGHTS

You have certain data protection rights, including:

- the right to access your personal data and to obtain information about how we process it (see below);
- the right to restrict the use of your personal data;
- the right to have incomplete or inaccurate data corrected;
- the right to ask us to stop processing your personal data; and
- the right to require us to delete your personal data in some limited circumstances.

You also have the right in some circumstances to request for us to "port" your personal data in a portable, re-usable format to other organisations (where this is possible).

RIGHT TO ACCESS INFORMATION

You have the right to access information held about you. If you wish to exercise such right, please contact us using the details set out at 'Contact Us' below.

Please note that any access request shall be subject to you providing acceptable proof of identification.

CONCERNS OR QUERIES

We take your concerns very seriously. We encourage you to bring it to our attention if you have any concerns about our processing your personal data.

You also have the right to complain to the data protection regulator in the Isle of Man, which is the Isle of Man Information Commissioner. You can access their website here: www.inforights.im

CONTACT US

This Notice was drafted with simplicity and clarity in mind. We are, of course, happy to provide any further information or explanation needed. Our contact details are below.

You can contact us by email at: fund.services@suntera.com

You can also contact us in writing using the following address: Data Protection, SMP Sterling Roll-Up Fund PLC, Clinch's House, Lord Street, Douglas, Isle of Man, IM99 1RZ.

CHANGES TO THIS PRIVACY NOTICE

We keep this Notice under regular review and should there be any significant changes, you will be notified accordingly. You can request a copy of the most up-to-date version of this Notice at any time using the details above.

This Data Privacy Notice was last reviewed in September 2020.