

GCT PRIVACY NOTICE

Trust is the foundation of our relationship with customers. We understand Your desire for privacy, and we recognise that You trust us with your personal and financial data. This privacy notice is designed to describe our privacy practices and principles in a format that is easy to navigate, read and understand. We are dedicated to treating Your personal data with care and respect.

1. Introduction

In this privacy notice the terms:

“**EEA**” shall refer to the European Economic Area.

“**You**”, “**Your**”, “**Customer**” shall refer to a prospective or existing client of GCT.

“**We**”, “**us**” and “**our**” shall refer to U.S. Bank Global Corporate Trust¹ (“**GCT**”).

When a service is requested from GCT, the Customer will provide GCT with the relevant personal data in instances where the Customer is a natural person or with personal data relating to individuals connected with the Customer (e.g., directors, employees, authorized signatories, shareholders or ultimate beneficial owners etc.).

2. Information we collect about You

We may process the following personal data about You which we may receive from You and/or Your company when availing of services offered by GCT:

- Name, address, copies or ID and proof of address, contact details, date of birth, gender, nationality, photograph (if included in an ID), signature, occupational history, job title, income, assets, bank details, other financial information and tax residency; and
- Information obtained for the purpose of the know-your-client (KYC) procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, criminal convictions and offences), and

¹ U.S. Bank Global Corporate Trust is a trading name of U.S. Bank Global Corporate Trust Limited, U.S. Bank Trustees Limited and Elavon Financial Services DAC (each a U.S. Bancorp group company). U.S. Bank Global Corporate Trust Limited is a limited company registered in England and Wales having the registration number 05521133 and a registered address of 125 Old Broad Street, Fifth Floor, London, EC2N 1AR. U.S. Bank Global Corporate Trust Limited, Dublin Branch is registered in Ireland with the Companies Registration Office under Reg. No. 909340 with its registered office at Block F1, Cherrywood Business Park, Cherrywood, Dublin 18, Ireland D18 W2X7. U.S. Bank Trustees Limited is a limited company registered in England and Wales having the registration number 02379632 and a registered address of 125 Old Broad Street, Fifth Floor, London, EC2N 1AR. Elavon Financial Services DAC (a U.S. Bancorp Company), trading as U.S. Bank Global Corporate Trust, is regulated by the Central Bank of Ireland. Registered in Ireland with the Companies Registration Office, Reg. No. 418442. The liability of the member is limited. Registered Office: Block F1, Cherrywood Business Park, Cherrywood, Dublin 18, Ireland D18 W2X7. Directors: A list of names and personal details of every director of the company is available for inspection to the public at the company’s registered office for a nominal fee. In the UK, Elavon Financial Services DAC trades as U.S. Bank Global Corporate Trust through its UK Branch from its establishment at 125 Old Broad Street, Fifth Floor, London, EC2N 1AR (registered with the Registrar of Companies for England and Wales under Registration No. BR020005). Authorised and regulated by the Central Bank of Ireland. Authorised by the Prudential Regulation Authority and with deemed variation of permission. Subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority. Details of the Temporary Permissions Regime, which allows EEA-based firms to operate in the UK for a limited period while seeking full authorisation, are available on the Financial Conduct Authority’s website. All banking services are provided through Elavon Financial Services DAC. U.S. Bank Global Corporate Trust Limited and U.S. Bank Trustees Limited are Trust Corporations and not banking institutions and are not authorised to carry on banking business in the United Kingdom, Ireland or any other jurisdiction.

information from public websites and other public sources.

3. Purposes and legal basis for processing

If the purpose of Your interaction with us is to inquire about our product or services or to answer other questions You may raise using the contact form, we will only process the data You will leave on our page that are necessary to contact You or answer Your question.

The personal data collected in connection with Your GCT agreement will be collected, stored, disclosed, used and otherwise processed by GCT for the purposes of entering into and performing its obligations under an agreement. Please note that other, separate Privacy Notices may apply to respective phases of contractual arrangement, processes or needs (e.g. to provide an additional information about processing of data for KYC, AML and sanctions screening).

The legal basis for processing Your personal data will be based on the following legal basis:

- To comply with our legal obligations under legislation relating to anti-money laundering and sanctions screening;
- Pursuant to our legitimate interests and the legitimate of third parties;
- Performance of a contract.

The legitimate interests for the processing of Your personal data by us includes risk oversight, monitoring where appropriate and permissible, analysis, statistics, auditing of our business and IT systems, marketing and to carry out the ordinary and reasonable business activities of a corporate trust provider.

Please note that legitimate interest is also the legal basis relied on by us for the processing of Your personal data for the purposes of additional sanctions screening, if such sanctions screening is mandatory for our organisation, but it is not based on European and/or United Kingdom (UK) applicable legislation.

In respect of any processing special categories of data, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

We will process sensitive personal data as part of our KYC and screening processes, this processing will be based on our legal obligations and will only be conducted where permissible by law.

4. Who do we share Your information with

We may from time to time, in accordance with the purposes described above, disclose our personal data to other parties, including affiliates, professional service providers, courts and regulators, tax and governmental authorities and third parties in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business.

Some of these parties will process Your personal data in accordance with our instructions and others will themselves be responsible for their use of Your personal data. These persons may be permitted to further disclose the personal data to other parties.

5. Transfers of Your personal data outside the European Economic Area

Your personal data may be transferred to and stored outside of the EEA, including the UK. Your data may also be transferred to and stored by our affiliates outside the EEA and/or the UK.

Where personal data is transferred outside the EEA/UK, we will ensure that the transfer is subject to appropriate safeguards e.g., the country to which the personal data is transferred may be approved by the European Commission as an adequate territory, the recipient may have agreed to model contractual clauses approved by the European Commission (and/or UK International Data Transfer Agreement respectively) that oblige them to protect the personal data to the same level as is expected by EU law.

You are entitled, upon request to receive a copy of the relevant safeguards that have been put in place to protect Your personal data during such transfers. Please send Your request to the EU Data Protection Office specified at the end of this privacy notice.

6. Retention of personal data

We will keep Your Information for as long as we have a contract with You (or negotiate such contract) and for as long as we need your Information for regulatory or evidential purposes after expiry of termination of Your contract.

7. Your data protection rights

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have the following privacy rights under data protection legislation, not all rights are absolute:

- Access Your data (in an easily readable form);
- Rectification of Your data where inaccurate/incorrect;
- Restriction of Your data;
- The right to object to the processing of Your data;
- The right to erasure (the right to be forgotten);
- The right to data portability;
- Rights in relation to automated decision making and profiling.

We may ask You for additional information to confirm Your identity and for security purposes. We reserve the right to charge a fee if permitted by law, for instance if Your request is manifestly unfounded or excessive. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform You if we require further information in order to fulfil Your request.

You can exercise Your rights by contacting EUDataprotectionoffice@elavon.com

You have the right to complain to the Data Protection Commission (IRE), the Information Commissioner's Office (UK) or another supervisory authority.

You can find details of how to contact the relevant supervisory authority on their website www.dataprotection.ie or www.ico.org.uk.

8. Getting in touch

If You have any questions in relation to how Your personal data is processed, You can contact the Data Protection Officer at:

EUdataprotectionoffice@elavon.com; or

Data Protection Office
Block F1
Cherrywood Business Park
Cherrywood
Dublin 18
D18 W2X7
Ireland